Sustainability reporting

GENERAL INFORMATION

Criteria for preparation

General basis for preparation of sustainability statements

The Sustainability Reporting of the Banco BPM Group (hereinafter, also "Group") is prepared on a consolidated basis on the same scope used to prepare the consolidated financial statements.
The Group's Sustainability Reporting takes into account the upstream and downstream value chain.
Specifically:

- the assessment of the materiality of impacts, risks and opportunities (known as "IRO") was carried out with reference to its own operations and direct and indirect commercial relationships in the upstream and downstream value chain based on the data available when the analysis was carried out. In this sense, starting from the next few years, the Group is committed to expanding the scope and depth of the assessments carried out on its activities and on those of the parties upstream and downstream of its value chain;
- the policies, actions and objectives are defined with reference to its own operations and take into account the upstream and downstream value chain;
- availing itself of the phase-in measures, the Banco BPM Group does not normally report metrics with data on the upstream and/or downstream value chain (with the exception of, for example, some entity-specific metrics; see "Entity-specific metrics for the management of IROs" and Scope 3 GHG emissions; see "Metrics on Gross Scopes 1, 2, 3 and Total GHG emissions"). Also in light of the extension of the scope of application of the greater reporting and disclosure obligations, the Group expects to continue to improve the levels of coverage, availability and quality of the data reported in the coming years.

Disclosures in relation to specific circumstances

As indicated by the ESRS, sustainability reporting includes forward-looking information on events that may occur in the future and on possible future actions by the Group. Forward-looking information is, by its very nature, subject to greater uncertainty in its measurement or evaluation than historical information.

Estimates regarding the value chain

In the absence of direct primary data regarding the upstream and/or downstream value chain, the Group used estimation processes, applying assumptions and methodological hypothesis based on the best information available. The metrics that include data from the estimated value chain refer, in particular, to Scope 3 greenhouse gas emissions, the calculation of which requires the use of data from external sources, such as: suppliers, customers and business partners. The estimates made by the Group were based on the most widespread calculation frameworks (such as GHG Protocol, Technical Guidance for Calculating Scope 3 Emissions implemented by the ABI LAB Guidelines on the application of the ESRS in the Bank on environmental matters and Partnership for Carbon Accounting Financials, also "PCAF") that allow for the adoption of structured approaches for data estimation and reporting.[1] In particular, it should be noted that the following Scope 3 emission categories envisaged the integration of input data using estimates:

Scope 3 emissions category 6. Business travelling

The calculation of emissions related to employees' business travelling is carried out based on precise input data for train and air travel, while the travel by private car is estimated, assuming that the car fleet of the Group is representative in terms of supply and capacity of the private car fleet of employees. For more details on the calculation methodologies, please see the section "Metrics on gross GHG emissions in scope 1, 2, 3 and total GHG emissions".

[1] Reference is made in particular to the "ABI Lab Guidelines on the application of the European Sustainability Reporting Standards (ESRS) for environmental issues in the field of banking operations - December 2024 version", which address the application of some environmental topics of the ESRS in the banking sector, taking into account the interpretations that have emerged in various working groups, including at institutional level.

Scope 3 emissions category 7. Employee commuting

Emissions related to employee commuting are estimated on the basis of the actual attendance of employees assuming, as a precaution, that 70% of the travels are carried out by car and 30% by train, excluding the possibility of travel with zero emissions (on foot or by bicycle). In addition, it was assumed that the Group's car fleet is representative in terms of fuel and capacity of the private car fleet of employees. For more details on the calculation methodologies, please see the section "Metrics on gross GHG emissions in scope 1, 2, 3 and total GHG emissions".

Financed emissions - Scope 3 category 15. Investments

With reference to the financed emissions related to exposures to financial and non-financial companies, the portion of emissions related to investments that is not obtained from precise data published by counterparties is estimated starting from official data obtained from public sources on emission intensity. In addition, for emissions financed by commercial real estate and mortgage asset classes, the estimate is made based on the building's APE Certificate or through the use of PCAF grids. For more details on the calculation methodologies, please see the section "Metrics on gross GHG emissions in scope 1, 2, 3 and total GHG emissions".

Causes of uncertainty in the estimates of results

With regard to its own operations, in the absence of accurate data, the Group used estimates, adopting proxies and applying methodological assumptions based on the best information available. It should be noted that the quantitative metrics subject to estimates for own transactions, shown below, present a reasonable level of measurement uncertainty which, as a precaution, could lead to overestimates:

Energy consumption

The natural gas consumption for condominium heating is estimated using a significant sample of condominiums (greater than 10%) to project the relative consumption (obtained from reports, invoices or other documentation) on the entire condominium area owned by the Group. For further information, please see the section "Energy consumption and mix metrics".
For properties owned by the Group leased to third parties, the consumption of electricity, heat, steam and cooling from purchased or acquired fossil sources and the consumption of natural gas are calculated through estimation, applying to the areas of leased properties specific consumption factors per square metre for electricity (KWh/sqm) and natural gas (Smc/sqm) obtained based on the precise consumption KWh/sqm and Smc/sqm of the Group's properties[1]. The sum of the areas of leased properties is an overestimation, as a precaution, considering all the surface area of the owned properties leased to third parties, without distinction of the part of the property actually leased.
If precise data regarding the square footage of a property leased to third parties are not present, the leased surfaces are estimated in terms of square metres starting from the average of the square metres for which precise data are available for the same type of property. For further information, please see the section "Energy consumption and mix metrics".

Accident rate

The rate of recordable work-related accidents is calculated using the available precise data and, to a lesser extent, the number of theoretical hours that can be worked. In particular, the Group does not have the exact number of hours worked:

- for employees who work for Banca Aletti & C. (Suisse) S.A., BBPM Life, Sagim S.r.l. Società agricola and Terme Ioniche S.r.l., for which the number of theoretical workable hours envisaged by the contract is counted;
- for employees with a classification higher than or equal to the managerial level, for which the number of theoretical workable hours envisaged by contract, for each contract type, is counted based on the recorded presence.

For further information, please see the section "Health and safety metrics".

[1] Excluding the properties owned by the Group and leased to third parties for which precise consumption data is available.

Disclosures required by other regulations or by provisions on sustainability reporting

The Sustainability Reporting of the Banco BPM Group does not include additional information deriving from other regulations or provisions on sustainability reporting, with the exception of the information referred to in Article 8 of Regulation (EU) 2020/852 of the European Parliament (for more information, see the section "Taxonomy pursuant to Article 8 of Regulation (EU) 2020/852").

Governance

Role of the administrative, management and supervisory bodies

The Banco BPM Group (which has been granted the status of Financial Conglomerate) shares values that guide the actions of all its member companies, in addition to the work of management and staff. These values, on which the strategy and the governance model are based, are:

- focus on the customer;
- focus on results;
- enhancement of staff as a strategic asset;
- focus on corporate social responsibility.

In order to achieve the objectives defined in accordance with the values indicated, the Banco BPM Group is divided into various companies, among which Banco BPM performs the role of Parent Company, exercising management, coordination and control activities over all the other Companies (for further in-depth information on the Group composition, please see the section "Banco BPM Group Business Line").
In this context, the bodies and structures of the Parent Company, each in the areas of its competence and on the basis of the powers and delegations received, carry out the strategic and operational guidance of the Banco BPM Group, as well as the coordination and supervision of the central and business functions. The Parent Company also carries out services and activities in a centralised manner for the entire Group and for some subsidiaries on the basis of specific service agreements, ensuring homogeneous and consistent management at consolidated level, guaranteeing the effectiveness of the relationship, the quality of the service and proper risk management. Functional relationships may exist between the corporate functions of the Parent Company and those of the Subsidiaries, as well as between the functions and structures of the Parent Company.
In order to facilitate the concrete performance of the functions assigned to the Parent Company, various methods of coordination with the Subsidiaries are envisaged, including:

- Group steering committees;
- functional relationships;[1]
- service agreements and/or conventions;
- organisational unit of the Parent Company with a specific coordination function with the Subsidiaries;
- information flows between the Parent Company and the Subsidiaries and/or between the Subsidiaries themselves.

The corporate management and coordination of the Parent Company and the Group, in compliance with the general planned and strategic guidelines established by the Banco BPM Board of Directors, are entrusted to the Chief Executive Officer who works with the Co-General Managers and the areas, functions and Companies directly reporting to them (areas: Chief Innovation Officer, Chief Lending Officer, Chief Risk Officer, Corporate & Investment Banking; functions: Compliance, Corporate Communication and Responsibility, Legal and Regulatory Affairs, Human Resources, Organisation, Anti-Money Laundering; Companies: Banco BPM Invest SGR S.p.A.) or the Co-General Managers themselves (the Chief Financial Officer oversees the Strategic Planning, Administration and Budget, Finance, Equity Investments and Transition and Sustainability areas, while the Chief Business Officer oversees the Sales area as well serving the Subsidiaries Banca Aletti S.p.A. and Banco BPM Vita S.p.A.).
The Banco BPM Board of Statutory Auditors, insofar as it is pertinent, meets periodically with the control bodies of the other Group banks and the main Subsidiaries to ensure, inter alia, an adequate exchange of information and overall supervision of the activities carried out in the within the scope of competence of the individual bodies.

[1]Relationships that exist between the corporate functions of the Parent Company and those of the Subsidiaries, as well as between the functions and structures of the same Parent Company.

In order to ensure the monitoring of impacts, risks and opportunities identified as material as a result of the dual materiality analysis (herein also "DMA"), Banco BPM has defined a consistent corporate strategy, approved by the Board of Directors and implemented by the Chief Executive Officer, the Co-General Managers and their direct reports, also adopting an effective governance model.
In the context of a traditional corporate governance model, the Shareholders' Meeting, which represents the universality of the Shareholders, appoints:

- the Board of Directors, which exercises the functions of strategic supervision and management of Banco BPM, to be conducted also with a view to sustainable success, understood as the creation of value in the long-term for the benefit of the shareholders, taking into account the interests of other relevant stakeholders, also with the support of the Chief Executive Officer and Co-General Managers;
- the Board of Statutory Auditors performs the control function, monitoring, among other things, compliance with the law, regulations and articles of association, as well as observance of the principles of proper administration; the adequacy of Banco BPM's organisational and administrative-accounting structure and the financial and sustainability reporting process; the effectiveness and adequacy of the risk management and control system, internal auditing and the operation and adequacy of the overall internal control system.

The tasks and responsibilities of each body are outlined in the Articles of Association and in the internal regulations adopted by Banco BPM in compliance with the reference external regulations. In this context, the Board of Directors of the Parent Company:

- defines the strategies and the guidelines and coordination policies on sustainability (i.e., environmental, social and governance);
- defines the governance model for social and cultural responsibility and for combating corruption and bribery;
- annually approves the results of the dual materiality analysis;
- approves the Consolidated Sustainability Reporting in compliance with the relevant regulatory provisions;
- updates the Code of Ethics and Whistleblowing policies.

The Board is assisted by the Committees established within it, governed by the articles of association and vested with the functions and duties envisaged by the legislation, including regulations in force at the time, as well as by the code of conduct on corporate governance promoted by the regulated market management company (Corporate Governance Code promoted by the Corporate Governance Committee) which Banco BPM endorses.
In particular, with regard to sustainability, the Board is supported, for the respective areas of competence, by the Sustainability Committee, the Internal Control and Risk Committee and the Remuneration Committee. In particular, the Sustainability Committee carries out the functions envisaged by sustainability regulations, including support in the assessment and in-depth analysis of ESG issues related to the exercise of the Group's activities and the approval of strategies and policies on sustainability, also in light of shared best practices and market developments.
In addition to the roles specified in the Articles of Association, in the "Regulation for the functioning and organisation of the Board of Directors and self-evaluation of the Board of Directors and its Committees", the mechanisms for the circulation of information between the corporate bodies and therein to oversee the management efficiency objectives, also with a view to sustainable success and effectiveness of controls, in line with the provisions of the supervisory provisions on the corporate governance of banks as well as the provisions of the Articles of Association in force.
The Chief Executive Officer of Banco BPM coordinates the enforcement of the strategic policies on sustainability through a management committee (ESG Committee), which they chair, composed of the two Co-General Managers, in addition to almost all the Bank's front-line managers.
The main tasks of the ESG Committee include the assessment of the Group's positioning and the coordination of all the activities necessary to achieve the strategic objectives, overseeing the integration of ESG profiles into the Group's operating model and also ensuring the preparation of consolidated sustainability reporting.

The other management committees (Credit Committee, Risk Committee, Finance Committee, Investment Committee, New Products and Markets Committee, Donations Committee), according to their respective areas of responsibility, also deal with sustainability issues. Each business area and function is involved in ESG matters according to the scope of operations.
In addition, specific monitoring, management and control roles on significant sustainability matters are assigned to the functions of the Parent Company (and the Consolidated Companies) and set out in internal regulatory documents, some of which are disseminated to the public through publication on the Bank's website. These roles and activities are fully integrated into the Group's governance processes, controls and procedures.
In this context, in management terms, the new, central Transition and Sustainability structure was established in 2024 by decision of the Board of Directors. It reports directly to the Co-General Manager CFO and is responsible for

coordinating all the activities carried out by the internal functions in relation to sustainability. This function is organised into two structures:

- ESG Strategy, responsible for ESG approaches, methodologies, metrics, KPIs and reporting;
- ESG Business Advisory, which plays a role in supporting the corporate functions (of all Group companies) in the implementation of the ESG strategy.

The Group ensures the design and implementation of procedures dedicated to quality control and the effective integration of sustainability issues in business processes also through the internal control system, a fundamental element of the overall governance system, to ensure that the business activity is in line with company strategies and policies and is based on sound and prudent management standards. Articulated in rules, functions/structures, resources, processes and procedures, this system plays a fundamental role, as it fosters the dissemination of a culture aimed at risk awareness and control, legality and respect for corporate values. Sustainability issues are part of the internal control system, making explicit and expanding the responsibilities of corporate bodies and functions at Group level with regard to the integration and dissemination of ESG factors in operational processes and the assessment and monitoring of inherent risks.

In this context, the Integrated *Tableau de Bord* represents the summary management tool through which the control functions report quarterly to the administrative and control bodies on the gaps found in the course of their audit activities. In addition to the findings of the control functions, this instrument includes the gaps highlighted by the Auditing Firm and the findings raised by the Supervisory Authorities (including, inter alia, ECB, Bank of Italy, IVASS and Consob) through their inspection activities on the Banco BPM Group.

The gap score detected by the control functions (residual risk and consequent level of resolution urgency) is established based on a common methodology that considers, among other things, reputational and compliance aspects, economic impact and impact on risk parameter calculation models.

The reporting systems are a further control tool: one relating to the functioning and observance of the Organisational, Management and Control Model (pursuant to Italian Legislative Decree no. 231/2001) of each Group Company which has one, entrusted to the Supervisory Body, aimed at monitoring the possible commission of crimes, acts, omissions and/or conduct not in line with the Code of Ethics, the Organisational Model and the underlying rules. The second system is instead dedicated to any behaviour that does not comply with the regulations (Whistleblowing), overseen by the Parent Company's Audit function and, for the insurance business, by Banco BPM Vita S.p.A.

Strategic planning is one of the Group's main medium-long term governance tools, also with reference to sustainability issues. In particular, the Group directs the creation of sustainable value over time through this process, seizing the opportunities presented by a constantly evolving context. The Banco BPM Group business model welcomes stakeholder requests and integrates environmental, social and governance objectives to translate them into a strategy of responsible growth, in line with the Risk Appetite Framework (also "RAF"), the strategic medium-long term objectives and with the related implementation measures, indicating them in a single document (Strategic Plan or Plan).

In this sense, it should be noted that on 11 February 2025, the Board of Directors of the Parent Company, on the occasion of the approval of the results for the year as at 31 December 2024, having already achieved the main objectives of the 2023-26 Strategic Plan in advance thanks to the excellent performance recorded in 2024, updated the Strategic Plan, extending the objectives to 2024-27 and taking into account the acquisition and integration of Anima SGR.

There is substantial continuity especially in terms of ESG objectives, therefore in the following, both the results obtained in 2024 and the targets, in particular those updated to 2027, will generally be explained in accordance with the required data points. Strategic planning is based on the forward-looking analysis of the evolution of the business with market scenarios in ordinary and stressed conditions, taking into account the positioning of the Group with respect to its competitors.

Starting from the relationship with the territory, listening to stakeholders, the relationship with the financial market and the acquisition of the indications of the international bodies to identify relevant objectives, the characteristics and needs of the customers to be met are considered in the projection, as well as the constraints of both a regulatory nature and deriving from any commitments undertaken towards third parties (for example in relation to agreements or initiatives, such as the Net Zero Banking Alliance - also "NZBA"), to which the Group is subject or for which it is committed. The proposed Strategic Plan to be submitted for approval of the Board of Directors of the Parent Company is developed on the basis of the medium/long-term risk appetite, expressed through the RAF Guidelines, outlining the objectives for homogeneous areas of activity, including those relating to the business, the organisational structure, the asset-based and liquidity situation, in line with the material sustainability issues.

Based on the objectives defined as part of the strategic planning, the operational objective represents one of the main short-term governance tools through which the Group defines specific objectives, assigning them to the business units and monitoring them over time. The budget and Strategic Plan monitoring are the main control tools through which the Group:

- measures and analyses the final economic, equity and financial results, assessing deviations in forecasts and drawing up projections for the end of the current year;
- verifies the consistency of the results with respect to the short-term objectives and the sustainability of the medium-long term objectives, also in relation to forward-looking scenarios;
- oversees the enforcement of strategic projects and managerial actions defined in the Strategic Plan;
- evaluates the opportunity to define remedial actions to ensure compliance with the objectives or, ultimately, to envisage any updates to the budget objectives or the Strategic Plan.

Periodic reports are envisaged, at least on a quarterly basis, for the Board of Directors of Banco BPM regarding the performance of the final results with respect to the budget and the progress of the Strategic Plan projects with the analysis of the main deviations. In the event of significant discrepancies which could have material effects on the economic results net of non-recurring components and/or on the Group's risk profile, the Chief Executive Officer informs the Board of Directors to assess any mitigation actions or proceed with any updating of the budget or Strategic Plan.

The Banco BPM Board of Statutory Auditors, both through participation in Board meetings and through the independent examination of the reports produced, in particular by the control functions, detects any shortcomings or misalignments with respect to the regulations, specifically with reference to ESG governance and processes that affect the dimensions of sustainability, including that aimed at drafting the consolidated sustainability reporting.

Banco BPM has adopted a policy that defines, in line with the legislative and regulatory provisions in force from time to time, the suitability requirements of the members of the administration, management and control bodies, a policy that has been implemented and also applies to the other Companies belonging to the Group to which the specific sector regulations on the requirements of suitability for office apply.

As part of this policy, the expertise and experience of the members regarding sustainability matters in general are important, also in terms of the qualitative and quantitative breakdown considered optimal for each body.

The members of the administrative, management and control bodies of Banco BPM and of the other Group Companies to which specific sector requirements apply have consolidated experience in relation to the Group's sectors and products, ascertained through the periodic verification of skills with respect to the requirements of current national and European legislation, ensuring adequate diversification in terms of skills and experience in relation to different sectors.

In particular, the Board of Directors and Board of Statutory Auditors of Banco BPM and of the other Group Companies to which specific sector regulations on the breakdown and appointment of the corporate bodies apply, at the time of their respective renewals, identify the qualitative-quantitative breakdown in advance which is deemed optimal for the effective performance of the tasks and responsibilities entrusted to the administrative and control bodies.

In this regard, the following are prepared:

- a document on the qualitative and quantitative composition of the Board of Directors containing, inter alia, the expected profiles of the members of the same Board and of the Internal Board Committees, including particularly relevant roles (Chairman, Deputy Chairman, Chief Executive Officer and Chairmen of the Internal Board Committees);
- a document on the qualitative-quantitative composition of the Board of Statutory Auditors.

In addition to the suitability requirements set out in the aforementioned policy, specific skills are also required for the roles of the administrative, management and control bodies in addition to the knowledge required for all areas envisaged by current legislation. In fact, the directors have a very good or distinctive level of expertise in the following areas:

- internal control systems and other operational mechanisms (11 out of 15, equal to 73.33%);
- organisational and corporate governance structures (15 out of 15, equal to 100%);
- ESG area (10 out of 15, equal to 66.66%).

The standing auditors also have a very good or distinctive level of expertise in the following areas:

- internal control systems and other operational mechanisms (four out of five, equal to 80%);
- organisational and corporate governance structures (four out of five, equal to 80%);
- identification and assessment of the risk of money-laundering and terrorist financing (four out of five, equal to 80%);
- sustainability and non-financial reporting and, in particular, the management of environmental and climate risks (five out of five, equal to 100%).

For Banco BPM and for the other Group Companies to which specific sector regulations on the suitability requirements for office are applied, each body ascertains the suitability of the individual member and the overall body itself, also taking into consideration the skills and experiences on sustainability issues.
This check is carried out both at the time of establishment and periodically (for example during the self-evaluation) or per event, in line with the legislative and regulatory provisions in force from time to time. As part of this process, the skills already present and those to be strengthened or supplemented are therefore identified.
With regard to sustainability, the Board of Directors of each Group Company can also make use of the specific expertise:

- ascertained for the members of the Parent Company's Sustainability Committee, which in its breakdown has members with recognised experience and skills at both professional and academic level, as well as knowledge of the path of integration of the Group's ESG profiles;
- developed over the years in dedicated operating contexts, for example at the Parent Company, the CRO and CLO Areas, the Transition and Sustainability function and the Sustainability Reporting Control structure.

The skills and experience of the members are continuously strengthened, also in light of the results of the dual materiality analysis, through annual or dedicated training plans, periodically scheduled by the Banco BPM Board of Directors in the interest of all the members of relevant Group Companies. Similarly, the skills present at managerial level are periodically reassessed, also based on the results of the dual materiality analysis, envisaging dedicated training courses where necessary or appropriate.
The table below shows the breakdown by gender of the administrative, management and control bodies of Banco BPM.

	Men	% Men	Women	% Women	Total
Members of the administrative, management and control bodies	12	60%	8	40%	20
Members of the Board of Directors (including committees)	9	60%	6	40%	15
Executive members of the Board	1	100%	0	0%	1
Non-executive members of the Board	8	57%	6	43%	14
Independent Board members	7	54%	6	46%	13
Gender diversity			66.7%		

The line "Members of the administrative, management and supervisory bodies" includes: Board of Directors (incl. Committees) and the Board of Statutory Auditors (including only standing auditors).

Independent members of the Board of Directors, including committees, account for 86.67% of the total number of members. On the occasion of the renewal of the Board of Directors of Banco BPM, which took place at the Shareholders' Meeting of 20 April 2023, one employees' representative was nominated (chosen from the List of Shareholders - Employees).

Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

Banco BPM and the other Group Companies to which specific sector regulations apply have governed, with specific regulations, the principles, criteria, roles and responsibilities regarding the functioning and organisation of the work of the Board of Directors and the Internal Board Committees as well as the Board of Statutory Auditors and with regard to information flows to the respective members, also ensuring mechanisms for the circulation of information between and within the Corporate Bodies to monitor the management efficiency objectives, also with a view to sustainable success and effectiveness of controls, in line with regulatory provisions and those of the articles of association.
The topics covered by the envisaged information flows also include the material sustainability issues, sometimes addressed separately, as in the case of the examination of the dual materiality analysis results or approval of the Consolidated Sustainability Reporting, but in most cases integrated into ordinary processes relating, for example, to business, credit policies or risk management.
When examining topics pertaining to significant impacts, risks and opportunities, the Banco BPM Board of Directors has been supported by observations and opinions expressed by the competent internal Board Committees (Internal Control and Risk Committee, Sustainability Committee, Remuneration Committee) as well as by the Board of Statutory Auditors, where deemed appropriate.

As part of its role of defining and approving strategic policies, the Banco BPM Board of Directors approves the ESG risk management and control policies, assessing the degree of efficiency and adequacy of the internal control system and drawing up the remuneration and incentive policies (including ESG performance objectives), to be submitted to the Shareholders' Meeting for approval.
The Banco BPM Board of Statutory Auditors participates in Board meetings and thereby supervises any ESG impacts deriving from initiatives and decisions taken by the Bank, reporting, if necessary, any noteworthy aspects in its report to the Shareholders' Meeting.
The Banco BPM Group is aware of the impact that environmental, social and governance factors have on its business model, market competitiveness and company objectives and strategy, in particular considering the fundamental role it plays as a guide for companies and private individuals in the transition process to a sustainable economy, in which traditional considerations on economic-financial profiles are accompanied by environmental and social ones.
Therefore, in addition to being integrated into the Banco BPM Strategic Plan, operating processes and financial planning, these considerations are evaluated on an ongoing basis also in the context of Risk Identification and in the definition of the Risk Appetite and the related Framework (managed by the risk control function of Banco BPM, responsible for building and enforcing the risk management system at Group level).
During 2024, the Banco BPM Board of Directors examined significant sustainability issues during 20 sessions, estimating a total of 41 the various ESG topics covered.
More specifically and without limitation, the Board:

- periodically monitored the progress of the 2023-26 Strategic Plan for the main areas of activity through a set of the most significant Key Performance Indicators (also "KPIs"), including those associated with sustainability objectives;
- in line with the commitments undertaken in March 2023 with the NZBA endorsement, identified five priority sectors, communicating the relative targets by the deadline, with roll-out to all sectors identified by 2026;
- as part of the annual approval of credit policies for the direction of commercial activities, approved the adoption of guidelines and new metrics aimed at achieving the integration of ESG sustainability factors in the Group's business model;
- for this purpose, examined the periodic reporting prepared by the competent structures, including updates on customer engagement initiatives for acquiring information also relating to the ESG profile thereof, as well as specific reporting with regard to transition and physical risks and financed issues;
- draws up remuneration and incentive policies, including ESG performance targets, to submit to the Shareholders' Meeting for approval;
- resolved new issues of social and green bonds, the proceeds of which are intended for the loan and/or refinancing of eligible loans, as defined in the "Green, Social and Sustainability Bonds Framework" adopted and periodically updated;
- within the framework of its spending and social responsibility policies, and subject to resolution by the Shareholders' Meeting, allocates a portion of the year's profit to the Group's Territorial Offices and Foundations for charitable initiatives to support the needs of the Group's reference communities.

In this context, in 2024 the Board relied on the support of the Internal Board Committees for the profiles under their responsibility, as detailed below:

- the Internal Control and Risk Committee, in compliance with its own Regulations, has carried out the matters within its competence in the ESG area, paying particular attention to the risk profiles underlying sustainability and social responsibility. In particular, the Committee assisted the Board of Directors in defining the guidelines of the internal control and risk management system (including climate/environmental risks), so that the main risks pertaining to the Parent Company and its Subsidiaries are correctly identified and adequately measured, managed and monitored; and determined the degree of compatibility of the risks pertaining to the Group with a sound and prudent management, consistent with the strategic objectives identified. The Committee handled approximately 55 ESG topics during the 23 meetings held during the year;
- the Remuneration Committee, in line with the attention paid by the Group to the social principles of diversity and inclusion, continued to monitoring the progress of the initiatives launched in the field of diversity and aimed in particular at increasing the number of women in managerial positions, as well as at gradually eliminating the gender pay gap, promoting an approach strongly oriented towards the less represented gender and the neutrality of remuneration with respect to gender. It also confirmed the need to consider, among the sustainability objectives, the promotion of social initiatives, corporate volunteering and the development of ESG awareness and culture among customers. In compliance with its prerogatives in terms of remuneration policies, it also paid particular attention to the criteria for defining the objective sheets, specifically furthering their ESG profiles and contributing to outlining adequate management incentive

systems, including a selected number of KPIs referring to these specific assessment areas. The Committee handled approximately 21 ESG topics during the 23 meetings held during the year;
- the Sustainability Committee assisted the Board of Directors in assessing a broad spectrum of ESG issues, from strategy to objectives to reporting. The Committee held 17 meetings during the year, addressing numerous and recurring topics related to the areas of competence (including: "ESG Risks and Compliance ", "ESG Governance", "ESG Reporting", "Relations with Supervisory Authorities" and "ESG Rating"), making use of a complex system of information flows and the support of the Head of the Transition and Sustainability function, as a permanent guest, as well as the other competent company functions. In particular, the Committee carried out intense reporting activities during the year, supervising the preparation of the Consolidated Non-Financial Statement for the year 2023 as well as the project activities related to the new Consolidated Sustainability Reporting for the year 2024, aimed at implementing the provisions of the reference regulations, and those serving its drafting (such as the dual materiality analysis process and the definition of the dedicated internal control system), in liaison with the Financial Reporting Manager and the Auditing Firm. The Committee examined, inter alia, the initiatives pursued in connection with NZBA endorsement, the implementation of the sustainability objectives defined in the Strategic Plan and the contribution relating to the ESG dimensions in the context of the disclosures disseminated to the public.

In general, the Internal Control and Risk Committee and the Remuneration Committee acquire the observations and make use of the support of the Sustainability Committee, taking into account the responsibilities reserved to the latter in matters of sustainability. To this end, the Chairman of the Sustainability Committee is invited to participate in meetings of the two Committees when topics that have sustainability implications are discussed.

Integration of sustainability-related performance in incentive systems

The Group's incentive systems are designed to motivate and reward employees based on their performance and the achievement of strategic objectives monitored with specific KPIs. Thanks to the definition of Short-Term Incentives ("STI") and Long-Term Incentives ("LTI") for employees, both cash and share holdings are awarded to promote the success and sustainable growth of Banco BPM. In particular, the integration of sustainability factors into the incentive systems reflects the Group's commitment to responsible and sustainable business practices.
One of the pivotal elements of the Remuneration Policy (Section 1) pursuant to the provisions of legislation in force is the close correlation between variable staff remuneration and strategic actions concerning environmental, health and safety issues and human resources management, with a focus on inclusiveness and gender neutrality.
The combination of objectives relating to the financial and insurance business, such as profitability, credit and asset quality, capital adequacy, along with ESG metrics (hereinafter also Key Sustainability Indicators or KSIs) is in fact considered a key factor in strengthening the Group's results in the medium-long term, as it makes it possible to combine stakeholder satisfaction - among which a fundamental component consists of Banco BPM employees - with socio-environmental sustainability.
The remuneration of the Group's employees is divided into fixed and variable components: the former reflects professional experience, organisational responsibilities and technical skills, according to a principle of equal opportunities and fair pay. The variable component is instead performance-related and allows staff to be valued, recognising their individual contribution to achieving results.

Regarding the Board of Directors, the Articles of Association of Banco BPM establish that its members are entitled, besides the reimbursement of expenses incurred in performing their duties, to an annual fee that is set at a fixed amount for the entire period of office. In addition, directors holding special offices are granted additional remuneration. The Chief Executive Officer is the only member of the Board for whom the variable component is envisaged.
Banco BPM's Policy envisages both a Short-Term Incentive Plan (STI) to be paid by more than 50% in shares, and a Long-Term Incentive (LTI) Plan to be paid in full in shares.
The incentive is linked to achieving the annual targets of the STI Plan, and is recognised if the profitability and capital and liquidity levels (known as access gates) are met. The economic resources actually available at the end of the year are determined based on financial and non-financial indicators, the latter being indicators related to reputational risk (ECAP Reputational Risk) and Anti-Money Laundering (AML).
In particular, the ECAP Reputational Risk indicator representing the amount of economic capital that Banco BPM must retain with respect to the reputational risk estimated using an internal model could reduce the economic resources intended for the STI Plan in the event of a sudden deterioration of the Group's image, also in relation to the possible occurrence of ESG risk factors.

The STI Plan is intended for both identified staff[1] and other staff.
The STI sheet of the Chief Executive Officer also includes specific KSIs in relation to the annual articulation of the respective ESG objectives included in the Strategic Plan.
In particular, the 2024 STI plan includes the following 2 KSIs with a weight of 10%:

- new disbursements of medium/long-term low-carbon loans;
- share of ESG bonds in the owned corporate portfolio.

Additionally, always with a weight of 10%, the qualitative assessment formulated by the Board of Directors is envisaged, after consultation with the Remuneration, Internal Control and Risk and Sustainability Committees, on the following sustainability drivers:

- monitoring and development of areas related to the Net-Zero Banking Alliance;
- monitoring of operational and reputational risks and dissemination of a risk culture;
- promotion of values and behaviour in line with the corporate culture.

On the other hand, the LTI Plan supports the Strategic Plan to pursue results that create value in the medium/long term for the relevant stakeholders. The scope of the beneficiaries of the LTI Plan includes around 80 positions (excluding those belonging to functions with control tasks), selected on the basis of the level of the position, the impact on the business or for retention purposes. The beneficiary roles include the Chief Executive Officer and executives with strategic responsibilities of the Parent Company.
The incentive related to the LTI Plan is commensurate with the achievement of performance conditions and objectives. In particular, in compliance with capital, liquidity and economic conditions, the performance objectives focus managers' attention on profitability, de-risking and issues related to sustainability, the increase in female representation in managerial roles and the issuance volumes of Green, Social & Sustainable bonds.
The ESG metrics included in the STI and LTI Plans are the same as those used for monitoring the objectives of the Strategic Plan and also included in the Risk Appetite Framework, in the section related to reporting objectives.
The portion of variable remuneration that depends on sustainability-related objectives and/or impacts amounts to 17.5%.[2]
The remuneration Policy (Section I), the STI Plan (and specifically the objectives sheet of the Chief Executive Officer) and the LTI Plan are approved by the Shareholders' Meeting. The Corporate Bodies, Internal Board Committees and company functions are involved in the process of their drafting, preparation and approval. Specifically:

- the Human Resources function ensures technical support to the Corporate Bodies and prepares the supporting documentation;
- the Chief Risk Officer and the Planning and Value Management function identify the strategic and performance objectives to ensure that the incentives system is consistent with the Company’s risk appetite, medium/long-term strategies and objectives;
- the Transition and Sustainability function defines, based on any indications of the Sustainability Committee, the ESG KPIs and sends them to the Human Resources function for adoption;
- the Compliance function verifies compliance with the reference legislative framework;
- the Audit function verifies the correct implementation;
- the Board of Directors draws up the submission to the Shareholders’ Meeting, with the assistance of the Chief Executive Officer and Internal Board Committees.

[1] Parties whose professional activity has or may have a significant impact on the Group’s risk profile. These include, among others, the Chief Executive Officer, the General Manager (where appointed), the Co-General Managers, operational and senior management, the Chief Risk Officer and the Managers in the first line of the Parent Company, the Chief Executive Officer, the General Manager, the Co-General Manager and the Deputy General Manager (where present) of Banca Aletti and Banca Akros, the Chief Executive Officer of Banco BPM Vita and Vera Vita.
[2] Considering that the variable component of the annual remuneration of the Chief Executive Administrator is 50% connected to the STI Plan and the remaining 50% to the LTI Plan, the percentage is obtained as the average of the weight of the objectives linked to the sustainability of the STI Plan and the weight of those of the LTI Plan. The average between 20% (STI plan) and 15% (LTI plan) is 17.5%.

As part of the definition of the remuneration system for the members of the Administration, Management and Control Bodies, the Parent Company envisages the disbursement of a variable component for the Chief Executive Officer. In particular, in the variable remuneration paid to the Chief Executive Officer in 2024 (deriving from the sum of the portions of the STI Plans relating to the years 2018 to 2023), a portion directly connected to climate change mitigation objectives was not recognised. However, in the 2024 STI Plan, which includes the possible recognition and disbursement in 2025, a qualitative assessment is envisaged, with a weight of 10% compared to the total of the objective sheet, formulated by the Board of Directors on the opinion of the Committees (Remuneration, Internal Risk and Control, Sustainability) with respect to:

- monitoring and development activities of areas related to the Net-Zero Banking Alliance;
- monitoring activities of operational and reputational risks and dissemination of a risk culture;
- promotion of values and behaviour in line with the corporate culture.

In addition, it should be noted that the evaluation sheet of the Chief Executive Officer has a KPI, with a weight of 6%, on new medium/long-term Low-Carbon loans. With reference to the 2021-2023 LTI Plan, recognised in 2024 and whose first portion of shares is delivered in 2025, note the presence of the KPI "CO_2 emissions", with a weight of 3.75% (fully achieved thanks to carbon neutrality reached). The 2024-2026 LTI Plan envisages a "Green Social & Sustainable Bond Issues" KPI with a weight of 7.5%.
The achievement of carbon neutrality and the assessment of the areas related to the Net Zero Banking Alliance are considered objectives directly in support of climate change mitigation, while the KPIs relating to new medium/long-term Low-Carbon loans and Green, Social & Sustainable bond issues contribute to the climate change mitigation strategy by financing the transition of customers and that of the Bank.

Declaration on Due Diligence obligations

This disclosure aims to facilitate an understanding of the due diligence process of the Banco BPM Group. Although there is no structured process consistent with the OECD Due Diligence Guidelines for responsible business conduct, due diligence is implemented as a normal practice and principle in all areas mapped below with reference to the different sections of the Sustainability Reporting:

Fundamental elements of due diligence	Sustainability Reporting Sections
Integrate due diligence into governance, strategy and business model	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies
	Integration of sustainability-related performance in incentive systems
	Material impacts, risks and opportunities and their interaction with strategy and business model
Stakeholder engagement in all phases of the due diligence process	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies
	Stakeholder engagement activities
	Process of identifying and assessing impacts, risks and opportunities
	Policies related to climate change mitigation and adaptation Policies related to working conditions and the well-being of own workforce Policies related to the health and safety of own workforce Policies related to equal pay and opportunities for own workforce Policies related to the confidentiality and correct processing of own workforce data Policies related to affected communities Policies related to consumers and end-users Policies related to corporate culture and business conduct
	Interests and views of own workers Interests and opinions of the communities affected Interests and opinions of consumers
Identify and assess negative impacts	Process of identifying and assessing impacts, risks and opportunities
	Material impacts, risks and opportunities and their interaction with strategy and business model
Interventions (actions taken) to address negative impacts	Definition and monitoring of actions for own workforce Prevention and identification of corruption and bribery and confirmed cases of corruption Actions and resources in relation to climate change policies Actions related to the management of IROs in relation to working conditions and well-being of own workforce Actions related to the management of IROs in relation to health and safety Actions related to the management of IROs in relation to equal treatment and opportunities for own workforce Actions related to the management of IROs in relation to the confidentiality and correct processing of own workforce data Actions related to the management of IROs in relation to corporate culture and conduct
Monitoring the effectiveness of actions and achievement of objectives	Targets related to climate change mitigation and adaptation Process of defining objectives related to own workforce Objectives related to working conditions and the well-being of own workforce Objectives related to the health and safety of own workforce Objectives related to equal treatment and opportunities for own workforce Objectives related to confidentiality and proper processing of own workforce data Objectives related to corporate culture and conduct Metrics on energy consumption and mix Metrics on Gross Scopes 1, 2, 3 and Total GHG emissions Metrics on GHG removals and GHG mitigation projects financed through carbon credits Metrics related to the characteristics of employees and non-employees in own workforce Health and safety metrics Metrics related to adequate wages, remuneration and social protection Work-life balance metrics Diversity and pay gap metrics Training and skills development metrics Metrics related to incidents, complaints and severe human rights impacts Prevention and identification of corruption and bribery and confirmed cases of corruption Management of relations with suppliers and metrics related to payment practices

Risk management and internal controls over sustainability reporting

The Sustainability Reporting has been prepared in compliance with the reporting standards approved by the European Commission (also "European Sustainability Reporting Standard" or "ESRS") and the specifications adopted pursuant to Article 8, paragraph 4, of Regulation (EU) 2020/852 (Taxonomy Regulation).
To this end, as part of the "CSRD Project", a suitable Internal Control System (hereinafter also "ICS-SR") was defined and made operational to guarantee the aforementioned compliance obligations, with the aim of simultaneously supporting the issuance of the joint certification required by Article 12 of Italian Legislative Decree 125/2024.
The overall control framework, in the absence of specific legislation on the matter, was established by taking as reference the general principles set forth in the international standard published by the Committee of Sponsoring Organisations (also "COSO") as well as maximising synergies with the financial reporting Internal Control System.
The main rationale and key elements of the framework implemented by the Group to verify the adequacy of the Sustainability Reporting (relating to the year 2024) are summarised below.
The Internal Control System (ICS) envisages, as a first logical step, the definition of the overall "Process Governance" with the aim of clearly identifying the various structures involved, assigning them precise roles and responsibilities. More specifically:

- the functions responsible for the data to be reported provide the sustainability data and information falling within their area of competence, performing first-level controls thereon;
- the Transition and Sustainability function supervises and oversees the adequacy of the information reported, also coordinating the combination and standardisation of the data included in the final reporting;
- the Data Quality & Aggregation office carries out second-level controls on the quality of sustainability data and information. The Data Governance function instead ensures the application and extension of the framework defined by the Group to the ESG data being reported;
- the Sustainability Control Reporting structure verifies the overall adequacy and effectiveness of the internal control system overseeing the specific disclosure, supporting the Chief Executive Officer and the Financial Reporting Manager in their assessments;
- the Organisation function ensures the adequate functioning and evolution of the disclosure and control processes, as well as the related internal regulations.

Lastly, the framework envisages the involvement of the Compliance function as part of the verification of compliance with external regulations, and the Audit function with regard to third-level audits on the internal control system.
The second key element of the framework (ICS-SR) relates to the definition of the scope of analysis (Scoping), i.e., identifying the quantitative indicators and qualitative sustainability information deemed most relevant for the Banco BPM Group and representing, namely, the object of the overall Control System.
The described framework (ICS_SR) envisages a "progressive and modular" adoption approach.
For the first disclosure exercise, the audits carried out were indeed focused on a defined set of data points subject to reporting, selected through specific prioritisation criteria (qualitative information that required preliminary sharing with the Corporate Bodies, thematic areas that highlighted negative impacts/very material risks, indicator calculation complexity) and rationalisation thereof (efficiency due to the concentration of ownerships for the calculation of multiple data points).
The application of these criteria makes it possible to ensure suitable and adequate coverage of the reporting scope with regard to the Sustainability Disclosure for the year 2024. The complete extension of the overall Control System (ICS-SR) will take place with the implementation of the target solution by the end of the year 2025.
The modularity of the approach is instead determined by the different calibration of the verification activities based on the different type of information examined.
As already highlighted, the Internal Control System (ICS-SR) adopted requires the extension of the Data Governance framework defined by the Group, also to the sustainability information subject to verification. Specifically, the mapping of the Data Management tools, in particular the workflows through which the data pass and the census of the IT applications used, were addressed.
Second-level controls on the adequacy of the operating processes for the management and processing of quantitative information as well as on the overall assessments of data quality were also progressively defined and implemented.
The cornerstone of the Control System (ICS-SR) implemented by the Group is the "Risk & Control assessment" phase, i.e., the survey and subsequent assessment of the potential risks identified and the relative controls carried out, formalised in what is known as the "Risks - controls matrix".
With regard to risk mapping, the methodology adopted is based on the identification, for each key ESG information disclosure process, of the type of "inherent risk" associated with the potential violation of one or more sustainability assertions.

These assertions - listed below - expressly refer to the qualitative characteristics that non-financial information must meet (Appendix B - Standard ESRS 1):

- Relevance: sustainability information is relevant when it can make a difference in the decisions of users according to a dual materiality approach;
- Completeness: sustainability information is complete when it includes the relevant information necessary to understand the impacts, risks and opportunities of the area examined, in compliance with all the reporting requirements envisaged by the ESRS standards;
- Assessment and Accuracy: the sustainability information is collected in accordance with the ESRS standards, simultaneously guaranteeing the accuracy and verifiability (i.e. the information itself or the data from which it was obtained can be corroborated);
- Representation: sustainability information is clear, free of bias and is not compromised (i.e., opportunities are not overestimated and risks are not underestimated). The information is also comparable with information provided in previous periods as well as with information provided by other financial institutions.

For each individual process examined, the assessment of the "inherent risk" of the violation of the specific sustainability assertion derives from the joint analysis of two distinct factors: the probability of occurrence (related to the process complexity and stability as well as the competence of the staff involved) and the possible expected impact (considering the materiality of the information and its relevance with respect to the overall process of preparing the Sustainability Reporting).
The potential risks identified are mitigated through the mapping and classification of the different controls implemented by the Group (first level, first and second level, second level). The verification of their adequacy (Test of Design) originates from the expert-based analysis of criteria related to the expected effectiveness of the controls supplemented by overall considerations relating to their efficiency.
In greater detail, controls are considered effective when they ensure appropriate coverage of the risk assumed as a reference (judgement expressed through the following assessment drivers: timing, frequency, traceability, suitability and formalisation of the verification activities). Controls are instead considered efficient when the expected mitigation benefits are adequate relative to the tools and resources used.
The intersection between the inherent risk and the overall assessment of the related controls determines the attribution of a score - defined on four possible levels (Low, Medium Low, Medium High, High) - to the "partial residual risk", i.e., the inherent risk mitigated by the control.
The presence of any internal controls adopted in line with the Data Governance framework defined by the Group (e.g., Data Management and Data Quality tools) generates a further potential reduction of the partial residual risk if the evidence of the controls, carried out by the Data Quality & Aggregation office, confirm the adequacy of these controls.
The verification phase of the effective application of the controls (Test of Effectiveness) - aimed at assessing the actual implementation of the processes and procedures for preparing the Sustainability Disclosure - was carried out on a sample of controls identified on the basis of specific selection drivers (materiality of the processes, recent updates/regulatory changes, diversification of the areas examined, findings emerged from the control functions, multi-year rotation of the processes subject to analysis, etc.).
The sample checks were carried out by the Sustainability Reporting Control structure through appropriate interviews with the owner functions, the collection/inspection of specific documentation and, where possible, by reperforming the test examined.
The results emerging from the Test Of Effectiveness affected the judgement of the "final residual risk" assigned. When the result of the TOE was found suitable or partially suitable, the score which originated from the Test of Design was confirmed, while in the case of an unsuitable result, the final residual risk was worsened.
If the examined control is not carried out, the related final residual risk will coincide with the inherent one initially estimated, effectively sterilising the mitigating effect that emerged from the Test of Design.
The detailed analyses and the overall results of the "Risk & Control Assessment" activity were included and reported in the periodic report - illustrated by the Financial Reporting Manager of the Group's Corporate and Control Bodies - in preparation for the issuance of the required certificates of specific competence.
The potential risks and shortcomings that emerged from the audits carried out were classified and prioritised in order to prepare an effective and suitable action plan aimed at reducing/eliminating these risks, as expressly required by the ESRS-2 reporting standard.
The remedial actions identified by the Internal Control System on Sustainability Reporting will be subject to careful monitoring, on an ongoing basis, through the definition of adequate reporting flows to the Corporate Bodies and control functions of the Group.

Specifically, a specific half-yearly report will be prepared and submitted to the Sustainability Committee. The same findings will also be integrated into the "Integrated *Tableau de Bord*" managed by the Audit function and periodically reviewed by the Internal Control and Risk Committee (ICRC).

Strategy, business model and value chain

Sustainability issues are fully integrated into the fundamental elements of the Group's strategy in terms of:

Products and/or services offered

Banco BPM mainly operates as a commercial bank and, through specialised Group companies, offers specialised services in the areas of investment banking, bancassurance, asset management, consumer credit, leasing and e-money. The products and services offer is aimed at individuals, businesses, institutions and companies operating in the third sector and includes: current accounts and digital services, loan products, credit and debit cards, mortgages, savings and investment products, insurance products and services related to mobility. With regard to companies, the offer also includes ad-hoc products and services such as payment collection services, for foreign operations and for leasing. For companies with more advanced financial needs, the offer is enhanced with corporate and investment banking solutions and structured finance services.
Sustainability issues have been integrated into the Group's offer with products and services for energy transition and efficiency. Third sector companies benefit from an ad-hoc range designed for particular needs, such as the five per thousand advance or loans that can cover the time delay between the start of activities and the disbursement of public financing.
With particular reference to climate and environmental issues, in order to support customers in the transition towards an economy with zero net greenhouse gas emissions, the Group's offer includes products with specific green purposes, approved by the New Products and Markets Committee and identified in the individual commercial proposals:

- catalogue-oriented loans with Green characteristics, whose green purpose is demonstrated by specific documentation;
- loans for the purchase, development or renovation of properties with an adequate level of energy efficiency;
- project financing for green purposes, also in pools with other banks, for example the construction of photovoltaic plants.

Lastly, also through commercial partnerships, the Group distributes financial products related to sustainability issues (for example, products pursuant to Article 8 and Article 9 of the Sustainable Finance Disclosure Regulation (also "SFDR")).

Customers and markets served

The Group operates almost exclusively in Italy, mainly targeting retail customers (natural persons and small and medium-size companies), corporate customers and, in the context of corporate and investment banking activities, larger companies, also listed ones or those with development objectives through the capital market. The customers benefiting from the offer of products related to sustainability issues are both companies (through ESG loans or services related to mobility) and natural persons (green mortgages and personal loans, services related to mobility, investment products that integrate ESG factors). In order to guarantee quality, widespread service with respect to the territorial distribution of its customers, the Group's employees are also spread over the different geographical areas served by the same, as shown below.

Number of employees by geographical area:[1]

North	Centre	South and islands	Foreign operations	Total
15,607	2,549	1,280	54	19,490

[1]North: Emilia-Romagna, Friuli-Venezia Giulia, Liguria, Lombardy, Piedmont, Trentino-Alto Adige, Valle d'Aosta, Veneto. Centre: Lazio, Marche, Tuscany, Umbria. South and Islands: Abruzzo, Basilicata, Calabria, Campania, Molise, Puglia, Sardinia, Sicily.

Sustainability objectives related to products and customers

In the 2023-26 Strategic Plan, and recently confirmed with the update and approval of the 2024-27 Strategic Plan, Banco BPM formalised its ambition to support customers in the transition process through consulting and commercial offer activities, paving the way for a Net Zero strategy.
At present, the Group's offer linked to sustainability issues, although constantly evolving, is in line with the strategic ambition adopted.
In particular, as part of the 2023-26 Strategic Plan, and recently confirmed with the update and approval of the 2024-27 Strategic Plan, Banco BPM outlined a path to integrate sustainability issues into strategic policies, ensuring that the growth of the business and financial soundness are accompanied by social and environmental sustainability. The integration process was facilitated by the full use of governance levers to create shared value in the long term.
The main project areas identified during strategic planning were:

- consolidation of leadership in the Business & Corporate Investment Banking segment and support of the green transition;
- strengthening of Wealth Management and Life Insurance;
- extraction of greater value from recent non-life insurance and e-money deals;
- benefits of the further development of omnichannel;
- strengthening of tech innovation, lean banking and cybersecurity;
- further strengthening of the Group's capital profile;
- empowerment of employees and communities in line with the social vocation of the Group.

ESG issues are integrated in these areas, representing an enabling factor to achieve the objectives of the Plan, and are made concrete through the definition and monitoring of specific targets. In particular, the Group has defined the following objectives:

- in the environmental field:
  - supporting customers along the transition path through consultancy activities and commercial offers, paving the way for a Net Zero strategy;
  - strengthening the management and monitoring of climate and environmental risk;
  - continuing to reduce environmental impact;
- in the social sphere:
  - further improving the People Strategy, generational turnover, women's empowerment and work-life balance;
  - strengthening the leadership position as a Third Sector lender;
  - confirming itself as a top Community Bank, with a strong impact on the communities present in the areas where the Group operates (with a focus on school and education);
- in the governance sphere:
  - confirmation of short and long-term incentive plans for managers and employees in line with ESG objectives;
  - supporting the digital transformation, with a strong focus on privacy and cybersecurity;
  - further improvement of ESG risk factor measurement systems, consistent with developments in external regulations and risk materiality;
  - defining sustainable finance policies related to proprietary investments and funding.

The business model adopted by the Group aims to create sustainable value over time, seizing the opportunities presented by a constantly evolving context, also by listening to stakeholders to integrate environmental, social and governance objectives and translate them into a responsible growth strategy. In fact, the relationship established with the territory, the financial market and international bodies facilitates the identification of material sustainability issues for full integration within the corporate strategy.
The Group's operating model is that of a financial conglomerate: the resources raised are used to offer financial and insurance products and services through an "omnichannel" model. The economic value generated is largely distributed, becoming a driver of development for the company. The main enabling factors of the Group's business model are the solid capital structure, staff engagement and skills, risk management skills and balanced governance.
The widespread network found throughout almost the entire country makes it possible to fully understand the needs and peculiarities of each territory and guarantee proximity to customers, also through the various relationship channels (omnichannel) made available by the Group (physical branches, web, app, telephone, consultants, etc.). Customers can therefore benefit from a complete and integrated range of banking, financial and insurance solutions and a proximity to the bank that is expressed both through local proximity and knowledge of the needs of the communities

served. In addition, the lean operating model guarantees an adequate level of efficiency and profitability, thereby benefiting investors and other Group stakeholders.
The Group's value chain includes suppliers (upstream of the value chain), customers (downstream), interests held in associates and joint ventures and direct investments in securities. During the dual materiality analysis, the Group carried out a precise mapping and analysis of direct and indirect business relationships in its upstream and downstream value chain.
In particular, the list of suppliers was considered when defining the upstream value chain, broken down by sector of economic activity on the basis of the prevailing Budget item associated at the entry of purchase requests. To define the downstream value chain, the main business activities carried out by the Group in terms of product lines/services offered and customers served were considered and the following was assessed:

- amount of credit exposure by economic sector of the counterparties;
- amount of exposures in securities by economic sector of the issuers;
- book value of interests in associates and joint ventures in the financial statements by economic sector to which the investee belongs;
- amount of expenses broken down by supply sector.

The use, collection, processing and protection of data were managed in accordance with the national and internal regulations of reference.

Stakeholder engagement activities

Listening to our stakeholders is a very important moment in defining strategic choices, as in the daily work of the Group.
To this end, Banco BPM's organisational model envisages specialised corporate functions responsible for overseeing the main stakeholders (for example: Investor Relations for investors, analysts and rating companies; Marketing and Sales for customers; Human Resources for its own workforce; etc.).
In particular, the dedicated specialist functions report to the administrative, management and control bodies (mainly the Board of Directors, the Sustainability Committee and the Internal Control and Risk Committee) the outcome of listening to stakeholder requests and interests in order to guarantee - where deemed appropriate - integration between the Group's strategic priorities and as part of the assessment of any organisational developments.
For the main stakeholder categories, the engagement methods and purposes are summarised below, as well as how this engagement was considered within the management of the Group's activities.

The engagement with institutional subjects of the financial market takes place through the Investor Relations function (directly reporting to the Co-General Manager, Chief Financial Officer) with the day-by-day activities of this function. The most important initiatives include sector conferences, financial roadshows and events (calls/webcasts) to present the Group's financial results, business plans and other strategic transactions to the market.
These transactions allow to disseminate qualified, exhaustive, timely and equal disclosure regarding the Group's strategy, activities, results, sustainability issues and prospects, also in light of the indications of Consob, the principles expressed by the Corporate Governance Code and of national and international best practices, ensuring the correct understanding of the issues of interest to the market.
In addition, a specialised team within the Corporate Affairs Secretariat function is responsible for overseeing the relationship with retail shareholders, providing assistance and overseeing the organisation of meetings. These processes oversee and facilitate the participation of shareholders in shareholders' meetings, as an opportunity for engagement and dialogue.
The meetings and events organised with the financial community represent an opportunity to share financial results and the main sustainability issues that impact the Group's business, strategies and prospects. On these occasions, feedback from external stakeholders is collected and subsequently reported to the Co-General Manager, CFO and Board of Directors through the Investor Relations function, which reports the results of the engagement activities in terms of issues addressed and requests collected from the market, guaranteeing the full understanding of the interests and opinions of the financial market players for the Corporate Bodies and Top Management.

Customer engagement takes place through various listening channels such as:

- Customer Satisfaction surveys to detect the degree of customer satisfaction in relations with the Group;
- ad-hoc research projects to investigate services, products and new ways of using them;
- Customer Feedback Management (CFM) platform for collecting instant feedback on customer experience, regarding channel usage, digital interactions and the purchase of products and services;
- survey on sustainability issues, aimed at companies to understand levels of awareness, needs and expectations concerning ESG areas;
- adequate channels for reporting complaints, detailed in the section “Processes for engaging consumers and end-users and channels for expressing concerns”.

These initiatives aim to ensure an understanding of the level of satisfaction with the service offered, as well as the identification of commercial and organisational solutions to make it more responsive to customer needs. In addition, customer feedback is useful in the strategic planning phase.

The engagement of the Group’s employees instead mainly takes place through the staff managers and the managers of the Headquarters and Network structures, who receive dedicated training and are constantly made aware and incentivised to devote themselves to the active listening of their collaborators. The engagement activities also include:

- a listening channel for collecting professional aspirations that allows staff to communicate their career growth and development goals to the company;
- listening spaces aimed at fostering an inclusive culture and supporting physical and mental well-being in the company.

These activities allow the Group to understand the experience and needs of staff. In this regard, during 2024, 200 people were involved in 13 Focus Groups in which ideas and proposals for mitigation and improvement actions were collected as part of the initiatives for Group employees. As a result of the ideas that emerged through this activity, the performance assessment system was revised and a new internal communication plan was launched, in addition to the implementation of operational interventions relating to workplaces and IT equipment.

Community engagement is ensured by the local presence of Banco BPM, which has developed, inter alia, channels dedicated to the community. In particular, in the main geographical areas of reference for the Group's operations, the Territorial Committees and Foundations envisaged by the Articles of Association have the aim of responding to the social and environmental needs of the communities in a widespread manner. The Territorial Committees include representatives of the economic, professional and associative world of the territory and, through periodic meetings, formulate proposals, plan and organise events and initiatives and, where required, express opinions on the issues presented.
In addition, in order to strengthen the coverage of requests collected in the territory, in 2024 Banco BPM established the “Corporate Social Responsibility” structure, which reports to the Communication and Social Responsibility function and is responsible, among other activities, for coordinating activities related to donations. The structure represents a point of continuous dialogue with the territories and makes it possible to seize and welcome the needs of the community to direct any initiatives and projects.

The Supplier Registry portal ensures that the Group maintains constant dialogue with its suppliers. In addition, suppliers complete an ESG questionnaire when being assessed in order to understand their sustainability performance, thereby allowing the Group to create an opportunity for dialogue that promotes supplier awareness both in terms of ESG and in the progress of their corporate practices. In addition, the survey allows Banco BPM to have significant information that enhances supply chain sustainability and makes it possible to better understand the ESG positioning of suppliers, also with a view to an effective use of this information in the logic related to supply chain management.
Banco BPM takes into account the interests and opinions of stakeholders when defining its medium/long-term strategy. In particular, for the formalisation of the 2023-26 Strategic Plan and the recent update to the 2024-27 Strategic Plan, the Group considered:

- feedback received from customers on various areas of operations. With particular reference to the issues of environmental, social and governance sustainability, the needs expressed by client companies significantly contributed to the launch of the ESG Factory project and to the development of digital technologies that improve accessibility to products, services and information;
- requests collected from its own workforce to define professional development paths, initiatives for accessibility and the inclusion of diversity, systems to guarantee the protection of the right to equal pay and strengthening work-life balance initiatives.

The administrative, management and control bodies of the Parent Company are regularly informed on the opinions and interests of the main stakeholders with respect to issues related to ESG sustainability and, in carrying out their role, take these opinions and interests into account.
In particular, the various sustainability initiatives launched to respond, where deemed appropriate, to the interests and opinions of the main stakeholders (for example, results emerged from surveys related to staff or customers, ESG preferences expressed by customers through the MiFID questionnaire, results of ESG questionnaires completed by Group suppliers, etc.) are presented to the Corporate Bodies and internal board committees.
In addition, the administrative, management and control bodies of the Parent Company are informed of the methods for conducting and the results emerging from the dual materiality analysis carried out, at least annually, at Group level. Also in this context, Banco BPM collects and listens to the requests, interests and opinions of the main stakeholders called upon to express themselves on the impacts, risks and opportunities deriving from sustainability issues identified internally.

Interests and views of own workers

People are the very heart of Banco BPM Group's business strategy, which recognises their value as a primary resource, fundamental for the company's continuous development. In labour relations, Banco BPM is committed to promoting respect for dignity, fairness and equal opportunities and enhancing each individual's specificities in order to create an inclusive and welcoming work environment and thus foster collaboration and improve effectiveness and productivity. The opinions and interests of the people who work in the Group guide the Group's strategy and organisational development. With regard to strategy, as already highlighted, one of the areas of the 2023-26 Plan (also confirmed when updating the 2024-27 Strategic Plan) concerns the People Strategy. In particular, the welfare and work-life balance measures, expressed both through climate surveys and through discussions with Trade Unions, contributed to defining a plan to bring greater employee empowerment, with particular reference to better work-life balance.
With regard to the operating model, specific organisational controls are envisaged in relation not only to staff management, but also to welfare, industrial relations and remuneration policies in order to spread a corporate culture focused on people and to develop Diversity and Inclusion initiatives.

Interests and opinions of the communities affected

The interests and opinions of the communities affected are collected through activities carried out by the Group and through the Sales Network and Territorial Committees. Listening to the communities allows continuous dialogue with the areas where the Group is rooted, to welcome and understand the needs of the community, cementing any initiatives and projects. The issues that emerge as being of greatest interest and importance to stakeholders are considered for the subsequent development of initiatives and sensitisation activities. They are mainly related to respect for human rights and the dissemination of a culture focused on sustainable development.

Interests and opinions of consumers

The Banco BPM Group takes into account the interests, opinions and rights of customers in strategic planning as well as in the Group's business model through dedicated organisational controls and processes. In particular, the Group is committed to monitoring the level of satisfaction with the services offered and identifies commercial and organisational solutions to increasingly align them with its customers' needs. These solutions are also brought to the attention of the competent Corporate Bodies for the necessary strategic and organisational implementations.
In this regard, the main dedicated listening channels are:

- customer satisfaction surveys to measure overall customer satisfaction;
- research projects to investigate services/products and new ways of using them;
- customer feedback management platform for collecting instant feedback on customer experience regarding channel usage, digital interactions and the purchase of products and services;
- survey on sustainability issues, mainly aimed at companies to understand levels of awareness, needs and expectations concerning ESG areas;
- analysis of complaints submitted by customers in the event of a violation of contractual obligations and diligence, fairness, information and transparency on banking, financial and insurance products and services.

People, companies and organisations are considered partners of a shared future in a relationship that is consolidated day after day, with the aim of facilitating the lives of customers and making it possible for them to seize every opportunity for sustainable growth.

Process of identifying and assessing impacts, risks and opportunities

Banco BPM carried out the dual materiality analysis (DMA) as a criterion for the selection of material sustainability topics for the Group and its value chain, which were therefore included in the 2024 Sustainability Reporting. The exercise was carried out by assessing impact materiality - which made it possible to identify the positive and negative, current and potential material impacts on people and the environment that are connected to the Group's operations or generated by the value chain in the short, medium and long term (inside-out perspective) - and financial materiality - which made it possible to identify the risks and opportunities deriving from sustainability topics that may have material effects on the Group's financial position in the short, medium and long term (outside-in perspective) - adopting the highest level of granularity (sub-topic or sub-sub-topic, where applicable) allowed by the European Sustainability Reporting Standards (ESRS) envisaged by the Corporate Sustainability Reporting Directive (CSRD).
The process was developed through an approach consistent with the dictates of the EFRAG Guidelines for the enforcement of the Standards on materiality analysis ("Implementation Guidance EFRAG IG 1 Materiality Assessment" of 31 May 2024). In particular, the methodology adopted envisaged the breakdown of the work into four phases:

- <u>context analysis</u>: provided an overview of key information to identify Impacts, Risks and Opportunities (IRO) by developing an overview of the Group's activities and commercial relations with customers and suppliers, as well as the context in which these take place, and an understanding of the main stakeholders. Banco BPM carried out the context analysis through:
  - benchmarking activities on the banking sector;
  - analysis of the 2023-26 Strategic Plan;
  - materiality analysis reported in the previous Consolidated Non-Financial Statement (CNFS);
- <u>IRO identification</u>: provided a first long-list of Impacts, Risks and Opportunities on environmental, social and governance issues starting from the sustainability issues reported in ESRS 1 AR16, and secondly, through the assessment of any necessary additions for specific Banco BPM matters (not recognised for the year 2024);
- <u>IRO assessment</u>: through the application of qualitative/quantitative criteria, the various functions of the Parent Company responsible for the matter associated an assessment score with the IROs identified;
- <u>determination of materiality</u>: on the basis of the defined materiality threshold, the IROs were judged as material (if associated with higher score than the established threshold level) or non-material (if associated with lower score than the established threshold level) to be subsequently subject to validation by a selected panel of external stakeholders.

During the identification and assessment, the Group indicated the time horizon in which a sustainability topic is expected to produce effects in terms of IRO. In particular, the time horizons considered are aligned with those established by the ESRS:

- short-term scenario - the reference time horizon is one year;
- medium-term scenario - the reference time horizon is from one to five years;
- long-term scenario - the reference time horizon is over five years.

When identifying and assessing impacts, the Group focused on its *own operations* and on its upstream and downstream value chain. In particular, the work concentrated efforts to identify the impacts generated by the main activities carried out on the basis of the business model of the Group Companies (for example: credit disbursement, insurance business, investments, savings management) and by the parties with which commercial relationships are established upstream and downstream of the value chain (for example, the main suppliers). For each IRO identified, Banco BPM specified whether the impact, risk or opportunity referred to its operations and/or the upstream or downstream value chain, defining:

- *own-operations*: the set of internal processes of the Group (including the activities of the Legal Entities consolidated on a line-by-line basis in the financial statements) and which focus on internal stakeholders such as, for example, employees;
- supply chain: the Group's suppliers;
- customers/investments: the Group's business processes that focus on external stakeholders such as customers. In particular, the following were analysed: interests in associates and joint ventures, investments in securities (including investments to cover provisions for insurance portfolios) and loans disbursed.

The identification of the long-list of impacts generated in the context of own operations leveraged, first and foremost, what was reported in the 2023 CNFS, tracing the issues identified in the past as material according to the GRI Standards (Global Reporting Initiative) to those envisaged by the new ESRSs. Secondly, any additional impacts that

emerged during 2024 were identified through discussions with the main functions of the Parent Company directly involved in the issues subject to analysis.
For the identification of a long-list of impacts generated along the upstream value chain, the analysis was based on the data available in the Group Supplier Register: the main suppliers and related sectors to which they belong were associated with potentially material ESRS topics according to the "Materiality Map" published by SASB.
For the identification of a long-list of impacts generated along the downstream value chain, the analysis was based on the data available with respect to the macro-sectors to which the Group's main customers/investments belong (understood as financed customers, issuers of securities in the portfolio and investee companies), subsequently identifying the potentially material ESRS topics according to the "Materiality Map" published by the SASB.
For the identification of a long-list of **risks** related to ESG issues, the Group has taken into consideration:

- the positive/negative impacts that could generate consequent risks (by way of non-limiting example: the negative impact on the climate deriving from a customer's production processes can generate a worsening of its credit rating and, consequently, an increase in the credit risk profile to which Banco BPM is exposed);
- the results of the internal risk identification process carried out by the Risk Management function in the reference year, in which the risks deriving from sustainability topics are fully assessed.

Financial and non-financial risks were traced back to ESG issues and to at least one of the three reference perimeters for the purposes of the dual materiality analysis according to the value chain or circle of *own operations* from which the risk is generated. As a result, the Group identified a long-list of "traditional" risks on which to carry out a materiality assessment in relation to the areas required by the ESRS.
For the identification of a long-list of **opportunities** on ESG issues, the Group took into consideration:

- the analyses carried out when identifying impacts in order to identify any opportunities linked to the direct dependency of the Group and/or the sectors to which the players in the value chain belong upstream (supply chain) and downstream (customers, investments, interests in associates and joint ventures);
- the positive/negative impacts that could generate consequent opportunities (by way of example but not limited to the positive impacts on staff generate opportunities to attract young talent);
- the initiatives set out in the Group Strategic Plan and the projects/opportunities in the commercial area.

For the phase of assessing the impacts on people and the environment in the short, medium or long term, each actual or potential negative or positive impact was associated with a score of 0.1 to 5 (where 0.1 represents the minimum score and five the maximum score) on the basis of the opinions expressed by the various functions of the Parent Company responsible for the matter, associated with the following dimensions:

- scale: indicates how serious the negative impact is or how great the benefit of the positive impact is for people or the environment;
- scope: indicates the extent of the impact along *own operations* and the value chain upstream and downstream of the Group;
- irremediability: assessed exclusively for negative impacts, it indicates the expected complexity to remedy the resulting damage or to neutralise the negative impact assessed;
- probability: used exclusively for potential impacts, it indicates the probability of generating an impact.

The relevant Parent Company functions are responsible for continuously monitoring the impacts (actual and potential) generated by the company on people and the environment.
The risk and opportunity assessment process, aimed at expressing an opinion on the assessment dimensions envisaged by the regulations, was carried out through expert-based assessment and leverage the results of internal processes and tools available and governed by the Risk Management function of the Parent Company.
For the purposes of assessing the risks and opportunities to which the Group is exposed in the short, medium or long term, each was assigned a score of 0.1 to 4.5 (where 0.1 represents the minimum score and 4.5 the maximum score[1]) according to an expert-based assessment of the following assessment dimensions:

- extent;
- probability of occurrence.

The relevant functions of the Parent Company are responsible for continuously monitoring risks and opportunities on sustainability topics.
At the end of the internal assessment phase, the score associated with the IROs in the context of both Financial Materiality (risks and opportunities) and Impact Materiality (impacts) were aggregated in a summary view through a

[1] With reference to risks and opportunities, since these are "probable" events, the maximum value assumed by the "probability" size is 90%, for which the maximum final score is 4.5.

heat map from which the Group defined the value to be considered as the materiality threshold. This threshold was defined starting from the judgement scales adopted for the assessment dimensions of IRO (scope, probability, extent, etc.) which envisaged the allocation of a final relevance score between 0.1 and 5.
In order to ensure that the reporting includes the most significant issues for Banco BPM and its value chain, it was deemed appropriate to adopt a threshold that was at least higher than the median value of the scales envisaged, thus setting it at a value of 3.5.
Subsequently, in the process of identifying the material information to be reported, the Group excluded the voluntary and/or phase-in information - as indicated by EFRAG regarding the first Sustainability Reporting - and applied the criteria for determining the materiality from the information contained in the IG 1 implementation guidelines published by EFRAG.
Lastly, once the score was assigned to the assessment dimensions envisaged for the IROs through the discussions with the internal functions of the Parent Company, the external stakeholders were involved in order to gather a qualitative judgement of validation and possible integration with respect to the topics that emerged as material.
In particular, the methodological framework used for the analysis and the related results were illustrated to the external stakeholders in order to gather their feedback and observations, thus guaranteeing the integration of the market point of view with respect to the material topics subject to reporting. In fact, the involvement of professionals, analysts, professors and independent sustainability experts from outside the Group made it possible to understand the information needs regarding ESG issues from the point of view of professionals with in-depth knowledge in the field of Sustainability and spokespersons of interests of the Affected Communities and the Market.
The criteria that guided the selection of external stakeholders to assess the preliminary results of the materiality analysis were as follows:

- academic background with teachings and publications in the ESG field and/or in the context of the integration of sustainability in the financial sector;
- corporate reporting experts, with particular reference to the integration between sustainability and financial disclosure;
- experts in sustainability management within large companies (including non-banking), including a customer of Banco BPM.

Stakeholder engagement involved the conduct of focus groups aimed at encouraging discussion, exchange and reciprocal dialogue. The open and direct involvement of experts representing the vision of external stakeholders was oriented towards two main objectives:

- sharing and validating the robustness of the methodology used for the dual materiality analysis;
- taking into account any suggestions/considerations regarding the ESRS Topics and related IROs that emerged as material from the internal analysis as well as with regard to the ESRS Topics and related IROs considered non-material as a result of the dual materiality exercise carried out internally.

The results of the DMA and material topics subject to reporting for the year 2024 were approved by the Board of Directors of the Parent Company at the meeting of 6 November 2024, informing the Board of Statutory Auditors in this regard, following a process of involvement and sharing of the methodological framework adopted with: the (managerial) ESG and Risk Committees, the (Internal Board) Sustainability and Internal Control and Risk Committees (the latter limited to the materiality analysis of the risks) and the Board of Directors, to which the DMA framework was pre-emptively illustrated in a Board Induction held on 24 September 2024.

Process of identifying and assessing impacts, risks and opportunities related to climate change and their interaction with the strategy and business model

To identify and assess the impacts generated on climate change with particular reference to GHG emissions, the Group assessed:

- as regards own operations, energy consumption and emissions generated by its operating offices;
- in the upstream value chain, the emission intensity of the sectors in which the Group's main suppliers operate;
- in the downstream value chain, the emission intensity of the sectors in which the counterparties operate, to which it is exposed through loans and/or investments (including equity interests in associates and joint ventures).

In addition, the main functions of the Parent Company involved in the above processes expressed an expert-based opinion in order to assess these impacts. In particular, the opinion expressed regarding the extent of the impacts generated by suppliers and customers/issuers was associated based on the Group's level of exposure to the sectors

in which the main suppliers, customers, issuers of securities in the portfolio and interests in associates and joint ventures operate.
With regard to its own operations, the Group screened its owned properties in order to identify the actual and potential sources of GHG emissions as part of its own operations through a structured Environmental and Energy Management System that covers all operating properties (excluding leased properties) and allows to constantly monitor and measure consumption performance and the achievement of objectives.
The sources of GHG emissions in the upstream and downstream value chain have not been accurately identified; however, the Group carried out an analysis based on a screening of the economic sectors of suppliers and counterparties to which it is exposed through loans and/or investments (including interests in associates and joint ventures). This assessment was based on data from the SASB framework.
In order to identify and assess climate-related **opportunities**, the Group considered, as part of its own operations, the existence of opportunities to improve its brand reputation and, as part of the downstream value chain (customers), any commercial opportunities in terms of extension/creation of dedicated products aligned with the needs of counterparties in terms of climate change mitigation were assessed (e.g., disbursement of new green and low transition risk loans to companies and SMEs).
The identification and assessment of **risks**, for the description of which please see chapter "*Description of the process to identify and assess material impacts, risks and opportunities"*, leverage the results of internal processes and tools available and governed by the Risk Management function of the Parent Company.
The analysis of the effects of physical and transition climate risks on the Group and its customers in terms of financial and non-financial risks is, in fact, subject to assessment as part of the capital adequacy assessment processes (regulatory and operational) and of liquidity - which make it possible to project and simulate the evolution of economic figures as well as the related underlying risk measures - and through the main risk identification and risk assessment processes (the latest framework was presented to the corporate bodies) in October 2024.
These analyses also make it possible to assess the Group's resilience to climate change as a whole. The scope of the analyses is differentiated in consideration of the type of assets being assessed, focusing on the risk drivers that materially impact the Group's risk profile.

In this context, the Group makes use of the climate scenarios developed periodically at institutional level, in particular those produced by the Network for Greening the Financial System (NGFS), a group of Central Banks and Supervisory Authorities committed to sharing best market practices, to contributing to the development of climate and environmental risk management in the financial sector, and to mobilising traditional finance to support the transition to a sustainable economy. Over time, the NGFS has prepared a set of scenarios that incorporate the effects of climate change on the global economy and individual countries under different climate shock assumptions.
Banco BPM assesses its own capital adequacy, also in light of the financial KPIs generated by the information contained in the new NGFS scenarios (phase IV), by adopting specific sector/territorial analyses, as well as by implementing increasingly advanced and accurate approaches. The choice of climate scenario based on the NGFS provision was made following a materiality analysis conducted on the prospective Probability of Default (PD) under the assumptions of the "Orderly Transition," "Disorderly Transition," and "Hot House World" scenarios, with short-term (2023-2026), medium-term (2030), and long-term (2050) horizons, in line with the guidelines set forth in the "Thematic Review – Climate-related and Environmental Risk Strategies".

Based on the three NGFS scenarios mentioned, the impact of climate shocks on PD has been quantified by applying the financial module of internal rating models to projected financial statements of corporate clients, aligned with key climate indicators. In particular, the impact on PD of the sectoral financial indicators perturbed on the basis of costs and investments that companies are expected to incur as a result of the climate transition is understood. In this context, the impacts of a potential introduction of a carbon tax are considered, which is aimed at discouraging greenhouse gas emissions, alongside the costs of increased debt incurred by companies to fund investments aimed at the decarbonisation of their production processes. The long-term projections also capture the increase in insurance premiums for policies stipulated to mitigate the impacts of physical risk.
The variations in financial factors adjusted for climate drivers observed in the projected financial statements across the three scenarios were aggregated at the sector level and across macro-clusters to estimate the prospective PD through the aforementioned financial module. At the aggregate level, across the entire credit portfolio, the following observations are made:

- In the short term, the three scenarios analysed lead to an increase in the PD which is much more pronounced in the "Orderly" scenario due to the immediate implementation of greenhouse gas emission reduction measures, resulting in increased costs and investments for the transition. The other two scenarios show a

more modest increase in the PD, as it is assumed that no specific emission reduction policies are implemented in the initial years of projection;
- in the medium (2030) and long (2050) term, an opposite performance is observed: the higher PD values are reached in the "Hot House World" scenario as a result of the costs necessary to deal with the increase in adverse weather events, as a result of the failure to reduce greenhouse gas emissions.

This analysis highlights the impacts of different scenarios on the creditworthiness of the Bank's clients, delving into the effects of both transition risk (comparing the "Orderly" and "Disorderly" scenarios) and physical risk, captured in the "Hot House World" scenario and the long-term implications in the "Disorderly" scenario.
In conclusion, distinguishing the impacts on PD in the short term (2023-2026), medium term (2030), and long term (2050), it is observed that in the short term, the "Orderly" scenario is the most conservative and, therefore, the most suitable to be used in projection exercises on a short-medium term horizon.
The aforementioned scenarios are also used in the accounting estimate of value adjustments (Expected Credit Losses or ECL) on performing credit exposures. For further details on the integration methodology of these scenarios in the ECL measurement, please see the section "*2.3 Methods for measuring expected losses*".

In order to identify and assess the physical risks deriving from climate change in the short, medium and long term, the Group therefore considered:
- as part of its **own operations**:
  - owned properties and activities carried out by assessing the degree of exposure to real estate and operating risks deriving from the occurrence of adverse weather events on owned instrumental assets, in line with the Group's Business Continuity framework approach;
  - the reputational risk deriving from a perception that the Group is not adequately sensitive to the problems of climate adaptation by its stakeholders;
  - the strategic risk linked to the loss of customers due to the lack of products aimed at supporting the Group's counterparties in terms of adapting to climate change;
- as part of the **upstream value chain**, the operational risk deriving from the occurrence of adverse weather events on outsourced services and IT activities (in line with the Group's Business Continuity framework approach), as well as the reputational risk deriving from suppliers that do not have defined objectives or policies to support climate change adaptation;
- as part of the **downstream value chain**, credit and liquidity risks deriving from the Group's exposure to counterparties operating in sectors or geographical areas vulnerable to physical risks, as well as the reputational risk deriving from exposure to counterparties that have not defined objectives or policies to support climate change adaptation.

With reference to the transition risks linked to climate change, it considered:
- in the context of its **own operations**:
  - operational and real estate risk deriving mainly from legal liabilities (e.g., in relation to Greenwashing");
  - the strategic risk deriving from the failure to achieve commercial objectives (envisaged in the Group's Strategic Plan) in terms of inadequate or insufficient supply and marketing of products and services to support climate change mitigation initiatives; and
  - the reputational risk deriving from the failure to achieve the objectives defined in support of climate change mitigation (e.g., failure to achieve the objectives defined as part of the Net-Zero Banking Alliance);

- in the **upstream value chain**:
  - the reputational risk deriving from suppliers that have not defined objectives or policies to support climate change mitigation or show little attention to energy efficiency objectives; and
  - operational risk deriving from legal liabilities related to transition risk events affecting the Group's supply chain;

- in the context of the **downstream value chain**: credit, market and liquidity risks deriving from exposure to counterparties that will be required to incur additional costs or investments to make up for the failure to define a Transition Plan and energy efficiency objectives, as well as reputational risk deriving from exposure to counterparties that have not defined objectives or policies to support climate change mitigation or show little attention to energy efficiency objectives.

For a description of the time horizons used, please see the chapter "Process for identifying and assessing impacts, risks and opportunities". It should further be specified that:

- the short term guarantees full alignment with the budget and three-year planning horizon;
- the medium term is consistent with the intermediate decarbonisation objectives of the loan and securities portfolios identified following membership in the Net-Zero Banking Alliance or with the time horizon required by regulatory exercises (for example, One-off Fit-for-55 climate risk scenario analysis);
- the long term is consistent with the Paris climate objectives signed by the European Union and with the Green Deal approved by the European Parliament.

In continuity with the exercises conducted in previous years, the Group conducted analyses to measure its exposure to climate and environment-related risk factors in key economic sectors and geographic areas and thus determine the current impacts on the Group's credit risk profile. In particular, the materiality level of loan portfolio exposure to transition, physical and environmental risk was constantly monitored during the year and the related analysis methodology expanded and consolidated. Analyses to measure the impact on the Group's risk profile of exposure to climate and environmental risk factors also include market, operational and liquidity risks as well as other types of "second-pillar" risk. Below is a summary of the actions taken by the Group to measure climate risk exposure for each risk category.

Credit risk

Impacts related to climate change are assessed in the context of credit risk based on what is expressly set out in the relevant regulations, which require banks to consider climate and environmental risk factors in all phases of the lending and credit monitoring process, carrying out analyses to identify any concentrations in sectors or geographical areas that are strongly exposed to these risk factors, even if only potentially.
In particular, in the vertical reporting produced on the issue, the Group integrated the assessments of transition and physical risks (the most relevant factors of climate and environmental risk as a whole) with a series of detailed analyses that provide a complete methodological overview and an analytical representation for each individual risk driver, in order to be able to examine all the elements considered most significant. The methodology described, developed with the support of an external data provider, allows continuous updating of the physical (acute, chronic and environmental) and transition risk score with regard to:

- real estate received as collateral;
- companies financed;
- related production assets.

The score scale adopted is consistent for all types of risk and based on specific assessment classes, from "Very Low" (score 0) to "Very High" (score 4) risk. The approach implemented also makes it possible to consider specific elements of analysis in relation to the individual driver examined. For example, the "Very Low" score, defined with specific regard to transition risk, is assigned to all corporate counterparties that conduct green economic activities (i.e., fully aligned with EU Taxonomy requirements).
Instead with reference to acute physical risk, the "Very Low" score is assigned to real estate located in geographic areas not substantially exposed to the relative risk factors (flooding, landslides, fire, etc.). The scoring process is firstly based on the availability of precise and analytical data that allow the Group to carry out adequate detailed assessments. In some cases, this information is public (i.e., the maps provided by the Italian Institute for Environmental Protection and Research - ISPRA for flood and landslide risks), in others it was necessary to request the support of specialised providers (e.g., on emission intensities) or draw from appropriate certified external data sources (i.e., for energy performance certificates of production assets and/or guarantees).
In order to assign an overall summary score, the information collected is then integrated with that made available directly by borrower customers through the completion of specific qualitative ESG questionnaires. The risk score obtained, for each individual counterparty or property, was therefore calculated with a top-down approach (mainly sector-based for transition risk) and a bottom-up approach (often relevant for significantly larger customers that draw up a Non-Financial Statement or Sustainability Reporting).
In general, the methodology for estimating climate and environmental risks is therefore based on the combination of sector elements, precise geographic data, and where available, additional information provided by the customer or relating to the individual asset examined.
With regard to the specific analysis of transition risk, for the purpose of its internal assessments the Group also considers the emission intensities relating to the counterparty examined, its overall alignment with the EU Taxonomy requirements and the possibility for the customer to access the CO_2 emissions market (EU Emissions Trading System).

Lastly, for certain types of loans, requested by companies in order to make specific investments of a structural nature, the Bank envisages certification of the overall projects by independent third-party experts in the field.

With reference to the analysis of other environmental risk factors (related to the protection and restoration of biodiversity and ecosystems, the transition to a circular economy, the sustainable use of water resources and the reduction of pollution), the Group adopts separate assessment criteria for each individual objective examined, borrowing its approach from the EU Taxonomy regulations. Particular importance is attributed to "Do No Significant Harm" (DNSH) and the indications adopted by the main Italian and European institutions.

The methodology developed by the Group for the purposes of assessing the physical risk component takes into account what is expressly required by the current legislation on the matter, considering all the potential physical risk hazards envisaged by the "Taxonomy". This methodology makes it possible to assess, directly or indirectly - also considering the important correlations between the various events examined - the overall list of physical risk hazards (acute and chronic) envisaged by the Supervisory Authority, therefore guaranteeing a complete score mapping. It should be specified that, by virtue of the predominantly domestic nature of its business, Banco BPM pays great attention to the most significant risk factors to which Italy is exposed with a dedicated focus, in particular, on hydrogeological events (landslides and floods) and the phenomenon of drought.

During 2024, Banco BPM continued to strengthen and fine-tune the estimation models used to assess the potential impacts of climate and environmental risk factors on its business model and on the definition of specific company strategies, also through greater availability of detailed information. Such increasing data availability will at the same time determine a substantial improvement in the quality, accuracy and timeliness of the information relating to these particular areas of analysis. In addition, thanks to the improvement of the methodology, it was possible to refine the assessment of customers' climate risks by increasing the use of single-name information on the Group's loan portfolio in relation to the real estate sector.
With reference to credit risk, climatic, physical and transition risks currently emerge as material but at the same time the score attributed to these types of risk is limited overall, confirming the fact that Banco BPM customers are on average concentrated in geographical areas and sectors not excessively exposed to these risk factors. In addition, consistent with the measurement models described above, the Risk function of Banco BPM carries out specific sensitivity analyses to estimate the impact of the factors examined on the main risk parameters (PD and LGD - Loss Given Default), taking into account expected evolutions over the different time horizons considered and in relation to the different scenarios used.

Specifically, in the credit risk area, Banco BPM has:

- integrated climate risks into IFRS 9 provisioning measures (via Post Model Adjustment - PMA - already starting from December 2022);
- integrated climatic risks, adopting an advanced approach, into capital adequacy assessments - ICAAP (starting from March 2023);
- defined the methodological framework for including climate risks in the internal rating system for management purposes.

With reference to the first two points, climate risk is considered in the PD and LGD satellite models, in particular in those in application from 31 December 2024 but, albeit to a less precise extent, also in the previous ones since 2023, through the use of specific exogenous factors as a vehicle for the higher costs due to the energy transition as well as the need for mitigation or reconstruction following the occurrence of an extreme event (e.g., flood).
The PD satellite models relate the change in default rates with the performance of the main macroeconomic drivers, also envisaging the use of sector financial KPIs as additional explanatory drivers. In fact, financial KPIs represent an important indicator that makes it possible to better understand the transmission of transition risk and, in the long term, of physical risk depending on the climate scenario being analysed. The introduction of the carbon tax and the need to reduce emissions translate into higher costs that a company must face for higher taxation and for the investments to be made to support the energy transition. In addition, the increase in the likelihood of extreme physical events involves the use of insurance as protection against such events, and the investments necessary for any reconstruction following the damage suffered. The increase in costs caused by the aforementioned factors affects the financial statements of corporate customers, which in the starting point are indirectly affected by the scoring assessments described above, and on the relative prospective financial stability, which is why they were integrated as external drivers in the PD satellite models of the financial and non-financial companies, discriminating by economic sector.

The LGD satellite models instead make it possible to capture the relationship between the changes in the expected recovery rates of the Group's credit exposure and the performance of a selected set of macroeconomic drivers and financial KPIs. Similarly to the PD satellite models, the LGD satellite models integrate climate risk as a vehicle for transmitting transition policies that can cause a shock on residential/commercial property price indices and financial KPIs.

Both satellite models were used in IFRS9 and ICAAP with a reference date of 31 December 2024, applying the Orderly NGFS (Net-Zero 2050) scenario, integrated with the flood scenario of the Climate Stress Test conducted by the ECB in 2022, which instead impacts the value of the properties as collateral.

The methodology described above aims to quantify the impact of climate and environmental risk factors, as described later in the diagram relating to financial risk transmission channels.

With regard to the third point, at the end of 2023 a framework was defined to support the Rating Desk structure, in order to attribute a credit rating to borrowing customers, and the manager who can override the rating. This framework envisages the calculation of a Climate rating alongside the AIRB reporting rating, while waiting for the climate and environmental risk drivers to be directly included in the regulatory rating system.

The Climate rating is obtained thanks to the application of a specific model developed by the Group that can modify the counterparty AIRB rating through the application of worsening or improving notches, in order to incorporate the (positive or negative) impacts on the assessment of the debtor's credit rating deriving from exposure to physical and transition risks.

With regard to transition risk, the Climate rating considers both the costs and investments that impact the single-name balance sheet projections of the debtor under different climate scenarios, and the qualitative ESG questionnaires completed by the relationship managers. These two factors are integrated so as to create a single climate score to be compared with notch-up and notch-down thresholds defined for each estimation sector or cluster during the assessment of the model.

The factors considered by the climate rating for physical risk, on the other hand, are represented by synthetic scores at counterparty level and by specific questions on the ESG qualitative questionnaires completed by the relationship managers. Also in this case, these factors are integrated so as to create a single climate score to be compared with specific thresholds (notch-up and notch-down) defined during the model estimation phase. Starting from June 2024, the climate rating was applied in the IFRS9 framework for the purpose of computing and refining the above-mentioned PMA to manage one of the emerging risks that the Supervisory Authorities have been monitoring.

Lastly, with regard to the measurement of the Social (S) and Governance (G) components, it should be noted that the Group has launched an assessment activity to acquire the necessary information from counterparties also in these two areas, which will be added to the assessments already present, for example, the qualitative component of the ESG questionnaire of credit policies, which includes questions on the Governance and Social aspects of the counterparties. The increasing availability/quality of the information collected through the questionnaire will allow the Group to strengthen the strategies put in place with regard to the specific management of climate and environment risk factors, allowing the competent company functions it to target appropriate initiatives to proactively manage the impacts of these special components on its business model, processes and company policies adopted internally. For more information, please see the section “Lending policies”.

Market risk

The impacts relating to climate change were assessed by Banco BPM also with specific reference to market risk, by analysing the potential impairment of financial instruments included in the owned portfolios following unexpected economic difficulties or default of the issuing companies, due to the effect of higher costs or investments incurred by them to support the energy transition.

In particular, the Group conducted an in-depth analysis to estimate the materiality - in terms of overall exposure - of investment portfolios (trading and banking books) to these risk factors, examining their composition (bonds, shares and derivatives) as well as the concentration by individual issuer with respect to the business sectors deemed most sensitive to transition risk and physical risks.

The results of the checks carried out confirm what already emerged in the previous analyses carried out by the Group: almost all of the exposure deriving from the financial instruments falling within the scope considered is marginally impacted by climate and environmental risk factors.

Banco BPM also conducts an estimate of the transition risk on the fair value of (equity and bond) positions included in the trading portfolio. The analysis described is also extended, from a management point of view, to the banking books limited to the credit spread risk factor, as the latter represents the main risk factor of the portfolios in question. The methodology adopted by the Bank is mainly based on the rationales and evolution of macroeconomic variables envisaged for these types of risk as part of specific “Climate Stress Test” exercises.

With reference to the (corporate and financial) issuers of bonds and shares of the Group's proprietary portfolios, separately by trading book and banking book, Banco BPM also conducts a materiality analysis of the exposure to ESG risks, based on certain indicators calculated by the platform of a leading external info provider.

Liquidity risk

As part of the activities on ESG risks applied to liquidity risk, in line with what was done for the other risks to which Banco BPM is exposed and in line with the materiality analyses conducted, the focus was on risks related to the Environmental (E) component.
The potential impacts linked to climate change are assessed by the Group with specific reference to three main areas of analysis: credit lines, funding mix and securities portfolio. Within each of the three clusters, a materiality analysis is conducted on exposure to environmental and climate risk factors, based on NACE sectors classified by different risk scores, as well as data and information related to GHG emissions. The results of the analyses show, on the whole, low exposure of the Group to NACE sectors characterised by high transition risk scores.
With reference to the cluster relating to the investment portfolio, the analysis on transition risk was also conducted on the basis of the ESG score, calculated via the platform of a primary external info provider. The Group's exposure to issuers with medium-high ESG scores highlighted negligible values. With reference to credit lines and funding (funding mix), starting from 2023 the assessments also entailed measuring ESG scores relating to acute and chronic physical risks. The results of these assessments resulted in overall low exposures to counterparties with high ESG scores.
In addition, Banco BPM carries out specific sensitivity analyses to assess the historical impacts on liquidity and funding profiles originating from acute and unforeseen physical events, which actually occurred, with a specific focus on the collection of liquidity via demand deposits. In 2024 the Group integrated into the databases used in the measurement of liquidity/funding risks, a set of ESG information considered material for the purpose of preparing adequate periodic reporting on the three clusters analysed and mentioned above.
The integrations regarded the following aspects:

- acquisition of the information flow from the supplier's DWH, in accordance with the methods defined by Banco BPM, containing information and data on environmental risks relating to the Group's customers;
- acquisition of the information flow from the platform of a leading international data provider that is used to estimate the ESG risk on the investment portfolio, consisting of various ESG data points that make it possible to assign an average score to each securities issuer.

Among the various data points extracted from the platform of a leading international data provider, there is a synthetic parameter that considers all ESG aspects, including that related to Governance. Therefore, with reference to the securities portfolio, the assessment carried out periodically also includes specific aspects relating to governance risk. The Governance Risk Score is also extracted from the same database, which allows the Group to isolate the governance risk, making it possible to assess any impacts at the level of liquidity and funding risk.
Lastly, it should be noted that the risk factors linked to climate and environment are integrated within the Internal Liquidity Adequacy Assessment Process (ILAAP) framework through materiality and sensitivity analyses.
The ILAAP framework contains the description of the methodological approach adopted in the Materiality Assessment of C&E risks on the main aggregates: investment portfolio, funding mix and credit lines, on a half-yearly basis. The materiality analysis is based on the exposure of the main aggregates assessed on the basis of specific synthetic scores. In particular, with reference to physical risks, the internally developed score was used, which summarises the exposure of the province of residence to acute physical events (landslides, fires, floods, etc.). For transition risk, the exposure to these risk factors of the individual production sectors (ATECO) was assessed, while for the investment portfolio an additional score was also used (primary international data provider source) that measures exposure to ESG risks of the economic value of the instrument issuer in the portfolio.

Operational risk

The potential impacts related to climate change are assessed by the Group in terms of operational risk in relation to the consequences arising from adverse events related to the climate and the environment (floods, landslides, fires, droughts, weather phenomena, etc.) that could cause an increase in operational risks, with a focus, in addition to the effects on business continuity and on the damage to the real estate and artistic assets of the Group, also on the potential losses directly or indirectly caused by legal actions (e.g., for greenwashing linked to the sale of banking or financial products or to legal action and complaints by stakeholders due to environmental non-compliance of products issued or placed or for Group exposures in controversial sectors). In particular, the objective is to assess the potential exposure

of the Group to operational ESG risk factors, both through the historic reporting of the events and through the forward-looking analyses carried out, including the results of in-depth analyses.
The application of Risk Self-Assessment (RSA) analytical scenarios allowed for an assessment of potential exposures related to physical risk and the associated conduct risk, the outcome of which showed limited impacts even in terms of unexpected losses. These impacts were considered in determining second-pillar risks in the periodic capital adequacy assessment exercises (ICAAP).
Lastly, the transmission channels of climate factors (in particular those linked to physical risk events) to operational risk are represented by the same tangible assets owned or used by the Group (branches, service centres but also the same artistic heritage), which may be directly affected by acute or chronic natural disasters which, directly or indirectly affecting the Group's production sites, may cause interruptions to business continuity and system failure. For both transmission channels, Banco BPM estimates unexpected loss scenarios in the RSA process whose purpose is to intercept vulnerabilities of the Bank systems and processes, also returning a materiality in terms of potential economic loss. The Group continuously implements further methodological developments, also in line with the relevant regulatory developments. In this context, the refinement of the operational risk taxonomy is noteworthy, as it aims to include the categorisation of climate events, thereby further enhancing the granularity of operational risk databases.

Lastly, ESG risk factors have been integrated into the measurement models of the other types of Pillar 2 Risk.

Reputational risk

With reference to reputational risk, Banco BPM has refined the methodology it uses for quantifying estimates of economic capital in order to include the possible deterioration of the Group's image, perceived by its various stakeholders, as a result of the potential emergence of specific ESG risk factors. The reputational risk assessment model includes the Corporate Social Responsibility area and the ESG area, which consist of indicators that allow the Group's reputational positioning in these areas to be monitored over time. In particular, the ESG area consists of three web sentiment indicators, one for Environmental issues, one for Social issues and one for Governance issues, which assess the news on the web that pairs the Group's image to these three areas.
The Environmental web sentiment indicator evaluates news relating to the Group that are appropriately classified in this area through cataloguers developed with artificial intelligence techniques. In addition to an aggregate assessment, the score is opened to evaluate the marginal contribution of the various climate and environmental risk factors to the overall measure of economic capital to deal with this particular type of risk. In particular, four different risk sub-categories are considered (transition risk, physical risk, conduct risk and other) in which the news is further classified. Finally, the news is associated, where possible, with the business cases contained in the ECB Climate Stress Test. A what-if analysis is also carried out to assess potential reputational impacts due to events that have occurred in the banking system as a whole, in order to measure the impact that they could have on the measure of economic capital if they were to occur for the Group.
The Social and Governance web sentiment indicators also offer an aggregate score with respect to the Group's positioning in these areas. In particular, the Social indicator is then opened for sub-areas of risk relating to issues such as culture, education, dignity, peace, health, inclusion and territory.
Finally, with a view to stress testing and sensitivity analysis, the scores of the indicators of the two areas mentioned above are appropriately stressed by considering pejorative scoring on the basis of the probability distributions assigned by the machine learning engines.
Banco BPM has also defined a framework for continuous monitoring and for the preventive mitigation of the reputational risk to which counterparties with loans are exposed. The framework is based on analyses deriving from instruments of the commercial network, from credit policy processes, from activities of the Rating Desk on the credit rating of counterparties and, lastly, envisages second-level controls conducted by the Risk Management function, both for purposes of monitoring, and ex-ante. The tools available in the commercial network make it possible to analyse companies by collecting a wide range of information, including elements useful for identifying potential reputational risk factors.
The main drivers of the credit policy framework include the ESG score of counterparties. This score is directly impacted by the results of the ESG questionnaire which covers, in particular in the qualitative section, elements of potential reputational risk for environmental, social and governance aspects, and a specific question is also envisaged to be completed by the manager on the reputational aspects known to them not already covered by the questions in the questionnaire.
There are also two "fatal" questions on social and governance matters that can nullify the mitigation effect of the ESG questionnaire.

The activities carried out by the Rating Desk envisage the option to override the credit rating of counterparties, in a negative sense, in the presence of potential reputational risks of an ESG nature. These risks are identified by reviewing the news of the main newspapers on the counterparty analysed as well as the information acquired from the analysis of the Notes to the Financial Statements, the Report on Operations and, above all, the Independent Auditors' Report. If these events are considered material, an override/attribution is triggered with the appropriate ESG motive.
In order to carry out these assessments, the Rating Desk also makes use of the information provided by the manager, the decision maker or of the indications available in the ESG questionnaire. Its intervention may, in the most serious cases, lead the counterparty to be included on the watchlist.
The Risk Management function also manages the analysis of the reputational risk of counterparties, both as part of ex-ante assessments, and in periodic monitoring with reference to the second level controls.

Strategic risk

With reference to strategic risk, the Group completed a review of the main methodological assumptions to further strengthen assessments of short-term commercial objectives with the Business Plan targets, more oriented to a medium and long-term horizon, at the same time strengthening the strategic controls relating to the impacts of ESG factors and the overall evolution of digitalisation processes.
In particular, to calculate the economic capital measurement related to this risk, the quantitative KPIs underlying the main initiatives of the Group Strategic Plan are considered in order to provide the contribution of ESG issues to the overall measure of economic capital, as well as to carry out what-if and sensitivity analyses to assess changes in terms of capital absorption.

Real estate risk

Banco BPM refined the property risk model by including the physical risk and transition risk components in the estimation methodologies. In particular, in the measurements of economic capital used to assess the Group's capital adequacy, the impacts deriving from the potential occurrence of physical risk were considered, according to scenarios published by the Network for Greening the Financial System (NGFS), or used in the context of specific climate stress test exercises. Using these scenarios, the historical series of prices underlying the geographical clusters in which the properties owned by the Group are located are projected on a three-year basis in order to assess the potential increase in the relative volatility that then impacts, for the same real estate portfolio, the measurement of economic capital.

Equity Risk

With regard to equity risk, with reference to economic capital measures, similar assessments were carried out by the Group in order to include the impact of the climate component, again with respect to the scenarios mentioned above, taking advantage of the overlaps with the credit, banking and trading book input perimeter of the portfolio model. The underlying logic is the determination of an impairment loss (fair value) of the assets in the event of the occurrence of the above-mentioned risks. Specifically, climate risk assessment methods, scenarios and transmission channels are borrowed from the above for credit risk.

With reference to the climate stress test exercises carried out within the context of the Supervisory Authority requests, it should be noted that in the last quarter of 2023, the Group was engaged in preparatory activities for the first data collection exercise "Fit for 55 climate risk scenario analysis" conducted by the European Banking Authority (EBA) in collaboration with the ECB, which took place in early 2024. This exercise is part of the mandates received from the EBA, as part of the renewed sustainable finance strategy of the European Commission. Its primary objective is to assess the overall resilience of the banking sector with respect to the targets defined with the "Fit for 55" package and to acquire information on the ability of banks to support the transition to a low greenhouse gas emission economy. The participating intermediaries have provided the starting point values, as at 31 December 2022, of the required climate data, which are included in the banking sector module of the "One-off Fit for 55 climate risk scenario analysis". The forward-looking results of this module were obtained using the top-down climate risk stress test models developed by the ECB. At the end of May 2024 the ECB sent each participant an individual report that shows, for selected areas, the progress compared to the results of the 2022 SSM Climate Risk Stress Test, highlighting a good positioning of Banco BPM with respect to its peers. Lastly, in November 2024, ESA, ECB and ESBR published a joint report with the aggregate results for the year, which shows that, for the EU banking sector, the costs of the transition due to the application of the "Fit-for-55" package, equal to approximately 6% (€340 billion) of the value of the assets analysed,

(€5.9 trillion in loans and investments of the 110 SSM supervised banks), substantially neutralise further negative, purely climate-related impacts, but not their combination with other macroeconomic shocks.

The overall impacts of the ESG factors, particularly environmental and climate-related, resulting from the analyses conducted on the main types of material risk for the Group show a marginal exposure and materiality in consideration of the current risk score. Based on this analysis, the expected potential economic loss linked to C&E risks is low.
The outcomes of the monitoring of each type of risk, including the related ESG impacts, are periodically reported within both the respective vertical reporting and the Group's integrated reporting (Risk Appetite Monitoring - RAM).
In addition, the Group ensures its ability to adjust or adapt its strategy and business model to climate change in the short, medium and long term by integrating these aspects into its Strategic Plan, company operating processes and financial planning. In this regard, please see the chapter "*Material impacts, risks and opportunities and their interaction with the strategy and business model*".
The assets and business activities that require significant efforts to be compatible with the energy transition were identified by screening the credit portfolio and the proprietary investment portfolio, which allowed to identify the counterparties that will have to gradually reconvert their business or substantially change the production process to remain in the market.
These assessments are an integral part of the Credit Policy framework, within which each counterparty in the portfolio is associated with a transition risk on the basis of the economic sector of activity (NACE) in which it operates, expressed on a five-class scale: Very High, High, Medium, Negligible, Green.
Moreover, with reference to the five priority sectors selected by the Bank as part of its commitment to the NZBA, ad-hoc assessment logic has been introduced. In particular, as part of the credit policy risk assessment, a notching is calculated on the basis of point data, where available, on the counterparty's greenhouse gas emission intensities and their distance in relation to sector decarbonisation trajectories. These sectors are subject to more stringent credit strategies, in particular with regard to those counterparties that do not draw up Sustainability Reporting or the Non-Financial Statement or which, in general, have not begun a transition process towards a carbon-free economy.
In particular, the application of a run-off strategy is confirmed towards coal-related sectors, which are incompatible with the climate transition, consistent with the objective of progressively reducing direct exposure up to eliminating them by 2026, as indicated in the 2021-2024 Strategic Plan and confirmed by the 2023-2026 Strategic Plan and its updating to 2027.

Process of identifying and assessing impacts, risks and opportunities related to pollution

As part of the dual materiality analysis, the Group has implemented processes for identifying and assessing impacts, risks and opportunities related to the topic of pollution.
In particular, to identify and assess the **impacts** generated on pollution, the Banco BPM Group assessed:

- in the area of *own operations*: the level of air pollution generated through its offices and the performance of business operations (for example: polluting emissions from the company fleet, gas heating systems, etc.);
- in the upstream value chain, the level of exposure to particularly polluting sectors with reference to those in which the Group's suppliers operate;
- in the downstream value chain, the level of exposure to particularly polluting sectors with reference to those in which the counterparties to which the Group is exposed through loans and/or investments (including interests in associates and joint ventures) operate.

The main functions of the Parent Company involved in the identification and assessment process have formulated an expert-based judgement in order to assess these impacts. In particular, the opinion expressed on the level of the extent of the impacts generated by suppliers and customers/investments was expressed on the basis of the Group's exposure level to the sectors in which the main suppliers, customers, issuers of securities in the portfolio and interests in associates and joint ventures operate.
In order to identify and assess the **opportunities** linked to the topic of pollution, any commercial opportunities in terms of extension and creation of dedicated products were considered, as part of the downstream value chain (customers), in line with the needs of the counterparties to carry out investments or bear the costs of interventions aimed at reducing pollution. The main functions of the Parent Company involved in the identification and assessment process have expressed an expert-based judgement in order to assess these opportunities.
To identify and assess the **risks** linked to pollution, the credit risk deriving from (i) higher write-downs of mortgage collateral with reference to properties located in geographical areas and from debtors belonging to sectors exposed to pollution risk was taken into consideration as part of the downstream value chain, as well as deriving from (ii) additional costs that companies will be required to incur to adapt to the new standards on pollution. In particular, the

identification and assessment process carried out by the Parent Company's Risk Management function took advantage of a previous assessment and measurement of the exposure of the credit portfolio to non-financial companies with respect to environmental risks.
Following the assessments carried out by internal stakeholders on the basis of qualitative and quantitative criteria, Banco BPM considered the negative impact generated on the environment by loans to customers operating in sectors that contribute to air pollution as material. The results of the analyses conducted on the impact materiality and financial materiality front with reference to the issue of pollution were validated through the involvement of external stakeholders.
For further information on the stakeholder engagement methods carried out during the dual materiality analysis, please see the section "*Interaction of impacts, risks and opportunities with the strategy and business model*".

Process of identifying and assessing impacts, risks and opportunities related to water and marine resources

As part of the dual materiality analysis, Banco BPM has implemented processes for identifying and assessing impacts, risks and opportunities related to the topic water and marine resources.
In particular, to identify and assess the **impacts** generated on water and marine resources, the Group assessed:

- in the area of *own operations*: the impact of the water consumption of the Group's offices on the availability of water resources;
- in the upstream value chain: the Group's exposure level to suppliers operating in sectors whose production activities require significant water consumption and/or which, when finished using the water, discharge it incorrectly in groundwater;
- in the downstream value chain: the Group's exposure level, through loans and/or investments (including interests in associates and joint ventures) to counterparties that operate in sectors whose production activities require significant water consumption and/or which, when finished using the water, discharge it incorrectly in groundwater.

The main functions of the Parent Company involved in the identification and assessment process have formulated an expert-based judgement in order to assess these impacts. In particular, the opinion expressed on the level of the extent of the impacts generated by suppliers and customers/investments was assessed on the basis of the Group's exposure level to the sectors in which the main suppliers, customers, issuers of securities in the portfolio and interests in associates and joint ventures operate.
In order to identify and evaluate **opportunities** related to water and marine resources, Banco BPM considered, as part of the downstream value chain (customers), any commercial opportunities in terms of extension and creation of dedicated products, aligned with the needs of counterparties to make investments or bear costs with the aim of reducing water consumption, withdrawals discharge and water into the oceans and extraction and use of marine resources. The main functions of the Parent Company involved in the identification and assessment process have expressed an expert-based judgement in order to assess these opportunities.
In order to identify and assess the **risks** linked to the use of water resources, Banco BPM considered, as part of the downstream value chain, the credit risk deriving from:

- lower valuations of mortgage guarantees referring to properties exposed to hydraulic risk;
- additional costs that companies will be required to incur to adapt to the new standards regarding the use of water resources.

In particular, the identification and assessment process carried out by the Parent Company's Risk Management function took advantage of a previous assessment and measurement of the exposure of the credit portfolio to non-financial companies with respect to environmental risks.
The results of the DMA related to water and marine resources were validated through the involvement of external stakeholders who, in relation to the Group's scope of activities and its value chain, confirmed the assessment of non-applicability with respect to marine resources and non-material for the topics related to the water resources in question.
For further information on the Stakeholder Engagement methods carried out during the DMA, please see the section "*Interaction of impacts, risks and opportunities with the strategy and business model*".

Process of identifying and assessing impacts, risks and opportunities related to biodiversity and ecosystems

As part of the DMA, with reference to biodiversity and ecosystem issues, actual impacts were identified and assessed both with reference to *own operations* and along the upstream and downstream value chain.

In particular, to identify and assess the **impacts** generated on biodiversity and ecosystems, the Group:

- in the area of *own operations*, considered the positive impact on the protection of biodiversity deriving from the promotion of initiatives related to the protection and restoration of ecosystems carried out through the subsidiary Lido dei Coralli, which operates within a protected environmental area. The assessments carried out did not result in the materiality threshold being exceeded;
- in the upstream value chain, the impacts associated with activities in sectors that typically negatively impact biodiversity (for example: change in land use, desertification, deforestation, excessive urbanisation) of suppliers operating in the ICT, paper and catering sectors were considered;
- in the context of the downstream value chain (customers, investments and interests in associates and joint ventures), negative impacts were assessed from deforestation practices or the deterioration of ecosystems that risk being disrupted by intensive agriculture, extraction of raw materials and fossil fuels in the agricultural, agri-food, manufacturing, textile and clothing sectors. Ecosystem dependencies were also considered for these sectors.

The analysis conducted to assess the impacts identified upstream and downstream gave, in both cases, evidence of limited Group exposure to the most affected sectors, leading to an overall outcome of the materiality assessment below the materiality threshold.
The DMA related to biodiversity and ecosystems has brought **opportunities** to light deriving from the potential increase in the disbursement of loans for this purpose and/or the extension of the range of products aligned with the needs of counterparties for initiatives in favour of ecosystem restoration, protection of species biodiversity and reduction of impacts and dependencies in terms of ecosystem services. The Group has assessed the opportunities identified as non-material, taking into account:

- the possible presence of 2023-26 Strategic Plan objectives linked to the disbursement of products dedicated to the area in question;
- the current commercial offer;
- the definition of new products and services to be offered to customers.

In order to identify and assess the **risks** connected to the loss of biodiversity and the impacts on ecosystems, the Group has considered, in the context of the downstream value chain, the credit risk deriving from:

- lower valuations of mortgage collateral on properties against exposures to sectors or geographical areas vulnerable to the risk of biodiversity loss (physical risk);
- additional costs that companies will be required to incur to adapt to the new standards in terms of the preservation of biodiversity and ecosystems (transition risk).

In particular, the identification and assessment process carried out by the Parent Company's Risk Management function took advantage of a previous assessment and measurement of the exposure of the credit portfolio to non-financial companies with respect to environmental risks and did not identify material risks for the Group.
As part of the DMA, no consultations were conducted with the communities affected. The results of the analyses conducted on the impact materiality and financial materiality front with reference, inter alia, to the issue of biodiversity and ecosystems, were validated through the involvement of external stakeholders. For further information on the stakeholder engagement methods carried out during the DMA, please see the section *"Material topics - Impacts, risks and opportunities and their interaction with the strategy and business model"*.
The subsidiary Lido dei Coralli is located within a protected area. The related activity involves the management of a bathing establishment, in compliance with the regulations in force regarding the positioning within a protected area. With reference to 2024, it was not necessary to implement measures to mitigate the impacts on biodiversity deriving from the operations of the aforementioned company.

Process of identifying and assessing impacts, risks and opportunities related to resource use and circular economy

As part of the dual materiality analysis, the Group has implemented processes for identifying and assessing impacts, risks and opportunities related to the topic of resource use and circular economy.
In particular, in order to identify and assess the **impacts** generated with regard to resource use and circular economy, the following were considered:

- in *own operations*, the use of "virgin" raw materials compared to recycled, regenerated or recovered raw materials (for example, office paper, toner, IT devices);

- in the upstream value chain, the level of exposure to suppliers operating in sectors in which circular economy principles are not typically applied, employing critical resources in their production processes, without activating strategies to reduce resource use;
- in the downstream value chain, the level of exposure to counterparties belonging to sectors typically characterised by a linear economy and which are not committed to reducing the flow of incoming resources or reducing waste and outgoing resources not covered by recycling/recovery activities.

The main functions of the Parent Company involved in the process of identifying and assessing the impacts have formulated an expert-based opinion based on the Group exposure level to the sectors in which the main suppliers, customers, issuers of securities in the portfolio and interests in associates and joint ventures operate.
To identify and evaluate the **opportunities** related to resource use and circular economy, the following were considered:

- as part of the downstream value chain (customers), any commercial opportunities in terms of extension and creation of dedicated products, aligned with counterparties' needs for initiatives in favour of recycling, reuse and contribution to circular economy systems (reduction of resource inflows);
- as part of *own operations*, the potential improvement of the Group's brand reputation as well as the reduction of operating expenses following the definition of internal initiatives to support the circular economy.

The main Parent Company functions involved in the process of identifying and assessing opportunities have expressed an expert-based opinion.
In order to identify and assess the **risks** linked to resource use and circular economy, in the context of the downstream value chain, the credit risk deriving from additional costs and investments that companies will be required to bear to adapt to the new standards in circular economy was considered. In particular, the identification and assessment process carried out by the Parent Company's Risk Management function took advantage of a previous assessment and measurement of the exposure of the credit portfolio to non-financial companies with respect to environmental risks.
As a result of the assessments carried out by internal stakeholders on the basis of qualitative-quantitative criteria, the negative impact generated on the environment by suppliers operating in sectors with a high use of critical resources (e.g., extraction of virgin raw materials used in the technological components) was considered material. The results of the analyses conducted on the impact materiality and financial materiality front, with reference, inter alia, to the topics of resource use and circular economy, were validated through the involvement of external stakeholders. For further information on the stakeholder engagement methods carried out during the dual materiality analysis, please see the section "*Interaction of impacts, risks and opportunities with the strategy and business model*".

Process of identifying and assessing impacts, risks and opportunities related to business conduct

As part of the dual materiality analysis, the Group has implemented processes to identify and assess impacts, risks and opportunities related to the topic of business conduct in terms of culture, whistleblowing, anti-corruption and management of supplier relations. In particular, to identify and assess the **impacts**, the following were assessed:

- in the area of own operations, the activities carried out by the Group in terms of business and products/services offered, as well as the regulatory context in which it operates and the operating model adopted;
- in the upstream value chain, the exposure level to sectors particularly exposed to issues related to business conduct with reference to those in which the Group's suppliers operate;
- in the downstream value chain, the exposure level to sectors particularly exposed to issues related to business conduct with reference to those in which the counterparties to which the Group is exposed through loans and/or investments operate (including interests in associates and joint ventures).

The main functions of the Parent Company involved in the identification and assessment process have formulated an expert-based judgement in order to assess these impacts. In particular, the opinion on the extent of the impacts generated by suppliers and customers/investments was expressed on the basis of the Group's exposure level to the sectors in which the main suppliers, customers, issuers of securities in the portfolio and interests in associates and joint ventures operate.
To identify and assess the **risks** related to business conduct, the reputational, strategic and operating risk to which the Group is exposed was taken into consideration, with particular reference to the issues in question. In particular, the identification and assessment process carried out by the Parent Company's Risk Management function was based on an expert-based assessment of episodes of operational risks and expected impacts on the Group's brand reputation, also in light of the controls activated by the same.

In order to identify and assess the **opportunities** linked to the issue of business conduct, any improvements in the Group's brand reputation were considered in terms of the activation of particular processes and controls on the issues in question as well as the reduction of costs and operational efficiency through the optimisation of management processes in supplier relations. The main functions of the Parent Company involved in the identification and assessment process have expressed an expert-based judgement in order to assess these opportunities.
Following the assessments carried out by internal stakeholders on the basis of qualitative and quantitative criteria, the Banco BPM Group considered material:

- the positive impacts generated through dissemination of an adequate culture of ethics and corporate integrity (including controls with respect to its suppliers) and preparation of internal reporting processes and channels;
- the potential negative impacts generated in the event of unlawful conduct, disputes with customers and corruption and bribery.

The results of the analyses conducted on the impact materiality and financial materiality with reference to the issue of business conduct were validated through the involvement of external stakeholders. For further information on the stakeholder engagement methods carried out during the dual materiality analysis, please see the section "Interaction of impacts, risks and opportunities with the strategy and business model".

Material impacts, risks and opportunities and their interaction with strategy and business model

The impacts generated by the Group's operations (in terms of own operations or through the links in the upstream and downstream value chain) identified as material as a result of the DMA have positive and negative effects on people and the environment.
In general, the Group has a negative impact on the environment through:

- greenhouse gas emissions from activities carried out directly and indirectly by its customers and suppliers;
- disbursement of loans and investments to counterparties operating in sectors that contribute to air pollution;
- working with suppliers that use critical resources (for example virgin raw materials) without strategies to reduce the influx of resources.

At the same time, the Group has a positive impact on the environment through the promotion of loan products and services that accompany customers in the ecological transition and in the production of energy from renewable sources.
In addition, the Group has a positive impact on people and communities through:

- providing its workforce with quality employment, equal pay and skills development programmes;
- local initiatives dedicated to supporting communities;
- protection of the data of its workforce and customers, also indirectly through its suppliers;
- dissemination to customers of financial awareness, transparency and accessibility to products and services;
- dissemination of the culture of ethics and corporate integrity within the Group.

Finally, potential negative impacts on its workforce may derive from:

- injuries/near-misses/occupational diseases/work-related stress due to ineffective application of preventive actions;
- discriminatory wage disparities between employees.

In the case of potential impacts, during the dual materiality analysis, the Group estimated the time horizon within which the effects of the impact are reasonably expected. As a result of this exercise, the potential negative impacts on its stakeholders were material in the medium term and are attributable to:

- disputes, unlawful conduct and litigation arising, for example, from fraud, insider dealing, anti-competitive conduct, etc.;
- corruption and bribery.

The risks and opportunities to which the Group is exposed have repercussions on its economic and financial condition. In particular, the potential financial effects of the major risks of Banco BPM may lead to reductions in equity and worsening of the economic result through the following transmission channels:

- increase in defaults among carbon-emitting companies due to higher costs and investments that these companies undergo to reduce greenhouse gas emissions;
- impairment of properties used as collateral for loan transactions;
- decrease in the amount of liquidity deposited by customers due to withdrawals to cover costs and investments related to mitigation, energy efficiency or climate change adaptation;

- negative impacts deriving from the variability of bond and equity prices of issuers operating in sectors exposed to transition risk or energy-intensive sectors;
- losses caused by incorrect, untimely or inconsistent decisions due to the use of inadequate/estimated quality data or by “adverse” changes in ESG regulations;
- increase in defaults and the consequent loss (Loss Given Default (LGD)) due to the damages suffered by production sites/properties of customers located in climate/environmental risk areas and/or the need to incur higher costs and make specific investments for their prevention/mitigation.

Banco BPM has insurance coverage to protect the Group's instrumental assets, both tangible and intangible, and the assets backing its business operations, in addition to the coverage of damage typical of its activities, with a view to appropriately managing the transfer of operational risk.
The financial effects of the material opportunities that the Group can seize instead improve its financial performance, acting through the following transmission channels:

- expansion of the customer base;
- development of products that meet the needs of ESG counterparties;
- increase in the productivity of Group staff.

For details of the material IROs along the value chain or associated with the Group’s operations, please see the following table. In particular, there are no impacts, risks and opportunities other than those covered by the report obligations envisaged by the ESRS, for which it is not deemed necessary to use the specific additional disclosure.

The Group has embarked on a path to integrate significant social, environmental and governance impacts, risks and opportunities generated by the business model into activities, operating processes and governance mechanisms, starting with the Group's Strategic Plan that includes measurable ESG objectives and can be reached through the implementation of the operating model and monitoring dedicated KSIs.
The Group expects to continue to implement and direct its strategy in order to ensure the management and integration of emerging impacts, risks and opportunities in the short, medium and long term linked to sustainability, ensuring that the corporate operating and financial planning processes are adequate. In particular, considering the constantly evolving context, the Group expects to take action in the short and medium term to manage the emerging negative impacts that will be progressively integrated into the Group's strategy and business model with reference to:

- air pollution caused by operations in the downstream value chain (customers);
- use of critical materials in the upstream value chain (ICT suppliers).

The resilience of the strategy relies on:

- in the business model, the definition and offer of solutions, products and consulting services that support customers in the transition to a sustainable economy;
- in credit policies, the integration of ESG factors into the framework that makes it possible to define the Group's credit strategies;
- in the risk management process, the definition and implementation of assessments dedicated to monitoring the main ESG risk factors;
- in IT architecture and data governance, through developments of the IT infrastructure and related management of ESG data.

The following table shows the impacts, risks and opportunities identified as material in the dual materiality analysis. The details related to the metrics used to assess their performance and effectiveness are subsequently included in the respective Topical Standards.

ESRS Topic	ESRS sub-topic or sub-sub-topic	Perimeter	Negative impact (potential)	Positive impact (potential)	Risk	Opportunity
ESRS E1 Climate Change	Climate change mitigation	Upstream value chain	x			
		Own operations	x			x
		Downstream value chain	x	x	x	x
	Climate change adaptation	Downstream value chain			x	x
	Energy	Upstream value chain	x			
		Own operations	x			
		Downstream value chain	x	x		x
ESRS E2 Pollution	Air pollution	Downstream value chain	x			
ESRS 5 Resource use and circular economy	Resource inflows, including resource use	Upstream value chain	x			
S1 Own workforce	Secure employment, Working hours	Own operations		x		x
	Adequate wages	Own operations		x		
	Social dialogue, Freedom of association, existence of company committees and information rights, consultation and participation of workers, Collective bargaining	Own operations		x		
	Work-life balance	Own operations		x		
	Training and skills development	Own operations		x		
	Measures against workplace violence and harassment	Own operations		x		
	Diversity, Employment and inclusion of people with disabilities	Own operations		x		
	Confidentiality	Own operations		x		
	Health and safety	Own operations	x			
	Gender equality and equal pay for work of equal value	Own operations	x			
S3 Affected communities	Economic, social and cultural rights of communities, Civil and political rights of communities	Own operations		x		
		Downstream value chain				x
S4 Consumers and end-users	Confidentiality	Upstream value chain		x		
		Own operations		x		x
	Freedom of expression	Own operations		x		
	Access to quality information	Own operations		x		
	Access to products and services/Responsible business practices	Own operations		x		
		Downstream value chain				x
G1 Business conduct	Protection of whistleblowers	Own operations		x		
	Management of relations with suppliers, including payment practices	Own operations		x		
	Corporate culture	Own operations	(x)	x		
	Corruption and bribery	Own operations	(x)			

ESRS disclosure obligations included in this Sustainability Reporting

Content index

The report obligations that Banco BPM Group has fulfilled in preparing the Sustainability Reporting, based on the results of the materiality assessment, are reported below, indicating the sections of the document in which the related information is found.

Section	ESRS	Disclosure obligation and corresponding information	Section
General information	ESRS 2	BP-1 - General basis for preparation of sustainability statements	General basis for preparation of sustainability statements
		BP-2 - Disclosures in relation to specific circumstances	Disclosures in relation to specific circumstances
		GOV-1 - Role of the administrative, management and supervisory bodies	Role of the administrative, management and supervisory bodies
		GOV 2 - Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies
		GOV-3 - Integration of sustainability-related performance in incentive systems	Integration of sustainability-related performance in incentive systems
		GOV-4 - Statement on due diligence	Statement on due diligence
		GOV-5 - Risk management and internal controls over sustainability reporting	Risk management and internal controls over sustainability reporting
		SBM-1 - Strategy, business model and value chain	Strategy, business model and value chain
		SBM-2 - Interests and views of stakeholders	Stakeholder engagement activities
		SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model	Material impacts, risks and opportunities and their interaction with strategy and business model
		IRO-1 - Description of the processes to identify and assess material impacts, risks and opportunities	Process of identifying and assessing impacts, risks and opportunities
		IRO-2 - Disclosure requirements in ESRS covered by the undertaking's sustainability statement	Process for identifying and assessing impacts, risks and opportunities Disclosure requirements in ESRS covered by this Sustainability Reporting
Environmental information	E1 Climate change	ESRS 2 GOV-3 – Integration of sustainability-related performance in incentive systems	Integration of sustainability-related performance in incentive systems
		E1-1 –Transition plan for climate change mitigation	Transition plan for climate change mitigation
		ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model	Material impacts, risks and opportunities and their interaction with strategy and business model
		ESRS 2 IRO-1 - Description of the processes to identify and assess material climate-related impacts, risks and opportunities	Process of identifying and assessing impacts, risks and opportunities related to climate change and their interaction with the strategy and business model
		E1-2 – Policies related to climate change mitigation and adaptation	Policies related to climate change mitigation and adaptation
		E1-3 – Actions and resources in relation to climate change policies	Actions and resources in relation to climate change policies
		E1-4 – Targets related to climate change mitigation and adaptation	Targets related to climate change mitigation and adaptation
		E1-5 – Energy consumption and mix	Metrics on energy consumption and mix
		E1-6 – Gross Scopes 1, 2, 3 and Total GHG emissions	Metrics on Gross Scopes 1, 2, 3 and Total GHG emissions
		E1-7 – GHG removals and GHG mitigation projects financed through carbon credits	Metrics on GHG removals and GHG mitigation projects financed through carbon credits
	E2 Pollution	ESRS 2 IRO-1 - Description of the processes to identify and assess material pollution-related impacts, risks and opportunities	Process of identifying and assessing impacts, risks and opportunities related to pollution
		E2-1 - Policies related to pollution	Policies, Actions and Targets related to pollution
		E2-2 - Actions and resources related to pollution	Policies, Actions and Targets related to pollution
		E2-3 - Targets related to pollution	Policies, Actions and Targets related to pollution

Section	ESRS	Disclosure obligation and corresponding information	Section
	E3 Water and marine resources	ESRS 2 IRO-1 - Description of the processes to identify and assess material water and marine resources-related impacts, risks and opportunities	Process of identifying and assessing impacts, risks and opportunities related to water and marine resources
	E4 Biodiversity and ecosystems	ESRS 2 IRO-1 - Description of processes to identify and assess material biodiversity and ecosystem-related impacts, risks and opportunities	Process of identifying and assessing impacts, risks and opportunities related to biodiversity and ecosystems
	E5 Resource use and circular economy	ESRS 2 IRO-1 - Description of the processes to identify and assess material resource use and circular economy-related impacts, risks and opportunities	Process of identifying and assessing impacts, risks and opportunities related to resource use and circular economy
		E5-1 - Policies related to resource use and circular economy	Policies, Actions and Targets related to circular economy
		E5-2 - Actions and resources related to resource use and circular economy	Policies, Actions and Targets related to circular economy
		E5-3 - Targets related to resource use and circular economy	Policies, Actions and Targets related to circular economy
		E5-4 - Resource inflows	Metrics related to resource inflows
Social information	**S1 Own workforce**	ESRS 2 SBM-2 - Interests and views of stakeholders	Interests and views of own workers
		ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model	Significant impacts, risks and opportunities for own workers and their interaction with the strategy and business model
		S1-1 - Policies related to own workforce	Policies related to own workforce Policies related to the working conditions and well-being of own workforce Policies related to the health and safety of own workforce Policies related to equal pay and opportunities for own workforce Policies related to the confidentiality and correct processing of own workforce data
		S1-2 - Processes for engaging with own workers and workers' representatives about impacts	Processes for engaging with own workforce and channels for expressing concerns
		S1-3 - Processes to remediate negative impacts and channels for own workers to raise concerns	Processes for engaging with own workforce and channels for expressing concerns
		S1-4 - Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions	Definition and monitoring of actions for own workforce Actions related to the management of IROs in relation to the working conditions and well-being of own workforce Actions related to the management of IROs in relation to health and safety Actions related to the management of IROs in relation to equal pay and opportunities for own workforce Actions related to the management of IROs in relation to the confidentiality and correct processing of own workforce data
		S1-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Process of defining objectives related to own workforce Targets related to the working conditions and well-being of own workforce Targets related to the health and safety of own workforce Targets related to equal pay and opportunities for own workforce Targets related to confidentiality and proper processing of own workforce data
		S1-6 - Characteristics of the undertaking's employees	Metrics related to the characteristics of employees and non-employees in own workforce
		S1-7 - Characteristics of non-employee workers in the undertaking's own workforce	Metrics related to the characteristics of employees and non-employees in own workforce
		S1-8 - Collective bargaining coverage and social dialogue	Metrics related to adequate wages, remuneration and social protection
		S1-9 - Diversity metrics	Diversity and pay gap metrics

Section	ESRS	Disclosure obligation and corresponding information	Section
		S1-10 - Adequate wages	Metrics related to adequate wages, remuneration and social protection
		S1-11 - Social protection	Metrics related to adequate wages, remuneration and social protection
		S1-12 - Persons with disabilities	Diversity and pay gap metrics
		S1-13 - Training and skills development metrics	Training and skills development metrics
		S1-14 - Health and safety metrics	Health and safety metrics
		S1-15 - Work-life balance metrics	Work-life balance metrics
		S1-16 - Compensation metrics (pay gap and total compensation)	Diversity and pay gap metrics
		S1-17 - Incidents, complaints and severe human rights impacts	Metrics related to incidents, complaints and severe human rights impacts
	S3 Affected communities	ESRS 2 SBM-2 - Interests and views of stakeholders	Interests and opinions of the communities affected
		ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model	Material impacts, risks and opportunities for the affected communities and their interaction with strategy and business model
		S3-1 - Policies related to affected communities	Policies related to affected communities
		S3-2 - Processes for engaging with affected communities about impacts	Processes for engaging with affected communities and channels which allow to raise concerns
		S3-3 - Processes to remediate negative impacts and channels for affected communities to raise concerns	Processes for engaging with affected communities and channels which allow to raise concerns
		S3-4 - Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	Actions related to the management of IROs in relation to the communities concerned
		S3-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Targets related to the communities affected
	S4 Consumers and end-users	ESRS 2 SBM-2 - Interests and views of stakeholders	Interests and opinions of consumers
		ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model	Significant impacts, risks and opportunities for consumers and their interaction with the strategy and business model
		S4-1 - Policies related to consumers and end-users	Policies related to consumers and end-users
		S4-2 - Processes for engaging with consumers and end-users about impacts	Processes for engaging with consumers and end-users and channels for consumers and end-users to express concerns
		S4-3 - Processes to remediate negative impacts and channels for consumers and end-users to express concerns	Processes for engaging with consumers and end-users and channels for consumers and end-users to express concerns
		S4-4 - Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	Actions related to the management of IROs in relation to consumers and end-users
		S4-5 - Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	Targets related to consumers and end-users
Governance information	**G1 Business conduct**	ESRS 2 GOV-1 - Role of the administrative, management and supervisory bodies	Role of the administrative, management and supervisory bodies
		ESRS 2 IRO-1 - Description of the processes to identify and assess material impacts, risks and opportunities	Process of identifying and assessing impacts, risks and opportunities related to business conduct
		G1-1 - Policies on business culture and business conduct	Policies related to corporate culture and business conduct
		G1-2 - Management of relationships with suppliers	Management of relations with suppliers and metrics related to payment practices
		G1-3 - Prevention and detection of corruption and bribery	Prevention and identification of corruption and bribery and confirmed cases of corruption Actions related to the management of IROs in relation to business culture and business conduct
		G1-4 - Confirmed incidents of corruption or bribery	Prevention and identification of corruption and bribery and confirmed cases of corruption
		G1-6 - Payment practices	Management of relations with suppliers and metrics related to payment practices

Datapoints deriving from other EU legislative acts listed in Appendix B

Below are all the datapoints deriving from other EU legislative acts listed in Appendix B, indicating where they can be found in this document and indicating those assessed as non-material.

Disclosure requirements and corresponding datapoint	Reference to other EU legislative acts	Materiality	Section
ESRS 2 GOV-1 Gender diversity in the board, paragraph 21, letter d)	SFDR reference: Annex I, table 1, indicator no. 13 Reference Regulation on Benchmarks: Commission Delegated Regulation (EU) 2020/1816, annex II	Not subject to dual materiality analysis	"Role of the administrative, management and supervisory bodies"
ESRS 2 GOV-1 Percentage of independent members of the Board of Directors, paragraph 21, letter e)	Reference benchmark regulation: Commission Delegated Regulation (EU) 2020/1816, annex II	Not subject to dual materiality analysis	"Role of the administrative, management and supervisory bodies"
ESRS 2 GOV-4 Statement on due diligence, paragraph 30	SFDR reference: Annex I, table 3, indicator no. 10	Not subject to dual materiality analysis	"Declaration on due diligence obligations"
ESRS 2 SBM-1 Involvement in activities related to activities in the fossil fuel sector, paragraph 40, letter d), point i)	SFDR reference: Annex I, table 1, indicator no. 4 Third pillar reference: Article 449-bis of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453, Table 1 - Qualitative Information on environmental risk and Table 2 - Qualitative Information on social risk Reference benchmark regulation: Commission Delegated Regulation (EU) 2020/1816, annex II	Not subject to dual materiality analysis	*Disclosure subject to progressive entry into force*
ESRS 2 SBM-1 Involvement in activities related to chemical production, paragraph 40, letter d), point ii)	SFDR reference: Annex I, table 2, indicator no. 9 Reference benchmark regulation: Commission Delegated Regulation (EU) 2020/1816, annex II	Not subject to dual materiality analysis	*Disclosure subject to progressive entry into force*
ESRS 2 SBM-1 Participation in activities related to controversial weapons, paragraph 40, letter d), point iii)	SFDR reference: Annex I, table 1, indicator no. 14 Reference benchmark regulation: Article 12, paragraph 1) of Delegated Regulation (EU) 2020/1818 and annex II of Delegated Regulation (EU) 2020/1816	Not subject to dual materiality analysis	*Disclosure subject to progressive entry into force*
ESRS 2 SBM-1 Involvement in activities related to the cultivation and production of tobacco, paragraph 40, letter d), point iv)	Reference benchmark regulation, Article 12, paragraph 1) of Delegated Regulation (EU) 2020/1818 and annex II of Delegated Regulation (EU) 2020/1816	Not subject to dual materiality analysis	"Strategy, business model and value chain"
ESRS E1-1 Transition plan to achieve climate neutrality by 2050, paragraph 14	EU climate legislation reference: Article 2, paragraph 1) of Regulation (EU) 2021/1119	Material	"Transition plan for climate change mitigation"
ESRS E1-1 Companies excluded from the benchmarks aligned with the Paris Agreement, paragraph 16, letter g)	Third pillar reference: Article 449-bis of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking portfolio - Indicators of potential transition risk related to climate change: credit quality of exposures by sector, emissions and residual maturity Reference benchmark regulation: Article 12, paragraph 1, letters d) to g) and paragraph 2 of Delegated Regulation (EU) 2020/1818	Material	*Disclosure not applicable, as paragraph 16 is not reported due to lack of the Transition Plan. In any case, it should be noted that the Group is not excluded from benchmarks aligned with the Paris Agreement.*
ESRS E1-4 GHG emission reduction targets, paragraph 34	SFDR reference: Annex I, table 2, indicator no. 4 Third pillar reference: Article 449-bis of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3: Banking book - Indicators of potential transition risk related to climate change: alignment metrics Reference benchmark regulation: Article 6 of Delegated Regulation (EU) 2020/1818	Material	"Targets related to climate change mitigation and adaptation"
ESRS E1-5 Energy consumption from fossil fuels broken down by source (high climate impact sectors only), paragraph 38	SFDR reference: Annex I, table 1, indicator no. 5 and annex I, table 2, indicator no. 5	Material	"Metrics on energy consumption and mix"
ESRS E1-5 Energy consumption and mix, paragraph 37	SFDR reference: Annex I, table 1, indicator no. 5	Material	"Metrics on energy consumption and mix"
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors, paragraphs 40 to 43	SFDR reference: Annex I, table 1, indicator no. 6	Material	"Metrics on energy consumption and mix"
ESRS E1-6 Gross Scope 1, 2, 3 and total GHG emissions, paragraph 44	SFDR reference: Annex I, table 1, indicators no. 1 and 2 Third pillar reference: Article 449-bis of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking portfolio - Indicators of potential transition risk related to climate change: credit quality of exposures by sector, emissions and residual maturity Reference benchmark regulation: Article 5, paragraph 1), Article 6 and Article 8, paragraph 1) of Delegated Regulation (EU) 2020/1818	Material	"Metrics on Gross Scopes 1, 2, 3 and Total GHG emissions"

Disclosure requirements and corresponding datapoint	Reference to other EU legislative acts	Materiality	Section
ESRS E1-6 Gross GHG emissions intensity, paragraphs 53 to 55	SFDR reference: Annex I, table 1, indicator no. 3 Third pillar reference: Article 449-bis of Regulation (EU) no. 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3: Banking book - Indicators of potential transition risk related to climate change: alignment metrics Reference benchmark regulation: Article 8, paragraph 1 of Delegated Regulation (EU) 2020/1818	Material	"Metrics on Gross Scopes 1, 2, 3 and Total GHG emissions"
ESRS E1-7 GHG removals and carbon credits, paragraph 56	EU climate legislation reference: Article 2, paragraph 1) of Regulation (EU) 2021/1119	Material	"Metrics on GHG removals and GHG mitigation projects financed through carbon credits"
ESRS E1-9 Exposure of the benchmark index portfolio to climate-related physical risks, paragraph 66	Reference benchmark regulation, Annex II of Delegated Regulation (EU) 2020/1818 and annex II of Delegated Regulation (EU) 2020/1816	Material	*Disclosure subject to progressive entry into force*
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk, paragraph 66, letter a) ESRS E1-9 Position of significant activities at material physical risk, paragraph 66, letter c)	Third pillar reference: Article 449-bis of Regulation (EU) no. 575/2013; points 46 and 47 of Commission Implementing Regulation (EU) 2022/2453; Template 5: Banking book - Indicators of potential physical risk related to climate change: exposures subject to physical risk	Material	*Disclosure subject to progressive entry into force*
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy efficiency classes, paragraph 67, letter c)	Third pillar reference: Article 449-bis of Regulation (EU) no. 575/2013; point 34 of Commission Implementing Regulation (EU) 2022/2453; Model 2: Banking book - Indicators of potential transition risk related to climate change: loans secured by real estate - Energy efficiency of collateral	Material	*Disclosure subject to progressive entry into force*
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities, paragraph 69	Reference benchmark regulation: Annex II of Delegated Regulation (EU) 2020/1818	Material	*Disclosure subject to progressive entry into force*
ESRS E2-4 Amount of each pollutant listed in annex II of the E-PRTR (European Pollutant Emissions and Transfer Register) released to air, water and soil, paragraph 28	SFDR reference: Annex I, table 1, indicator no. 8; annex I, Table 2, indicator no. 2; annex 1, table 2, indicator no. 1; annex I, Table 2, indicator no. 3	Not material	
ESRS E3-1 Water and marine resources, paragraph 9	SFDR reference: Annex I, table 2, indicator no. 7	Not material	
ESRS E3-1 Dedicated policy, paragraph 13	SFDR reference: Annex I, table 2, indicator no. 8	Not material	
ESRS E3-1 Sustainability of the oceans and seas, paragraph 14	SFDR reference: Annex I, table 2, indicator no. 12	Not material	
ESRS E3-4 Total water recycled and reused, paragraph 28, letter c)	SFDR reference: Annex I, table 2, indicator no. 6.2	Not material	
ESRS E3-4 Total water consumption in m3 compared to net revenue from own operations, paragraph 29	SFDR reference: Annex I, table 2, indicator no. 6.1	Not material	
ESRS 2 IRO-1 - E4 paragraph 16, letter a), point i)	SFDR reference: Annex I, table 1, indicator no. 7	Not subject to dual materiality analysis	*Disclosure subject to progressive entry into force*
ESRS 2 IRO-1 - E4 paragraph 16, letter b)	SFDR reference: Annex I, table 2, indicator no. 10	Not subject to dual materiality analysis	*Disclosure subject to progressive entry into force*
ESRS 2 IRO-1 - E4 paragraph 16, letter c)	SFDR reference: Annex I, table 2, indicator no. 14	Not subject to dual materiality analysis	*Disclosure subject to progressive entry into force*
ESRS E4-2 Sustainable agricultural/land use policies or practices, paragraph 24, letter b)	SFDR reference: Annex I, table 2, indicator no. 11	Not material	
ESRS E4-2 Sustainable sea/ocean use practices or policies, paragraph 24, letter c)	SFDR reference: Annex I, table 2, indicator no. 12	Not material	
ESRS E4-2 Policies to address deforestation, paragraph 24, letter d)	SFDR reference: Annex I, table 2, indicator no. 15	Not material	
ESRS E5-5 Non-recycled waste, paragraph 37, letter d)	SFDR reference: Annex I, table 2, indicator no. 13	Not material	

Disclosure requirements and corresponding datapoint	Reference to other EU legislative acts	Materiality	Section
ESRS E5-5 Hazardous waste and radioactive waste, paragraph 39	SFDR reference: Annex I, table 1, indicator no. 9	Not material	
ESRS 2 - SBM3 - S1 Forced labour risk, paragraph 14, letter f)	SFDR reference: Annex I, table 3, indicator no. 13	Material	"Material impacts, risks and opportunities for own workers and their interaction with the strategy and business model"
ESRS 2 - SBM3 - S1 Child labour risk, paragraph 14, letter g)	SFDR reference: Annex I, table 3, indicator no. 12	Material	"Material impacts, risks and opportunities for own workers and their interaction with the strategy and business model"
ESRS S1-1 Human rights policy commitments, paragraph 20	SFDR reference: Annex I, table 3, indicator no. 9 and annex I, table 1, indicator no. 11	Material	"Processes for engaging with own workforce and channels which allow to raise concerns"
ESRS S1-1 Due diligence policies on issues addressed by the International Labour Organisation Core Conventions 1 to 8, paragraph 21	Reference benchmark regulation: Commission Delegated Regulation (EU) 2020/1816, annex II	Material	"Policies related to the health and safety of own workforce"
ESRS S1-1 Procedures and measures to prevent trafficking in human beings, paragraph 22	SFDR reference: Annex I, table 3, indicator no. 11	Material	"Policies related to own workforce"
ESRS S1-1 Work-related injury prevention policy or management system, paragraph 23	SFDR reference: Annex I, table 3, indicator no. 1	Material	"Policies related to the health and safety of own workforce"
ESRS S1-3 Grievance/complaint handling mechanisms, paragraph 32, letter c)	SFDR reference: Annex I, table 3, indicator no. 5	Material	"Processes for engaging with own workforce and channels which allow to raise concerns"
ESRS S1-14 Number of deaths and number and rate of work-related injuries, paragraph 88, letters b) and c)	SFDR reference: Annex I, table 3, indicator no. 2 Reference benchmark regulation: Commission Delegated Regulation (EU) 2020/1816, annex II	Material	"Health and safety metrics"
ESRS S1-14 Number of days lost due to injuries, accidents, fatalities or illnesses, paragraph 88, letter e)	SFDR reference: Annex I, table 3, indicator no. 3	Material	"Health and safety metrics"
ESRS S1-16 Unadjusted gender pay gap, paragraph 97, letter a)	SFDR reference: Annex I, table 1, indicator no. 12 Reference benchmark regulation: Commission Delegated Regulation (EU) 2020/1816, annex II	Material	"Diversity and pay gap metrics"
ESRS S1-16 Excessive pay gap in favour of the CEO, paragraph 97, letter b)	SFDR reference: Annex I, table 3, indicator no. 8	Material	"Metrics related to adequate wages, remuneration and social protection"
ESRS S1-17 Incidents related to discrimination, paragraph 103, letter a)	SFDR reference: Annex I, table 3, indicator no. 7	Material	"Metrics related to incidents, complaints and serious impacts on human rights"
ESR S1-17 Failure to comply with the UN Guiding Principles on Business and Human Rights and OECD principles, paragraph 104, letter a)	SFDR reference: Annex I, table 1, indicator no. 10 and annex I, table 3, indicator no. 14 Reference benchmark regulation: Annex II of Delegated Regulation (EU) 2020/1816 and Article 12, paragraph 1 of Delegated Regulation (EU) 2020/1818	Material	"Metrics related to incidents, complaints and serious impacts on human rights"
ESRS 2 SBM-3 - S2 Serious risk of child labour or forced labour in the labour chain, paragraph 11, letter b)	SFDR reference: Annex I, table 3, indicators no. 12 and 13	Not material	
ESRS S2-1 Political commitments on human rights, paragraph 17	SFDR reference: Annex I, table 3, indicator no. 9 and annex I, table 1, indicator no. 11	Not material	
ESRS S2-1 Policies related to workers in the value chain, paragraph 18	SFDR reference: Annex I, table 3, indicators no. 11 and 4	Not material	
ESRS S2-1 Failure to comply with UN Guiding Principles on Business and Human Rights and OECD Guidelines, paragraph 19	SFDR reference: Annex I, table 1, indicator no. 10 Reference benchmark regulation: Annex II of Delegated Regulation (EU) 2020/1816 and Article 12, paragraph 1) of Delegated Regulation (EU) 2020/1818	Not material	
ESRS S2-1 Due diligence policies on issues addressed by the International Labour Organisation Core Conventions 1 to 8, paragraph 19	Reference benchmark regulation: Commission Delegated Regulation (EU) 2020/1816, annex II	Not material	
ESRS S2-4 Human rights issues and incidents in its upstream and downstream value chain, paragraph 36	SFDR reference: Annex I, table 3, indicator no. 14	Not material	

Disclosure requirements and corresponding datapoint	Reference to other EU legislative acts	Materiality	Section
ESRS S3-1 Human rights policy commitments, paragraph 16	SFDR reference: Annex I, table 3, indicator no. 9 and annex I, table 1, indicator no. 11	Material	"Processes for engaging affected communities and channels which allow to raise concerns" "Policies related to affected communities"
ESRS S3-1 Failure to comply with UN Guiding Principles on Business and Human Rights, ILO Principles or OECD Guidelines, paragraph 17	SFDR reference: Annex I, table 1, indicator no. 10 Reference benchmark regulation: Annex II of Delegated Regulation (EU) 2020/1816 and Article 12, paragraph 1) of Delegated Regulation (EU) 2020/1818	Material	"Policies related to the affected communities"
ESRS S3-4 Human rights issues and incidents, paragraph 36	SFDR reference: Annex I, table 3, indicator no. 14	Material	"Policies related to the affected communities"
ESRS S4-1 Policies related to consumers and end-users, paragraph 16	SFDR reference: Annex I, table 3, indicator no. 9 and annex I, table 1, indicator no. 11	Material	"Policies related to consumers and end-users"
ESRS S4-1 Failure to comply with UN Guiding Principles on Business and Human Rights and OECD Guidelines, paragraph 17	SFDR reference: Annex I, table 1, indicator no. 10 Reference benchmark regulation: Annex II of Delegated Regulation (EU) 2020/1816 and Article 12, paragraph 1) of Delegated Regulation (EU) 2020/1818	Material	"Policies related to consumers and end-users"
ESRS S4-4 Human rights issues and incidents, paragraph 35	SFDR reference: Annex I, table 3, indicator no. 14	Material	"Actions related to the management of IROs in relation to consumers and end-users"
ESRS G1-1 United Nations Convention against corruption, paragraph 10, letter b)	SFDR reference: Annex I, table 3, indicator no. 15	Material	"Policies on business culture and business conduct"
ESRS G1-1 Protection of whistleblowers, paragraph 10, letter d)	SFDR reference: Annex I, table 3, indicator no. 6	Material	"Policies on business culture and business conduct"
ESRS G1-4 Fines imposed for violations of the laws against corruption and bribery, paragraph 24, letter a)	SFDR reference: Annex I, table 3, indicator no. 17 Reference benchmark regulation: Annex II of Delegated Regulation (EU) 2020/1816	Material	"Prevention and detection of corruption and bribery and confirmed cases of corruption"
ESRS G1-4 Anti-corruption and anti-bribery standards, paragraph 24, letter b)	SFDR reference: Annex I, table 3, indicator no. 16	Material	"Prevention and detection of corruption and bribery and confirmed cases of corruption"

ENVIRONMENTAL INFORMATION

Climate change

The following table provides a description of the impacts, risks and opportunities that the Group has assessed as material in relation to climate change following its dual materiality assessment.

ESRS Topic, sub-topic, or sub-sub-topic	IRO	Perimeter	Description	Metrics used to assess performance and effectiveness in relation to a material IRO
Climate change mitigation	Negative impact	Upstream value chain	Generation of greenhouse gas emissions from activities carried out by Group suppliers	E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions
		Own operations	Generation of greenhouse gas emissions from activities conducted by the Group in carrying out its business	E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions E1-7 GHG removals and GHG mitigation projects financed through carbon credits
		Downstream value chain	Loans and investments (incl. interests in associates and joint ventures) in sectors and companies that generate greenhouse gas emissions, that contribute to the acceleration of climate change and/or have inadequate/delayed decarbonisation plans	E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions
	Positive impact	Downstream value chain	Promotion of loan products and services that accompany counterparties in the transition to an economy with low global greenhouse gas emissions	
	Transition risk	Downstream value chain	Economic losses related to financial and non-financial risks caused by counterparties exposed to transition risk (e.g., increase in default among carbon-emitting companies that need to incur higher costs and make specific investments for technological development aimed at reducing CO_2 emissions or energy efficiency).	
	Opportunity	Own operations	Improvement of the Group's reputation deriving from the definition and achievement of targets in support of climate change mitigation (e.g., achievement of the Carbon Neutrality targets deriving from membership in the Net Zero Banking Alliance)	E1-7 GHG removals and GHG mitigation projects financed through carbon credits
		Downstream value chain	Increase in the disbursement of targeted loans and/or extension of the range of products aligned with the climate change mitigation needs of counterparties (e.g., disbursement of new green and low transition risk loans to companies and SMEs), consolidating leadership in the Business & Corporate Investment Banking segment (e.g., products that finance the transition to energy from renewable sources, such as solar and wind power, and reduced use of fossil fuels for the benefit of electricity from renewable sources, such as the electrification of processes and mobility)	
Climate change adaptation	Physical risk	Downstream value chain	Risk of incurring economic losses related to the occurrence of financial and non-financial risks caused by counterparties exposed to physical risk (e.g., decrease in cash deposits due to large withdrawals following adverse events, impairment of properties in areas exposed to physical risks)	
	Opportunity		Increase the disbursement of targeted loans and/or extend the range of products aligned with the needs of counterparties in terms of climate change adaptation (e.g., granting loans for the implementation of data backup and recovery systems, loan for infrastructure/work for climate change adaptation such as rainwater collectors for adaptation to periods of prolonged drought, construction of works to protect buildings in case of floods)	

ESRS Topic, sub-topic, or sub-sub-topic	IRO	Perimeter	Description	Metrics used to assess performance and effectiveness in relation to a material IRO
Energy	Negative impact	Upstream value chain	Generation of energy consumption generated by Group suppliers	
		Own operations	Generation of energy consumption generated by the Group's activities	E1-5 Energy consumption and mix
		Downstream value chain	Loans and investments in sectors and companies with high energy impact dependent on high amounts of energy generated from fossil sources that slow down the transition to renewable energies and low-emission technologies	
	Positive impact	Downstream value chain	Promotion of loan/investment products and services to support solutions that promote the self-production of energy from renewable sources such as solar, wind, hydroelectric and biomass and energy efficiency.	
	Opportunity	Downstream value chain	Increase the disbursement of targeted loans and/or extend the range of products aligned with the needs of counterparties in terms of energy efficiency of buildings and production activities	

Transition plan for climate change mitigation

The Group does not yet have a transition plan which is aligned with the ESRS requirements; it will publish the transition plan for climate change mitigation of its financed emissions in relation to the priority sectors defined in terms of the NZBA by the beginning of August 2025. In particular, in relation to the project for developing its transition plan, Banco BPM:

- has endorsed the NZBA agreement since March 2023 and plans activities to achieve the Net Zero targets, in particular having communicated to the market in August 2024 the interim decarbonisation targets to 2030 for the priority sectors identified;
- continuously supports customers in their transition process, also by proposing products that facilitate their transition;
- implements and progressively refines an assessment process (also through the formulation of dedicated climate sheets for the counterparties in scope pursuant to the NZBA priority sectors intended for decision-making bodies) and monitoring of ESG risk factors (including the integration of specific KSIs in the RAF), in particular climate control;
- updated credit policies for 2025 to support the transition in the most impactful sectors in order to mitigate climate risk, which are precisely the priority sectors pursuant to the NZBA;
- updates the roles of the Board of Directors and Top Management and implements new remuneration and incentive policies linked to ESG objectives, including climate mitigation objectives in line with those set out in the Strategic Plan;
- promotes ESG culture with training initiatives dedicated to all employees and to financed companies, in order to maximise the effectiveness of its policies, including in the field of climate mitigation.

Policies related to climate change mitigation and adaptation

The sustainability policies adopted by the Group deal with:

- issues related to **climate change mitigation**. In particular, the policies adopted aim to:
  - reduce the impact of employee mobility with sustainable mobility solutions such as carpooling platforms, low-emission company cars and agreements with public transport operators;
  - implement solutions and technologies that promote virtual communication, also leveraging projects like smart learning and smart working;
  - stimulate virtuous conduct in employees in relation to environmental issues;
  - design and provide training sessions for employees on environmental protection, the importance of energy efficiency and climate change, in order to emphasise the impact of individual behaviour within collective responsibility;
  - maintain a constant level of information and awareness regarding sustainable mobility policies;
  - ensure appropriate prevention and protection measures in emergency situations, as required by legislation in force;
  - provide a framework aimed at integrating ESG risks in the provision of investment services;
  - engage in conduct and offer solutions that help customers to effectively manage the transition to a sustainable economy;

- define, with regard to lending, exclusionary policies and selective approaches to high-risk ESG sectors. To this end, climate and environmental risks are integrated into credit policies and the overall risk management framework, with particular attention to the transition risk associated with the counterparty's sector, assessing its emission profile and reduction path, and the physical risks to which production properties and properties used as collateral for loan transactions are exposed;

- issues related to **climate change adaptation**. In particular, the policies adopted aim to:
  - assess the impacts of adverse climatic and environmental events (e.g., floods, droughts, fires, etc.) which could cause disruptions to customers' business continuity, considering the consequent need to disburse loans aimed at restoring full operations;
  - integrate the assessment of a client's exposure to climate and environmental risks in lending policies and in the overall risk management framework. In particular, the negative impacts of climatic/physical phenomena on the credit rating of the counterparty and on the value of the assets guaranteeing the loans granted are considered;

- issues related to energy efficiency and renewable energy deployment, with regard to which the policies of Banco BPM aim to:
  - confirm the use of only electricity from renewable sources for offices and branches;
  - implement energy plans with continuous improvement objectives in terms of energy consumption, supply and efficiency;
  - promote, in renovations and new builds, choices and solutions aimed at improving energy performance and reducing emissions.

The main policies adopted to manage issues related to climate change mitigation and adaptation are:
- Guidelines on the management of environmental and energy issues and the fight against climate change;
- Guidelines for the integration of sustainability factors in the investment strategies of the proprietary portfolio;
- Guidelines on the integration of sustainability risks in the provision of investment services to customers;
- Regulations on the integration of sustainability factors in the provision of investment services.

Guidelines on the management of environmental and energy issues and the fight against climate change

The Guidelines on the management of environmental and energy issues and the fight against climate change, applied by the entire Group along the entire value chain, which also includes its own operations, regulate principles, roles and responsibilities regarding the management of the environmental, energy and climate change mitigation issues, with greater attention to the impacts deriving from the choices and actions implemented by the Group companies. In particular, they define the principles and values that guide the Group in this area, directing its strategic and operational choices, with greater detail with respect to the direct and indirect impacts deriving from its operations.
The main objectives of the Guidelines in question are to reduce the environmental impact and support the transition towards a low greenhouse gas emission economy, making it possible to:
- manage direct and indirect negative impacts related to climate change mitigation and energy consumption, referring to the entire value chain, including its own operations;
- favour direct and indirect positive impacts related to climate change mitigation and energy consumption, referring to the downstream value chain;
- manage the transition risk linked to climate change mitigation and the physical risks linked to climate change adaptation, referring to the downstream value chain;
- seize the opportunities deriving from the actions taken by the Group or its customers in order to support climate change mitigation, climate change adaptation and energy consumption.

Through the application of the aforementioned Guidelines, the Environment, Social and Governance (ESG) Management Committee ensures monitoring the implementation and alignment of corporate strategies and initiatives in the field of environment, energy and climate change.
ensures monitoring the implementation and alignment of corporate strategies and initiatives in the field of environment, energy and climate change.
In addition, with the implementation of the aforementioned Guidelines, the Group undertakes to:
- respect the principles of the Global Compact and the Sustainable Development Goals (SDGs) promoted by the United Nations and in Agenda 2030;

- favour the plan to align loan and investment portfolios aimed at achieving the goal of net zero greenhouse gas emissions by 2050, in line with the targets set by the Paris Climate Agreement and with the interim targets to 2030 published by the Group for the five priority sectors (sectors with high greenhouse gas emissions present in the Bank's portfolios: Automotive, Cement, Coal, Oil and Gas, Power Generation) following membership in the Net-Zero Banking Alliance.

The highest management level responsible for the enforcement of the aforementioned Guidelines coincides with the role of the Chief Executive Officer.
An extract of the Guidelines on the management of environmental and energy issues and the fight against climate change is made available to stakeholders on the Group's website. Internal stakeholders can consult the full version of the document on the company intranet.

Guidelines for the integration of sustainability factors in the investment strategies of the proprietary portfolio

The Guidelines for the integration of sustainability factors in the investment strategies of the proprietary portfolio, applied by the Parent Company at the level of the downstream value chain, regulate the principles, roles and responsibilities regarding the integration of environmental, social and governance sustainability factors in the proprietary portfolio investment strategy.
In particular, they define the principles and values that guide the Parent Company in this area, directing its strategic and operational choices, with greater detail with respect to the direct and indirect impacts deriving from its operations.
In particular, the document describes:

- the exclusion criteria, aimed at avoiding investments in issuers whose activities or sectors could worsen the Group's ESG profile;
- the inclusion criteria through which the bank undertakes to encourage investments in companies that are most active in the field of environmental responsibility and respect for human and minority rights, as well as investments in bonds aimed at financing environmental and social projects as well as projects for improving the issuer's governance.

The Guidelines in question seek to build portfolios that avoid financing activities that are not aligned with the Group's ESG profile, instead including those considered virtuous from an environmental, social and governance point of view, making it possible to:

- manage the indirect negative impacts generated by investments in sectors and companies:
  - that generate greenhouse gas emissions, accelerating climate change and/or which have inadequate/delayed decarbonisation plans;
  - with high energy impact dependent on high amounts of energy generated from fossil sources that slow down the transition to renewable energies and low-emission technologies;
- manage the transition risk linked to climate change mitigation and the physical risks linked to climate change adaptation, referring to the downstream value chain.

The highest management level responsible for enforcing the Guidelines on the integration of sustainability factors in the investment strategies of the proprietary portfolio coincides with the role of the Chief Executive Officer.
The Guidelines are made available to internal stakeholders via the company intranet.

Guidelines on the integration of sustainability risks in the provision of investment services to customers

The Guidelines on the integration of sustainability risks in the provision of investment services to customers apply to Banco BPM and Banca Aletti at the downstream value chain level and govern the principles, roles and responsibilities regarding the integration of risks relating to ESG issues in the provision of investment services and, in particular, in investment consulting and portfolio management.
The objectives of the Guidelines in question are the identification of investment opportunities connected with a sustainable development model and to the offer of high-quality products and services, keeping pace with the reference regulatory and market developments.
The application of the regulations related to the collection of sustainability preferences in the context of MiFID envisages, for customers who have indicated a high level of interest, the possibility of proposing products that have the objective of:

- favouring positive impacts related to climate change mitigation and energy, referring to the downstream value chain;

- seizing opportunities related to climate change mitigation, climate change adaptation and energy, referring to the downstream value chain.

The Guidelines envisage that the monitoring process on investment activities ensures that the services and products offered in the catalogue (e.g., UCIs, management lines, issue of administered savings instruments) remain consistent over time in relation to risk profiles and customer needs (by filling in the appropriate questionnaire).
Through the enforcement of the Guidelines, the company undertakes to comply with the provisions of Regulation (EU) 2019/2088 (also "SFDR"), Directive 2014/65/EU (also "MiFID II"), as supplemented by Regulation (EU) 2017/565, and by Regulation (EU) 2020/852 (also referred to as the "Taxonomy Regulation").
The highest management level responsible for enforcing the Guidelines on the integration of sustainability risks in the provision of investment services coincides with the role of the Chief Executive Officer.
The Guidelines are made available to stakeholders on the institutional website of Banco BPM and Banca Aletti as indicated by the SFDR regulations.

Regulations on the integration of sustainability factors in the provision of investment services – Banco BPM Invest SGR

The Regulations on the integration of sustainability factors in the provision of investment services applies to Banco BPM Invest SGR at the downstream value chain level and governs the principles, roles and responsibilities regarding the integration of ESG factors in the performance of investment activities and services, particularly in collective asset management and portfolio management services.[1]
The objective of integrating ESG factors is pursued through the application of exclusion and inclusion principles, as well as criteria aimed at encouraging investments in products that promote investments with environmental or social characteristics, or a combination of these characteristics, and provided that the managers and the AIFs, in which the investments are made, comply with good governance practices, allowing:

- managing negative impacts related to climate change mitigation and energy, referring to the downstream value chain;
- favouring positive impacts related to climate change mitigation and energy, referring to the downstream value chain;
- managing the transition risk linked to climate change mitigation, referring to the downstream value chain.

The Regulations envisage monitoring following completion of the investment in order to verify that the ESG factors analysed and the declared requirements are periodically monitored.
The highest management level responsible for the enforcement of the aforementioned Regulations coincides with the role of the Chief Executive Officer of Banco BPM Invest SGR.
The Regulations are available to stakeholders on the institutional website of Banco BPM Invest SGR, as indicated by the SFDR regulations.

Actions and resources in relation to climate change policies

The Group has adopted and planned multiple actions in order to manage relevant climate change issues, as well as to achieve the purposes and objectives of its internal policies.
In particular, in order to achieve the objectives set by the Guidelines on the management of environmental and energy issues and the fight against climate change, the main actions adopted by the Group relate to:

- the efficient use of energy by replacing obsolete boilers and installing new refrigeration units and/or heat pumps;
- with reference to atmospheric emissions, the use of agile work and training solutions (including remote working and remote learning) and initiatives aimed at promoting sustainable corporate mobility;
- the preparation of a range of products and services to ensure more favourable access to capital for customers affected by transition paths towards a sustainable economy, contributing to the fight against and mitigating climate change, through:
    - the purchase of ESG bonds within the securities portfolio owned by the Parent Company;
    - updating the Green, Social & Sustainability Bonds Framework and the contextual definition of a Green, Social & Sustainability Bonds emission plan based on the updated framework;
    - implementing a dedicated process for measuring and monitoring lending performance in the context of low-carbon disbursements;

[1] It should be noted that as at 31 December 2024, the Company had not yet carried out savings management activities for third party customers, it only holds the Asset Management of Banco BPM.

- allocating specific objectives for the Commercial Networks in terms of volumes disbursed, consistent with the objectives set in the context of low-carbon disbursements.

The Group has implemented and planned numerous actions as detailed below, but has not yet published a climate transition plan and therefore a list of climate change mitigation actions broken down by decarbonisation lever. In any case, as is clear in this paragraph, the analysis of the actions did not reveal any significant monetary amounts necessary for the enforcement of the actions undertaken or planned.

Lastly, in line with what the Group declares in the Code of Ethics, namely to believe "*in the distinctive value of the professionalism and merit of our people, encouraging the continuous development of skills and competencies, providing suitable training, refresher training and development tools*", specific ongoing training initiatives were activated, internally in the commercial production chain and externally to customers, focusing on the ESG product catalogue.
Together, these actions allow the Group to make a positive contribution to remedying the material and actual negative impacts in terms of issues related to climate change and referring to the Group's own operations and its downstream value chain. With reference to the latter, the initiatives launched (and partly completed) by the Group are aimed at managing:

- the negative impact on the environment resulting from loans and investments in sectors and companies that generate greenhouse gas emissions, that contribute to the acceleration of climate change and/or have inadequate/delayed decarbonisation plans;
- the negative impact on the environment resulting from loans and investments in sectors and companies with a high energy impact dependent on high quantities of energy generated from fossil sources, which slow down the transition to renewable energies and low-emission technologies and/or which have inadequate/delayed energy efficiency plans.

Replacing obsolete boilers and installing new refrigeration units and/or heat pumps

During 2024, the Group continued to pursue an overall reduction in its energy consumption, making it possible to manage the significant negative impacts related to the mitigation of climate change and energy through initiatives to replace obsolete boilers with condensing boilers or heat pumps and the installation of new refrigeration units and/or higher performance heat pumps. It should be noted that these interventions allow to improve the conditions of the working environments.
In addition, following the energy audits carried out in 2023, the Group carried out a series of interventions in 2024, including:

- the installation of a new LED lighting system at the Verona offices in Via Meucci;
- the installation of inverters and reluctance motors at the offices in Bergamo, Largo Porta Nuova, and Verona, Via Meucci;
- commissioning the first power quality project at the Lodi offices in Via Cavour, at the end of which (first half year of 2025) it will be possible to assess its effectiveness for possible extension to other sites.

These interventions guarantee, in addition to savings in terms of consumption for greater efficiency of the installed systems, a better quality of the environment and therefore a situation of greater well-being for the personnel working in the redeveloped sites. In fact, in some cases, the choices of plant requalification depend on the intervention requests from personnel highlighting anomalies in system operation (incorrect temperatures, humidity, poor air quality).
All the initiatives undertaken are focused on the Group's operating properties distributed throughout the country, and normally have a duration of about 12 months, although they could take place over two tax years as the timeframes for the tender, procurement of materials, construction and inspection may not coincide with the calendar year. Initiatives on properties owned by third parties can be implemented where heating or cooling is the Group's responsibility and the lease agreements allow these activities.

Use of agile working and initiatives aimed at promoting sustainable mobility

With particular reference to emissions generated by commuting, Banco BPM has implemented the following initiatives at Group level:

- the implementation of solutions and technologies that favour virtual communication and the use of remote work, which makes it possible to avoid home-work commuting with a consequent reduction in emissions deriving from daily commuting. The remote work tool was activated for the first time on an experimental

basis in 2018, and subsequently extended as an organisational measure to all professional roles compatible with remote services;
- between the end of October and the beginning of November 2024, employees in offices with more than 100 people were asked to complete a questionnaire on mobility; in addition to supporting the preparation of Home-Work Travel Plans, as required by law, this tool allows to learn about people's commuting habits and the propensity to change towards more sustainable mobility alternatives;
- activation on the company portal of a section dedicated to Mobility Management with info-training content on sustainable mobility and a set of agreements dedicated to green mobility.

Purchase of ESG bonds within the securities portfolio owned by the Parent Company[1]

In order to achieve the objectives set by the Guidelines on the management of environmental and energy issues and the fight against climate change, the Parent Company envisages:
- an increase in purchases on the primary and secondary ESG bonds market from Corporate and Financial issuers that invest in projects aimed at reducing the negative effects generated on the climate, in line with the objective of reaching a share equal to 40% of these bonds relative to the overall portfolio of non-government bonds owned by the end of 2026, and further detailed in the section "*Targets related to climate change mitigation and adaptation*";[2]
- refocusing investments towards those attributable to the companies most committed to environmental and social sustainability issues, as well as decarbonisation if belonging to priority sectors in the Net-Zero Banking Alliance, obtained by using the inclusion and exclusion criteria defined in the Guidelines for the integration of sustainability factors in the investment strategies of the proprietary portfolio.

Updating the Green, Social & Sustainability Bonds Framework and the contextual definition of a Green, Social & Sustainability Bonds Emission Plan

The Parent Company has adopted a Green, Social & Sustainability Bonds Framework, aligned with the ICMA Principles[3] and for some categories of Eligible Green Loans, the European Taxonomy[4], to regulate the issue of Green, Social & Sustainability Bonds to the market. The updating of the Framework continued during the year, mainly involving IT and data collection processes.

In particular, in 2024 Banco BPM worked to analyse the IT developments necessary to be able to implement IT solutions and strengthen the data collection process, drawing mostly from external sources.
These actions will make it possible to more accurately identify those eligible in the green area (for example, green mortgages, renewable energy or energy efficiency projects) and in the social area (for example, loans to SMEs located in disadvantaged areas) within the existing portfolios.
At the same time, the Parent Company has defined a plan with annual issue targets in order to reach the total amount envisaged in the Strategic Plan in the period 2024-2026. In addition, the refinancing of the loans portfolio to SMEs located in disadvantaged areas will allow Banco BPM to strengthen its support to companies located in economically less favourable areas or which have been affected by natural catastrophes.

Low Carbon Disbursements

Consistent with the objective of supporting companies in the transition towards a sustainable business model, the Parent Company has launched several initiatives aimed at the Commercial Networks in relation to new medium/long-term loans.
In particular, Banco BPM worked to further develop and rationalise its product catalogue in the lending sector in 2024, activating, among other things, some important initiatives such as:

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[1] The Corporate debt securities in the portfolio are classified under Consolidated Balance Sheet item "40. Financial assets at amortised cost - b) loans to customers" and "30. Financial assets measured at fair value through other comprehensive income".
[2] The indicator considers one *of which* of the "non-government" component of the overall debt securities portfolio. Specifically, the following are not included in the scope: supranational securities, securities in the commercial portfolio, GACS senior notes. The denominator as at 31 December 2024 was €6,509 million.
[3] In particular, the framework is aligned with the ICMA "Green Bond Principles" (2022), "Sustainability Bond Guidelines" (2023) as well as the "Sustainability Bond Guidelines" (2022).
[4] In particular, the categories of "Eligible Green Loans" aligned with the European Taxonomy are Green Building (7.1, 7.2 and 7.7), Renewable Energies (4.1, 4.3, 4.5 and 4.8) and Manufacture of Organic Basic Chemicals (3.14).

- the integration of the catalogue with a new ordinary finance product of the Sustainability Linked Loan type (also called "SLL") named "Impresa Sostenibile" and offered to customers from 2025;
- streamlining the catalogue by offering pre-arranged, simpler, more rational and easily understandable products for Networks and customers (which will be completed in 2025);
- the implementation, starting in 2024, of higher discounts for green loan products for individuals.

In addition to the initiatives described above, Banco BPM has integrated the objective of new disbursements in the incentive system of the Commercial Networks, modulating the performance objectives on the individual commercial segments, also activating specific and dedicated commercial initiatives, where possible.
The allocation of these objectives was also accompanied by the preparation of an adequate monitoring framework as well as the forecasting of new KSIs within the Group RAF.

Evolution of credit and risk management processes in line with the commitments made in relation to the NZBA

Banco BPM has envisaged the integration into the Group 2025 RAF, in continuity with previous years, of specific KSIs up to the strategic level to monitor the carbon footprint by 2030 for the sectors with greater emission intensity (called Priority Sectors). The related monitoring activity, already active in 2024, includes the involvement of the Corporate Network and the Corporate Banking Books function in controlling the portfolios for the priority sectors defined in the NZBA. Continuous portfolio monitoring makes it possible to avoid the assumption of significant positions that are not compatible with the Group targets, enabling the progressive concentration of the portfolio on counterparties with better emission intensity.
With reference to the credit policies framework, Banco BPM has embarked on a path, already launched in previous years and further evolved in 2024, to adjust them in order to reward the most virtuous customers who have already embarked on a climate transition path. Specifically, ad-hoc evaluation logics have been introduced for sectors selected by the Bank in the context of NZBA membership, which are characterised by a high environmental impact. These sectors are subject to more stringent credit strategies, in particular with regard to those counterparties that do not draw up a sustainability reporting and which, in general, have not begun a transition process to decarbonise their production processes.
In addition to updating the credit policy framework, Banco BPM has envisaged the formulation of sustainability assessment sheets for decision-making bodies, created by analysing the contribution of new operations to specific climate performance indicators, including current emission intensities and prospective in NZBA. In particular, for each counterparty falling within the priority sectors, the collection of data on Scope 1, 2 and 3 emissions and, in general, on its exposure to climate risk factors was activated.

Activation of training for the commercial chain and customers with a focus on the ESG product catalogue

In line with the provisions of the Code of Ethics, Banco BPM has implemented the following initiatives:

- the preparation of a basic and detailed training offer, customised for the various professional figures;
- the activation of specific modules in relation to the offer of new products (for example, activating an initiative dedicated to the new SLL Impresa Sostenibile product, concluded in January 2025);
- greater customer involvement in the training and disclosure processes of ESG issues (e.g., ESG Factory Project in the section "Actions related to the management of IROs in relation to consumers and end-users").

The dissemination of knowledge of ESG issues and the dedicated commercial offer aims to expand knowledge (of colleagues and customers) on medium/long-term loan solutions defined by Banco BPM to support, in particular, companies that decide to invest in energy transition and ecological projects.

Targets related to climate change mitigation and adaptation

The main targets aimed at managing relevant climate change issues as well as monitoring the effectiveness of policies and actions are:

- reduced direct energy consumption[1];
- reduced Scope 1 and 2 emissions (market-based)[2];
- maintenance of the current value of indirect emissions deriving from commuting;

[1] Excluding the consumption of properties owned by the Group and leased to third parties.
[2] Excluding the emissions of properties owned by the Group and leased to third parties and the emissions deriving from HFC gas leaks.

- setting by 2026 emission intensity reduction targets for the sectors that are materially more relevant for the Group's operations in terms of emissions financed for the sectors envisaged by the NZBA;
- elimination of direct exposure (run-off) in the coal sector by 2026;
- elimination by 2050 - with interim targets to 2030 - of the net greenhouse gas emissions of the corporate counterparties operating in the Automotive, Cement, Oil and Gas and Power Generation sectors present in the loans and securities portfolios of the Banking Book;
- new disbursements of medium/long-term low-carbon loans;
- cumulative issue of Green, Social and Sustainable bonds;
- issue of Green, Social and Sustainable bonds as Joint Bookrunner/Lead Manager;
- achievement, within the securities portfolio owned by the Parent Company, of a share of ESG bonds equal to 40% of the total Corporate bonds managed by the Finance function by 2026.

When setting the targets, the various functions responsible for the matter envisaged a formal step involving Top Management in order to share the methodologies and approaches employed.

Reduced direct energy consumption[1]

In line with the update of the 2024-27 Strategic Plan, the Group aims to achieve, by 2027, a total energy consumption of 472,000 GJ - 131,111 MWh, down compared to what was consumed in 2024 (485,998 GJ - 135,000 MWh).

In the energy reduction process implemented to achieve this target, the Group further expects to achieve the following interim targets:

Consumption 2024	**Target 2025**	**Target 2026**	**Target 2027**
485,998 GJ 135,000 MWh	483,000 GJ 134,167 MWh	477,000 GJ 132,500 MWh	472,000 GJ 131,111 MWh

The 2027 target was defined in line with:
- the objectives declared in the Guidelines for the management of environmental and energy issues and the fight against climate change;
- the initiatives and objectives declared in the Energy Plan[2];
- the Group's commitments in seeking the best and most innovative solutions to reduce the direct impacts deriving from the conduct of its activities.

In particular, the objectives were defined considering the expected effects deriving from the necessary technical and organisational interventions. In particular, the reduction in consumption deriving from:
- specific interventions on the network, with estimated savings of 9,099 GJ - 2,527 MWh, determined on the basis of the historical analysis of previous closure plans, with the exception of cases in which the disposal of entire buildings made it possible to accurately determine the volume of consumption saved (related to an entire site). This contribution was then spread over two years and divided by energy carrier;
- ordinary revamping activities for which the savings are estimated on the basis of:
  - a historical analysis of the savings achieved following system remediation;
  - interventions planned to respond to reports from Group staff regarding any system malfunctions.

  This annual contribution was divided by energy carrier (electricity and gas);
- revamping activities deriving from the Energy Diagnoses on the basis of feasibility studies aimed at calculating the potential savings according to the technical data sheets of the proposed solutions. This contribution was spread over several years in order to identify the correct period of benefit. The annual quota was then broken down by energy carrier.

In addition, as part of the 2024-27 Strategic Plan, the Group confirmed the target of purchasing 100% of its electricity needs from renewable sources.

[1] Excluding the consumption of properties owned by the Group and leased to third parties.
[2] The Energy Plan is the document that, drawn up by the Group's Energy Management structure, reports the consolidated energy consumption of the previous year and identifies the actions to be taken in order to make them more efficient.

Reduced Scope 1 and 2 emissions (market-based)[1]

As part of the update of the 2024-27 Strategic Plan, the Group has declared the target of reducing its CO_2e emissions (Scope 1 and 2 market-based) by -94 tCO_2e by 2027, compared to the 10,994 tCO_2e[2] emitted in 2024, a year in which there were no influences from external factors (for example, COVID-19) and representative of the efficiency and reduction process undertaken.

As part of this process, the Group expects to achieve the following interim targets:

- 2025: 10,968 tCO2e;
- 2026: 10,920 tCO2e.

The target was defined in line with the emissions declared in the GHG inventory and attributable to the Group's direct consumption and with the dictates of the Guidelines on the management of environmental, energy and climate change issues, in which the Group declares the target of reducing its environmental impact.
In particular, the objective was outlined considering savings deriving from:

- system requalification from energy diagnoses;
- the ordinary revamping of systems;
- the closure of branches.

The contributions of each intervention category were broken down by energy carrier (electricity and gas) and, subsequently, an annual forecast of total consumption was defined, spread over several years according to the expected benefits. This made it possible to accurately quantify only the consumption that contributes to determining the market-based Scope 1 and 2 emissions. In fact, the reductions in emissions deriving from the reductions in electricity consumption are not considered for the purposes of this target, as electricity is purchased from renewable sources and the related market-based emissions are considered nil.
The actions underlying the definition of the target constitute the decarbonisation levers that the Group expects to activate to achieve the market-based Scope 1 and 2 reduction objective. In particular, the estimated contributions for the reductions for each year amount to:

- 2025:
  - Revamping systems: -91 tCO_2e (corresponding to -1,540 GJ of gas consumption);
- 2026:
  - Revamping systems: -91 tCO_2e (corresponding to -1,540 GJ of gas consumption);
  - Energy Diagnosis: -28 tCO_2e (corresponding to -474 GJ of gas consumption);
  - Rationalisation of branches: -34 tCO_2e (corresponding to -567 GJ of gas consumption);
- 2027:
  - Revamping systems: -91 tCO_2e (corresponding to -1,540 GJ of gas consumption);
  - Energy Diagnosis: -28 tCO_2e (corresponding to -474 GJ of gas consumption);
  - Rationalisation of branches: -34 tCO_2e (corresponding to -567 GJ of gas consumption).

In light of the reductions highlighted above, the total expected market-based Scope 1 and 2 emissions in 2027 is 10,900 tCO_2e[3].

GHG emissions Scope 1 + 2	2024 (base year)	2027 (target year)
Absolute value of GHG emissions in tCO_2e	10,994	10,900
% change in GHG emissions compared to the base year	-	-1%

Maintenance of the current value of indirect emissions deriving from commuting

In line with the update of the 2024-27 Strategic Plan, the Group[4] has set itself the target of maintaining a cumulative indirect emissions value deriving from employee commuting in line with the value recorded as at 31 December 2024: 12,000 tCO2.

[1] Excluding the emissions of properties owned by the Group and leased to third parties and the emissions deriving from HFC gas leaks.
[2] Of which 8,019 tCO2e related to Scope 1 and 2, 975 tCO2e related to Scope 2 market-based (excluding the emissions of properties owned by the Group and leased to third parties and the emissions deriving from HFC gas leaks)
[3] For the calculation of the target value in terms of tCO2e, potential future increases in emissions deriving from other sources of Scope 1 and 2 (e.g., consumption of the company car fleet and district heating) are taken into account.
[4] Reference perimeter: all employees of Group companies based in Italy

The target was set in line with:

- the objectives declared in the Guidelines for the management of environmental and energy issues and the fight against climate change;
- the Group's commitments in seeking the best and most innovative solutions to reduce the direct impacts deriving from the conduct of its activities.

The objective was defined while also considering the expected evolution of the Group's workforce and according to the agreements signed with regard to the agile working methods in force from time to time.
In particular, for the estimation of emissions, the Group considered the conversion and emission factors from the ISPRA portal for cars and the ABI Guidelines for trains, as well as taking into account the number of days worked in the offices by the average work-home distance in terms of total km travelled. In addition, as a precautionary measure, it was assumed that the commuting methods were carried out by car or train and that the Group's car fleet is representative of employees' car fleet.

Setting emission intensity reduction targets by 2026 for the sectors that are more material for the Group's operations in terms of emissions financed for the sectors envisaged by the NZBA.

In consideration of the decarbonisation process launched following membership in the Net Zero Banking Alliance, Banco BPM plans to assess the setting by 2026 (known as the second wave) of emission reduction targets for sectors other than those considered "priority" during the first assessment of the portfolio.
This target was set by the competent Parent Company function, in line with the Guidelines on the management of environmental and energy issues and the fight against climate change, taking into account that the Group "achieves objectives and lines of action aimed at guaranteeing more favourable access to capital for green activities or to companies involved in a transition process".

Elimination of direct exposure (run-off) in the coal sector by 2026

Upon its endorsement of the Net Zero Banking Alliance, the Parent Company has planned to achieve by 2026, through portfolio run-off activities, the net zero emissions target with reference to exposures to Large Corporate and Corporate counterparties (considering loans and securities of the Banking Book) operating mainly in the coal sector (considered "priority" to achieve the climate neutrality objectives despite being completely marginal on the overall portfolio).
The target was set in accordance with:

- the objectives declared in the Guidelines for the management of environmental and energy issues and the fight against climate change;
- the initiatives and objectives declared in the 2023-26 Strategic Plan and confirmed in the 2024-27 Strategic Plan.

When setting the target in question, the competent Parent Company function envisaged monitoring the indicators with respect to the set target, although it did not formalise interim targets. From the periodic monitoring activity, the performance is substantially in line with the envisaged decarbonisation plan.

Elimination by 2050 - with interim targets to 2030 - of the net greenhouse gas emissions of the corporate counterparties operating in the Automotive, Cement, Oil and Gas and Power Generation sectors present in the loans and securities portfolios of the Banking Book

Upon its endorsement of the Net Zero Banking Alliance, the Parent Company has planned to achieve the net zero emissions target by 2050 for Large Corporate and Corporate counterparties (with reference to the scope of loans and securities of the Banking Book) operating in the Oil & Gas, Power Generation, Cement and Automotive sectors.
In this context, it was asked to identify the sectors within the loan portfolio with the most impact in terms of greenhouse gas emissions and to set interim emission reduction targets in line with the expectations of the Paris Agreements to maintain the rise in the global average temperature within +1.5 °C.
On this occasion, the competent Parent Company function set targets consistent with the scope of its GHG inventory (i.e., category 15 of Scope 3) considering the specificities of the business conducted by the Group (mainly loan activities).
To this end, the Parent Company conducted a preliminary assessment of the loan portfolio, obtaining an estimate of the baseline of the emissions financed for all priority sectors based on the quality of the emissions data and the

feasibility of achieving the targets. The aforementioned assessment, in line with market best practices, allowed the identification of four additional priority sectors (Automotive, Cement, Oil & Gas and Power Generation, in addition to the aforementioned Coal) to allow a more incisive contribution to the decarbonisation targets of its loan and securities portfolios of the Banking Book it has undertaken to achieve.
The target setting methodology was based on what is called the "physical WACI" metric, which represents the weighted average per used (loans and securities) of total CO2 equivalent emissions (CO2e or GHG from greenhouse gases) of the counterparty with respect to the typical output quantity of the business sector to which it belongs. In order to estimate the inertial path of the portfolio from the starting point until 2050, the metric is projected in a "static balance-sheet" perspective for each counterparty based on the available information, as follows:

- for counterparties that publish starting points and NZ2050 path validated on a scientific basis, the projection of the metric took place based on individual transition plans (the use of estimates is not envisaged);
- for the other counterparties, starting from the 2022 starting point, the sector metric was projected in a "business as usual" perspective using the STEPS and APS inertial scenarios produced on a scientific basis by the International Energy Agency (IEA), which incorporate, with varying degrees of optimism, the expected evolution of the sectors in terms of emissions.

Lastly, the final quantification of the targets is the result of a recalibration of the inertial scenarios, as they are not sufficient to reach a metric level in line with the net zero logic in 2050. The point of passage of the recalibrated net zero paths in the year 2030 identifies the percentage reduction target of the metric with respect to the starting point.
The selection of the target metrics, based on solid scientific elements, was carried out by analysing the metrics also suggested by the Regulators (for example, indications of the European Banking Authority - also "EBA" - for the compilation of Pillar 3, ESG section) in the context of transition risk and verifying its usefulness and dissemination - in the reference standards and benchmarks - in the context of the Net Zero Banking Alliance.
In summary, the decarbonisation process of the loans and securities portfolios envisages interim sector targets to 2030 with which the Parent Company undertakes to decrease, compared to 2022 (base year considered representative of the activities envisaged by the Group in accordance with the rules specified by the NZBA) emission intensity in relation to the following specific indicators:

- 48% reduction in the Automotive sector (measured in tonnes of CO2e per billion passenger-kilometres travelled by vehicles sold);
- 23% reduction in the Cement sector (measured in tonnes of CO2e per tonne of cement product);
- 14% reduction in the Oil & Gas sector (measured in grams of CO2e per megajoules of oil/natural gas produced or distributed);
- 56% reduction in the Power Generation sector (measured in tonnes of CO2e per megawatt-hour of energy produced).

Sector	**Reference metric**	**2022 (base year)**	**2030 (target year)**
Automotive	Tonnes of CO_2e per billion passenger-kilometres travelled by vehicles sold	0.45	-48%
Cement	Tonnes of CO_2e per tonne of cement product	0.50	-23%
Oil & Gas	Grams of CO_2e per megajoules of oil/natural gas product produced or distributed	60.7	-14%
Power Generation	Tonnes of CO_2e per megawatt-hour of energy produced	0.17	-56%

The targets were set in line with:

- the objectives declared in the Guidelines for the management of environmental and energy issues and the fight against climate change;
- the initiatives and objectives declared in the 2023-26 Strategic Plan and confirmed in the 2024-27 Strategic Plan.

To pursue its decarbonisation targets with reference to category 15 of Scope 3, the Parent Company envisages the use of multiple actions: customer engagement, exclusion policies, disinvestment, development of new capacities, development of new tools and products, assessment of portfolio alignment, assessment of portfolio exposure/risks, development of new policies, public policy and advocacy positions for government/regulatory actions and strategy to grow the customer base.
From the periodic monitoring activity, the performance is substantially in line with the envisaged decarbonisation plan.

New disbursements of medium/long-term low-carbon loans

In line with what was indicated during the presentation of results as at 30 June 2024 to the public, the Parent Company has planned a target of new medium/long-term low-carbon loans of at least €5 billion for 2024.[1] It should be noted that with the recent approval of the updated 2024-27 Strategic Plan, the target was updated to €7 billion[2] for 2027. The target was set in accordance with the Guidelines on the management of environmental and energy issues and the fight against climate change, in which the Group declares to "achieve objectives and lines of action aimed at ensuring more favourable access to capital for green activities or to companies involved in a transition process".
The 2024 target was set considering the performance in disbursements envisaged in the 2024 budget and with the support of the related commercial areas concerned (bottom-up approach), estimating the expected volumes at the end of the year.
Monthly monitoring of the indicator was carried out during the year. The new disbursements, with disbursed volumes of €5,712 million as at 31 December 2024[3], confirmed the full achievement of the target in 2024.

Cumulative issue of Green, Social and Sustainable bonds

In line with the Group's 2023-26 Strategic Plan, the Parent Company envisaged the issue of €5 billion in Green, Social and Sustainability bonds in the period between 2024 and 2026.
The target was set in line with the asset selection and income allocation and management criteria reported in the Group's Green, Social and Sustainability Bonds Framework. This Framework is complementary to the commitment and strategy implemented to combat climate change and generate a positive social impact.
When setting this target, the following were considered:

- the targets in the 2021-24 Strategic Plan, which envisaged issues of Green and/or Social Bonds for a value of €2.5 billion and the amount actually achieved in the three-year period 2021-23 (€4.5 billion);
- the reconciliation with Banco BPM's Funding Plan, defined for the period 2024-2026 and approved by the Board of Directors, envisages a total amount of over €12 billion in bonds to be issued as senior/senior non-preferred/covered bonds;
- the consistency of the target with the stock of eligible assets, as well as with the expected evolution of green and social loans disbursed by the Bank.

In order to monitor the performance of the target, interim targets were set for Green, Social and Sustainability bond issues equal to:

- €1.5 billion in 2024;
- €1.5 billion in 2025;
- €2 billion in 2026.

The performance monitoring activities have confirmed that the interim target to 2024 is achieved. In particular, the figure as at 31 December 2024 highlights the issue of Green, Social and Sustainability bonds for a value of €1.5 billion.[4] In consideration of the above, during the recent approval of the 2024-27 Strategic Plan, the target was confirmed at €5 billion also for the period between 2025 and 2027. In this regard, it should be noted that in January 2025 Banco BPM successfully concluded the issue of a senior social bond, intended for institutional investors, for a total value of €0.5 billion.

Issue of Green, Social and Sustainable bonds as Joint Bookrunner/Lead Manager

Confirming the commitment made on the financial markets for the collection of resources for ESG sustainability projects, also providing support in the placement process of other issuers, in 2024 the subsidiary Banca Akros S.p.A. supported the placement of ESG bonds as a Joint Bookrunner or Lead Manager for a value of €9.4 billion.

[1] This includes loans of transactions with "green" characteristics aimed at supporting the transition to an economy with net zero greenhouse gas emissions by customers operating in sectors with high transition risk and disbursements to counterparties operating in green and low transition risk sectors, assessed by applying a specific score developed internally.
[2] New loans to households, companies and businesses with an original due date of > 18 months, including "green" lending products (targeted loans, project financing and SLL) and ordinary loans granted to sectors classified as "green" or with low exposure to climate transition risk
[3] New low-carbon disbursements are classified in the Consolidated Balance Sheet under item "40. Financial assets at amortised cost - b) loans to customers".
[4]The bond issues of the Parent Company are classified under liability items in the Consolidated Balance Sheet under item "10. Financial liabilities at amortised cost - c) debt securities in issue".

The Group, again through Banca Akros, has also planned to participate in the placement of ESG bonds in the period between 2025 and 2027, as Joint Bookrunner or Joint Lead Manager, for a total nominal value of €19.5 billion. The target was set in line with the objectives of the Guidelines on the management of environmental and energy issues and the fight against climate change, in particular facilitating the reduction of environmental impact and support for the transition to a low greenhouse gas emission economy.
In particular, to set this target in the 2024-27 Strategic Plan, the historical trends relating to the results achieved by Banca Akros were taken into consideration, together with an analysis of the maturity of the current market and of potential developments and future volatility.

Achievement, within the securities portfolio owned by the Parent Company, of a share of ESG bonds equal to 40% of the total Corporate bonds managed by the Finance function by 2026

In line with what is indicated in the 2023-26 Strategic Plan and recently confirmed in the update of the Plan to 2024-27, Banco BPM has set itself the objective of increasing the share of ESG bonds present in the corporate investment portfolio managed by the Finance function to 40% by 2026.[1]
The target was defined in line with the objectives declared in the Guidelines for the integration of sustainability factors in the investment strategies of the proprietary portfolio.
In particular, when formalising the 2023-26 Strategic Plan, for the definition of this target, the share of ESG bonds in place as at 30 September 2023 (equal to 27% of the corporate investment portfolio managed by the Finance function) was considered as the starting point**.**
In addition, internal in-depth analyses were carried out on the current market conditions and possible evolutionary prospects, on the basis of which the maximum share of the proprietary portfolio investable in ESG bonds was determined without substantial negative impacts on the profitability of the investments. Based on target monitoring, at 31 December 2024 the percentage of the non-government portfolio invested in this type of bond was close to 35%[2], being fully in line with the target of 40% by the end of 2026.

Metrics on Energy consumption and mix

As at 31 December 2024, the Group recorded total energy consumption of 221,888 MWh (135,000 MWh if the consumption related to properties owned by the Group and leased to third parties are not considered), considering the conversion factors of the ABI LAB Guidelines on the Bank's application of ESRS on environmental matters (17/12/2024).
The total energy consumption is certified by the supplier. In addition, for this consumption, the relevant Guarantees of Origin are issued by the GSE, as required by the supply contract itself.

[1] The Corporate debt securities in the portfolio are classified under Consolidated Balance Sheet item "40. Financial assets at amortised cost - b) loans to customers" and "30. Financial assets measured at fair value through other comprehensive income".
[2] The percentage share is calculated on the total "Other corporate debt securities" managed by the Finance function and equal to €6,509 million as at 31 December 2024. In particular, with respect to the total "non-government securities" (equal to €9,427 million as at 31 December 2024), the denominator of the indicator in question does not consider: supranational securities, securities in the commercial portfolio and GACS senior notes.

Details of the energy mix are provided below.

Energy consumption and mix	**2024**
Fuel consumption from coal and coal products (in MWh)	-
Fuel consumption from crude oil and petroleum products (in MWh)	7,924
Natural gas consumption (in MWh)	57,165
Fuel consumption from other fossil sources (in MWh)	-
Consumption of electricity, heat, steam and cooling purchased or acquired from fossil sources (in MWh)	62,407
Total fossil energy consumption (in MWh)	127,496
% share of fossil fuels in total energy consumption	57%
Consumption from nuclear sources (in MWh)	-
% of consumption from nuclear sources of total energy consumption	-
Consumption of fuel from renewable sources, including biomass (also including industrial and municipal waste of biological origin, biogas, renewable hydrogen, etc.) (in MWh)	-
Consumption of electricity, heat, steam and cooling purchased or acquired from renewable sources (in MWh)	94,292
Consumption of self-generated non-combustible renewable energy (in MWh)	99
Total renewable energy consumption (in MWh)	94,392
% share of renewable sources of total energy consumption	43%
Total energy consumption (in MWh)	221,888

The Group has three photovoltaic plants at the Milan offices (two on the Via Massaua complex and one on the Viale Eginardo complex), equipped with meters from which it is possible to obtain the consumption and production figures. In particular, as at 31 December 2024, 119 MWh of electricity had been produced from renewable sources.
As at 31 December 2024, the energy intensity of the Companies operating in sectors with a high climate impact was 0.002 MWh per euro of net revenue.
The sectors with high climate impact analysed for reporting purposes are:
- the purchase and sale of real estate on own assets, in which the companies BRF Property S.p.A. and Sirio Immobiliare S.r.l. operate;
- agricultural crops associates with animal breeding: mixed activity, in which the company Sagim S.r.l. Società agricola operates;
- □the construction of residential and non-residential buildings, in which the companies Lido dei Coralli S.r.l. and P.M.G. S.r.l. (company in liquidation) operate.

With regard to net revenues, it should be noted that the item in the financial statements used is "Other operating expenses/income - Other operating income - Rental income on real estate."
The energy intensity shown in the table below is calculated with reference to:
- the Company Lido dei Coralli S.r.l.;
- the Company Sirio Immobiliare S.r.l.;
- the Company Sagim S.r.l.; Società agricola.

The remaining Companies operating in the sectors mentioned above (BRF Property S.p.A. and P.M.G. S.r.l.) do not have direct energy consumption and do not record values in the financial statements under the item “Other operating expenses/income - Other operating income - Rental income on real estate".

Energy intensity of companies operating in sectors with a high climate impact	**2024**
Total energy consumption of activities in high climate impact sectors (in MWh)	2,915
Net revenue deriving from activities in high climate impact sectors (in euro)	1,565,000
Energy intensity of activities in sectors with a high climate impact compared to net revenues from these activities (MWh/euro)	0.002

Metrics on Gross Scopes 1, 2, 3 and Total GHG emissions

The Group’s emissions (Scope 1, 2 and 3) as at 31 December 2024 amounted to 58,139,824 tCO_2e market-based and 58,161,576 tCO_2e location-based (of which 26 tCO_2e market-based and 79 $tCO)_2e$ location-based in Switzerland and 47,268 tCO_2e market-based and 47,276 tCO_2e location-based in Ireland).

It should be noted that the Group's Scope 1 and 2 emissions as at 31 December 2024, without taking into account the portion deriving from owned properties leased to third parties, amount to 10,525 tCO_2e for Scope 1, 2,975 tCO_2e for Scope 2 market-based and 29,408 tCO_2e for Scope 2 location-based.
The figure, not certified by an external body, was defined considering the emission and conversion factors according to the ABI LAB Guidelines on the application in the Bank of ESRS on environmental matters (17/12/2024).

The Scope 1, 2 and 3 emissions are shown below, broken down by geographical area as at 31 December 2024.

Greenhouse gas emissions (GHG)	**Italy**	**Switzerland**	**Ireland**	**Total**
Gross Scope 1 GHG emissions (in tCO_2e)	16,813	0	0	16,813
Gross Scope 2 GHG emissions location-based (in tCO_2e)	47,045	69	15	47,129
Gross Scope 2 GHG emissions market-based (in tCO_2e)	25,355	16	7	25,377
Total indirect gross Scope 3 GHG emissions 3 (in tCO2e)	58,050,363	10	47,261	58,097,634
of which category 1. Purchased goods and services[1] (in tCO_2e)	*2,088*	*0*	*0*	*2,088*
of which category 2. Capital Goods[1] (in tCO_2e)	*502*	*0*	*0*	*502*
of which category 6. Business trips[1] (in tCO_2e)	*1,405*	*0*	*0*	*1,405*
of which category 7. Employee commuting[1] (in tCO_2e)	*11,974*	*10*	*13*	*11,997*
of which category 15. investments (in tCO_2e)	58,034,394	0	47,248	58,081,642
of which banking business (in tCO2e)	*56,597,635*	*0*	*0*	*56,597,635*
of which insurance business (in tCO2e)	*1,436,759*	*0*	*47,248*	*1,484,007*

It should be noted that 46% of Scope 2 emissions (market-based) are covered by guarantees of origin contracted in the electricity supply.
With regard to Scope 3 emissions, the excluded categories (not considered significant enough to be calculated), are listed below:

- category 3. Fuel and energy-related activities;
- category 4. Upstream transport and distribution;
- category 5. Waste generated during operations;
- category 8. Upstream leased assets;
- category 9. Downstream transport;
- category 10. Transformation of products sold;
- category 11. Use of products sold;
- category 12. End-of-life treatment of products sold;
- category 13. Downstream leased assets;
- category 14. Franchising.

The methodological reference for accounting Scope 3 (for categories other than 15) is the GHG Protocol, Technical Guidance for Calculating Scope 3 Emissions, implemented by the ABI LAB Guidelines on the application in the Bank of the ESRSs on environmental matters (version 17/12/2024). In addition, the methodological choices and assumptions adopted for the calculation of the relative emission categories are specified below:

- category 1. Goods and services purchased: includes emissions deriving from the consumption of office paper, calculated starting from the kg purchased and the type of paper used (recycled or not), and applying the conversion factors provided by the "UK Government GHG Conversion Factors for Company Reporting" (latest available update);
- category 2. Capital Goods: includes emissions deriving from purchases of IT equipment (PCs, smartphones, printers, etc.) calculated on the basis of the weight and type of equipment and applying the conversion factors envisaged by Ademe (French environment and energy management agency);
- category 6. Business travel: includes emissions deriving from business travel by car, plane and train, for which the provisions of the ABI LAB Guidelines on the application in the Bank of ESRSs on environmental matters have been applied in both cases, version 17/12/2024. For Companies that do not have any Full Time Equivalent (FTE) employees, the contribution in terms of commuting is considered equal to zero;
- category 7. Employee commuting: includes only emissions from home-work commuting. The emissions are calculated starting from the average home-work distance and the number of days in the offices, applying the conversion factors envisaged by ISPRA for car travel and by the ABI LAB Guidelines on the application in the Bank of ESRSs on environmental matters, version 17/12/2024, for the train. For Companies that do not

[1] The perimeter considered is the same as that defined in the consolidated financial statements.

have any Full Time Equivalent (FTE) employees, the contribution in terms of commuting is considered equal to zero.

For the calculation of the Scope 3 emissions of categories 1, 2, 6 and 7: in 13% of cases, input from specific activities along the upstream and downstream value chain were used and in 9% of cases from primary data obtained from suppliers or other partners along the value chain.
Financed emissions were calculated by adopting a methodology compliant with the Global GHG Accounting and Reporting Standard developed by the Partnership for Carbon Accounting Financials (PCAF) - Financed Emission, Part A.
More specifically:

- for the banking business, the calculation of financed emissions focuses on the exposures present in the banking book, thus excluding the assets of the trading book, and covered all seven assets identified by PCAF for reporting financed emissions: Listed equity and corporate bonds; Business loans and unlisted equity; Project finance; Commercial real estate; Mortgages; Sovereign debt; Motor vehicle loans[1];
- for the insurance business, the calculation focuses on the emissions related to the investments of the Group's insurance companies according to the PCAF methodology. With reference to the assets classified by PCAF, the calculation of the financed emissions therefore concerned the following portfolios: Listed equity and corporate bonds; Business loans and unlisted equity; Sovereign debt.

With reference to the financed emissions related to exposures to financial and non-financial Companies, the Banco BPM Group based the calculation on the collection of information on counterparties with the support of an external supplier. In particular, the information on greenhouse gas emissions was collected and determined in compliance with the PCAF considering, where available, the precise emissions, communicated directly by the individual counterparties subject to analysis through public reports (such as the Non-Financial Statement and Sustainability Reporting). In the absence of precise data, the emissions are estimated using methodologies aligned with market practices.

The estimation methodology is based on official data from public sources (Eurostat) on emission intensity, broken down by sector (NACE code). This coefficient is further refined by incorporating, where available, more detailed data on emissions for specific NACE/Ateco codes[2].
The emissions intensity, expressed in tonnes of CO_2 per euro of added value, is then recalibrated to obtain a measure of intensity per euro of revenues. The sector emission factor obtained is finally applied to the turnover of the individual counterparty to determine the estimated volume of emissions.
With reference to the financed emissions deriving from the "commercial real estate" and "mortgages" asset classes, the Group based the calculation of the estimate through the building's EPC Certificate (which reports a reference value in tCO2e/m2), if available, or through the use of PCAF grids.
The financed emissions are calculated as part of exposures for an amount of €129.6 billion (of which €118.4 billion relating to the banking business and €11.2 billion relating to the insurance business), corresponding to 74.9% of the overall Gross Carrying Amount (GCA).
This perimeter will be subject to further progressive extension. More specifically, with reference to the insurance business, the activation of specific projects is envisaged that will make it possible to expand the calculation of the financed emissions to portfolios not currently covered, in particular to UCIT funds (exposures of approximately €5.6 billion), ideally by means of look-throughs in order to promptly identify the related underlyings, and to other unlisted companies.
With regard to the banking business, it should be noted that the Group will direct specific activities aimed at strengthening the coverage of the information assets necessary for each counterparty and, at the same time, at structuring an adequate data collection process in order to ensure a precise quantification of the financed emissions related to the "Project Finance" asset class.
With respect to the exposures subject to analysis, the actual coverage of specific data is 42.8% while the remaining 57.2% is based on estimated data.

Finally, there are no biogenic emissions of Scope 1, 2 and 3. Nevertheless, the emission factors applied to the electricity consumed do not distinguish the percentage of biomass or biogenic CO_2.

[1] With reference to the asset class of "motor vehicle loans", the materiality of the type of loan within the activities of Banco BPM is residual; therefore, taking into account the complexities of treatment envisaged by the PCAF methodology on this type of asset class, these loans were included in the generic "business loans" category.
[2] The sources used are mainly the Higher Institute for Environmental Protection and Research (ISPRA) and the Single Register for the Emissions Trading System.

With reference to the aforementioned emissions, as at 31 December 2024, the intensity of its greenhouse gas emissions with respect to net revenues, shown in the table below, is equal to 0.01 tCO_2e per euro, both for location-based and market-based emissions.

GHG intensity compared to net revenues	2024
Total GHG emissions location-based (in tCO_2e)	58,161,576
Total GHG emissions market-based (in tCO_2e)	58,139,824
Net revenues (in thousands of euro)	9,690,050
Intensity of GHG emissions location-based (tCO_2e / euro)	0.01
Intensity of GHG emissions market-based (tCO_2e / euro)	0.01

The revenue items in the Income Statement used to calculate the intensity of greenhouse gas emissions are:

- 10. Interest and similar income;
- 40. Fee and commission income;
- 70. Dividends and similar income;
- 80. Net trading income;
- 90. Fair value gains/losses on hedging derivatives;
- 100. Gains (losses) on disposal or repurchase
  - Financial assets at amortised cost
  - Financial assets measured at fair value through other comprehensive income
  - Financial liabilities;
- 110. Net gains (losses) from other financial assets and liabilities measured at fair value through profit or loss;
- 160. Profit (loss) on insurance services (ex Net premiums);
- 230. Other operating expenses/income - Other operating income - Income on current accounts and loans;
- 230. Other operating expenses/income - Other operating income - Rental income on real estate.

These items were included only if their amount is greater than 0 (positive).

Metrics on GHG removals and GHG mitigation projects financed through carbon credits

Between December 2024 and February 2025, the Group requested the removal of carbon credits, referring to the year 2024, for offsetting its own residual scope 1 and 2 emissions (market-based)[1] recorded as at 31 December 2024. In particular, the offsetting took place through the purchase of carbon credits resulting from climate change mitigation projects outside the value chain, for a total of 13,500 tCO_2e[2].

The quality of the credits that the Group cancels, certified and exchanged, is confirmed by the presence in the registers of the voluntary credit market within which the documents supporting the project and the promoting body can be consulted.

Carbon credits cancelled in the reference year	2024
Total (in tCO_2e)	13,500
% share of emission reduction projects	70%
% share of emissions removal projects	30%
% share of credits certified by Goldstandard	63%
% share of credits certified by VCS	26%
% share of credits certified by VCS/CCB	11%
Type of well related to carbon credits from removal projects	Biogenic

100% of the credits cancelled in 2024 represent a corresponding adjustment pursuant to Article 6 of the Paris Agreement; none of them derive from projects developed in the EU.

[1] In quantifying Scope 1 and 2 emissions as at 31 December 2024, the Group excluded those generated by real estate leased to third parties

[2] Of which 10,525 tCO2e linked to Scope 1 emissions and 2,975 tCO2e linked to scope 2 market-based emissions (excluding emissions from Group-owned properties leased to third parties).

The offsetting of emissions through carbon credits took place with reference to the Group's Scope 1 and 2 emissions recorded in 2024, while emission reduction targets are envisaged starting from 2025. Therefore, the purchase of loans does not hinder or reduce their achievement.
There is no removal or storage of greenhouse gases resulting from projects developed as part of own operations or to which the Group contributes along the upstream and downstream value chain.

Pollution

The following table provides a description of the impacts, risks and opportunities that the Group has assessed as material in relation to pollution following its dual materiality assessment.

ESRS Topic, sub-topic, or sub-sub-topic	IRO	Perimeter	Description	Metrics used to assess performance and effectiveness in relation to a material IRO
Air pollution	Negative impact	Downstream value chain	Disbursement of loans to customers operating in sectors that contribute to air pollution and emit polluting emissions as part of their production processes	*Disclosure subject to progressive entry into force*

Policies, Actions and Targets related to pollution

The Group has not yet adopted specific policies, actions and targets related to pollution. The emergence of these issues as material, with reference to Group customers following the extension to the entire value chain of the dual materiality analysis conducted in 2024, did not make the implementation of appropriate policies, actions and targets possible, due to time constraints. These additional interventions will be planned over the following years, also in line with the phase-in period envisaged for the metrics by the relevant regulations.

Resource use and circular economy

The following table provides a description of the impacts, risks and opportunities that the Group has assessed as material in relation to resource use and circular economy following its dual materiality assessment.

ESRS Topic, sub-topic, or sub-sub-topic	IRO	Perimeter	Description	Metrics used to assess performance and effectiveness in relation to a material IRO
Resource inflows, including resource use	Negative impact	Upstream value chain	Failure to adopt circular economy principles by Group suppliers who use critical resources in their production processes without activating strategies to reduce the influx of resources	*Disclosure subject to progressive entry into force*

Policies, Actions and Targets related to circular economy

The Group has not yet adopted specific policies, actions and targets related to circular economy. The emergence of these issues as material, with reference to Group suppliers following the extension to the entire value chain of the dual materiality analysis conducted in 2024, did not make the implementation of appropriate policies, actions and targets possible, due to time constraints. These additional interventions will be planned over the following years in line with the phase-in period envisaged for the metrics by the relevant regulations.

Metrics related to Resource inflows

As a result of the dual materiality analysis conducted by Banco BPM Group in relation to the management of incoming resource inflows, a material impact was found generated by suppliers (upstream value chain) who mainly provide services to Banco BPM Group.
The main supply categories used by the Group, based on the amount of expense items recorded, include:

- technological and telecommunications services;
- financial services;

- consumables (e.g., paper, forms, etc.);
- property maintenance services.

Among these, the most significant expense items concern ICT (Information and Communications Technology) services essential for the performance of the Group's activities, such as hardware, software and telecommunications. Typically, the incoming material flows in these areas generate a negative impact on the environment since they include minerals and rare earths, as well as more common materials and resources such as plastic, metal and water for cooling systems. As non-renewable resources, minerals and rare earths are characterised by criticalities related to their limited availability in terms of quantity and geographical concentration (mainly in vulnerable geographical areas, in terms of geopolitical conflicts, working conditions and extraction processes not regulated by adequate environmental standards).
The impacts related to the extraction of these materials can be mitigated through the adoption of purchasing and production policies that promote compliance with high environmental standards and the protection of human rights, together with the implementation of circular economy solutions focused on the recovery and recycling of critical materials from end-of-life electronic devices. At the same time, investments in research and development for the use of new materials, alternatives to rare earths and with a lower environmental impact, are decisive for the creation of innovative long-term solutions.

Taxonomy pursuant to Article 8 of Regulation (EU) 2020/852

The following tables include the disclosure requirements set forth in Article 8 of the Disclosures Delegated Act, which supplements the EU Taxonomy Regulation (2020/852). These obligations require financial companies to communicate the KPIs of eligibility and alignment with the Taxonomy, according to the annexes provided by EU Delegated Regulations 2021/2178 and 2022/1214 (Annex XII Template for gas and nuclear). Specifically, we have also completed the template form required for insurance companies (Annex X) and the Group summary indicator as required by Commission Notice 2024/6691 published in the OJEU on November 8, 2024. The main aligned portfolios are those relating to exposures to companies subject to NFRD obligations and private loans secured by real estate. At a methodological level, refinements have been made, mainly with regard to the calculation of "flow KPIs" and the extension to the other objectives of the Taxonomy in terms of eligibility. Adequate data quality activities have also been carried out, necessary for the use of the information collected through info providers. The Group pursues a strategy of defining and marketing new products aimed at ensuring an ever-increasing level of eco-sustainability of its assets.

Annex VI - Template for the KPIs of Credit Institutions

Template Annex VI: GAR KPIs and off-balance-sheet KPIs

Template 0: Summary of KPIs to be disclosed by Credit Institutions under Article 8 of the Taxonomy Regulation

		Total environmentally sustainable assets (TURNOVER)	Total environmentally sustainable activities (CAPEX)	KPI****	KPI*****	% Coverage (over total assets)*** - TURNOVER	% Coverage (over total assets)*** - CAPEX	% of assets excluded from the GAR numerator (Article 7, paragraphs 2 and 3, and point 1.1.2 of Annex V)	% of assets excluded from the GAR denominator (Article 7, paragraph 1, and point 1.2.4 of Annex V)
Main KPI	**GAR (green asset ratio) for stock**	3,292.68	3,702.57	2.52	2.84	71.62	71.62	48.73	28.38

		Total environmentally sustainable assets (TURNOVER)	Total environmentally sustainable activities (CAPEX)	KPI (TURNOVER)	KPI (CAPEX)	% Coverage (over total assets) - TURNOVER	% Coverage (over total assets) - CAPEX	% of assets excluded from the GAR numerator (Article 7, paragraphs 2 and 3, and point 1.1.2 of Annex V)	% of assets excluded from the GAR denominator (Article 7, paragraph 1, and point 1.2.4 of Annex V)
Additional KPIs	*GAR (flow)*	1,481.52	1,676.15	2.45	2.78	53.87	53.87	42.54	46.13
	*Trading book**	Not in scope	Not in scope	Not in scope	Not in scope				
	Financial guarantees	0.15	0.24	0.02	0.03				
	Assets under management	7.25	14.47	0.35	0.69				
	*Fees and commissions income***	Not in scope	Not in scope	Not in scope	Not in scope				

** For credit institutions that do not meet the conditions of Article 94, paragraph 1 of the CRR or the conditions set out in Article 325a, paragraph 1 of the CRR*
*** Fees and commissions income from services other than lending and assets under management*
Institutions shall disclose forward-looking information for these KPIs, including information in terms of targets, together with relevant explanations on the methodology applied.
**** % of assets covered by the KPI over banks' total assets*
***** based on the turnover KPI of the counterparty*
****** based on the CapEx KPI of the counterparty, except for lending activities where turnover KPI is used for general lending*

Template 1: Assets for the calculation of GAR (Turnover)

	a	b	c	d	e	f	g	h	i	k	k	l	m	n
	Disclosure reference date T													
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
Million euro	Total (gross) carrying amount	Of which towards taxonomy relevant sectors (taxonomy-eligible)					Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)			
			Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)		
				Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling
GAR - Assets hedged in both the numerator and the denominator														
1 Loans and advances, debt securities and equity instruments not held for trading, eligible for GAR calculation	41,292.54	34,542.55	3,290.43	2,556.40	41.76	422.00	47.75	2.25	-	0.83	84.11	-	-	-
2 **Financial corporations**	3,921.26	608.73	39.56	-	2.34	3.29	16.95	1.32	-	0.00	0.04	-	-	-
3 Credit institutions	2,080.40	546.75	27.82	-	2.26	2.70	0.44	0.11	-	0.00	-	-	-	-
4 Loans and advances	125.78	30.36	1.26	-	0.18	0.12	0.05	0.01	-	-	-	-	-	-
5 Debt securities, including UoP	1,475.63	366.86	24.17	-	2.08	2.53	0.40	0.09	-	0.00	-	-	-	-
6 Equity instruments	478.99	149.53	2.39	-	-	0.04	-	-	-	-	-	-	-	-
7 Other financial corporations	1,840.86	61.99	11.74	-	0.08	0.59	16.51	1.22	-	-	0.04	-	-	-
8 Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debt securities including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 of which insurance undertakings	65.98	12.47	2.38	-	0.00	0.46	14.22	0.99	-	-	-	-	-	-
17 Loans and advances	0.02	0.00	0.00	-	0.00	0.00	0.00	0.00	-	-	-	-	-	-
18 Debt securities, including UoP	65.97	12.47	2.37	-	0.00	0.46	14.22	0.99	-	-	-	-	-	-
19 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20 **Non-financial corporations**	4,529.07	1,273.67	694.46	-	39.42	418.71	30.79	0.93	-	0.83	84.06	-	-	-
21 Loans and advances	3,963.84	1,069.31	542.78	-	29.75	364.78	3.77	0.17	-	0.09	84.06	-	-	-
22 Debt securities, including UoP	565.04	204.35	151.68	-	9.66	53.93	27.02	0.75	-	0.74	-	-	-	-
23 Equity instruments	0.18	0.01	-	-	-	-	-	-	-	-	-	-	-	-
24 **Households**	32,660.15	32,660.15	2,556.40	2,556.40	-	-	-	-	-	-	-	-	-	-
25 of which loans collateralised by residential immovable property	27,288.67	27,288.67	2,556.40	2,556.40	-	-	-	-	-	-	-	-	-	-
26 of which building renovation loans	35.65	35.65	-	-	-	-	-	-	-	-	-	-	-	-
27 of which motor vehicle loans	128.84	128.84	-	-	-	-	-	-	-	-	-	-	-	-
28 **Local governments financing**	182.06	-	-	-	-	-	-	-	-	-	-	-	-	-
29 Construction financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30 Other local government financing	182.06	-	-	-	-	-	-	-	-	-	-	-	-	-

(continued) Template 1: Assets for the calculation of GAR (Turnover)

	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
	Disclosure reference date T																
	Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)								
Million euro		Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)			
			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling
GAR - Assets hedged in both the numerator and the denominator																	
1 Loans and advances, debt securities and equity instruments not held for trading, eligible for GAR calculation	40.62	-	-	-	2.38	-	-	-	0.02	-	-	-	34,717.42	3,292.68	2,556.40	41.76	506.11
2 **Financial corporations**	0.27	-	-	-	0.01	-	-	-	0.02	-	-	-	626.03	40.89	-	2.34	3.33
3 Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	547.19	27.93	-	2.26	2.70
4 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	30.40	1.27	-	0.18	0.12
5 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	367.25	24.26	-	2.08	2.53
6 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	149.53	2.39	-	-	0.04
7 Other financial corporations	0.27	-	-	-	0.01	-	-	-	0.02	-	-	-	78.83	12.96	-	0.08	0.63
8 Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debt securities including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	26.69	3.36	-	0.00	0.46
17 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	0.00	0.00	-	0.00	0.00
18 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	26.68	3.36	-	0.00	0.46
19 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20 **Non-financial corporations**	40.35	-	-	-	2.37	-	-	-	0.00	-	-	-	1,431.24	695.38	-	39.42	502.77
21 Loans and advances	35.08	-	-	-	2.37	-	-	-	0.00	-	-	-	1,194.59	542.95	-	29.75	448.84
22 Debt securities, including UoP	5.27	-	-	-	-	-	-	-	-	-	-	-	236.64	152.44	-	9.66	53.93
23 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	0.01	-	-	-	-
24 **Households**	-	-	-	-	-	-	-	-	-	-	-	-	32,660.15	2,556.40	2,556.40	-	-
25 of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	-	-	-	-	27,288.67	2,556.40	2,556.40	-	-
26 of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	35.65	-	-	-	-
27 of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	128.84	-	-	-	-
28 **Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29 Construction financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

(continued) Template 1: Assets for the calculation of GAR (Turnover)

		a	b	c	d	e	f	g	h	i	k	k	l	m	n
		Disclosure reference date T													
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
			Of which towards taxonomy relevant sectors (taxonomy-eligible)					Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)			
				Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)		
	Million euro	Total (gross) carrying amount			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling
31	**Collaterals obtained by taking possession: residential and commercial immovable properties**	398.18	398.18	-	-	-	-	-	-	-	-	-	-	-	-
32	**Other assets excluded from the numerator for GAR calculation (covered in the denominator)**	88,756.77													
33	**Financial and non-financial corporations**	73,578.04													
34	SMEs and NFCs (Non-Financial Corporations other than SMEs) not subject to NFRD disclosure obligations	52,758.66													
35	Loans and advances	52,075.91													
36	of which loans collateralised by commercial immovable property	10,497.52													
37	of which building renovation loans	0.93													
38	Debt securities	598.05													
39	Equity instruments	84.70													
40	Non-EU country counterparties not subject to NFRD disclosure obligations	858.62													
41	Loans and advances	482.88													
42	Debt securities	375.73													
43	Equity instruments	0.00													
44	**Derivatives**	1,033.27													
45	**On demand interbank loans**	252.64													
46	**Cash and cash related assets**	738.82													
47	**Other assets (e.g. goodwill, commodities, etc.)**	13,154.01													
48	**Total GAR assets**	**130,447.49**	**34,940.73**	**3,290.43**	**2,556.40**	**41.76**	**422.00**	**47.75**	**2.25**	**-**	**0.83**	**84.11**	**-**	**-**	**-**
49	**Other assets not covered for GAR calculation**	51,695.45													
50	**Sovereigns**	33,550.96													
51	**Central banks exposure**	12,136.44													
52	**Trading book**	6,008.06													
53	**Total assets**	182,142.94													
	Off-balance sheet exposures - Corporates subject NFRD disclosure obligations														
54	Financial guarantees	780.28	8.38	0.14	-	0.03	0.05	4.77	0.01	-	0.01	-	-	-	-
55	Assets under management	2,096.91	28.70	7.06	-	0.59	3.97	7.77	0.19	-	0.14	0.17	-	-	-
56	Of which debt securities	171.37	17.38	4.43	-	0.48	2.22	1.79	0.13	-	0.07	0.16	-	-	-
57	Of which equity instruments	146.19	10.16	2.64	-	0.10	1.75	5.98	0.06	-	0.06	0.01	-	-	-

(continued) Template 1: Assets for the calculation of GAR (Turnover)

Million euro	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
	Disclosure reference date T																
	Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)								
		Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)			
			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling
31 **Collaterals obtained by taking possession: residential and commercial immovable properties**	-	-	-	-	-	-	-	-	-	-	-	-	398.18	-	-	-	-
32 **Other assets excluded from the numerator for GAR calculation (covered in the denominator)**																	
33 **Financial and non-financial corporations**																	
34 SMEs and NFCs (Non-Financial Corporations other than SMEs) not subject to NFRD disclosure obligations																	
35 Loans and advances																	
36 of which loans collateralised by commercial immovable property																	
37 of which building renovation loans																	
38 Debt securities																	
39 Equity instruments																	
40 Non-EU country counterparties not subject to NFRD disclosure obligations																	
41 Loans and advances																	
42 Debt securities																	
43 Equity instruments																	
44 **Derivatives**																	
45 **On demand interbank loans**																	
46 **Cash and cash related assets**																	
47 **Other assets (e.g. goodwill, commodities, etc.)**																	
48 Total GAR assets	**40.62**	**-**	**-**	**-**	**2.38**	**-**	**-**	**-**	**0.02**	**-**	**-**	**-**	**35,115.60**	**3,292.68**	**2,556.40**	**41.76**	**506.11**
49 **Other assets not covered for GAR calculation**																	
50 **Sovereigns**																	
51 **Central banks exposure**																	
52 **Trading book**																	
53 **Total assets**																	
Off-balance sheet exposures - Corporates subject NFRD disclosure obligations																	
54 Financial guarantees	-	-	-	-	-	-	-	-	-	-	-	-	13.15	0.15	-	0.03	0.05
55 Assets under management	0.07	-	-	-	0.01	-	-	-	0.00	-	-	-	36.73	7.25	-	0.59	4.14
56 Of which debt securities	0.06	-	-	-	0.00	-	-	-	0.00	-	-	-	19.39	4.55	-	0.48	2.38
57 Of which equity instruments	0.01	-	-	-	0.01	-	-	-	-	-	-	-	16.17	2.70	-	0.10	1.76

Template 1: Assets for the calculation of GAR (Turnover)

	Million euro	ag	ah	ai	aj	ak	al	am	an	ao	ap	aq	ar	as	at
		Disclosure reference date T-1													
		Total (gross) carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
			Of which towards taxonomy relevant sectors (taxonomy-eligible)					Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)			
				Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)		
					Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling
	GAR - Assets hedged in both the numerator and the denominator														
1	Loans and advances, debt securities and equity instruments not held for trading, eligible for GAR calculation	36,425.47	29,938.82	2,678.12	-	100.30	202.45	5.19	1.33	-	-	-	-	-	-
2	**Financial corporations**	4,422.26	541.64	-	-	-	-	-	-	-	-	-	-	-	-
3	Credit institutions	2,624.61	511.86	-	-	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	1,087.48	68.54	-	-	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	1,484.71	433.24	-	-	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	52.42	10.08	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	1,797.65	29.78	-	-	-	-	-	-	-	-	-	-	-	-
8	Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	0.00	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	0.00	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	4.21	0.31	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	4.21	0.31	-	-	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	0.00	0.00	-	-	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	**Non-financial corporations**	3,711.71	1,289.93	521.20	-	100.30	202.45	5.19	1.33	-	-	-	-	-	-
21	Loans and advances	3,304.77	1,142.13	417.71	-	95.58	162.29	5.08	1.33	-	-	-	-	-	-
22	Debt securities, including UoP	405.71	146.57	103.48	-	4.72	40.16	0.02	-	-	-	-	-	-	-
23	Equity instruments	1.23	1.23	-	-	-	-	0.09	-	-	-	-	-	-	-
24	**Households**	28,107.25	28,107.25	2,156.92	-	-	-	-	-	-	-	-	-	-	-
25	of which loans collateralised by residential immovable property	27,766.48	27,766.48	2,156.92	-	-	-	-	-	-	-	-	-	-	-
26	of which building renovation loans	76.74	76.74	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	264.03	264.03	-	-	-	-	-	-	-	-	-	-	-	-
28	**Local governments financing**	184.26	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Construction financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	184.26	-	-	-	-	-	-	-	-	-	-	-	-	-

(continued) Template 1: Assets for the calculation of GAR (Turnover)

		au	av	aw	ax	ay	az	ba	bb	bc	bd	be	bf	bg	bh	bi	bj	bk
		Disclosure reference date T-1																
		Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Million euro	Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)					Of which towards taxonomy relevant sectors (taxonomy-eligible)			
			Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)		
				Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling
	GAR - Assets hedged in both the numerator and the denominator																	
1	Loans and advances, debt securities and equity instruments not held for trading, eligible for GAR calculation	-	-	-	-	-	-	-	-	-	-	-	-	29,944.01	2,679.45	-	100.30	202.45
2	**Financial corporations**	-	-	-	-	-	-	-	-	-	-	-	-	541.64	-	-	-	-
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	511.86	-	-	-	-
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	68.54	-	-	-	-
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	433.24	-	-	-	-
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	10.08	-	-	-	-
7	Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	29.78	-	-	-	-
8	Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	0.31	-	-	-	-
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	0.31	-	-	-	-
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	0.00	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	**Non-financial corporations**	-	-	-	-	-	-	-	-	-	-	-	-	1,295.12	522.53	-	100.30	202.45
21	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	1,147.21	419.05	-	95.58	162.29
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	146.59	103.48	-	4.72	40.16
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	1.31	-	-	-	-
24	**Households**	-	-	-	-	-	-	-	-	-	-	-	-	28,107.25	2,156.92	-	-	-
25	of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	-	-	-	-	27,766.48	2,156.92	-	-	-
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	76.74	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	264.03	-	-	-	-
28	**Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Construction financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

(continued) Template 1: Assets for the calculation of GAR (Turnover)

	Million euro	ag	ah	ai	aj	ak	al	am	an	ao	ap	aq	ar	as	at
		Disclosure reference date T-1													
		Total (gross) carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
			Of which towards taxonomy relevant sectors (taxonomy-eligible)					Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)			
				Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)		
					Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling
31	**Collaterals obtained by taking possession: residential and commercial immovable properties**	518.77	518.77	-	-	-	-	-	-	-	-	-	-	-	-
32	**Other assets excluded from the numerator for GAR calculation (covered in the denominator)**	95,570.22													
33	**Financial and non-financial corporations**	77,649.36													
34	SMEs and NFCs (Non-Financial Corporations other than SMEs) not subject to NFRD disclosure obligations	54,479.91													
35	Loans and advances	53,933.92													
36	of which loans collateralised by commercial immovable property	11,527.87													
37	of which building renovation loans	1.23													
38	Debt securities	356.62													
39	Equity instruments	189.37													
40	Non-EU country counterparties not subject to NFRD disclosure obligations	736.30													
41	Loans and advances	478.16													
42	Debt securities	258.14													
43	Equity instruments	0.00													
44	**Derivatives**	979.92													
45	**On demand interbank loans**	318.73													
46	**Cash and cash related assets**	454.39													
47	**Other assets (e.g. goodwill, commodities, etc.)**	16,167.83													
48	**Total GAR assets**	**132,514.46**	**30,457.58**	**2,678.12**	**-**	**100.30**	**202.45**	**5.19**	**1.33**	**-**	**-**	**-**	**-**	**-**	**-**
49	**Other assets not covered for GAR calculation**	54,631.47													
50	**Sovereigns**	31,831.28													
51	**Central banks exposure**	18,457.45													
52	**Trading book**	4,342.74													
53	**Total assets**	187,145.93													
	Off-balance sheet exposures - Corporates subject NFRD disclosure obligations														
54	Financial guarantees	429.12	3.06	-	-	-	-	-	-	-	-	-	-	-	-
55	Assets under management	1,844.33	10.50	2.56	-	0.01	1.63	0.00	-	-	-	-	-	-	-
56	Of which debt securities	74.43	4.58	1.16	-	-	0.76	-	-	-	-	-	-	-	-
57	Of which equity instruments	129.23	5.00	1.40	-	0.01	0.88	0.00	-	-	-	-	-	-	-

(continued) Template 1: Assets for the calculation of GAR (Turnover)

Million euro	au	av	aw	ax	ay	az	ba	bb	bc	bd	be	bf	bg	bh	bi	bj	bk
	Disclosure reference date T-1																
	Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)			
			Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)		
			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling
31 **Collaterals obtained by taking possession: residential and commercial immovable properties**	-	-	-	-	-	-	-	-	-	-	-	-	518.77	-	-	-	-
32 **Other assets excluded from the numerator for GAR calculation (covered in the denominator)**																	
33 **Financial and non-financial corporations**																	
34 SMEs and NFCs (Non-Financial Corporations other than SMEs) not subject to NFRD disclosure obligations																	
35 Loans and advances																	
36 of which loans collateralised by commercial immovable property																	
37 of which building renovation loans																	
38 Debt securities																	
39 Equity instruments																	
40 Non-EU country counterparties not subject to NFRD disclosure obligations																	
41 Loans and advances																	
42 Debt securities																	
43 Equity instruments																	
44 **Derivatives**																	
45 **On demand interbank loans**																	
46 **Cash and cash related assets**																	
47 **Other assets (e.g. goodwill, commodities, etc.)**																	
48 Total GAR assets	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**30,462.77**	**2,679.45**	**-**	**100.30**	**202.45**
49 **Other assets not covered for GAR calculation**																	
50 **Sovereigns**																	
51 **Central banks exposure**																	
52 **Trading book**																	
53 **Total assets**																	
Off-balance sheet exposures - Corporates subject NFRD disclosure obligations																	
54 Financial guarantees	-	-	-	-	-	-	-	-	-	-	-	-	3.06	-	-	-	-
55 Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	10.50	2.56	-	0.01	1.63
56 Of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-	4.58	1.16	-	-	0.76
57 Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	5.00	1.40	-	0.01	0.88

Template 1: Assets for the calculation of GAR (CapEX)

		a	b	c	d	e	f	g	h	i	k	k	l	m	n
		Disclosure reference date T													
			Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	Million euro	Total (gross) carrying amount	Of which towards taxonomy relevant sectors (taxonomy-eligible)					Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)			
				Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)		
					Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling
	GAR - Assets hedged in both the numerator and the denominator														
1	Loans and advances, debt securities and equity instruments not held for trading, eligible for GAR calculation	41,292.54	34,975.18	3,681.71	2,556.40	41.46	702.84	184.79	20.85	-	0.14	121.06	-	-	-
2	**Financial corporations**	3,921.26	616.37	48.91	-	3.07	7.31	18.52	1.42	-	-	0.04	-	-	-
3	Credit institutions	2,080.40	550.24	33.71	-	2.46	6.13	0.51	0.15	-	-	-	-	-	-
4	Loans and advances	125.78	30.54	1.78	-	0.28	0.40	0.06	0.01	-	-	-	-	-	-
5	Debt securities, including UoP	1,475.63	369.78	29.41	-	2.19	5.64	0.45	0.14	-	-	-	-	-	-
6	Equity instruments	478.99	149.92	2.52	-	-	0.09	-	-	-	-	-	-	-	-
7	Other financial corporations	1,840.86	66.14	15.20	-	0.61	1.18	18.01	1.27	-	-	0.04	-	-	-
8	Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	65.98	13.72	3.17	-	0.07	0.86	14.25	1.02	-	-	-	-	-	-
17	Loans and advances	0.02	0.00	0.00	-	0.00	0.00	0.00	0.00	-	-	-	-	-	-
18	Debt securities, including UoP	65.97	13.72	3.17	-	0.07	0.86	14.25	1.02	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	**Non-financial corporations**	4,529.07	1,698.65	1,076.39	-	38.38	695.53	166.27	19.44	-	0.14	121.01	-	-	-
21	Loans and advances	3,963.84	1,385.14	820.78	-	26.73	584.76	107.88	15.11	-	0.01	120.99	-	-	-
22	Debt securities, including UoP	565.04	313.51	255.62	-	11.66	110.76	58.39	4.33	-	0.14	0.03	-	-	-
23	Equity instruments	0.18	0.00	-	-	-	-	-	-	-	-	-	-	-	-
24	**Households**	32,660.15	32,660.15	2,556.40	2,556.40	-	-	-	-	-	-	-	-	-	-
25	of which loans collateralised by residential immovable property	27,288.67	27,288.67	2,556.40	2,556.40	-	-	-	-	-	-	-	-	-	-
26	of which building renovation loans	35.65	35.65	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	128.84	128.84	-	-	-	-	-	-	-	-	-	-	-	-
28	**Local governments financing**	182.06	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Construction financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	182.06	-	-	-	-	-	-	-	-	-	-	-	-	-

(continued) Template 1: Assets for the calculation of GAR (CapEx)

	Million euro	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		Disclosure reference date T																
		Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)								
			Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)			
				Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling
	GAR - Assets hedged in both the numerator and the denominator																	
1	Loans and advances, debt securities and equity instruments not held for trading, eligible for GAR calculation	22.21	-	-	-	1.50	-	-	-	16.29	-	-	-	35,321.03	3,702.57	2,556.40	41.46	702.98
2	**Financial corporations**	0.22	-	-	-	0.01	-	-	-	0.02	-	-	-	635.18	50.33	-	3.07	7.31
3	Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	550.74	33.86	-	2.46	6.13
4	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	30.60	1.80	-	0.28	0.40
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	370.23	29.54	-	2.19	5.64
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	149.92	2.52	-	-	0.09
7	Other financial corporations	0.22	-	-	-	0.01	-	-	-	0.02	-	-	-	84.43	16.47	-	0.61	1.18
8	Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	27.97	4.19	-	0.07	0.86
17	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	0.00	0.00	-	0.00	0.00
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	27.97	4.19	-	0.07	0.86
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	**Non-financial corporations**	21.99	-	-	-	1.50	-	-	-	16.27	-	-	-	2,025.70	1,095.83	-	38.38	695.67
21	Loans and advances	17.63	-	-	-	1.41	-	-	-	0.00	-	-	-	1,633.06	835.89	-	26.73	584.77
22	Debt securities, including UoP	4.36	-	-	-	0.08	-	-	-	16.27	-	-	-	392.64	259.95	-	11.66	110.90
23	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	0.00	-	-	-	-
24	**Households**	-	-	-	-	-	-	-	-	-	-	-	-	32,660.15	2,556.40	2,556.40	-	-
25	of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	-	-	-	-	27,288.67	2,556.40	2,556.40	-	-
26	of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	35.65	-	-	-	-
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	128.84	-	-	-	-
28	**Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Construction financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

(continued) Template 1: Assets for the calculation of GAR (CapEx)

Million euro	a	b	c	d	e	f	g	h	i	k	k	l	m	n
	Disclosure reference date T													
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Of which towards taxonomy relevant sectors (taxonomy-eligible)					Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)			
			Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)		
	Total (gross) carrying amount			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling
31 **Collaterals obtained by taking possession: residential and commercial immovable properties**	398.18	398.18	-	-	-	-	-	-	-	-	-	-	-	-
32 **Other assets excluded from the numerator for GAR calculation (covered in the denominator)**	88,756.77													
33 **Financial and non-financial corporations**	73,578.04													
34 SMEs and NFCs (Non-Financial Corporations other than SMEs) not subject to NFRD disclosure obligations	52,758.66													
35 Loans and advances	52,075.91													
36 of which loans collateralised by commercial immovable property	10,497.52													
37 of which building renovation loans	0.93													
38 Debt securities	598.05													
39 Equity instruments	84.70													
40 Non-EU country counterparties not subject to NFRD disclosure obligations	858.62													
41 Loans and advances	482.88													
42 Debt securities	375.73													
43 Equity instruments	0.00													
44 **Derivatives**	1,033.27													
45 **On demand interbank loans**	252.64													
46 **Cash and cash related assets**	738.82													
47 **Other assets (e.g. goodwill, commodities, etc.)**	13,154.01													
48 Total GAR assets	**130,447.49**	**35,373.36**	**3,681.71**	**2,556.40**	**41.46**	**702.84**	**184.79**	**20.85**	**-**	**0.14**	**121.06**	**-**	**-**	**-**
49 **Other assets not covered for GAR calculation**	51,695.45													
50 **Sovereigns**	33,550.96													
51 **Central banks exposure**	12,136.44													
52 **Trading book**	6,008.06													
53 **Total assets**	182,142.94													
Off-balance sheet exposures - Corporates subject NFRD disclosure obligations														
54 Financial guarantees	780.28	8.05	0.22	-	0.02	0.07	6.59	0.02	-	0.00	0.03	-	-	-
55 Assets under management	2,096.91	32.68	13.84	-	0.90	7.19	7.13	0.63	-	0.00	0.30	-	-	-
56 Of which debt securities	171.37	21.13	8.93	-	0.83	4.59	1.60	0.38	-	0.00	0.28	-	-	-
57 Of which equity instruments	146.19	11.55	4.91	-	0.07	2.60	5.53	0.25	-	0.00	0.02	-	-	-

(continued) Template 1: Assets for the calculation of GAR (CapEx)

Million euro	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
	Disclosure reference date T																
	Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)								
		Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)			
			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling
31 **Collaterals obtained by taking possession: residential and commercial immovable properties**	-	-	-	-	-	-	-	-	-	-	-	-	398.18	-	-	-	-
32 **Other assets excluded from the numerator for GAR calculation (covered in the denominator)**																	
33 **Financial and non-financial corporations**																	
34 SMEs and NFCs (Non-Financial Corporations other than SMEs) not subject to NFRD disclosure obligations																	
35 Loans and advances																	
36 of which loans collateralised by commercial immovable property																	
37 of which building renovation loans																	
38 Debt securities																	
39 Equity instruments																	
40 Non-EU country counterparties not subject to NFRD disclosure obligations																	
41 Loans and advances																	
42 Debt securities																	
43 Equity instruments																	
44 **Derivatives**																	
45 **On demand interbank loans**																	
46 **Cash and cash related assets**																	
47 **Other assets (e.g. goodwill, commodities, etc.)**																	
48 **Total GAR assets**	**22.21**	**-**	**-**	**-**	**1.50**	**-**	**-**	**-**	**16.29**	**-**	**-**	**-**	**35,719.21**	**3,702.57**	**2,556.40**	**41.46**	**702.98**
49 **Other assets not covered for GAR calculation**																	
50 **Sovereigns**																	
51 **Central banks exposure**																	
52 **Trading book**																	
53 **Total assets**																	
Off-balance sheet exposures - Corporates subject NFRD disclosure obligations																	
54 Financial guarantees	-	-	-	-	-	-	-	-	-	-	-	-	14.67	0.24	-	0.02	0.07
55 Assets under management	0.34	-	-	-	0.01	-	-	-	0.00	-	-	-	40.46	14.47	-	0.90	7.19
56 Of which debt securities	0.32	-	-	-	0.00	-	-	-	0.00	-	-	-	23.33	9.31	-	0.83	4.59
57 Of which equity instruments	0.02	-	-	-	0.01	-	-	-	-	-	-	-	17.13	5.16	-	0.07	2.60

Template 1: Assets for the calculation of GAR (CapEX)

Million euro	ag	ah	ai	aj	ak	al	am	an	ao	ap	aq	ar	as	at
	Disclosure reference date T-1													
	Total (gross) carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Of which towards taxonomy relevant sectors (taxonomy-eligible)					Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)			
			Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)		
				Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling
GAR - Assets hedged in both the numerator and the denominator														
1 Loans and advances, debt securities and equity instruments not held for trading, eligible for GAR calculation	36,425.47	30,010.63	2,976.61	-	59.61	205.45	38.72	38.54	-	0.03	-	-	-	-
2 **Financial corporations**	4,422.26	353.08	-	-	-	-	-	-	-	-	-	-	-	-
3 Credit institutions	2,624.61	345.84	-	-	-	-	-	-	-	-	-	-	-	-
4 Loans and advances	1,087.48	42.93	-	-	-	-	-	-	-	-	-	-	-	-
5 Debt securities, including UoP	1,484.71	302.90	-	-	-	-	-	-	-	-	-	-	-	-
6 Equity instruments	52.42	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Other financial corporations	1,797.65	7.24	-	-	-	-	-	-	-	-	-	-	-	-
8 Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debt securities including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 of which management companies	0.00	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Loans and advances	0.00	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 of which insurance undertakings	4.21	0.39	-	-	-	-	-	-	-	-	-	-	-	-
17 Loans and advances	4.21	0.39	-	-	-	-	-	-	-	-	-	-	-	-
18 Debt securities, including UoP	0.00	0.00	-	-	-	-	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20 **Non-financial corporations**	3,711.71	1,550.31	819.69	-	59.61	205.45	38.72	38.54	-	0.03	-	-	-	-
21 Loans and advances	3,304.77	1,318.31	636.68	-	52.60	193.07	20.06	20.06	-	-	-	-	-	-
22 Debt securities, including UoP	405.71	230.77	183.00	-	7.01	12.38	18.66	18.49	-	0.03	-	-	-	-
23 Equity instruments	1.23	1.23	-	-	-	-	-	-	-	-	-	-	-	-
24 **Households**	28,107.25	28,107.25	2,156.92	-	-	-	-	-	-	-	-	-	-	-
25 of which loans collateralised by residential immovable property	27,766.48	27,766.48	2,156.92	-	-	-	-	-	-	-	-	-	-	-
26 of which building renovation loans	76.74	76.74	-	-	-	-	-	-	-	-	-	-	-	-
27 of which motor vehicle loans	264.03	264.03	-	-	-	-	-	-	-	-	-	-	-	-
28 **Local governments financing**	184.26	-	-	-	-	-	-	-	-	-	-	-	-	-
29 Construction financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30 Other local government financing	184.26	-	-	-	-	-	-	-	-	-	-	-	-	-

(continued) Template 1: Assets for the calculation of GAR (CapEx)

Million euro	au	av	aw	ax	ay	az	ba	bb	bc	bd	be	bf	bg	bh	bi	bj	bk
	Disclosure reference date T-1																
	Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)				
		Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)			
			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling
GAR - Assets hedged in both the numerator and the denominator																	
1 Loans and advances, debt securities and equity instruments not held for trading, eligible for GAR calculation	-	-	-	-	-	-	-	-	-	-	-	-	30,049.35	3,015.15	-	59.61	205.49
2 **Financial corporations**	-	-	-	-	-	-	-	-	-	-	-	-	353.08	-	-	-	-
3 Credit institutions	-	-	-	-	-	-	-	-	-	-	-	-	345.84	-	-	-	-
4 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	42.93	-	-	-	-
5 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	302.90	-	-	-	-
6 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Other financial corporations	-	-	-	-	-	-	-	-	-	-	-	-	7.24	-	-	-	-
8 Of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debt securities including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-	-	-	-	-	0.39	-	-	-	-
17 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	0.39	-	-	-	-
18 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	0.00	-	-	-	-
19 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20 **Non-financial corporations**	-	-	-	-	-	-	-	-	-	-	-	-	1,589.02	858.23	-	59.61	205.49
21 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	1,338.37	656.74	-	52.60	193.07
22 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	249.43	201.49	-	7.01	12.41
23 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	1.23	-	-	-	-
24 **Households**	-	-	-	-	-	-	-	-	-	-	-	-	28,107.25	2,156.92	-	-	-
25 of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	-	-	-	-	27,766.48	2,156.92	-	-	-
26 of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	76.74	-	-	-	-
27 of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	264.03	-	-	-	-
28 **Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29 Construction financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

(continued) Template 1: Assets for the calculation of GAR (CapEx)

Million euro	ag	ah	ai	aj	ak	al	am	an	ao	ap	aq	ar	as	at
	Disclosure reference date T-1													
	Total (gross) carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Of which towards taxonomy relevant sectors (taxonomy-eligible)					Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)			
			Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)		
				Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling
31 **Collaterals obtained by taking possession: residential and commercial immovable properties**	518.77	518.77	-	-	-	-	-	-	-	-	-	-	-	-
32 **Other assets excluded from the numerator for GAR calculation (covered in the denominator)**	95,570.22													
33 **Financial and non-financial corporations**	77,649.36													
34 SMEs and NFCs (Non-Financial Corporations other than SMEs) not subject to NFRD disclosure obligations	54,479.91													
35 Loans and advances	53,933.92													
36 of which loans collateralised by commercial immovable property	11,527.87													
37 of which building renovation loans	1.23													
38 Debt securities	356.62													
39 Equity instruments	189.37													
40 Non-EU country counterparties not subject to NFRD disclosure obligations	736.30													
41 Loans and advances	478.16													
42 Debt securities	258.14													
43 Equity instruments	0.00													
44 **Derivatives**	979.92													
45 **On demand interbank loans**	318.73													
46 **Cash and cash related assets**	454.39													
47 **Other assets (e.g. goodwill, commodities, etc.)**	16,167.83													
48 **Total GAR assets**	132,514.46	30,529.40	2,976.61	-	59.61	205.45	38.72	38.54	-	0.03	-	-	-	-
49 **Other assets not covered for GAR calculation**	54,631.47													
50 **Sovereigns**	31,831.28													
51 **Central banks exposure**	18,457.45													
52 **Trading book**	4,342.74													
53 **Total assets**	187,145.93													
Off-balance sheet exposures - Corporates subject NFRD disclosure obligations														
54 Financial guarantees	429.12	3.12	-	-	-	-	-	-	-	-	-	-	-	-
55 Assets under management	1,844.33	15.52	8.58	-	0.05	3.10	0.06	0.01	-	0.00	-	-	-	-
56 Of which debt securities	74.43	6.99	3.89	-	-	2.25	0.05	0.01	-	0.00	-	-	-	-
57 Of which equity instruments	129.23	7.62	4.69	-	0.05	0.86	0.00	0.00	-	0.00	-	-	-	-

(continued) Template 1: Assets for the calculation of GAR (CapEx)

	Million euro	au	av	aw	ax	ay	az	ba	bb	bc	bd	be	bf	bg	bh	bi	bj	bk
		Disclosure reference date T-1																
		Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)				
			Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)			
				Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling
31	**Collaterals obtained by taking possession: residential and commercial immovable properties**	-	-	-	-	-	-	-	-	-	-	-	-	518.77	-	-	-	-
32	**Other assets excluded from the numerator for GAR calculation (covered in the denominator)**																	
33	**Financial and non-financial corporations**																	
34	SMEs and NFCs (Non-Financial Corporations other than SMEs) not subject to NFRD disclosure obligations																	
35	Loans and advances																	
36	of which loans collateralised by commercial immovable property																	
37	of which building renovation loans																	
38	Debt securities																	
39	Equity instruments																	
40	Non-EU country counterparties not subject to NFRD disclosure obligations																	
41	Loans and advances																	
42	Debt securities																	
43	Equity instruments																	
44	**Derivatives**																	
45	**On demand interbank loans**																	
46	**Cash and cash related assets**																	
47	**Other assets (e.g. goodwill, commodities, etc.)**																	
48	**Total GAR assets**	-	-	-	-	-	-	-	-	-	-	-	-	30,568.12	3,015.15	-	59.61	205.49
49	**Other assets not covered for GAR calculation**																	
50	**Sovereigns**																	
51	**Central banks exposure**																	
52	**Trading book**																	
53	**Total assets**																	
	Off-balance sheet exposures - Corporates subject NFRD disclosure obligations																	
54	Financial guarantees	-	-	-	-	-	-	-	-	-	-	-	-	3.12	-	-	-	-
55	Assets under management	-	-	-	-	-	-	-	-	-	-	-	-	15.57	8.60	-	0.05	3.10
56	Of which debt securities	-	-	-	-	-	-	-	-	-	-	-	-	7.04	3.91	-	-	2.25
57	Of which equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	7.62	4.69	-	0.05	0.86

Template 2: GAR - Sector information (Turnover)

	Breakdown by sector - NACE 4 digits level (code and label)	a	b	c	d	e	f	g	h	y	z	aa	ab
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		Million euro	Of which environmentally sustainable (CCM)	Million euro	Of which environmentally sustainable (CCM)	Million euro	Of which environmentally sustainable (CCA)	Million euro	Of which environmentally sustainable (CCA)	Million euro	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Million euro	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	A01.1.1 - Growing of cereals (except rice), leguminous crops and oil seeds	1.80	0.00			2.69	-			4.50	0.00		
2	B06.1.0 - Extraction of crude petroleum	37.73	0.45			-	-			37.73	0.45		
3	B08.1.2 - Operation of gravel and sand pits; mining of clays and kaolin	0.23	0.00			-	-			0.23	0.00		
4	C10.5.1 - Operation of dairies and cheese making	2.84	-			-	-			2.84	-		
5	C10.7.3 - Manufacture of macaroni, noodles, couscous and similar farinaceous products	20.48	-			-	-			20.48	-		
6	C10.8.6 - Manufacture of homogenised food preparations and dietetic food	3.40	-			-	-			3.40	-		
7	C11.0.1 - Distilling, rectifying and blending of spirits	144.44	-			-	-			144.44	-		
8	C14.1.3 - Manufacture of other outerwear	0.03	-			-	-			0.03	-		
9	C14.3.9 - Manufacture of other knitted and crocheted apparel	35.83	-			-	-			35.83	-		
10	C15.2.0 - Manufacture of footwear	101.67	0.09			-	-			101.67	0.09		
11	C17.1.2 - Manufacture of paper and paperboard	2.80	-			-	-			2.80	-		
12	C17.2.3 - Manufacture of paper stationery	5.80	-			-	-			5.80	-		
13	C19.2.0 - Manufacture of refined petroleum products	208.90	0.58			-	-			208.90	0.58		
14	C20.1.1 - Manufacture of industrial gases	61.85	0.12			-	-			61.85	0.12		
15	C20.1.4 - Manufacture of other organic basic chemicals	69.49	0.83			-	-			69.49	0.83		
16	C20.4.2 - Manufacture of perfumes and toilet preparations	1.21	-			-	-			1.21	-		
17	C20.6.0 - Manufacture of man-made fibres	21.19	0.34			-	-			21.19	0.34		
18	C21.2.0 - Manufacture of pharmaceutical preparations	167.03	-			-	-			167.03	-		
19	C22.2.1 - Manufacture of plastic plates, sheets, tubes and profiles	0.00	-			-	-			0.00	-		
20	C22.2.9 - Manufacture of other plastic products	21.31	-			-	-			21.31	-		
21	C23.5.1 - Manufacture of cement	5.23	0.03			-	-			5.23	0.03		
22	C23.7.0 - Cutting, shaping and finishing of stone	0.22	0.02			-	-			0.22	0.02		
23	C24.1.0 - Manufacture of basic iron and steel and of ferro-alloys	30.82	10.47			0.00	0.00			30.82	10.47		
24	C24.2.0 - Manufacture of tubes, pipes, hollow profiles and related fittings, of steel	5.00	0.00			0.01	0.00			5.02	0.00		

	Breakdown by sector - NACE 4 digits level (code and label)	a	b	c	d	e	f	g	h	y	z	aa	ab
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		Million euro	Of which environmentally sustainable (CCM)	Million euro	Of which environmentally sustainable (CCM)	Million euro	Of which environmentally sustainable (CCA)	Million euro	Of which environmentally sustainable (CCA)	Million euro	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Million euro	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
25	C24.3.3 - Cold forming or folding	0.02	-			-	-			0.02	-		
26	C25.1.2 - Manufacture of doors and windows of metal	4.65	0.40			-	-			4.65	0.40		
27	C25.5.0 - Forging, pressing, stamping and roll-forming of metal; powder metallurgy	4.52	-			-	-			4.52	-		
28	C25.6.2 - Machining	0.01	0.00			-	-			0.01	0.00		
29	C25.9.3 - Manufacture of wire products, chain and springs	0.33	-			-	-			0.33	-		
30	C26.1.2 - Manufacture of loaded electronic boards	17.15	-			-	-			17.15	-		
31	C26.3.0 - Manufacture of communication equipment	0.52	0.00			0.04	-			0.56	0.00		
32	C26.5.1 - Manufacture of instruments and appliances for measuring, testing and navigation	38.17	6.64			-	-			38.17	6.64		
33	C26.6.0 - Manufacture of irradiation, electromedical and electrotherapeutic equipment	0.43	-			-	-			0.43	-		
34	C26.7.0 - Manufacture of optical instruments and photographic equipment	16.17	-			-	-			16.17	-		
35	C27.2.0 - Manufacture of batteries and accumulators	0.54	0.25			-	-			0.54	0.25		
36	C27.3.2 - Manufacture of other electronic and electric wires and cables	1.63	-			-	-			1.63	-		
37	C27.4.0 - Manufacture of electric lighting equipment	0.61	-			-	-			0.61	-		
38	C27.5.1 - Manufacture of electric domestic appliances	30.37	1.46			-	-			30.37	1.46		
39	C28.1.1 - Manufacture of engines and turbines, except aircraft, vehicle and cycle engines	14.22	-			0.94	-			15.17	-		
40	C28.1.2 - Manufacture of fluid power equipment	4.22	-			-	-			4.22	-		
41	C28.1.3 - Manufacture of other pumps and compressors	0.64	-			-	-			0.64	-		
42	C28.1.4 - Manufacture of other valves and taps	13.82	-			0.59	-			14.41	-		
43	C28.2.2 - Manufacture of lifting and handling equipment	5.27	2.59			-	-			5.27	2.59		
44	C28.2.5 - Manufacture of non-domestic cooling and ventilation equipment	0.64	0.50			-	-			0.64	0.50		
45	C28.2.9 - Manufacture of other general-purpose machinery n.e.c.	60.16	13.10			-	-			60.16	13.10		
46	C28.3.0 - Manufacture of agricultural and forestry machinery	7.69	-			-	-			7.69	-		
47	C28.9.1 - Manufacture of machinery for metallurgy	0.97	0.77			-	-			0.97	0.77		
48	C28.9.2 - Manufacture of machinery for mining, quarrying and construction	5.66	-			-	-			5.66	-		
49	C28.9.6 - Manufacture of plastics and rubber machinery	43.11	2.33			-	-			43.11	2.33		

	Breakdown by sector - NACE 4 digits level (code and label)	a	b	c	d	e	f	g	h	y	z	aa	ab
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		Million euro	Of which environmentally sustainable (CCM)	Million euro	Of which environmentally sustainable (CCM)	Million euro	Of which environmentally sustainable (CCA)	Million euro	Of which environmentally sustainable (CCA)	Million euro	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Million euro	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
50	C28.9.9 - Manufacture of other special-purpose machinery n.e.c.	1.17	0.17			-	-			1.17	0.17		
51	C29.3.2 - Manufacture of other parts and accessories for motor vehicles	0.00	-			-	-			0.00	-		
52	C30.1.1 - Building of ships and floating structures	221.17	30.65			-	-			221.17	30.65		
53	C30.1.2 - Building of pleasure and sporting boats	29.11	0.05			-	-			29.11	0.05		
54	C30.2.0 - Manufacture of railway locomotives and rolling stock	1.61	0.83			-	-			1.61	0.83		
55	C30.3.0 - Manufacture of air and spacecraft and related machinery	51.98	-			51.98	-			103.97	-		
56	C30.9.1 - Manufacture of motorcycles	6.86	0.43			-	-			6.86	0.43		
57	C.32.9.9 - Other manufacturing n.e.c.	46.38	-			-	-			46.38	-		
58	C33.1.4 - Repair of electrical equipment	0.21	0.10			-	-			0.21	0.10		
59	C33.1.7 - Repair and maintenance of other transport equipment	0.00	0.00			-	-			0.00	0.00		
60	C33.2.0 - Installation of industrial machinery and equipment	12.57	9.93			-	-			12.57	9.93		
61	D35.1.1 - Production of electricity	167.57	38.87			-	-			167.57	38.87		
62	D.35.1.2 - Transmission of electricity	174.25	148.11			-	-			174.25	148.11		
63	D35.1.4 - Trade of electricity	0.07	0.01			-	-			0.07	0.01		
64	D35.2.2 - Distribution of gaseous fuels through mains	0.00	0.00			-	-			0.00	0.00		
65	D35.2.3 - Trade of gas through mains	315.64	3.79			-	-			315.64	3.79		
66	D35.3.0 - Steam and air conditioning supply	0.00	0.00			-	-			0.00	0.00		
67	E36.0.0 - Water collection, treatment and supply	105.82	17.94			8.18	0.02			113.99	17.96		
68	E38.1.1 - Collection of non-hazardous waste	34.35	9.62			-	-			34.35	9.62		
69	E38.3.2 - Recovery of sorted materials	0.89	0.09			-	-			0.89	0.09		
70	F41.1.0 - Development of building projects	0.00	-			-	-			0.00	-		
71	F41.2.0 - Construction of residential and non-residential buildings	13.77	-			-	-			13.77	-		
72	F42.1.1 - Construction of roads and motorways	48.60	0.24			0.01	0.00			48.61	0.24		
73	F42.1.2 - Construction of railways and underground railways	34.65	21.64			0.31	0.07			34.96	21.71		
74	F42.9.9 - Construction of other civil engineering projects n.e.c.	0.01	-			0.09	-			0.10	-		
75	F43.2.1 - Electrical installation	0.66	0.24			-	-			0.66	0.24		

	Breakdown by sector - NACE 4 digits level (code and label)	a	b	c	d	e	f	g	h	y	z	aa	ab
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		Million euro	Of which environmentally sustainable (CCM)	Million euro	Of which environmentally sustainable (CCM)	Million euro	Of which environmentally sustainable (CCA)	Million euro	Of which environmentally sustainable (CCA)	Million euro	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Million euro	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
76	F43.2.2 - Plumbing, heat and air-conditioning installation	0.23	0.12			-	-			0.23	0.12		
77	F43.2.9 - Other construction installation	0.57	0.07			-	-			0.57	0.07		
78	F.43.9.9 - Other specialised construction activities n.e.c.	13.65	6.92			-	-			13.65	6.92		
79	G45.1.1 - Sale of cars and light motor vehicles	0.06	0.01			0.06	0.01			0.12	0.02		
80	G46.1.8 - Agents specialised in the sale of other particular products	0.00	-			-	-			0.00	-		
81	G46.5.1 - Wholesale of computers, computer peripheral equipment and software	20.98	-			-	-			20.98	-		
82	G46.6.6 - Wholesale of other office machinery and equipment	0.63	-			-	-			0.63	-		
83	G46.6.9 - Wholesale of other machinery and equipment	1.73	-			-	-			1.73	-		
84	G46.7.1 - Wholesale of solid, liquid and gaseous fuels and related products	0.00	0.00			-	-			0.00	0.00		
85	G46.7.2 - Wholesale of metals and metal ores	1.44	-			-	-			1.44	-		
86	G47.1.1 - Retail sale in non-specialised stores with food, beverages or tobacco predominating	78.60	-			-	-			78.60	-		
87	G47.1.9 - Other retail sale in non-specialised stores	26.10	-			-	-			26.10	-		
88	G47.7.4 - Retail sale of medical and orthopaedic goods in specialised stores	25.17	-			-	-			25.17	-		
89	G47.9.1 - Retail sale via mail order houses or via Internet	0.29	-			-	-			0.29	-		
90	H49.1.0 - Passenger rail transport, interurban	1.72	1.01			-	-			1.72	1.01		
91	H52.1.0 - Warehousing and storage	0.00	0.00			-	-			0.00	0.00		
92	H52.2.1 - Service activities incidental to land transportation	108.95	33.85			3.94	-			112.89	33.85		
93	H53.2.0 - Other postal and courier activities	24.13	0.27			-	-			24.13	0.27		
94	I55.1.0 - Hotels and similar accommodation	2.00	0.00			-	-			2.00	0.00		
95	J58.1.1 - Book publishing	0.00	-			-	-			0.00	-		
96	J58.1.3 - Publishing of newspapers	25.67	-			-	-			25.67	-		
97	J58.1.4 - Publishing of journals and periodicals	5.12	-			-	-			5.12	-		
98	J60.1.0 - Radio broadcasting	0.00	-			-	-			0.00	-		
99	J61.1.0 - Wired telecommunications activities	15.73	0.19			5.89	0.00			21.61	0.19		
100	J61.2.0 - Wireless telecommunications activities	9.14	-			-	-			9.14	-		
101	J61.9.0 - Other telecommunications activities	28.77	-			-	-			28.77	-		

	Breakdown by sector - NACE 4 digits level (code and label)	a	b	c	d	e	f	g	h	y	z	aa	ab
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		Million euro	Of which environmentally sustainable (CCM)	Million euro	Of which environmentally sustainable (CCM)	Million euro	Of which environmentally sustainable (CCA)	Million euro	Of which environmentally sustainable (CCA)	Million euro	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Million euro	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
102	J62.0.1 - Computer programming activities	20.27	0.00			-	-			20.27	0.00		
103	J62.0.2 - Computer consultancy activities	0.51	-			-	-			0.51	-		
104	J62.0.9 - Other information technology and computer service activities	4.86	1.72			0.29	0.08			5.15	1.80		
105	J63.1.2 - Web portals	0.08	-			0.02	-			0.10	-		
106	K64.2.0 - Activities of holding companies	39.15	7.35			24.31	0.74			63.46	8.09		
107	L68.1.0 - Buying and selling of own real estate	5.22	-			-	-			5.22	-		
108	L68.2.0 - Renting and operating of own or leased real estate	13.30	-			0.14	-			13.44	-		
109	L68.3.2 - Management of real estate on a fee or contract basis	0.02	-			0.01	-			0.03	-		
110	M70.1.0 - Activities of head offices	1,284.32	316.24			-	-			1,284.32	316.24		
111	M70.2.2 - Business and other management consultancy activities	12.31	-			0.08	-			12.39	-		
112	M71.1.2 - Engineering activities and related technical consultancy	0.51	0.13			-	-			0.51	0.13		
113	M72.1.9 - Other research and experimental development on natural sciences and engineering	0.00	0.00			-	-			0.00	0.00		
114	M73.1.1 - Advertising agencies	0.03	-			-	-			0.03	-		
115	M73.1.2 - Media representation	1.44	-			-	-			1.44	-		
116	N77.1.1 - Renting and leasing of cars and light motor vehicles	0.15	-			0.04	-			0.19	-		
117	N78.2.0 - Temporary employment agency activities	33.56	-			-	-			33.56	-		
118	N79.1.1 - Travel agency activities	1.27	-			-	-			1.27	-		
119	N82.3.0 - Organisation of conventions and trade shows	11.17	-			0.04	-			11.21	-		
120	N82.9.1 - Activities of collection agencies and credit bureaus	60.38	-			-	-			60.38	-		
121	N82.9.9 - Other business support service activities n.e.c.	21.61	-			6.66	-			28.27	-		
122	Q86.2.2 - Specialist medical practice activities	32.96	2.65			0.33	-			33.30	2.65		
123	Q87.3.0 - Residential care services for the elderly and disabled	-	0.24			0.24	-			0.24	0.24		
124	S95.1.1 - Repair of computers and peripheral equipment	0.22	-			-	-			0.22	-		
125	S96.0.1 - Washing and (dry-)cleaning of textile and fur products	0.02	-			-	-			0.02	-		

Template 2: GAR - Sector information (CapEx)

		A	b	c	d	e	f	g	h	y	z	aa	ab
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD	
Breakdown by sector - NACE 4 digits level (code and label)		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		Million euro	Of which environmentally sustainable (CCM)	Million euro	Of which environmentally sustainable (CCM)	Million euro	Of which environmentally sustainable (CCA)	Million euro	Of which environmentally sustainable (CCA)	Million euro	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Million euro	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
1	A01.1.1 - Growing of cereals (except rice), leguminous crops and oil seeds	3.90	0.00			0.59	-			4.50	0.00		
2	B06.1.0 - Extraction of crude petroleum	37.73	5.55			-	-			37.73	5.55		
3	B08.1.2 - Operation of gravel and sand pits; mining of clays and kaolin	0.23	0.03			-	-			0.23	0.03		
4	C10.5.1 - Operation of dairies and cheese making	2.84	0.09			-	-			2.84	0.09		
5	C10.7.3 - Manufacture of macaroni, noodles, couscous and similar farinaceous products	20.48	0.68			-	-			20.48	0.68		
6	C10.8.6 - Manufacture of homogenised food preparations and dietetic food	1.70	0.00			1.70	0.00			3.40	0.00		
7	C11.0.1 - Distilling, rectifying and blending of spirits	144.44	-			-	-			144.44	-		
8	C14.1.3 - Manufacture of other outerwear	0.03	-			-	-			0.03	-		
9	C14.3.9 - Manufacture of other knitted and crocheted apparel	35.83	-			-	-			35.83	-		
10	C15.2.0 - Manufacture of footwear	101.13	2.03			0.55	0.21			101.67	2.24		
11	C17.1.2 - Manufacture of paper and paperboard	2.80	-			-	-			2.80	-		
12	C17.2.3 - Manufacture of paper stationery	5.80	-			-	-			5.80	-		
13	C19.2.0 - Manufacture of refined petroleum products	208.90	42.82			-	-			208.90	42.82		
14	C20.1.1 - Manufacture of industrial gases	61.85	-			-	-			61.85	-		
15	C20.1.4 - Manufacture of other organic basic chemicals	69.49	10.21			-	-			69.49	10.21		
16	C20.4.2 - Manufacture of perfumes and toilet preparations	0.60	0.00			0.60	0.00			1.21	0.00		
17	C20.6.0 - Manufacture of man-made fibres	21.19	3.39			-	-			21.19	3.39		
18	C21.2.0 - Manufacture of pharmaceutical preparations	167.03	-			-	-			167.03	-		
19	C22.2.1 - Manufacture of plastic plates, sheets, tubes and profiles	0.00	-			-	-			0.00	-		
20	C22.2.9 - Manufacture of other plastic products	21.31	-			-	-			21.31	-		
21	C23.5.1 - Manufacture of cement	5.23	0.74			-	-			5.23	0.74		
22	C23.7.0 - Cutting, shaping and finishing of stone	0.22	0.00			-	-			0.22	0.00		
23	C24.1.0 - Manufacture of basic iron and steel and of ferro-alloys	30.82	4.64			0.00	0.00			30.82	4.64		
24	C24.2.0 - Manufacture of tubes, pipes, hollow profiles and related fittings, of steel	5.01	0.00			0.01	0.00			5.02	0.00		

	Breakdown by sector - NACE 4 digits level (code and label)	A	b	c	d	e	f	g	h	y	z	aa	ab
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		Million euro	Of which environmentally sustainable (CCM)	Million euro	Of which environmentally sustainable (CCM)	Million euro	Of which environmentally sustainable (CCA)	Million euro	Of which environmentally sustainable (CCA)	Million euro	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Million euro	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
25	C24.3.3 - Cold forming or folding	0.02	-			-	-			0.02	-		
26	C25.1.2 - Manufacture of doors and windows of metal	4.65	0.09			-	-			4.65	0.09		
27	C25.5.0 - Forging, pressing, stamping and roll-forming of metal; powder metallurgy	4.52	-			-	-			4.52	-		
28	C25.6.2 - Machining	0.01	0.00			-	-			0.01	0.00		
29	C25.9.3 - Manufacture of wire products, chain and springs	0.33	-			-	-			0.33	-		
30	C26.1.2 - Manufacture of loaded electronic boards	17.15	0.00			-	-			17.15	0.00		
31	C26.3.0 - Manufacture of communication equipment	0.02	0.01			0.55	-			0.56	0.01		
32	C26.5.1 - Manufacture of instruments and appliances for measuring, testing and navigation	38.17	8.96			-	-			38.17	8.96		
33	C26.6.0 - Manufacture of irradiation, electromedical and electrotherapeutic equipment	0.43	-			-	-			0.43	-		
34	C26.7.0 - Manufacture of optical instruments and photographic equipment	8.09	0.11			8.09	0.11			16.17	0.22		
35	C27.2.0 - Manufacture of batteries and accumulators	0.54	0.47			-	-			0.54	0.47		
36	C27.3.2 - Manufacture of other electronic and electric wires and cables	1.63	-			-	-			1.63	-		
37	C27.4.0 - Manufacture of electric lighting equipment	0.61	-			-	-			0.61	-		
38	C27.5.1 - Manufacture of electric domestic appliances	30.37	2.04			-	-			30.37	2.04		
39	C28.1.1 - Manufacture of engines and turbines, except aircraft, vehicle and cycle engines	13.20	-			1.97	-			15.17	-		
40	C28.1.2 - Manufacture of fluid power equipment	4.22	-			-	-			4.22	-		
41	C28.1.3 - Manufacture of other pumps and compressors	0.64	-			-	-			0.64	-		
42	C28.1.4 - Manufacture of other valves and taps	13.17	-			1.24	-			14.41	-		
43	C28.2.2 - Manufacture of lifting and handling equipment	5.27	2.42			-	-			5.27	2.42		
44	C28.2.5 - Manufacture of non-domestic cooling and ventilation equipment	0.64	0.22			-	-			0.64	0.22		
45	C28.2.9 - Manufacture of other general-purpose machinery n.e.c.	60.16	5.80			0.00	0.00			60.16	5.80		
46	C28.3.0 - Manufacture of agricultural and forestry machinery	7.69	-			-	-			7.69	-		
47	C28.9.1 - Manufacture of machinery for metallurgy	0.97	0.34			-	-			0.97	0.34		
48	C28.9.2 - Manufacture of machinery for mining, quarrying and construction	5.66	-			-	-			5.66	-		
49	C28.9.6 - Manufacture of plastics and rubber machinery	43.11	-			-	-			43.11	-		

		A	b	c	d	e	f	g	h	y	z	aa	ab
	Breakdown by sector - NACE 4 digits level (code and label)	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		Million euro	Of which environmentally sustainable (CCM)	Million euro	Of which environmentally sustainable (CCM)	Million euro	Of which environmentally sustainable (CCA)	Million euro	Of which environmentally sustainable (CCA)	Million euro	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Million euro	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
50	C28.9.9 - Manufacture of other special-purpose machinery n.e.c.	1.17	0.03			-	-			1.17	0.03		
51	C29.3.2 - Manufacture of other parts and accessories for motor vehicles	0.00	-			-	-			0.00	-		
52	C30.1.1 - Building of ships and floating structures	221.17	5.81			-	-			221.17	5.81		
53	C30.1.2 - Building of pleasure and sporting boats	29.11	0.30			-	-			29.11	0.30		
54	C30.2.0 - Manufacture of railway locomotives and rolling stock	1.61	0.78			-	-			1.61	0.78		
55	C30.3.0 - Manufacture of air and spacecraft and related machinery	51.98	2.08			51.98	1.00			103.97	3.08		
56	C30.9.1 - Manufacture of motorcycles	6.86	1.06			-	-			6.86	1.06		
57	C.32.9.9 - Other manufacturing n.e.c.	46.38	-			-	-			46.38	-		
58	C33.1.4 - Repair of electrical equipment	0.21	0.18			-	-			0.21	0.18		
59	C33.1.7 - Repair and maintenance of other transport equipment	0.00	0.00			-	-			0.00	0.00		
60	C33.2.0 - Installation of industrial machinery and equipment	12.57	4.40			-	-			12.57	4.40		
61	D35.1.1 - Production of electricity	163.45	72.35			4.11	1.60			167.57	73.96		
62	D.35.1.2 - Transmission of electricity	174.25	172.51			-	-			174.25	172.51		
63	D35.1.4 - Trade of electricity	0.07	0.01			-	-			0.07	0.01		
64	D35.2.2 - Distribution of gaseous fuels through mains	0.00	0.00			-	-			0.00	0.00		
65	D35.2.3 - Trade of gas through mains	315.64	46.40			-	-			315.64	46.40		
66	D35.3.0 - Steam and air conditioning supply	0.00	0.00			-	-			0.00	0.00		
67	E36.0.0 - Water collection, treatment and supply	113.41	26.81			0.58	0.54			113.99	27.36		
68	E38.1.1 - Collection of non-hazardous waste	34.35	23.36			-	-			34.35	23.36		
69	E38.3.2 - Recovery of sorted materials	0.89	0.25			-	-			0.89	0.25		
70	F41.1.0 - Development of building projects	0.00	-			-	-			0.00	-		
71	F41.2.0 - Construction of residential and non-residential buildings	13.77	-			-	-			13.77	-		
72	F42.1.1 - Construction of roads and motorways	1.77	0.75			46.84	0.04			48.61	0.79		
73	F42.1.2 - Construction of railways and underground railways	31.62	21.53			3.34	1.09			34.96	22.62		
74	F42.9.9 - Construction of other civil engineering projects n.e.c.	0.00	-			0.10	-			0.10	-		
75	F43.2.1 - Electrical installation	0.66	0.26			-	-			0.66	0.26		

	Breakdown by sector - NACE 4 digits level (code and label)	A	b	c	d	e	f	g	h	y	z	aa	ab
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		Million euro	Of which environmentally sustainable (CCM)	Million euro	Of which environmentally sustainable (CCM)	Million euro	Of which environmentally sustainable (CCA)	Million euro	Of which environmentally sustainable (CCA)	Million euro	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Million euro	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
76	F43.2.2 - Plumbing, heat and air-conditioning installation	0.23	0.09			-	-			0.23	0.09		
77	F43.2.9 - Other construction installation	0.57	0.26			-	-			0.57	0.26		
78	F.43.9.9 - Other specialised construction activities n.e.c.	13.33	9.64			0.31	0.30			13.65	9.94		
79	G45.1.1 - Sale of cars and light motor vehicles	0.06	0.04			0.06	0.04			0.12	0.08		
80	G46.1.8 - Agents specialised in the sale of other particular products	0.00	-			-	-			0.00	-		
81	G46.5.1 - Wholesale of computers, computer peripheral equipment and software	20.98	-			-	-			20.98	-		
82	G46.6.6 - Wholesale of other office machinery and equipment	0.63	-			-	-			0.63	-		
83	G46.6.9 - Wholesale of other machinery and equipment	1.73	-			-	-			1.73	-		
84	G46.7.1 - Wholesale of solid, liquid and gaseous fuels and related products	0.00	0.00			-	-			0.00	0.00		
85	G46.7.2 - Wholesale of metals and metal ores	1.44	-			-	-			1.44	-		
86	G47.1.1 - Retail sale in non-specialised stores with food, beverages or tobacco predominating	78.60	-			-	-			78.60	-		
87	G47.1.9 - Other retail sale in non-specialised stores	26.10	1.13			-	-			26.10	1.13		
88	G47.7.4 - Retail sale of medical and orthopaedic goods in specialised stores	25.17	-			-	-			25.17	-		
89	G47.9.1 - Retail sale via mail order houses or via Internet	0.29	-			-	-			0.29	-		
90	H49.1.0 - Passenger rail transport, interurban	1.67	1.41			0.05	0.04			1.72	1.45		
91	H52.1.0 - Warehousing and storage	0.00	0.00			-	-			0.00	0.00		
92	H52.2.1 - Service activities incidental to land transportation	57.93	47.54			54.96	1.44			112.89	48.98		
93	H53.2.0 - Other postal and courier activities	24.13	-			-	-			24.13	-		
94	I55.1.0 - Hotels and similar accommodation	2.00	0.00			-	-			2.00	0.00		
95	J58.1.1 - Book publishing	0.00	-			-	-			0.00	-		
96	J58.1.3 - Publishing of newspapers	25.67	-			-	-			25.67	-		
97	J58.1.4 - Publishing of journals and periodicals	5.12	-			-	-			5.12	-		
98	J60.1.0 - Radio broadcasting	0.00	-			-	-			0.00	-		
99	J61.1.0 - Wired telecommunications activities	20.64	0.52			0.97	0.00			21.61	0.52		
100	J61.2.0 - Wireless telecommunications activities	9.14	0.09			-	-			9.14	0.09		
101	J61.9.0 - Other telecommunications activities	28.77	-			-	-			28.77	-		

	Breakdown by sector - NACE 4 digits level (code and label)	A	b	c	d	e	f	g	h	y	z	aa	ab
		Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD		Non-financial corporations (subject to NFRD)		SMEs and other NFCs not subject to NFRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		Million euro	Of which environmentally sustainable (CCM)	Million euro	Of which environmentally sustainable (CCM)	Million euro	Of which environmentally sustainable (CCA)	Million euro	Of which environmentally sustainable (CCA)	Million euro	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Million euro	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)
102	J62.0.1 - Computer programming activities	20.27	0.00			-	-			20.27	0.00		
103	J62.0.2 - Computer consultancy activities	0.51	-			-	-			0.51	-		
104	J62.0.9 - Other information technology and computer service activities	5.02	2.29			0.13	0.11			5.15	2.41		
105	J63.1.2 - Web portals	0.08	-			0.02	-			0.10	-		
106	K64.2.0 - Activities of holding companies	37.76	27.66			25.71	3.05			63.46	30.71		
107	L68.1.0 - Buying and selling of own real estate	5.22	-			-	-			5.22	-		
108	L68.2.0 - Renting and operating of own or leased real estate	13.31	-			0.14	-			13.44	-		
109	L68.3.2 - Management of real estate on a fee or contract basis	0.02	-			0.01	-			0.03	-		
110	M70.1.0 - Activities of head offices	1,180.09	509.75			104.23	3.70			1,284.32	513.45		
111	M70.2.2 - Business and other management consultancy activities	12.31	-			0.08	-			12.39	-		
112	M71.1.2 - Engineering activities and related technical consultancy	0.51	0.00			0.00	-			0.51	0.00		
113	M72.1.9 - Other research and experimental development on natural sciences and engineering	0.00	0.00			-	-			0.00	0.00		
114	M73.1.1 - Advertising agencies	0.03	-			-	-			0.03	-		
115	M73.1.2 - Media representation	1.44	-			-	-			1.44	-		
116	N77.1.1 - Renting and leasing of cars and light motor vehicles	0.15	-			0.04	-			0.19	-		
117	N78.2.0 - Temporary employment agency activities	33.56	-			-	-			33.56	-		
118	N79.1.1 - Travel agency activities	1.27	-			-	-			1.27	-		
119	N82.3.0 - Organisation of conventions and trade shows	11.21	-			-	-			11.21	-		
120	N82.9.1 - Activities of collection agencies and credit bureaus	60.38	-			-	-			60.38	-		
121	N82.9.9 - Other business support service activities n.e.c.	21.61	-			6.66	-			28.27	-		
122	Q86.2.2 - Specialist medical practice activities	17.18	6.16			16.11	6.16			33.30	12.32		
123	Q87.3.0 - Residential care services for the elderly and disabled	0.24	0.24			-	-			0.24	0.24		
124	S95.1.1 - Repair of computers and peripheral equipment	0.22	-			-	-			0.22	-		
125	S96.0.1 - Washing and (dry-)cleaning of textile and fur products	0.02	-			-	-			0.02	-		

Template 3: GAR KPI (Stock turnover)

% (compared to total covered assets in the denominator)	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q
	Disclosure reference date T																
	Climate change mitigation (CCM)					Climate change adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)			
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		
			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling
GAR - Assets hedged in both the numerator and the denominator																	
1 Loans and advances, debt securities and equity instruments not held for trading, eligible for GAR calculation	26.48	2.52	1.96	0.03	0.32	0.04	0.00	-	0.00	0.06	-	-	-	0.03	-	-	-
2 **Financial corporations**	0.47	0.03	-	0.00	0.00	0.01	0.00	-	0.00	0.00	-	-	-	0.00	-	-	-
3 Credit institutions	0.42	0.02	-	0.00	0.00	0.00	0.00	-	0.00	-	-	-	-	-	-	-	-
4 Loans and advances	0.02	0.00	-	0.00	0.00	0.00	0.00	-	-	-	-	-	-	-	-	-	-
5 Debt securities, including UoP	0.28	0.02	-	0.00	0.00	0.00	0.00	-	0.00	-	-	-	-	-	-	-	-
6 Equity instruments	0.11	0.00	-	-	0.00	-	-	-	-	-	-	-	-	-	-	-	-
7 Other financial corporations	0.05	0.01	-	0.00	0.00	0.01	0.00	-	-	0.00	-	-	-	0.00	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 of which insurance undertakings	0.01	0.00	-	0.00	0.00	0.01	0.00	-	-	-	-	-	-	-	-	-	-
17 Loans and advances	0.00	0.00	-	0.00	0.00	0.00	0.00	-	-	-	-	-	-	-	-	-	-
18 Debt securities, including UoP	0.01	0.00	-	0.00	0.00	0.01	0.00	-	-	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20 **Non-financial corporations**	0.98	0.53	-	0.03	0.32	0.02	0.00	-	0.00	0.06	-	-	-	0.03	-	-	-
21 Loans and advances	0.82	0.42	-	0.02	0.28	0.00	0.00	-	0.00	0.06	-	-	-	0.03	-	-	-
22 Debt securities, including UoP	0.16	0.12	-	0.01	0.04	0.02	0.00	-	0.00	-	-	-	-	0.00	-	-	-
23 Equity instruments	0.00	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24 **Households**	25.04	1.96	1.96	-	-	-	-	-	-	-	-	-	-	-	-	-	-
25 of which loans collateralised by residential immovable property	20.92	1.96	1.96	-	-	-	-	-	-	-	-	-	-	-	-	-	-
26 of which building renovation loans	0.03	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27 of which motor vehicle loans	0.10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28 **Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29 Construction financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31 **Collaterals obtained by taking possession: residential and commercial immovable properties**	0.31	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32 **Total GAR assets**	**26.79**	**2.52**	**1.96**	**0.03**	**0.32**	**0.04**	**0.00**	**-**	**0.00**	**0.06**	**-**	**-**	**-**	**0.03**	**-**	**-**	**-**

(continued) Template 3: GAR KPI (Stock turnover)

	% (compared to total covered assets in the denominator)	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		Disclosure reference date T													
		Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total assets covered
			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				
				Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling	
	GAR - Assets hedged in both the numerator and the denominator														
1	Loans and advances, debt securities and equity instruments not held for trading, eligible for GAR calculation	0.00	-	-	-	0.00	-	-	-	26.61	2.52	1.96	0.03	0.39	22.67
2	**Financial corporations**	0.00	-	-	-	0.00	-	-	-	0.48	0.03	-	0.00	0.00	2.15
3	Credit institutions	-	-	-	-	-	-	-	-	0.42	0.02	-	0.00	0.00	1.14
4	Loans and advances	-	-	-	-	-	-	-	-	0.02	0.00	-	0.00	0.00	0.07
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	0.28	0.02	-	0.00	0.00	0.81
6	Equity instruments	-	-	-	-	-	-	-	-	0.11	0.00	-	-	0.00	0.26
7	Other financial corporations	0.00	-	-	-	0.00	-	-	-	0.06	0.01	-	0.00	0.00	1.01
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	0.02	0.00	-	0.00	0.00	0.04
17	Loans and advances	-	-	-	-	-	-	-	-	0.00	0.00	-	0.00	0.00	0.00
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	0.02	0.00	-	0.00	0.00	0.04
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	**Non-financial corporations**	0.00	-	-	-	0.00	-	-	-	1.10	0.53	-	0.03	0.39	2.49
21	Loans and advances	0.00	-	-	-	0.00	-	-	-	0.92	0.42	-	0.02	0.34	2.18
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	0.18	0.12	-	0.01	0.04	0.31
23	Equity instruments	-	-	-	-	-	-	-	-	0.00	-	-	-	-	0.00
24	**Households**	-	-	-	-	-	-	-	-	25.04	1.96	1.96	-	-	17.93
25	of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	20.92	1.96	1.96	-	-	14.98
26	of which building renovation loans	-	-	-	-	-	-	-	-	0.03	-	-	-	-	0.02
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	0.10	-	-	-	-	0.07
28	**Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	0.10
29	Construction financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	0.10
31	**Collaterals obtained by taking possession: residential and commercial immovable properties**	-	-	-	-	-	-	-	-	0.31	-	-	-	-	0.22
32	**Total GAR assets**	**0.00**	**-**	**-**	**-**	**0.00**	**-**	**-**	**-**	**26.92**	**2.52**	**1.96**	**0.03**	**0.39**	**71.62**

Template 3: GAR KPI (Stock turnover)

% (compared to total covered assets in the denominator)	ag	ah	ai	aj	ak	al	am	an	ao	ap	aq	ar	as	at	au	av	aw
	Disclosure reference date T-1																
	Climate change mitigation (CCM)					Climate change adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)			
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		
			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling
GAR - Assets hedged in both the numerator and the denominator																	
1 Loans and advances, debt securities and equity instruments not held for trading, eligible for GAR calculation	22.59	2.02	-	0.08	0.15	0.00	0.00	-	-	-	-	-	-	-	-	-	-
2 **Financial corporations**	0.41	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3 Credit institutions	0.39	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4 Loans and advances	0.05	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5 Debt securities, including UoP	0.33	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Equity instruments	0.01	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Other financial corporations	0.02	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 of which insurance undertakings	0.00	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17 Loans and advances	0.00	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18 Debt securities, including UoP	0.00	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20 **Non-financial corporations**	0.97	0.39	-	0.08	0.15	0.00	0.00	-	-	-	-	-	-	-	-	-	-
21 Loans and advances	0.86	0.32	-	0.07	0.12	0.00	0.00	-	-	-	-	-	-	-	-	-	-
22 Debt securities, including UoP	0.11	0.08	-	0.00	0.03	0.00	-	-	-	-	-	-	-	-	-	-	-
23 Equity instruments	0.00	-	-	-	-	0.00	-	-	-	-	-	-	-	-	-	-	-
24 **Households**	21.21	1.63	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
25 of which loans collateralised by residential immovable property	20.95	1.63	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
26 of which building renovation loans	0.06	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27 of which motor vehicle loans	0.20	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28 **Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29 Construction financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31 **Collaterals obtained by taking possession: residential and commercial immovable properties**	0.39	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32 **Total GAR assets**	22.98	2.02	-	0.08	0.15	0.00	0.00	-	-	-	-	-	-	-	-	-	-

(continued) Template 3: GAR KPI (Stock turnover)

% (compared to total covered assets in the denominator)	ax	ay	az	ba	bb	bc	bd	be	bf	bg	bh	bi	bj	bk
	Disclosure reference date T-1													
	Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				
			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling	
GAR - Assets hedged in both the numerator and the denominator														
1 Loans and advances, debt securities and equity instruments not held for trading, eligible for GAR calculation	-	-	-	-	-	-	-	-	22.60	2.02	-	0.08	0.15	19.46
2 **Financial corporations**	-	-	-	-	-	-	-	-	0.41	-	-	-	-	2.36
3 Credit institutions	-	-	-	-	-	-	-	-	0.39	-	-	-	-	1.40
4 Loans and advances	-	-	-	-	-	-	-	-	0.05	-	-	-	-	0.58
5 Debt securities, including UoP	-	-	-	-	-	-	-	-	0.33	-	-	-	-	0.79
6 Equity instruments	-	-	-	-	-	-	-	-	0.01	-	-	-	-	0.03
7 Other financial corporations	-	-	-	-	-	-	-	-	0.02	-	-	-	-	0.96
8 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	0.00
13 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	0.00
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-	0.00	-	-	-	-	0.00
17 Loans and advances	-	-	-	-	-	-	-	-	0.00	-	-	-	-	0.00
18 Debt securities, including UoP	-	-	-	-	-	-	-	-	0.00	-	-	-	-	0.00
19 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20 **Non-financial corporations**	-	-	-	-	-	-	-	-	0.98	0.39	-	0.08	0.15	1.98
21 Loans and advances	-	-	-	-	-	-	-	-	0.87	0.32	-	0.07	0.12	1.77
22 Debt securities, including UoP	-	-	-	-	-	-	-	-	0.11	0.08	-	0.00	0.03	0.22
23 Equity instruments	-	-	-	-	-	-	-	-	0.00	-	-	-	-	0.00
24 **Households**	-	-	-	-	-	-	-	-	21.21	1.63	-	-	-	15.02
25 of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	20.95	1.63	-	-	-	14.84
26 of which building renovation loans	-	-	-	-	-	-	-	-	0.06	-	-	-	-	0.04
27 of which motor vehicle loans	-	-	-	-	-	-	-	-	0.20	-	-	-	-	-
28 **Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	0.10
29 Construction financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	0.10
31 **Collaterals obtained by taking possession: residential and commercial immovable properties**	-	-	-	-	-	-	-	-	0.39	-	-	-	-	0.28
32 **Total GAR assets**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**22.99**	**2.02**	**-**	**0.08**	**0.15**	**70.81**

Template 3: GAR KPIs (CapEx stock)

	% (compared to total covered assets in the denominator)	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q
		Disclosure reference date T																
		Climate change mitigation (CCM)					Climate change adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)			
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			
			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		
				Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling
	GAR - Assets hedged in both the numerator and the denominator																	
1	Loans and advances, debt securities and equity instruments not held for trading, eligible for GAR calculation	26.81	2.82	1.96	0.03	0.54	0.14	0.02	-	0.00	0.09	-	-	-	0.02	-	-	-
2	**Financial corporations**	0.47	0.04	-	0.00	0.01	0.01	0.00	-	-	0.00	-	-	-	0.00	-	-	-
3	Credit institutions	0.42	0.03	-	0.00	0.00	0.00	0.00	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	0.02	0.00	-	0.00	0.00	0.00	0.00	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	0.28	0.02	-	0.00	0.00	0.00	0.00	-	-	-	-	-	-	-	-	-	-
6	Equity instruments	0.11	0.00	-	-	0.00	-	-	-	-	-	-	-	-	-	-	-	-
7	Other financial corporations	0.05	0.01	-	0.00	0.00	0.01	0.00	-	-	0.00	-	-	-	0.00	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	0.01	0.00	-	0.00	0.00	0.01	0.00	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	0.00	0.00	-	0.00	0.00	0.00	0.00	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	0.01	0.00	-	0.00	0.00	0.01	0.00	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	**Non-financial corporations**	1.30	0.83	-	0.03	0.53	0.13	0.01	-	0.00	0.09	-	-	-	0.02	-	-	-
21	Loans and advances	1.06	0.63	-	0.02	0.45	0.08	0.01	-	0.00	0.09	-	-	-	0.01	-	-	-
22	Debt securities, including UoP	0.24	0.20	-	0.01	0.08	0.04	0.00	-	0.00	0.00	-	-	-	0.00	-	-	-
23	Equity instruments	0.00	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	**Households**	25.04	1.96	1.96	-	-	-	-	-	-	-	-	-	-	-	-	-	-
25	of which loans collateralised by residential immovable property	20.92	1.96	1.96	-	-	-	-	-	-	-	-	-	-	-	-	-	-
26	of which building renovation loans	0.03	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which motor vehicle loans	0.10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	**Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	Construction financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	**Collaterals obtained by taking possession: residential and commercial immovable properties**	0.31	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	**Total GAR assets**	**27.12**	**2.82**	**1.96**	**0.03**	**0.54**	**0.14**	**0.02**	**-**	**0.00**	**0.09**	**-**	**-**	**-**	**0.02**	**-**	**-**	**-**

(continued) Template 3: GAR KPIs (CapEx stock)

	% (compared to total covered assets in the denominator)	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
		Disclosure reference date T													
		Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total assets covered
			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				
				Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling	
	GAR - Assets hedged in both the numerator and the denominator														
1	Loans and advances, debt securities and equity instruments not held for trading, eligible for GAR calculation	0.00	-	-	-	0.01	-	-	-	27.08	2.84	1.96	0.03	0.54	22.67
2	**Financial corporations**	0.00	-	-	-	0.00	-	-	-	0.49	0.04	-	0.00	0.01	2.15
3	Credit institutions	-	-	-	-	-	-	-	-	0.42	0.03	-	0.00	0.00	1.14
4	Loans and advances	-	-	-	-	-	-	-	-	0.02	0.00	-	0.00	0.00	0.07
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	0.28	0.02	-	0.00	0.00	0.81
6	Equity instruments	-	-	-	-	-	-	-	-	0.11	0.00	-	-	0.00	0.26
7	Other financial corporations	0.00	-	-	-	0.00	-	-	-	0.06	0.01	-	0.00	0.00	1.01
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	0.02	0.00	-	0.00	0.00	0.04
17	Loans and advances	-	-	-	-	-	-	-	-	0.00	0.00	-	0.00	0.00	0.00
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	0.02	0.00	-	0.00	0.00	0.04
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	**Non-financial corporations**	0.00	-	-	-	0.01	-	-	-	1.55	0.84	-	0.03	0.53	2.49
21	Loans and advances	0.00	-	-	-	0.00	-	-	-	1.25	0.64	-	0.02	0.45	2.18
22	Debt securities, including UoP	0.00	-	-	-	0.01	-	-	-	0.30	0.20	-	0.01	0.09	0.31
23	Equity instruments	-	-	-	-	-	-	-	-	0.00	-	-	-	-	0.00
24	**Households**	-	-	-	-	-	-	-	-	25.04	1.96	1.96	-	-	17.93
25	of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	20.92	1.96	1.96	-	-	14.98
26	of which building renovation loans	-	-	-	-	-	-	-	-	0.03	-	-	-	-	0.02
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	0.10	-	-	-	-	0.07
28	**Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	0.10
29	Construction financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	0.10
31	**Collaterals obtained by taking possession: residential and commercial immovable properties**	-	-	-	-	-	-	-	-	0.31	-	-	-	-	0.22
32	**Total GAR assets**	**0.00**	**-**	**-**	**-**	**0.01**	**-**	**-**	**-**	**27.38**	**2.84**	**1.96**	**0.03**	**0.54**	**71.62**

Template 3: GAR KPIs (CapEx stock)

% (compared to total covered assets in the denominator)	ag	ah	ai	aj	ak	al	am	an	ao	ap	aq	ar	as	at	au	av	aw
	Disclosure reference date T-1																
	Climate change mitigation (CCM)					Climate change adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)			
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		
			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling
GAR - Assets hedged in both the numerator and the denominator																	
1 Loans and advances, debt securities and equity instruments not held for trading, eligible for GAR calculation	22.65	2.25	-	0.04	0.16	0.03	0.03	-	0.00	-	-	-	-	-	-	-	-
2 **Financial corporations**	0.27	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3 Credit institutions	0.26	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4 Loans and advances	0.03	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
5 Debt securities, including UoP	0.23	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
7 Other financial corporations	0.01	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 of which insurance undertakings	0.00	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17 Loans and advances	0.00	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
18 Debt securities, including UoP	0.00	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20 **Non-financial corporations**	1.17	0.62	-	0.04	0.16	0.03	0.03	-	0.00	-	-	-	-	-	-	-	-
21 Loans and advances	0.99	0.48	-	0.04	0.15	0.02	0.02	-	-	-	-	-	-	-	-	-	-
22 Debt securities, including UoP	0.17	0.14	-	0.01	0.01	0.01	0.01	-	0.00	-	-	-	-	-	-	-	-
23 Equity instruments	0.00	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24 **Households**	21.21	1.63	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
25 of which loans collateralised by residential immovable property	20.95	1.63	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
26 of which building renovation loans	0.06	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27 of which motor vehicle loans	0.20	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28 **Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29 Construction financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31 **Collaterals obtained by taking possession: residential and commercial immovable properties**	0.39	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32 **Total GAR assets**	**23.04**	**2.25**	**-**	**0.04**	**0.16**	**0.03**	**0.03**	**-**	**0.00**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**

(continued) Template 3: GAR KPIs (CapEx stock)

	% (compared to total covered assets in the denominator)	ax	ay	az	ba	bb	bc	bd	be	bf	bg	bh	bi	bj	bk
		Disclosure reference date T-1													
		Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total assets covered
			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				
				Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling	
	GAR - Assets hedged in both the numerator and the denominator														
1	Loans and advances, debt securities and equity instruments not held for trading, eligible for GAR calculation	-	-	-	-	-	-	-	-	22.68	2.28	-	0.04	0.16	19.46
2	**Financial corporations**	-	-	-	-	-	-	-	-	0.27	-	-	-	-	2.36
3	Credit institutions	-	-	-	-	-	-	-	-	0.26	-	-	-	-	1.40
4	Loans and advances	-	-	-	-	-	-	-	-	0.03	-	-	-	-	0.58
5	Debt securities, including UoP	-	-	-	-	-	-	-	-	0.23	-	-	-	-	0.79
6	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	0.03
7	Other financial corporations	-	-	-	-	-	-	-	-	0.01	-	-	-	-	0.96
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	0.00
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	0.00
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	-	-	-	-	-	-	-	-	0.00	-	-	-	-	0.00
17	Loans and advances	-	-	-	-	-	-	-	-	0.00	-	-	-	-	0.00
18	Debt securities, including UoP	-	-	-	-	-	-	-	-	0.00	-	-	-	-	0.00
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	**Non-financial corporations**	-	-	-	-	-	-	-	-	1.20	0.65	-	0.04	0.16	1.98
21	Loans and advances	-	-	-	-	-	-	-	-	1.01	0.50	-	0.04	0.15	1.77
22	Debt securities, including UoP	-	-	-	-	-	-	-	-	0.19	0.15	-	0.01	0.01	0.22
23	Equity instruments	-	-	-	-	-	-	-	-	0.00	-	-	-	-	0.00
24	**Households**	-	-	-	-	-	-	-	-	21.21	1.63	-	-	-	15.02
25	of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	20.95	1.63	-	-	-	14.84
26	of which building renovation loans	-	-	-	-	-	-	-	-	0.06	-	-	-	-	0.04
27	of which motor vehicle loans	-	-	-	-	-	-	-	-	0.20	-	-	-	-	-
28	**Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	0.10
29	Construction financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	0.10
31	**Collaterals obtained by taking possession: residential and commercial immovable properties**	-	-	-	-	-	-	-	-	0.39	-	-	-	-	0.28
32	**Total GAR assets**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**-**	**23.07**	**2.28**	**-**	**0.04**	**0.16**	**70.81**

Template 4: GAR KPIs (Flow turnover)

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q
		Disclosure reference date T																
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)			
% (compared to flow of total eligible assets)		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			
			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		
				Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling
	GAR - Covered assets in both numerator and denominator																	
1	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	16.34	2.45	1.75	0.04	0.44	0.03	0.00	-	0.00	0.05	-	-	-	0.07	-	-	-
2	**Financial corporations**	0.73	-	-	-	-	-	-	-	-	0.00	-	-	-	0.00	-	-	-
3	Credit institutions	0.67	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4	Loans and advances	0.04	0.00	-	-	0.00	0.00	0.00	-	-	-	-	-	-	-	-	-	-
5	Debt securities, including UoP	0.39	0.03	-	-	0.00	0.00	0.00	-	0.00	-	-	-	-	-	-	-	-
6	Equity instruments	0.23	0.00	-	-	0.00	-	-	-	-	-	-	-	-	-	-	-	-
7	Financial corporations	0.07	0.01	-	-	0.00	0.02	0.00	-	-	0.00	-	-	-	0.00	-	-	-
8	of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12	of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14	Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16	of which insurance undertakings	0.02	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17	Loans and advances	0.00	0.00	-	-	0.00	0.00	0.00	-	-	-	-	-	-	-	-	-	-
18	Debt securities, including UoP	0.02	0.00	-	-	0.00	0.02	0.00	-	-	-	-	-	-	-	-	-	-
19	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20	**Non-financial corporations**	1.08	0.70	-	0.04	0.44	0.03	0.00	-	0.00	0.05	-	-	-	0.07	-	-	-
21	NFCs subject to NFRD disclosure obligations	0.98	0.60	-	0.04	0.41	0.00	0.00	-	0.00	0.05	-	-	-	0.06	-	-	-
22	Loans and advances	0.10	0.10	-	0.00	0.03	0.03	0.00	-	0.00	0.00	-	-	-	0.00	-	-	-
23	Debt securities, including UoP	0.00	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24	Equity instruments	14.53	1.75	1.75	-	-	-	-	-	-	-	-	-	-	-	-	-	-
25	**Households**	11.83	1.75	1.75	-	-	-	-	-	-	-	-	-	-	-	-	-	-
26	of which loans collateralised by residential immovable property	0.03	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27	of which building renovation loans	0.02	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28	of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29	**Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30	Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31	**Collateral obtained by taking possession: residential and commercial immovable properties**	0.00	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32	**Total GAR assets**	**16.34**	**2.45**	**1.75**	**0.04**	**0.44**	**0.03**	**0.00**	**-**	**0.00**	**0.05**	**-**	**-**	**-**	**0.07**	**-**	**-**	**-**

(continued) Template 4: GAR KPIs (Flow turnover)

	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
	Disclosure reference date T													
	Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
% (compared to flow of total eligible assets)	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total new assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				
			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling	
GAR - Covered assets in both numerator and denominator														
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.00	-	-	-	0.00	-	-	-	16.49	2.45	1.75	0.04	0.44	11.34
2 **Financial corporations**	0.00	-	-	-	0.00	-	-	-	0.73	-	-	-	-	1.76
3 Credit institutions	-	-	-	-	-	-	-	-	0.67	-	-	-	-	1.40
4 Loans and advances	-	-	-	-	-	-	-	-	0.04	0.00	-	-	0.00	0.10
5 Debt securities, including UoP	-	-	-	-	-	-	-	-	0.39	0.03	-	-	0.00	0.92
6 Equity instruments	-	-	-	-	-	-	-	-	0.23	0.00	-	-	0.00	0.38
7 Financial corporations	0.00	-	-	-	0.00	-	-	-	0.09	0.01	-	-	0.00	0.37
8 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-	0.02	-	-	-	-	0.06
17 Loans and advances	-	-	-	-	-	-	-	-	0.00	0.00	-	-	0.00	0.00
18 Debt securities, including UoP	-	-	-	-	-	-	-	-	0.04	0.01	-	-	0.00	0.06
19 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20 **Non-financial corporations**	0.00	-	-	-	-	-	-	-	1.22	0.70	-	0.04	0.44	1.72
21 NFCs subject to NFRD disclosure obligations	0.00	-	-	-	-	-	-	-	1.09	0.60	-	0.04	0.41	1.49
22 Loans and advances	-	-	-	-	-	-	-	-	0.13	0.10	-	0.00	0.03	0.23
23 Debt securities, including UoP	-	-	-	-	-	-	-	-	0.00	-	-	-	-	0.00
24 Equity instruments	-	-	-	-	-	-	-	-	14.53	1.75	1.75	-	-	7.83
25 **Households**	-	-	-	-	-	-	-	-	11.83	1.75	1.75	-	-	6.37
26 of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	0.03	-	-	-	-	0.02
27 of which building renovation loans	-	-	-	-	-	-	-	-	0.02	-	-	-	-	0.01
28 of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	0.02
29 **Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	0.02
31 **Collateral obtained by taking possession: residential and commercial immovable properties**	-	-	-	-	-	-	-	-	0.00	-	-	-	-	0.00
32 Total GAR assets	**0.00**	**-**	**-**	**-**	**0.00**	**-**	**-**	**-**	**16.49**	**2.45**	**1.75**	**0.04**	**0.44**	**53.87**

Template 4: GAR KPIs (Flow CapEx)

% (compared to flow of total eligible assets)	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q
	Disclosure reference date T																
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)			
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		
			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling
GAR - Covered assets in both numerator and denominator																	
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	16.64	2.76	1.75	0.04	0.73	0.07	0.02	-	0.00	0.06	-	-	-	0.04	-	-	-
2 **Financial corporations**	0.74	-	-	-	-	-	-	-	-	0.00	-	-	-	0.00	-	-	-
3 Credit institutions	0.67	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
4 Loans and advances	0.04	0.00	-	-	0.00	0.00	0.00	-	-	-	-	-	-	-	-	-	-
5 Debt securities, including UoP	0.40	0.03	-	-	0.01	0.00	0.00	-	-	-	-	-	-	-	-	-	-
6 Equity instruments	0.23	0.00	-	-	0.00	-	-	-	-	-	-	-	-	-	-	-	-
7 Financial corporations	0.07	0.02	-	-	0.00	0.03	0.00	-	-	0.00	-	-	-	0.00	-	-	-
8 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 of which insurance undertakings	0.02	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
17 Loans and advances	0.00	0.00	-	-	0.00	0.00	0.00	-	-	-	-	-	-	-	-	-	-
18 Debt securities, including UoP	0.02	0.01	-	-	0.00	0.02	0.00	-	-	-	-	-	-	-	-	-	-
19 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20 **Non-financial corporations**	1.36	1.01	-	0.04	0.73	0.07	0.02	-	0.00	0.06	-	-	-	0.04	-	-	-
21 NFCs subject to NFRD disclosure obligations	1.20	0.85	-	0.03	0.66	0.02	0.01	-	0.00	0.06	-	-	-	0.04	-	-	-
22 Loans and advances	0.17	0.16	-	0.01	0.07	0.04	0.01	-	0.00	0.00	-	-	-	0.00	-	-	-
23 Debt securities, including UoP	0.00	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
24 Equity instruments	14.53	1.75	1.75	-	-	-	-	-	-	-	-	-	-	-	-	-	-
25 **Households**	11.83	1.75	1.75	-	-	-	-	-	-	-	-	-	-	-	-	-	-
26 of which loans collateralised by residential immovable property	0.03	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
27 of which building renovation loans	0.02	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
28 of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
29 **Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
31 **Collateral obtained by taking possession: residential and commercial immovable properties**	0.00	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
32 Total GAR assets	**16.64**	**2.76**	**1.75**	**0.04**	**0.73**	**0.07**	**0.02**	**-**	**0.00**	**0.06**	**-**	**-**	**-**	**0.04**	**-**	**-**	**-**

(continued) Template 4: GAR KPIs (Flow CapEx)

% (compared to flow of total eligible assets)	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
	Disclosure reference date T													
	Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total new assets covered
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				
			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling	
GAR - Covered assets in both numerator and denominator														
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	0.00	-	-	-	0.13	-	-	-	16.94	2.78	1.75	0.04	0.73	11.34
2 **Financial corporations**	0.00	-	-	-	0.00	-	-	-	0.74	-	-	-	-	1.76
3 Credit institutions	-	-	-	-	-	-	-	-	0.67	-	-	-	-	1.40
4 Loans and advances	-	-	-	-	-	-	-	-	0.04	0.00	-	-	0.00	0.10
5 Debt securities, including UoP	-	-	-	-	-	-	-	-	0.40	0.03	-	-	0.01	0.92
6 Equity instruments	-	-	-	-	-	-	-	-	0.23	0.00	-	-	0.00	0.38
7 Financial corporations	0.00	-	-	-	0.00	-	-	-	0.10	0.02	-	-	0.00	0.37
8 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-
9 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
10 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
12 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-
13 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
16 of which insurance undertakings	-	-	-	-	-	-	-	-	0.02	-	-	-	-	0.06
17 Loans and advances	-	-	-	-	-	-	-	-	0.00	0.00	-	-	0.00	0.00
18 Debt securities, including UoP	-	-	-	-	-	-	-	-	0.05	0.01	-	-	0.00	0.06
19 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-
20 **Non-financial corporations**	0.00	-	-	-	0.13	-	-	-	1.66	1.02	-	0.04	0.73	1.72
21 NFCs subject to NFRD disclosure obligations	0.00	-	-	-	0.11	-	-	-	1.43	0.86	-	0.03	0.66	1.49
22 Loans and advances	0.00	-	-	-	0.02	-	-	-	0.23	0.17	-	0.01	0.07	0.23
23 Debt securities, including UoP	-	-	-	-	-	-	-	-	0.00	-	-	-	-	0.00
24 Equity instruments	-	-	-	-	-	-	-	-	14.53	1.75	1.75	-	-	7.83
25 **Households**	-	-	-	-	-	-	-	-	11.83	1.75	1.75	-	-	6.37
26 of which loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	0.03	-	-	-	-	0.02
27 of which building renovation loans	-	-	-	-	-	-	-	-	0.02	-	-	-	-	0.01
28 of which motor vehicle loans	-	-	-	-	-	-	-	-	-	-	-	-	-	0.02
29 **Local governments financing**	-	-	-	-	-	-	-	-	-	-	-	-	-	-
30 Other local government financing	-	-	-	-	-	-	-	-	-	-	-	-	-	0.02
31 **Collateral obtained by taking possession: residential and commercial immovable properties**	-	-	-	-	-	-	-	-	0.00	-	-	-	-	0.00
32 **Total GAR assets**	**0.00**	**-**	**-**	**-**	**0.13**	**-**	**-**	**-**	**16.94**	**2.78**	**1.75**	**0.04**	**0.73**	**53.87**

Template 5: KPIs for off-balance sheet exposures (Stock turnover)

% (compared to total eligible off-balance sheet assets)	a	b	c	d	e	f	g	h	i	j	k	l	m
	Disclosure reference date T												
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		
			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling
1 Financial guarantees (FinGuar KPI)	1.07	0.02	-	0.00	0.01	0.61	0.00	-	0.00	-	-	-	-
2 Assets under management (AuM KPI)	1.37	0.34	-	0.03	0.19	0.37	0.01	-	0.01	0.01	-	-	-

(continued) Template 5: KPIs for off-balance sheet exposures (Stock turnover)

% (compared to total eligible off-balance sheet assets)	n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae
	Disclosure reference date T																
	Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)			
			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling
1 Financial guarantees (FinGuar KPI)	-	-	-	-	-	-	-	-	-	-	-	-	1.69	0.02	-	0.00	0.01
2 Assets under management (AuM KPI)	0.00	-	-	-	0.00	-	-	-	0.00	-	-	-	1.75	0.35	-	0.03	0.20

Template 5: KPIs for off-balance sheet exposures (Stock CapEx)

		a	b	c	d	e	f	g	h	i	j	k	l	m
% (compared to total eligible off-balance sheet assets)		Disclosure reference date T												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			
			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		
				Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling
1	Financial guarantees (FinGuar KPI)	1.03	0.03	-	0.00	0.01	0.84	0.00	-	0.00	0.00	-	-	-
2	Assets under management (AuM KPI)	1.56	0.66	-	0.04	0.34	0.34	0.03	-	0.00	0.01	-	-	-

(continued) Template 5: KPIs for off-balance sheet exposures (Stock CapEx)

		n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae
% (compared to total eligible off-balance sheet assets)		Disclosure reference date T																
		Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				
			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)			
				Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling
1	Financial guarantees (FinGuar KPI)	-	-	-	-	-	-	-	-	-	-	-	-	1.88	0.03	-	0.00	0.01
2	Assets under management (AuM KPI)	0.02	-	-	-	0.00	-	-	-	0.00	-	-	-	1.93	0.69	-	0.04	0.34

Template 5: KPIs for off-balance sheet exposures (Flow turnover)

		a	b	c	d	e	f	g	h	i	j	k	l	m
% (compared to total eligible off-balance sheet assets)		Disclosure reference date T												
		Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			
			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		
				Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling
1	Financial guarantees (FinGuar KPI)	1.70	0.03	-	-	0.01	1.01	-	-	-	-	-	-	-
2	Assets under management (AuM KPI)	2.80	0.55	-	0.10	0.34	0.79	0.03	-	0.02	0.02	-	-	-

(continued) Template 5: KPIs for off-balance sheet exposures (Flow turnover)

		n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae
% (compared to total eligible off-balance sheet assets)		Disclosure reference date T																
		Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				
			Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)			
				Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling
1	Financial guarantees (FinGuar KPI)	-	-	-	-	-	-	-	-	-	-	-	-	2.71	0.03	-	-	0.01
2	Assets under management (AuM KPI)	0.01	-	-	-	0.00	-	-	-	0.00	-	-	-	3.63	0.58	-	0.10	0.36

Template 5: KPIs for off-balance sheet exposures (Flow CapEx)

% (compared to total eligible off-balance sheet assets)	a	b	c	d	e	f	g	h	i	j	k	l	m
	Disclosure reference date T												
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)			
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)		
			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling
1 Financial guarantees (FinGuar KPI)	1.72	0.04	-	-	0.02	1.41	0.00	-	0.00	0.01	-	-	-
2 Assets under management (AuM KPI)	1.81	0.60	-	0.03	0.39	0.62	0.05	-	-	0.04	-	-	-

(continued) Template 5: KPIs for off-balance sheet exposures (Flow CapEx)

% (compared to total eligible off-balance sheet assets)	n	o	p	q	r	s	t	u	v	w	x	z	aa	ab	ac	ad	ae
	Disclosure reference date T																
	Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-eligible)				
		Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (taxonomy-aligned)			
			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling
1 Financial guarantees (FinGuar KPI)	-	-	-	-	-	-	-	-	-	-	-	-	3.14	0.04	-	-	0.02
2 Assets under management (AuM KPI)	0.05	-	-	-	0.00	-	-	-	0.00	-	-	-	2.52	0.65	-	0.03	0.39

Annex XII - Additional information on nuclear and fossil gas related activities

Template Annex XII: disclosure on nuclear and fossil gas related activities (GAR stock)

Template 1: Nuclear and fossil gas related activities

	Nuclear energy related activities	Yes/No
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	Yes
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	Yes
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	Yes

	Fossil gas related activities	Yes/No
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	Yes
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	Yes
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	Yes

Template 2: Taxonomy-aligned economic activities (denominator) - Turnover

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	9.21	0.01	9.21	0.01	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.03	0.00	0.03	0.00	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.05	0.00	0.05	0.00	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**3,283.38**	**2.52**	**3,281.13**	**2.52**	**2.25**	**0.00**
8	**Total applicable KPI**	**3,292.68**	**2.52**	**3,290.43**	**2.52**	**2.25**	**0.00**

Template 3: Taxonomy-aligned economic activities (numerator) - Turnover

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	9.21	0.28	9.21	0.28	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.03	0.00	0.03	0.00	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.05	0.00	0.05	0.00	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI**	**3,283.38**	**99.72**	**3,281.13**	**99.72**	**2.25**	**100.00**
8	**Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI**	**3,292.68**	**100.00**	**3,290.43**	**100.00**	**2.25**	**100.00**

Template 4: Taxonomy-eligible but not taxonomy-aligned economic activities - Turnover

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
2	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
3	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.04	0.00	0.04	0.00	-	-
4	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	10.96	0.01	10.96	0.01	-	-
5	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	19.22	0.01	19.22	0.01	-	-
6	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.14	0.00	0.14	0.00	-	-
7	**Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**31,665.44**	**24.27**	**31,619.95**	**24.24**	**45.50**	**0.03**
8	**Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI**	**31,695.80**	**24.30**	**31,650.31**	**24.26**	**45.50**	**0.03**

Template 5: Taxonomy non-eligible economic activities - Turnover

	Economic activities	a	b
		TOTAL (CCM + CCA)	
		Amount	Percentage
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	2.29	0.00
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.93	0.00
7	**Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**95,455.79**	**73.18**
8	**Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI**	**95,459.01**	**73.18**

Template 2 - Taxonomy-aligned economic activities (denominator) - CapEx

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	1.34	0.00	1.34	0.00	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	7.86	0.01	7.86	0.01	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.01	0.00	0.01	0.00	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.36	0.00	0.36	0.00	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.02	0.00	0.02	0.00	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**3,692.97**	**2.83**	**3,672.12**	**2.82**	**20.85**	**0.02**
8	**Total applicable KPI**	**3,702.57**	**2.84**	**3,681.71**	**2.82**	**20.85**	**0.02**

Template 3: Taxonomy-aligned economic activities (numerator) - CapEx

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	1.34	0.04	1.34	0.04	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	7.86	0.21	7.86	0.21	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.01	0.00	0.01	0.00	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.36	0.01	0.36	0.01	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.02	0.00	0.02	0.00	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI**	**3,692.97**	**99.74**	**3,672.12**	**99.74**	**20.85**	**100.00**
8	**Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI**	**3,702.57**	**100.00**	**3,681.71**	**100.00**	**20.85**	**100.00**

Template 4: Taxonomy-eligible but not taxonomy-aligned economic activities - CapEx

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.03	0.00	0.03	0.00	-	-
4	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	5.08	0.00	4.71	0.00	0.38	0.00
5	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	15.21	0.01	15.21	0.01	-	-
6	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.21	0.00	0.21	0.00	-	-
7	**Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**31,835.04**	**24.40**	**31,671.48**	**24.28**	**163.56**	**0.13**
8	**Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI**	**31,855.58**	**24.42**	**31,691.64**	**24.29**	**163.94**	**0.13**

Template 5: Taxonomy non-eligible economic activities - CapEx

	Economic activities	a	b
		TOTAL (CCM + CCA)	
		Amount	Percentage
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	7.15	0.01
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	1.04	0.00
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.74	0.00
7	**Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**94,880.40**	**72.73**
8	**Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI**	**94,889.34**	**72.74**

Template Annex XII: Disclosure on nuclear and fossil gas related activities (GAR flow)

Template 1: Nuclear and fossil gas related activities

	Nuclear energy related activities	Yes/No
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	Yes
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	Yes
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	Yes

	Fossil gas related activities	Yes/No
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	Yes
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	Yes
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	Yes

Template 2: Taxonomy-aligned economic activities (denominator) - Turnover

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	2.04	0.00	2.04	0.00	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.02	0.00	0.02	0.00	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.03	0.00	0.03	0.00	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**1,479.43**	**2.45**	**1,478.58**	**2.45**	**0.85**	**0.00**
8	**Total applicable KPI**	**1,481.52**	**2.45**	**1,480.67**	**2.45**	**0.85**	**0.00**

Template 3: Taxonomy-aligned economic activities (numerator) - Turnover

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	2.04	0.14	2.04	0.14	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.02	0.00	0.02	0.00	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.03	0.00	0.03	0.00	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI**	**1,479.43**	**99.86**	**1,478.58**	**99.86**	**0.85**	**100.00**
8	**Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI**	**1,481.52**	**100.00**	**1,480.67**	**100.00**	**0.85**	**100.00**

Template 4: Taxonomy-eligible but not taxonomy-aligned economic activities - Turnover

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
2	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
3	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.02	0.00	0.02	0.00	-	-
4	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	1.15	0.00	1.15	0.00	-	-
5	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	7.01	0.01	7.01	0.01	-	-
6	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.06	0.00	0.06	0.00	-	-
7	**Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**8,393.21**	**13.90**	**8,377.75**	**13.88**	**15.46**	**0.03**
8	**Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI**	**8,401.45**	**13.92**	**8,385.99**	**13.89**	**15.46**	**0.03**

Template 5: Taxonomy non-eligible economic activities - Turnover

	Economic activities	a	b
		TOTAL (CCM + CCA)	
		Amount	Percentage
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.43	0.00
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.23	0.00
7	**Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**50,491.85**	**83.63**
8	**Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI**	**50,492.51**	**83.63**

Template 2 - Taxonomy-aligned economic activities (denominator) - CapEx

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.28	0.00	0.28	0.00	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	1.68	0.00	1.68	0.00	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.01	0.00	0.01	0.00	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.22	0.00	0.22	0.00	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.01	0.00	0.01	0.00	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**1,673.96**	**2.77**	**1,664.46**	**2.76**	**9.49**	**0.02**
8	**Total applicable KPI**	**1,676.15**	**2.78**	**1,666.66**	**2.76**	**9.49**	**0.02**

Template 3: Taxonomy-aligned economic activities (numerator) - CapEx

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.28	0.02	0.28	0.02	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	1.68	0.10	1.68	0.10	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.01	0.00	0.01	0.00	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.22	0.01	0.22	0.01	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.01	0.00	0.01	0.00	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI**	**1,673.96**	**99.87**	**1,664.46**	**99.87**	**9.49**	**100.00**
8	**Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI**	**1,676.15**	**100.00**	**1,666.66**	**100.00**	**9.49**	**100.00**

Template 4: Taxonomy-eligible but not taxonomy-aligned economic activities - CapEx

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		**Climate change mitigation (CCM)**		**Climate change adaptation (CCA)**	
		Amount	**Percentage**	**Amount**	**Percentage**	**Amount**	**Percentage**
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.02	0.00	0.02	0.00	-	-
4	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.80	0.00	0.73	0.00	0.07	0.00
5	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	3.55	0.01	3.55	0.01	-	-
6	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.06	0.00	0.06	0.00	-	-
7	**Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**8,405.93**	**13.92**	**8,375.52**	**13.87**	**30.41**	**0.05**
8	**Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI**	**8,410.35**	**13.93**	**8,379.87**	**13.88**	**30.48**	**0.05**

Template 5: Taxonomy non-eligible economic activities - CapEx

	Economic activities	a	b
		TOTAL (CCM + CCA)	
		Amount	Percentage
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	1.73	0.00
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.22	0.00
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.18	0.00
7	**Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**50,286.84**	**83.29**
8	**Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI**	**50,288.97**	**83.29**

Template Annex XII: Disclosure on nuclear and fossil gas related activities (AUM KPI stock)

Template 1: Nuclear and fossil gas related activities

	Nuclear energy related activities	Yes/No
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	Yes
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	Yes
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	Yes

	Fossil gas related activities	Yes/No
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	Yes
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	Yes
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	Yes

Template 2: Taxonomy-aligned economic activities (denominator) - Turnover

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.39	0.02	0.39	0.02	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**6.86**	**0.33**	**6.67**	**0.32**	**0.19**	**0.01**
8	**Total applicable KPI**	**7.25**	**0.35**	**7.06**	**0.34**	**0.19**	**0.01**

Template 3: Taxonomy-aligned economic activities (numerator) - Turnover

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.39	5.37	0.39	5.51	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI**	**6.86**	**94.62**	**6.67**	**94.48**	**0.19**	**100.00**
8	**Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI**	**7.25**	**100.00**	**7.06**	**100.00**	**0.19**	**100.00**

Template 4: Taxonomy-eligible but not taxonomy-aligned economic activities - Turnover

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
3	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
4	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.47	0.02	0.47	0.02	-	-
5	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	1.21	0.06	1.21	0.06	-	-
6	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
7	**Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**27.53**	**1.31**	**19.95**	**0.95**	**7.58**	**0.36**
8	**Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI**	**29.22**	**1.39**	**21.63**	**1.03**	**7.58**	**0.36**

Template 5: Taxonomy non-eligible economic activities - Turnover

	Economic activities	a	b
		TOTAL (CCM + CCA)	
		Amount	Percentage
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.01	0.00
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.08	0.00
7	**Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**2,060.35**	**98.26**
8	**Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI**	**2,060.44**	**98.26**

Template 2: Taxonomy-aligned economic activities (denominator) - CapEx

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.09	0.00	0.09	0.00	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.46	0.02	0.46	0.02	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**13.92**	**0.66**	**13.29**	**0.63**	**0.63**	**0.03**
8	**Total applicable KPI**	**14.47**	**0.69**	**13.84**	**0.66**	**0.63**	**0.03**

Template 3: Taxonomy-aligned economic activities (numerator) - CapEx

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.09	0.63	0.09	0.66	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.46	3.19	0.46	3.33	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.01	0.00	0.01	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI**	**13.92**	**96.17**	**13.29**	**95.99**	**0.63**	**100.00**
8	**Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI**	**14.47**	**100.00**	**13.84**	**100.00**	**0.63**	**100.00**

Template 4: Taxonomy-eligible but not taxonomy-aligned economic activities - CapEx

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
4	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.19	0.01	0.19	0.01	0.00	0.00
5	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.80	0.04	0.80	0.04	-	-
6	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.01	0.00	0.01	0.00	-	-
7	**Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**24.33**	**1.16**	**17.84**	**0.85**	**6.50**	**0.31**
8	**Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI**	**25.34**	**1.21**	**18.84**	**0.90**	**6.50**	**0.31**

Template 5: Taxonomy non-eligible economic activities - CapEx

	Economic activities	a	b
		TOTAL (CCM + CCA)	
		Amount	Percentage
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.06	0.00
7	**Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**2,057.03**	**98.10**
8	**Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI**	**2,057.10**	**98.10**

Template Annex XII: Disclosure on nuclear and fossil gas related activities (AUM KPI flow)

Template 1: Nuclear and fossil gas related activities

	Nuclear energy related activities	Yes/No
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	Yes
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	Yes

	Fossil gas related activities	Yes/No
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	Yes
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	Yes
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	Yes

Template 2: Taxonomy-aligned economic activities (denominator) - Turnover

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**3.98**	**0.58**	**3.79**	**0.55**	**0.19**	**0.03**
8	**Total applicable KPI**	**3.98**	**0.58**	**3.80**	**0.55**	**0.19**	**0.03**

Template 3: Taxonomy-aligned economic activities (numerator) - Turnover

	Economic activities	**a**	**b**	**c**	**d**	**e**	**f**
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		**Climate change mitigation (CCM)**		**Climate change adaptation (CCA)**	
		Amount	**Percentage**	**Amount**	**Percentage**	**Amount**	**Percentage**
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.04	0.00	0.04	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI**	**3.98**	**99.96**	**3.79**	**99.96**	**0.19**	**100.00**
8	**Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI**	**3.98**	**100.00**	**3.80**	**100.00**	**0.19**	**100.00**

Template 4: Taxonomy-eligible but not taxonomy-aligned economic activities - Turnover

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
4	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.04	0.01	0.04	0.01	-	-
5	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.32	0.05	0.32	0.05	-	-
6	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
7	**Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**20.46**	**2.96**	**15.19**	**2.20**	**5.28**	**0.76**
8	**Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI**	**20.82**	**3.02**	**15.54**	**2.25**	**5.28**	**0.76**

Template 5: Taxonomy non-eligible economic activities - Turnover

	Economic activities	a	b
		TOTAL (CCM + CCA)	
		Amount	Percentage
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.02	0.00
7	**Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**665.48**	**96.40**
8	**Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI**	**665.50**	**96.41**

Template 2: Taxonomy-aligned economic activities (denominator) - CapEx

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**4.52**	**0.65**	**4.16**	**0.60**	**0.36**	**0.05**
8	**Total applicable KPI**	**4.52**	**0.65**	**4.16**	**0.60**	**0.36**	**0.05**

Template 3: Taxonomy-aligned economic activities (numerator) - CapEx

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.05	0.00	0.05	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI**	**4.52**	**99.95**	**4.16**	**99.95**	**0.36**	**100.00**
8	**Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI**	**4.52**	**100.00**	**4.16**	**100.00**	**0.36**	**100.00**

Template 4: Taxonomy-eligible but not taxonomy-aligned economic activities - CapEx

	Economic activities	**a**	**b**	**c**	**d**	**e**	**f**
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		**Climate change mitigation (CCM)**		**Climate change adaptation (CCA)**	
		Amount	**Percentage**	**Amount**	**Percentage**	**Amount**	**Percentage**
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
4	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.02	0.00	0.02	0.00	-	-
5	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.21	0.03	0.21	0.03	-	-
6	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
7	**Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**12.04**	**1.74**	**8.11**	**1.17**	**3.93**	**0.57**
8	**Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI**	**12.27**	**1.78**	**8.34**	**1.21**	**3.93**	**0.57**

Template 5: Taxonomy non-eligible economic activities - CapEx

	Economic activities	a	b
		TOTAL (CCM + CCA)	
		Amount	Percentage
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.01	0.00
7	**Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**673.50**	**97.57**
8	**Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI**	**673.51**	**97.57**

Template Annex XII: Disclosure on nuclear and fossil gas related activities (finguar KPI stock)

Template 1: Nuclear and fossil gas related activities

	Nuclear energy related activities	Yes/No
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	Yes
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	Yes

	Fossil gas related activities	Yes/No
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	Yes
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	Yes
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	Yes

Template 2: Taxonomy-aligned economic activities (denominator) - Turnover

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.01	0.00	0.01	0.00	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**0.14**	**0.02**	**0.13**	**0.02**	**0.01**	**0.00**
8	**Total applicable KPI**	**0.15**	**0.02**	**0.14**	**0.02**	**0.01**	**0.00**

Template 3: Taxonomy-aligned economic activities (numerator) - Turnover

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.01	5.24	0.01	5.44	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI**	**0.14**	**94.76**	**0.13**	**94.56**	**0.01**	**100.00**
8	**Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI**	**0.15**	**100.00**	**0.14**	**100.00**	**0.01**	**100.00**

Template 4: Taxonomy-eligible but not taxonomy-aligned economic activities - Turnover

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
3	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
4	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.02	0.00	0.02	0.00	-	-
5	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.01	0.00	0.01	0.00	-	-
6	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
7	**Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**12.97**	**1.66**	**8.21**	**1.05**	**4.76**	**0.61**
8	**Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI**	**13.00**	**1.67**	**8.24**	**1.06**	**4.76**	**0.61**

Template 5: Taxonomy non-eligible economic activities - Turnover

	Economic activities	a	b
		TOTAL (CCM + CCA)	
		Amount	Percentage
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
7	**Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**767.13**	**98.31**
8	**Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI**	**767.13**	**98.31**

Template 2 - Taxonomy-aligned economic activities (denominator) - CapEx

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.01	0.00	0.01	0.00	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**0.23**	**0.03**	**0.21**	**0.03**	**0.02**	**0.00**
8	**Total applicable KPI**	**0.24**	**0.03**	**0.22**	**0.03**	**0.02**	**0.00**

Template 3: Taxonomy-aligned economic activities (numerator) - CapEx

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.01	3.11	0.01	3.42	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI**	**0.23**	**96.89**	**0.21**	**96.58**	**0.02**	**100.00**
8	**Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI**	**0.24**	**100.00**	**0.22**	**100.00**	**0.02**	**100.00**

Template 4: Taxonomy-eligible but not taxonomy-aligned economic activities - CapEx

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
4	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	0.00	0.00
5	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.01	0.00	0.01	0.00	-	-
6	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
7	**Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**14.39**	**1.84**	**7.82**	**1.00**	**6.56**	**0.84**
8	**Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI**	**14.40**	**1.85**	**7.84**	**1.00**	**6.56**	**0.84**

Template 5: Taxonomy non-eligible economic activities - CapEx

	Economic activities	a	b
		TOTAL (CCM + CCA)	
		Amount	**Percentage**
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
7	**Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**765.63**	**98.12**
8	**Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI**	**765.64**	**98.12**

Template Annex XII: Disclosure on nuclear and fossil gas related activities (finguar KPI flow)

Template 1: Nuclear and fossil gas related activities

	Nuclear energy related activities	**Yes/No**
1	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	No
2	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	Yes
3	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	Yes

	Fossil gas related activities	**Yes/No**
4	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	Yes
5	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	Yes
6	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	Yes

Template 2: Taxonomy-aligned economic activities (denominator) - Turnover

	Economic activities	**a**	**b**	**c**	**d**	**e**	**f**
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		**Climate change mitigation (CCM)**		**Climate change adaptation (CCA)**	
		Amount	**Percentage**	**Amount**	**Percentage**	**Amount**	**Percentage**
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.01	0.00	0.01	0.00	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**0.13**	**0.03**	**0.13**	**0.03**	**-**	**-**
8	**Total applicable KPI**	**0.13**	**0.03**	**0.13**	**0.03**	**-**	**-**

Template 3: Taxonomy-aligned economic activities (numerator) - Turnover

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.01	5.66	0.01	5.66	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI**	**0.13**	**94.34**	**0.13**	**94.34**	**-**	**-**
8	**Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI**	**0.13**	**100.00**	**0.13**	**100.00**	**-**	**-**

Template 4: Taxonomy-eligible but not taxonomy-aligned economic activities - Turnover

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
3	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
4	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.02	0.00	0.02	0.00	-	-
5	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.01	0.00	0.01	0.00	-	-
6	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
7	**Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**12.45**	**2.67**	**7.75**	**1.66**	**4.71**	**1.01**
8	**Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI**	**12.49**	**2.68**	**7.78**	**1.67**	**4.71**	**1.01**

Template 5: Taxonomy non-eligible economic activities - Turnover

	Economic activities	a	b
		TOTAL (CCM + CCA)	
		Amount	Percentage
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
7	**Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**453.09**	**97.29**
8	**Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI**	**453.09**	**97.29**

Template 2: Taxonomy-aligned economic activities (denominator) - CapEx

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.01	0.00	0.01	0.00	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**0.19**	**0.04**	**0.19**	**0.04**	**0.00**	**0.00**
8	**Total applicable KPI**	**0.20**	**0.04**	**0.20**	**0.04**	**0.00**	**0.00**

Template 3: Taxonomy-aligned economic activities (numerator) - CapEx

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.01	3.79	0.01	3.79	-	-
4	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
5	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
6	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
7	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI**	**0.19**	**96.21**	**0.19**	**96.21**	**0.00**	**100.00**
8	**Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI**	**0.20**	**100.00**	**0.20**	**100.00**	**0.00**	**100.00**

Template 4: Taxonomy-eligible but not taxonomy-aligned economic activities - CapEx

	Economic activities	a	b	c	d	e	f
		Amount and proportion (the information is to be presented in monetary amounts and as percentages)					
		TOTAL (CCM + CCA)		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	Percentage	Amount	Percentage	Amount	Percentage
1	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
4	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	0.00	0.00
5	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.01	0.00	0.01	0.00	-	-
6	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
7	**Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**14.36**	**3.08**	**7.80**	**1.67**	**6.56**	**1.41**
8	**Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI**	**14.38**	**3.09**	**7.81**	**1.68**	**6.56**	**1.41**

Template 5: Taxonomy non-eligible economic activities - CapEx

	Economic activities	a	b
		TOTAL (CCM + CCA)	
		Amount	Percentage
1	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
2	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
3	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00
4	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00
5	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
6	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
7	**Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**451.14**	**96.87**
8	**Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI**	**451.14**	**96.87**

Template Annex X: Templates for key performance indicators (KPIs) of insurance and reinsurance undertakings

Template 2: Insurance Companies

Weighted average value of all investments that are directed at funding, or are associated with taxonomy-aligned economic activities with respect to the value of all assets covered by the KPI, with the following weights for investments in the undertaking:	
Based on turnover (%):	0.66
Based on CapEx (%):	1.27

Percentage of assets covered by the KPI relative to total investments (total financial assets managed). Excluding investments in sovereign entities.	
Coverage (%):	50.01

Weighted average value of all investments that are directed at funding, or are associated with taxonomy-aligned economic activities, with the following weights for investments in the undertaking:	
Based on turnover (€ million):	56.93
Based on CapEx (€ million):	108.87

Monetary value of the assets covered by the KPI. Excluding investments in sovereign entities.	
Coverage (€ million):	8,584.00

Additional complementary information: break down of the KPI denominator

Percentage of derivatives relative to total assets covered by the KPI:	
Percentage (%):	-

Proportion of exposures to financial and non-financial undertakings in the European Union not subject to the application of Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:	
for non-financial undertakings (%):	5.55
for financial undertakings (%):	16.48

Proportion of exposures to financial and non-financial undertakings from non-EU countries not subject to the application of Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:	
for non-financial undertakings (%):	0.34
for financial undertakings (%):	1.28

Proportion of exposures to financial and non-financial undertakings subject to the application of Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI:	
for non-financial undertakings (%):	3.41
for financial undertakings (%):	3.98

Proportion of exposures to other counterparties over total assets covered by the KPI:	
Percentage (%):	0.29

Proportion of investments of the insurance or reinsurance undertaking other than investments held in respect of life insurance contracts where the investment risk is borne by the policy holders, that are directed at funding, or are associated with, taxonomy-aligned economic activities:	
Percentage (%):	68.68

Value of all the investments that are funding economic activities that are not taxonomy-eligible, relative to the value of total assets covered by the KPI:	
Based on turnover (%):	97.02
Based on CapEx (%):	96.68

Value of all the investments that are funding taxonomy-eligible but not taxonomy-aligned activities relative to the value of total assets covered by the KPI:	
Based on turnover (%):	2.32
Based on CapEx (%):	2.05

Value in monetary amounts of derivatives	
Monetary amount (€ million):	0.00

Value of exposures to financial and non-financial undertakings in the European Union European Union not subject to the application of Articles 19a and 29a of Directive 2013/34/UE:	
for non-financial undertakings (€ million):	476.07
for financial undertakings (€ million):	1,414.55

Value of exposures to financial and non-financial undertakings from non-EU countries not subject to the application of Articles 19a and 29a of Directive 2013/34/UE:	
for non-financial undertakings (€ million):	29.58
for financial undertakings (€ million):	110.02

Value of exposures to financial and non-financial undertakings subject to the application of Articles 19a and 29a of Directive 2013/34/EU:	
for non-financial undertakings (€ million):	292.41
for financial undertakings (€ million):	341.54

Value of exposures to other counterparties:	
Monetary amount (€ million)	24.54

Value of investments of the insurance or reinsurance undertaking other than investments held in respect of life insurance contracts where the investment risk is borne by the policy holders, that are directed at funding, or are associated with, taxonomy-aligned economic activities:	
Monetary amount (€ million)	5,895.29

Value of all the investments that are funding taxonomy-non-eligible economic activities:	
Based on turnover (€ million):	8,327.89
Based on CapEx (€ million):	8,299.31

Value of all the investments that are funding taxonomy-eligible but not taxonomy-aligned economic activities:	
Based on turnover (€ million):	199.18
Based on CapEx (€ million):	175.82

Additional complementary disclosures: breakdown of the KPI numerator

Proportion of taxonomy-aligned exposures to financial and non-financial undertakings subject to the application of Articles 19a and 29a of the Directive 2013/34/EU over total assets covered by the KPI:	
for non-financial undertakings (turnover %):	0.51
for non-financial undertakings (CapEx %):	1.10
for financial undertakings (turnover %):	0.10
for financial undertakings (CapEx %):	0.12

Proportion of investments of the insurance or reinsurance undertaking other than investments held in respect of life insurance contracts where the investment risk is borne by the policy holders, that are directed at funding, or are associated with, taxonomy-aligned economic activities:	
Percentage (turnover %):	0.05
Percentage (CapEx %):	0.05

Proportion of taxonomy-aligned exposures to other counterparties (real estate) over total assets covered by the KPI:	
Other Assets and Other counterparties (turnover %):	-
Other Assets and Other counterparties (CapEx %):	-

Value of taxonomy-aligned exposures to financial and non-financial undertakings subject to the application of Articles 19a and 29a of the Directive 2013/34/EU over total assets covered by the KPI:	
for non-financial companies (turnover € million):	44.06
for non-financial undertakings (CapEx € million):	94.59
for financial companies (turnover € million):	8.84
for financial undertakings (CapEx € million):	10.04

Value of investments of the insurance or reinsurance undertaking other than investments held in respect of life insurance contracts where the investment risk is borne by the policy holders, that are, on the basis of the main activity carried out by the issuer (financial assets) or on the nature of the investment (real estate), directed at funding, or are associated with, taxonomy-aligned economic activities:	
Based on turnover (€ million):	4.03
Based on CapEx (€ million):	4.24

Value of taxonomy-aligned exposures to other counterparties (real estate) over total assets covered by the KPI:	
Other Assets and Other counterparties (turnover € million):	0.00
Other Assets and Other counterparties (CapEx € million):	0.00

Breakdown of the KPI numerator by environmental objective

Taxonomy-aligned activities	Turnover %	Turnover % - Transitional activities	Turnover % - Enabling activities	CapEx %	CapEx % - Transitional activities	CapEx % - Enabling activities
1) Climate change mitigation (CCM)	0.62	0.01	0.39	1.14	0.05	0.59
2) Climate change adaptation (CCA)	0.04	-	0.03	0.11	-	0.00
3) Sustainable use and protection of water and marine resources (WTR)	0.01	-	-	0.01	-	-
4) Transition to a circular economy (CE)	0.00	-	-	0.00	-	-
5) Pollution prevention and control (PPC)	-	-	-	-	-	-
6) Protection and restoration of biodiversity and ecosystems (BIO)	-	-	-	-	-	-

Template Annex XII: Templates for key performance indicators (KPIs) of insurance and reinsurance undertakings

Template 1: Nuclear and fossil gas related activities

Nuclear energy related activities		
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	**YES**
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	**YES**
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	**YES**
Fossil gas related activities		
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	**YES**
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	**YES**
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	**YES**

Template 2: Taxonomy-aligned economic activities (denominator) - Turnover

	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) - based on turnover					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
7.	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**56.41**	**0.66**	**53.03**	**0.62**	**3.38**	**0.04**
8.	**Total applicable KPI**	**56.41**	**0.66**	**53.03**	**0.62**	**3.38**	**0.04**

Template 3: Taxonomy-aligned economic activities (numerator) - Turnover

	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) - based on turnover					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
7.	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI**	**56.41**	**100.00**	**53.03**	**100.00**	**3.38**	**100.00**
8.	**Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI**	**56.41**	**100.00**	**53.03**	**100.00**	**3.38**	**100.00**

Template 4: Taxonomy-eligible but not taxonomy-aligned economic activities - Turnover

	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) - based on turnover					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.10	0.00	0.10	0.00	-	-
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.04	0.00	0.04	0.00	-	-
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
7.	**Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**198.15**	**2.31**	**166.52**	**1.94**	**31.63**	**0.37**
8.	**Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI**	**198.30**	**2.31**	**166.66**	**1.94**	**31.63**	**0.37**

Template 5: Taxonomy non-eligible economic activities - Turnover

Economic activities		based on turnover	
		Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.01	0.00
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.04	0.00
7.	**Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**8,327.84**	**97.02**
8.	**Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI**	**8,327.89**	**97.02**

Template 2: Taxonomy-aligned economic activities (denominator) - CapEx

	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) - based on CapEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
7.	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**107.95**	**1.26**	**98.14**	**1.14**	**9.81**	**0.11**
8.	**Total applicable KPI**	**107.95**	**1.26**	**98.14**	**1.14**	**9.81**	**0.11**

Template 3: Taxonomy-aligned economic activities (numerator) - CapEx

	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) - based on CapEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	-	-	-	-	-
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
7.	**Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI**	**107.95**	**100.00**	**98.14**	**100.00**	**9.81**	**100.00**
8.	**Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI**	**107.95**	**100.00**	**98.14**	**100.00**	**9.81**	**100.00**

Template 4: Taxonomy-eligible but not taxonomy-aligned economic activities - CapEx

	Economic activities	Amount and proportion (the information is to be presented in monetary amounts and as percentages) - based on CapEx					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-	-	-	-	-
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.05	0.00	0.05	0.00	-	-
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.02	0.00	0.02	0.00	-	-
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00	0.00	0.00	-	-
7.	**Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**175.12**	**2.04**	**146.39**	**1.71**	**28.73**	**0.33**
8.	**Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI**	**175.19**	**2.04**	**146.46**	**1.71**	**28.73**	**0.33**

Template 5: Taxonomy non-eligible economic activities - CapEx

	Economic activities	based on CapEx	
		Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
2.	Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00
3.	Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00
4.	Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.00	0.00
5.	Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	-
6.	Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.03	0.00
7.	**Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI**	**8,299.27**	**96.68**
8.	**Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI**	**8,299.31**	**96.68**

Consolidated KPI at Group level

	Net Revenues*	Share of total revenues	KPI Turnover	KPI CapEx
Bank	9,284,700	93.6%	2.52%	2.84%
Insurance	637,076	6.4%	0.66%	1.27%
Total	9,921,776	100%		
Banco BPM Group Summary KPI (weighted average)			**2.40%**	**2.74%**

* *It should be noted that the amount of net revenues represented in the table refers to the reported values of the two specific businesses examined.*

SOCIAL INFORMATION

Own workforce

The following table provides a description of the impacts, risks and opportunities that the Group has assessed as material in relation to own workforce following its dual materiality assessment.

ESRS topic, sub-topic, or sub-sub-topic	IRO	Perimeter	Description	Metrics used to assess performance and effectiveness in relation to a material IRO
Secure employment, Working hours	Positive impact	Own operations	Provide own workforce with a guarantee of stable and safe employment (permanent employment contract) and compliance with the working hours envisaged by the terms	S1-6 Characteristics of the undertaking's employees S1-7 Characteristics of non-employees in the undertaking's own workforce S1-11 Social protection
Adequate wages	Positive impact		Definition of competitive remuneration programmes based on the recognition of merit and on a system of benefits/welfare for own workforce and related families (e.g. incentives linked to performance/results obtained, welfare that can also be extended to family members)	S1-10 - Adequate wages
Social dialogue, Freedom of association, existence of company committees and information rights, consultation and participation of workers, Collective bargaining	Positive impact		Guarantee the right to free association for own workforce (e.g. forecasting and formalisation of periodic consultations between management and trade union representatives) and promotion of dialogue at all company levels through the definition of procedures that guarantee greater commitment to workers' legal representation through internal communication channels	S1-8 - Collective bargaining coverage and social dialogue
Work-life balance	Positive impact		Definition of initiatives aimed at guaranteeing the balance between private and professional life (e.g. implementation of programmes dedicated to well-being including programmes to encourage a healthy lifestyle, support for parental leave, the right to disconnect), increasing employee well-being	S1-15 - Work-life balance metrics
Health and safety	Negative impact		Possible cases of injuries/near-misses/occupational diseases/work-related stress and potential decrease in the psycho-physical wellness of people due to an ineffective application of preventive actions and procedures	S1-14 - Health and safety metrics
Gender equality and equal pay for work of equal value	Negative impact		Wage disparities between employees	S1-16 - Remuneration metrics (pay gap and total remuneration)
Training and skills development	Positive impact		Activation of initiatives to support training, skills development and enhancement of the potential and uniqueness of employees, also through the definition of talent management and development programmes, feedback procedures and regular assessments	S1-13 - Training and skills development metrics
Measures against workplace violence and harassment	Positive impact		Promotion of a climate of respect and open communication and activation of internal channels for reporting any discriminatory act/mobbing/harassment	S1-17 - Incidents, complaints and severe human rights impacts
Diversity, Employment and inclusion of people with disabilities	Positive impact		Creation and dissemination of a culture oriented towards Diversity & Inclusion and the enhancement of equal opportunities	S1-9 Diversity metrics S1-12 Persons with disabilities
Confidentiality	Positive impact		Definition of internal policies/systems aimed at protecting the data of resources, in order to prevent impractical use involving confidential information for business purposes, to the detriment of employees. The improvement of data protection and IT security skills is guaranteed thanks to training courses provided to employees and transparent disclosure	
Secure employment, Working hours	Opportunity		Increase in the Group's productivity, reduction in operating expenses linked to staff and attraction of young talent through the definition of Talent Management programmes to encourage generational turnover, hiring young resources including IT-Tech specialists	

Significant impacts, risks and opportunities for own workers and their interaction with the strategy and business model

Within the scope of this report, all the workers on which the Banco BPM Group could produce material impacts have been considered. Almost all of the Group's workers who make up own workforce subject to material impacts are employees hired on permanent contracts. In addition to these, the residual portion includes non-employees working at head office structures.
The material negative impacts identified within the dual materiality analysis consider the entirety of the workforce (in this regard, it should be noted that there are no specific categories of workers that by activity and/or context in which they operate and/or personal characteristics are more exposed to risks) and are attributable to individual episodes of workplace injuries and wage disparity, a phenomenon to be considered systemic within the broader socio-economic context in which the Group operates.
The activities implemented by the Group generate material positive impacts on employees through multiple initiatives undertaken for the following sustainability topics:

- working conditions and well-being of own workforce, through welfare and well-being plans, promotion of work-life balance, support for parenting;
- health and safety, through health care and insurance policies, programmes and training to promote physical and mental well-being;
- equal pay and opportunities, through fairness in recruitment and selection, promotion of a climate of respect and open communication, initiatives and training to protect diversity and disability, channels for listening to personal aspirations and performance assessment systems, incentives related to performance, enhancement of female talent and monitoring the gender pay gap, promotion of growth for young talents;
- protection of employee data and information privacy, also through the Annual Cybersecurity Training and Awareness-raising Plan.

For more information on the actions implemented by the Group, please see the section "Actions related to the management of IROs in relation to the working conditions and well-being of own workforce", "Actions related to the management of IROs in relation to health and safety", "Actions related to the management of IROs in relation to equal pay and opportunities for own workforce," "Actions related to the management of IROs in relation to the confidentiality and correct processing of own workforce data".
It should be noted that the Group does not generate specific positive and/or negative impacts on its own workforce deriving from transition plans aimed at reducing negative impacts on the environment and implementing greener and more climate-neutral operations. Lastly, as part of the dual materiality analysis conducted, no material risks were identified for the Group deriving from impacts and dependencies in terms of its own workforce. As the Group mainly operates in Italy and does not carry out activities in countries or geographical areas significantly affected by phenomena such as forced and compulsory labour or child labour, is not exposed to the related risks. Vice versa, an opportunity to increase the Group's talent attraction and productivity has been identified, strictly interconnected with the positive impacts generated on its own workforce as per the above-mentioned activities.

Processes for engaging with own workforce and channels for expressing concerns

Through stakeholder engagement activities, the perspectives and interests of its own workforce guide the Group's decisions and activities aimed at managing material impacts.
Specifically:

- the Group provides moments for sharing information, consultation and periodic discussions, usually on a fortnightly basis, with the Trade Unions, with the aim of fostering a climate of mutual listening and dialogue in the continuous search for fruitful industrial relations through constant and systematic trade union dialogue;
- the Group has ad hoc channels to facilitate the reporting of violations by its own workforce.

In this context, the Human Resources function of the Parent Company is given the operational responsibility of ensuring that this engagement takes place and that the results guide the Group's approach.
In addition, the Group activates ad hoc measures to better understand the prospects of its workers, including those who may be particularly vulnerable to impacts and/or marginalised.
By way of example, in addition to the Whistleblowing channel (please see the chapter “Business Conduct” for more details), the following is guaranteed:

- the provision of a “Listening Space” managed by authorised internal psychologists in order to provide support and accompaniment to deal with work and/or personal difficulties with the utmost confidentiality;

- the establishment of a mailbox (*segnalo@bancobpm.it*) dedicated to reporting harassment and discriminatory acts, which are managed in accordance with the provisions of the reference internal regulations;
- the provision, for each employee, of a representative of the Personnel Management structure with whom constant and continuous dialogue is maintained.

The Group strives to ensure the availability of these channels in the workplace. In this sense, a section of the company intranet is specifically dedicated to these channels (Whistleblowing), ad hoc thematic carousels and dedicated news/communications are periodically published.
With particular reference to the reports submitted by the alleged victims and/or by witnesses using the e-mail address segnalo@bancobpm.it, the Human Resources structures involved in the management process are: Diversity, Inclusion and Social (responsible for communicating to the whistleblower that the report has been accepted and providing, by telephone, all the indications on the process and on the management of the report itself), Labour Policies, Legal Human Resources with the possible support of Staff Management and, if deemed appropriate, also with the support of external lawyers in line with internal regulations on disciplinary measures.
The Group reserves the right to implement the appropriate management interventions, promptly and even before the analysis and in-depth exploration of the report are completed, also taking into account the seriousness of the situation. These activities are carried out in compliance with the rules and regulations in force and in full respect of the principles of confidentiality and fairness, as well as with the legislation on the protection of personal data. In this sense, both the Circular "Combating harassment, violence and all forms of discrimination in the workplace" and the Process Regulation "Internal whistleblowing system" expressly provide for the Group's commitment to protect the whistleblower, the alleged victim and anyone involved in the process of handling the report from any retaliation.
In order to monitor the reporting phenomena as well as the consequent procedures and measures adopted, the Diversity, Inclusion and Social structure, in coordination with the structures involved in the process, produces a specific report on an anonymous and aggregate basis, of which evidence is given to the company structures and Bodies concerned as part of the annual Sustainability Reporting of the Group.
The Human Resources Legal function collaborates with the Academy structure in the design and provision of training activities on these issues. Finally, at the end of the training sessions, an assessment questionnaire is provided to certify the actual understanding of the course contents and assess the level of awareness of the workforce with respect to the existence of channels, structures and processes on which to rely to communicate concerns or needs.

Policies related to own workforce

The main policies adopted by the Banco BPM Group to manage its own workforce are:
- Guidelines on respecting and safeguarding human rights;
- Guidelines on workplace health and safety;
- Remuneration policy;
- Regulation on IT security;
- Regulation on privacy, processing and protection of personal data (see Confidentiality and correct data processing).

In preparing the internal reference regulations for the management of IROs related to its own workforce, the Group complies with all national and international regulations on issues such as trafficking in human beings, forced or compulsory labour and child labour, which however has not been found within the contexts in which the Group operates.

Definition and monitoring of actions for own workforce

The Group has adopted and planned multiple actions in order to manage the main material issues related to relations with its own workforce, as well as to achieve the purposes and objectives of its internal policies. The actions adopted concern the material sustainability topics identified by the Group for its own workforce:
- working conditions and the well-being of its own workforce;
- health and safety;
- equal pay and equal opportunities;
- confidentiality and correct processing of data.

The resources committed by the Group for the implementation of the different actions refer to both financial resources, attributable to the dedicated budgets and assigned to the individual structures, company contributions and loans

obtained by using sector funds for financed training, and to human resources, attributable to staff involved in the management and organisation of the various initiatives.
In particular, the actions implemented by the Group and described in detail below promote the pursuit of the material opportunities identified during the dual materiality analysis, in relation to the possibility of increasing the Group's productivity and attracting young talent through the definition of Talent Management programmes and recruitment of young resources to encourage generational turnover.
Through constant dialogue with the workers of its own workforce, also with the support of specific reference figures of the Staff Management structure, the Group ensures monitoring the effectiveness of all the initiatives introduced for its own workforce, evaluating, among other things, its suitability in the event of actions aimed at mitigating negative impacts.

Process of defining objectives related to own workforce

The objectives defined by the Group concern the following material sustainability topics identified for its own workforce:
- working conditions and the well-being of its own workforce;
- health and safety;
- equal pay and equal opportunities.

The definition of sustainability objectives is part of the more complex process of drafting the Strategic Plan, to which the various company functions and Top Management contribute according to their specific sphere of competence. This process takes into account the issues and requests that emerged during the meetings with the workforce and workers' representatives who are periodically involved through participation in trade union discussions, as well as the performance recorded in previous years and the resources made available in determining company objectives. The process of defining sustainability objectives also requires the involvement of Top Management.
The monitoring of performance linked to the sustainability objectives included in the Strategic Plan is carried out, for the respective areas of competence, by the Planning and Value Management function and by the Transition and Sustainability function at least on a quarterly basis.
The performance measured periodically is compared with the predetermined interim targets in order to detect any gaps. The results of the monitoring activity are brought to the attention of the corporate bodies, also in order to direct any remediation actions activated by engaging the company structures responsible for pursuing the company objectives.

Working conditions and the well-being of own workforce

Policies related to working conditions and the well-being of own workforce

<u>Guidelines on respecting and safeguarding human rights</u>

The Guidelines on respecting and safeguarding human rights are applied by all Group Companies, both in the context of their operations and in the upstream and downstream value chain, and govern the principles, roles and responsibilities for respecting and safeguarding human rights, with particular attention to the direct and indirect impacts deriving from the choices and actions implemented by the Group Companies, guiding their strategic and operational choices.
The main objectives of the Guidelines in question are the definition and promotion of values that inspire the Group and which aim to promote respect for dignity, equity, equal opportunities, the enhancement of the specificities of each individual, inclusiveness, data and information protection; these values are also integrated in the Group's Code of Ethics and in all other internal regulations on the matter.
The principles outlined in the Guidelines encourage the development of initiatives dedicated to listening to, respecting and combating all forms of harassment and discrimination, recognising the value of diversity and inclusion to:
- manage and prevent negative impacts related to human rights, such as incidents of discrimination and harassment;
- foster positive impacts, such as the promotion of dialogue at all company levels and initiatives aimed at increasing employee well-being, as well as protecting the economic, social and cultural rights of communities and the freedom of expression of customers;
- seize opportunities to make the Group as attractive as possible in the labour market, with particular reference to young talents.

Through the aforementioned Guidelines, the ESG Committee ensures monitoring the implementation and alignment of corporate strategies and initiatives in the field of human rights protection.
By enforcing the Guidelines in question, the Group undertakes to respect:

- the UN Declaration of Human Rights;
- the European Convention on Human Rights;
- the Declaration on Fundamental Principles and Rights at Work of the International Labour Organisation (ILO) and subsequent related conventions;
- the initiative of the United Nations Global Compact for the promotion of a sustainable global economy, a voluntary initiative with which the Group has formally complied.

The highest management level responsible for the enforcement of the Guidelines coincides with the role of the Chief Executive Officer.
An extract of the Guidelines on respecting and safeguarding human rights is made available to all stakeholders on the Group's institutional website. Internal stakeholders can consult the full version of the document on the company intranet.

Actions related to the management of IROs in relation to working conditions and well-being of own workforce

The Group has adopted and planned multiple actions dedicated to safeguarding the working conditions and well-being of its people, contributing to increasing the ability to attract and retain talent, in line with the purposes and objectives of its internal policies. In particular, the main actions adopted in the reference year in this area are reported below:

- offer of a Welfare Plan and the free Welfare Coach service;
- offer of supplementary pension plan schemes, conventions and corporate recreational clubs;
- implementation of workplace well-being programmes;
- implementation of activities and contributions to support parenting;
- activation of specific training courses for work-life balance;
- consolidation of the #Respect programme and preparation of a netiquette manual for managing virtual meetings.

Welfare Plan, free Welfare Coach service offer, conventions and corporate recreational clubs

With reference to employees of Italian Companies[1] in the credit sector for the Professional Areas and Middle Manager categories, in 2024 the Group confirmed awarding a welfare budget and the possibility of transforming the company bonus into a welfare budget in 2025.
The service can be used through a welfare platform that can also be used via an app, and is dedicated to the purchase of goods and services for the family, mobility, leisure, health care, supplementary pension plan and the repayment of domestic utilities.
The Welfare Coach service was also activated for the two-year period 2024-2025, offered to all employees of the Italian Companies[2] operating in the credit and insurance sector, for an orientation, information and support service for the care of frail family members, offering educational guidance for children and for their own personal growth. The service is accompanied by timely information that also communicates the opportunities offered in terms of welfare by the public service.
In addition, the Group has provided the possibility of taking advantage of special agreements and conditions for the purchase of goods and services and participation in events, also through the corporate recreational clubs of workers, which involve, in addition to employees, also retired staff and family members.

Supplementary pension plan offer

With reference to all Italian companies operating in the credit and insurance sector[3], the Group offers employees the opportunity to subscribe to one of the supplementary pension plans, identified on the basis of the Company to which they belong/origin and place of work, and granting a company contribution according to the person's choice to pay an individual contribution calculated on their remuneration. For some of these options, there is an additional possibility of registering the dependent family members for tax purposes.

[1] Banco BPM, Oaklins, Aletti Fiduciaria, Banca Aletti, Banca Akros
[2] Banco BPM, Oaklins, Aletti Fiduciaria, Banca Aletti, Banca Akros, Vera Vita and Banco BPM Vita
[3] Banco BPM, Oaklins, Aletti Fiduciaria, Banca Aletti, Banca Akros, Vera Vita and Banco BPM Vita

Implementation of the “Taking care” programme for work well-being

The “Taking care” programme was implemented by the Group with the aim of improving the work well-being of families with children in different age groups, caregivers, women returning from maternity leave and new fathers. The programme envisages the provision of specific courses and webinars on the issues of care for people in the family unit and on financial inclusion in the family. In addition, families with children with disabilities are involved in the “Ability Parent Care” parenting support programme, tailored to the needs of the family unit. The programme is provided through webinars, which makes the courses easy to use by the entire Banco BPM Group.

Implementation of activities and contributions to support parenting

In order to improve the well-being of its own workforce and promote balance between work and family life, several activities related to parenting have been implemented that concern the employees of the credit companies.
During the summer, employees can take advantage of campuses dedicated to children between 6 and 16, with different types of stays offered at different times in both Italy and abroad. For each child aged between 0 and 12, a dedicated budget is also made available for the purchase of a gift for the Christmas holidays.
To provide significant support in caring for the children of employees during working hours, Banco BPM has a company crèche available at its Milan office, “Il giardino di Bez”. Thanks to the agreement with the Municipality of Milan, the crèche welcomes around 70 children every year and is open to families in the neighbourhood, demonstrating the Group's commitment to the relationship with the community in which it operates.

Activation of specific training courses for work-life balance

The Group activated two training courses focused on improving work-life balance in 2024, helping to mitigate the negative impacts related to the risk of work-related stress. Specifically, the “Balancing Life and Work” workshop for all Group staff, aimed at transmitting new skills in reconciling the work with private life for greater effectiveness and organisational efficiency. The managerial workshop "Facilitating work-life balance", dedicated to figures who hold positions of responsibility, instead aimed at providing the management skills of their team to improve productivity while respecting work-life balance, encouraging regular feedback, meetings and effective communications.

Consolidation of the #Respect programme and preparation of a netiquette manual for virtual meetings

In line with the Strategic Plan, the Group is committed to consolidating and spreading a culture based on the value of respect and on the idea of a more accessible and inclusive company that values diversity, equity and inclusion. To this end, as part of the #Respect programme, the #Respect Tour was launched in October 2024, divided into a series of stops scheduled until December 2025 throughout the country, involving the company population at both the headquarters and in the network.
Taking its cue from the Manifesto Commitment of the #Respect programme, Banco BPM subsequently drew up a netiquette manual on the correct behaviour during virtual meetings. Made available to the entire Group, the document aims to stimulate behaviours that ensure respectful and inclusive communication, both in terms of language and in the methods with which company tools are used.

Objectives related to working conditions and the well-being of own workforce

The main objectives aimed at managing working conditions and the well-being of its own workforce as well as monitoring the effectiveness of policies and actions are:
- promoting generational turnover and investing in young talents;
- increasing the share of remote working for head office employees.

Promoting generational turnover and investing in young talents

In order to renew its workforce and contribute to the development of the new skills required to support business growth - by acquiring, in particular, new IT tech and cybersecurity skills - in the 2023-26 Strategic Plan, the Group has set out to hire 800 people under 30 on a permanent basis by 2026, envisaging that among the new IT tech specialists hired,

15% have specific cybersecurity skills.[1] This objective pursues the aim of internalising key skills to improve and strengthen the tech innovation, lean banking and cybersecurity sectors. With the recent approval of the update of the 2024-27 Strategic Plan, the objective was updated by envisaging the recruitment - aimed at generational turnover - of 800 people on a permanent basis over the 2025-26 time horizon. The 15% target on newly hired IT tech specialists with specific cybersecurity skills is confirmed and extended to 2027.
The objective in question is defined through specific business control and validation processes of the data and considering the results of a detailed discussion that involved the workers' representatives in dedicated trade union tables. In this discussion, the Group signed specific agreements for access to the extraordinary benefits of the Solidarity Fund, which made it possible to define a new target in terms of recruitment in the 2025-26 time horizon, leveraging the acceptance of requests for voluntary redundancy and on departures for benefiting from the incentivised retirement plan.
The figure as at 31 December 2024 shows the recruitment of 133 young people under 30, of which four are IT tech specialists with specific cybersecurity skills.

Increasing the share of remote working for head office employees

The Group expects to reach, by 2026, a share of remote working equal to 40% of the ordinary hours worked by employees of the headquarters.
Defined in the 2023-26 Strategic Plan and rescheduled by 2027 in the recent update of the 2024-27 Strategic Plan, the objective pursues various purposes in line with the Guidelines on respecting and safeguarding human rights, such as: the improvement of work-life balance and increase in the Group's attractiveness towards talents (in particular in the IT tech field), in addition to the consequent reduction of Scope 3 emissions deriving from commuting.
The Group has defined the objective based on the analytical data recorded through the internal attendance management system. In particular, the figure as at 31 December 2024, calculated considering the scope of the Banking Group, shows the achievement of a share of remote working equal to 33.8% of the ordinary hours worked.

Metrics related to the characteristics of employees and non-employees in own workforce

As at 31 December 2024, the Group had a total of 19,490 employees, counting each employee and/or person who carries out the majority of their activities in a Group Company as a "full-time equivalent" (hereinafter "FTE").
The Group also publishes the figure on the total number of employees in the Annual Financial Report in the section "Consolidated Financial Results".

The table below shows the breakdown of employees by type (gender and contract)

Employee type	Women	Men	Total
Number of permanent employees	9,108	10,379	19,487
Number of temporary employees	2	1	3
Number of employees with variable hours	0	0	0
Total	**9,110**	**10,380**	**19,490**
Number of full-time employees	5,998	10,157	16,155
Number of part-time employees	3,112	223	3,335

The Group recorded 529 employees who left in 2024 (and a consequent turnover rate of 2.71%), including in the count all the exits of employees of the Group and/or those who carry out most of their activities in a Group company.
As at 31 December 2024, the Group had a total of 32 non-employed workers (of which two are self-employed and 30 are provided by companies that carry out staff recruitment, selection and provision activities), who carry out most of their activities in a Group Company, considering each person equivalent to an FTE.
The most common types of non-employed staff included in the count are collaborators, temporary workers and people on internships.

[1] Specifically, IT tech specialists are the figures hired in the Chief Innovation Officer Area (also "CIO") or graduates in STEM (specifically mathematics, statistics, IT, etc.). For the calculation of the percentage of IT tech specialists with specific cybersecurity skills, the resources hired in the Data Governance function and in the Logical and Physical Security structure are considered out of the total resources hired within the CIO Area.

Metrics related to adequate wages, remuneration and social protection

The Group states that all employees (100%) receive an adequate salary, considering the results of the analyses carried out on the salaries of the foreign Companies' workforce (based on the regulations in force in each country) and considering that in the Italian Companies, all workers have National Collective Labour Agreements applied. Collective Agreements are envisaged for 99.8% of the workers of the entire Group, as only employees hired in Ireland and Asia[1] are subject to individual bargaining.
The overall percentage of Group employees covered by workers' representatives is 99.71%, while that recorded for employees in Italy amounts to 99.98%, taking into account all those hired by the Companies based in Italy for which national bargaining in the credit sector and ANIA or with more than 15 employees is envisaged.
The ratio between the total annual remuneration of the person receiving the maximum remuneration at Group level and the median total annual remuneration of all Group employees (excluding the aforementioned person) is equal to 47.9. This ratio is calculated considering the total annual remuneration of each employee of all Group companies for the denominator, with the exception of BBPM Life, for which the average annual remuneration at Company level is considered for each employee.
All Group workers are covered by the social protection envisaged by the institutions of national legislation and national bargaining that intervene in the event of loss of income (understood as job loss) due to one of the important life events listed below: illness, unemployment from the moment the employee ceases working for the company (excluding employees at BBPM Life), workplace injuries and acquired disability, parental leave and retirement. It should be noted that the Credit Sector currently includes national bargaining institutions that can help in the event of a reduction/loss of work through the Solidarity Fund and the Employment Fund.

Health and safety

Policies related to the health and safety of own workforce

In line with the issues defined by the Code of Ethics, the guiding values of the decisions made by the Banco BPM Group incorporate the protection of people's health and safety, through a commitment to ensuring a work environment compliant with legal standards. The definition of the principles, roles and responsibilities regarding health and safety identified to promote the policies, internal processes regarding safety and well-being in the workplace, is based on:

- the main international treaties on the protection of human rights, with reference to safeguarding health and safety and, in particular:
  - the UN Declaration of Human Rights (articles 3 and 23);
  - Convention C155 on the health and safety of workers issued by the ILO (International Labour Organisation) on 22 June 1981;
  - the principles of the Global Compact promoted by the United Nations (principle 1.06);
  - the UN Sustainable Development Goals (UN Agenda 2030 - Goal 8);
- the applicable legal provisions.

For the health and safety area, the Group has adopted both prevention policies and a system for managing workplace injuries.

<u>Guidelines on workplace health and safety</u>

The Guidelines on workplace health and safety regulate the principles and controls on the prevention, management and reduction of negative impacts on health and safety, guaranteeing a work environment that complies with legal standards.
The general objective of the Guidelines in question, in line with what is expressed in the Code of Ethics, is the protection of the health and safety of people, paying particular attention to the following purposes:

- allowing staff and associates to engage in good conduct in their daily work activities, making available and keeping up-to-date the information on company safety;
- developing human resources by offering of a training plan aimed at continuously improving the skills of all employees, promoting involvement and enhancing their awareness of workplace health and safety issues;
- verifying the technical-professional suitability of partner firms and freelance associates.

[1] The colleagues hired in Asia are local staff who deal with financial brokerage aimed at facilitating foreign transactions between our company and local companies. As already explained, their employment relationship is regulated by individual bargaining.

The implementation of the aforementioned Guidelines, with reference to own operations, guarantees the management and mitigation of the negative impact detected during the DMA on the subject in question.
The Guidelines are applied by Banco BPM, Banca Akros S.p.A (including the subsidiary Oaklins Italy S.r.l.), Banca Aletti S.p.A. (including the subsidiary Aletti Fiduciaria S.p.A.), Banco BPM Vita S.p.A. (including the subsidiary Vera Vita S.p.A.) and Banco BPM Invest SGR S.p.A. at the level of its own operations and of the entire value chain. Specifically, they apply to all employees and all parties who come into contact with the activities carried out by the Group, as well as those who access its properties.
The Guidelines do not apply (by definition) to companies with no staff and therefore not subject to Italian Legislative Decree 81/2008 and to the company Ge.Se.So. S.r.l. and Banca Aletti & C. (Suisse) S.A. which ensure the monitoring and management of health and safety in accordance with the dictates established by law and the Code of Ethics.
The company BBPM Life adopts the "Health and Safety Statement", through which it undertakes to comply with the legal provisions in force deriving from the Safety, Health and Welfare at Work Act 2005 in compliance with Irish legislation and the principles of the Group Guidelines. The policy applies to all employees and all parties who enter or access the Company's offices and identifies the risks and control measures adopted, divided into the different sections.
The highest management level responsible for the enforcement of the Guidelines coincides with the role of the Chief Executive Officer.
The Compliance function and the Chief Innovation Officer are responsible for monitoring the Guidelines.
Specifically:
- the Compliance structure constantly monitors the evolution of EU and Italian legislation, identifying any need for updating with reference to operating processes;
- the Chief Innovation Officer, who represents the highest level of management responsible for the enforcement of the Guidelines on behalf of the Parent Company, and the relative structures reporting to them monitor the actual enforcement of the periodic verification activities within the health and safety management system at work.

Owing to the systematic framework of the internal processes and health and safety services integrated with the principles outlined above, Banco BPM's workplace health and management system is compliant with standard UNI EN ISO 45001:2018 - cited above and complies with the current legal provisions deriving from Italian Legislative Decree 81/2008.
The Guidelines are made available to all external stakeholders through the institutional website of Banco BPM. Internal stakeholders can consult the document on the company intranet.

Actions related to the management of IROs in relation to health and safety

The Group has adopted and planned multiple actions in order to manage material health and safety issues, as well as to achieve the purposes and objectives of its internal policies.
The health and safety management system is entrusted to an organisational structure that monitors all the aspects established by the regulations, including health surveillance activities. Aside from the central structure, there are also company physicians covering the entire country, one of which works as coordinator in risk assessments and the implementation of measures to protect the health and mental/physical integrity of employees.
The actions implemented by the Group in relation to health and safety illustrated below also include the activities implemented in response to and to mitigate the negative impacts identified during the dual materiality analysis and also defined within the Strategic Plan. In particular, given the negative impact on health and safety issues, the Group is committed to actions aimed at:
- offering prevention and care services related to the health and well-being of employees and their families through various forms of health care, as well as benefiting from the voluntary suspension of work which is partially paid, for personal and family needs;
- guaranteeing and promoting the psycho-physical well-being of workers, including the agile work measures described in the section "Use of agile working and initiatives aimed at promoting sustainable mobility".

<u>Healthcare and insurance policies</u>

Employees operating in Italy in the credit and insurance sectors can benefit from funds the Group has had in place for many years to provide concrete support to employees and their families. Having good health coverage makes it possible to deal with any health protection needs that may arise. The forms of healthcare offered by the Group cover

the healthcare and social and health expenses incurred by members, guaranteeing employees and their families the opportunity to economically benefit from additional or replacement services with respect to those provided by the Italian National Health Service. The Banco BPM Group contributes to the availability of the funds with economic payments that are added to the contributions paid by those enrolled.
In addition, the Group provides insurance coverage in the event of workplace injuries and those occurring outside of work and in the event of disability deriving from illness, in addition to the Long Term Care policy (also "LTC") of the credit sector for cases of loss of self-sufficiency due to accident or illness.

Promoting physical and mental well-being

With the aim of promoting healthy lifestyles, the Group has activated and developed various initiatives for the employees of all Companies operating in Italy. These include:

- the W@W (Wellbeing at Work) project that includes a dedicated section within the company intranet offering training courses on proper nutrition, stress management, physical activity, postural education and mental well-being, also offering the possibility of accessing free courses with specialists in these areas;
- for mental well-being, the W@W project also offers staff the opportunity to attend four sessions annually with a psychologist, in addition to the five already provided for by the "Listening Space" project, the initiative managed by authorised internal professionals and aimed at those who feel the need for support and accompaniment to deal with work and/or personal difficulty;
- through the OSA initiative, the Group has activated a non-competitive virtual challenge for employees. It consists of recording their physical activity on a dedicated platform, also allowing them to monitor the reduction of greenhouse gas emissions;
- to raise awareness of the importance of blood donations, the Group has launched a multi-year collaboration with AVIS, with the aim of expanding the involvement of employees of all Group companies operating in Italy, through periodic campaigns;
- to promote good practice in the field of prevention, it offered employees working in Milan and its province the opportunity to join the free lung cancer screening campaign at the European Institute of Oncology (IEO) in Milan.

Training to prevent and manage the risk of aggression

In order to support employees in acquiring effective management and communication techniques with aggressive customers and to help mitigate the negative impacts on their health, the Group has provided all staff with the "Prevention and aggression risk management" course in remote learning mode. Preceded by communications on how to prevent and manage external intimidating and/or aggressive events, the course focuses on creating greater awareness of traumatic events, such as robberies and assaults, providing some measures that can help those involved in such events. and illustrating to all participants the support path that can be activated in these cases.

Objectives related to the health and safety of own workforce

Increasing the share of remote working for head office employees

The objective of achieving a remote working share equal to 40% of the hours worked for employees at headquarters by 2027, described in detail in the section "Objectives relating to working conditions and the well-being of own workforce", contributes to mitigating the risk of work-related stress by improving work-life balance.

Health and safety metrics

The health and safety management system covers all Group employees (100%). In particular, with regard to health and safety, the Group recorded in 2024:

- 187 workplace injuries, with an injury rate of 6.3 (which corresponds to the number of injuries per one million hours worked)[1];
- 0 deaths due to work-related injuries and illnesses[2];

[1] In calculating the rate of work-related injuries, the company divides the number of cases of work-related injuries reported to INAIL by the total number of hours worked by workers in the year, multiplied by 1,000,000.
[2] For the calculation of deaths due to work-related injuries and illnesses, the Group considers the number of deaths due to work-related illnesses and the number of work-related injuries recognised by INAIL (even if referring to previous years).

- One case of work-related illness[1] concerning an employee of the Company Ge.Se.So., exposed to different levels of risk than those in the banking and insurance sectors as it operates in the catering sector;
- 6,718 days lost due to injuries due to work-related injuries or illnesses[2].

Work-life balance metrics

All employees of all Group Companies are entitled to leave for family reasons, by virtue of social policy and/or collective agreements. The table below shows the percentage of employees who have taken leave for family reasons, considering the staff in service at the end of the period who received at least one leave of absence, including: maternity leave, paternity leave, childcare or family care.

	Women	Men	Total
Percentage of employees who are entitled to take leave for family reasons	100%	100%	100%
Percentage of eligible employees who took leave for family reasons	28%	17%	22%

Equal pay and opportunities for all

Policies related to equal pay and opportunities for own workforce

The Guidelines on respecting and safeguarding human rights, described in the section "Policies related to working conditions and the well-being of own workforce", are implemented by the Group in order to eliminate discrimination and harassment and to promote equal opportunities. The Guidelines are implemented through specific procedures that ensure discrimination is avoided, mitigated and addressed once detected, as well as to support inclusion and the enhancement of diversity.

In particular, in order to promote a participatory and professional work environment, in which all people are treated with dignity and respect, the Group contributes to spreading a culture of respect in relationships between people. From this perspective, the Group considers any type of behaviour that may be considered a threat to the dignity of the person who suffers it to be unacceptable, as it could compromise their health, confidence, morale, work motivation, work performance and the organisational climate. In addition, through the dissemination of specific internal Circulars, the Group guarantees the implementation of conduct consistent with the principles enshrined in the "Guidelines on respecting and safeguarding human rights" (referred to below) by defining ad hoc processes, by way of example for managing reports related to episodes of violence, harassment and discrimination (alongside, and without replacing, the Whistleblowing channel).

In line with the Code of Ethics, the Group is committed every day, in all areas in which it operates, to respecting human rights and promoting a culture focused on them, to combating and removing from conduct any form of discrimination, respecting and valuing differences in gender, age, ethnicity, nationality, religion, language, different abilities, sexual orientation and identity, political and trade union membership. All recipients of the Code of Ethics can report any violation of the Code itself or of the Model pursuant to Italian Legislative Decree 231/2001. The Group undertakes to carry out investigations in relation to any violations of which it becomes aware and to report them to the Supervisory Body through the dedicated IT platform or to the address that each Group company publishes on its institutional website. All recipients are also required to cooperate in internal investigations of violations and behaviour not in line with the Code of Ethics.

The Group implements line, second- and third-level controls to verify compliance with the principles set forth in the Guidelines on human rights and in the internal procedures issued in the application thereof. Human rights are integrated into the Group's risk management model and as such, are subject to periodic assessment as part of the broader corporate sustainability strategy.

The Group provides staff with appropriate channels to receive reports of alleged violations, reporting annually on performance in protecting human rights in terms of how it is managed and monitored, the risks identified, the results of assessment activities and management and mitigation actions.

In addition, the Human Resources function, through the Diversity, Inclusion and Social structure, designs and develops initiatives aimed at respecting individuals and their diversity and disabilities, as well as promoting gender, age and affective orientation, organisational well-being, social inclusion and equality.

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[1] For the calculation of work-related illnesses, the Group considers the number of work-related illnesses recognised by INAIL (even if referring to previous years).

[2] For the calculation of days lost caused by injuries due to work-related injuries or illnesses, the Group considers the days of work lost due to injury, death or work-related illness reported to INAIL.

Finally, the Group consistently monitors the need to adapt its processes in response to new regulatory requirements or changes to existing requirements.

Remuneration policy

The "Remuneration Policy" (hereinafter also Policy), applied by the entire Group at the level of its own operations, defines the principles and elements of the Group's remuneration system, guaranteeing:

- criteria based on responsibilities, professional skills, seniority, merit, regardless of gender;
- operational leverage useful for attracting, motivating and retaining management and staff;
- reducing the risks taken on (including legal and reputational risks), protecting customers and increasing loyalty while also being careful to manage conflicts of interest;
- the creation of long-term value for the benefit of shareholders and in the interest of the Group's stakeholders.

At the same time, with reference to its own operations, the Policy also represents one of the levers implemented by the Group to manage the negative impact detected during the DMA on the issue of equal pay and to favour the positive impact linked to adequate salaries.

Through the implementation of the Policy, the Group undertakes to respect:

- the 37th update of Circular 285/2013, with which the Bank of Italy implemented the changes introduced by Directive 2019/878/EU (CRDV) and the "Guidelines for healthy remuneration policies" of the European Banking Authority (EBA);
- the "Provisions regarding the transparency of banking and financial transactions and services. Fairness of relationships between intermediaries and customers" with which the Bank of Italy, inter alia, implemented the "Guidelines on remuneration policies and practices for staff responsible for offering banking products and for third parties employed in the banking network sale", issued by the EBA in September 2016;
- the Intermediaries Regulation adopted by CONSOB with resolution 20307/2018 (art. 93) and most recently updated with Resolution of 28 July 2022, as well as Delegated Regulation 2017/565/EU which supplements Directive 2014/65/EU (MiFID II). The "Guidelines on certain aspects of MiFID II remuneration requirements" issued by the European Securities and Markets Authority (ESMA) are also relevant;
- IVASS Regulation 38 on the corporate governance of companies and insurance groups, which implements Directive 2009/138/EU (Solvency II), with which the Italian Insurance Authority (IVASS) implements the Guidelines of the European Insurance and Occupational Pensions Authority (EIOPA) on the corporate governance system and which contains the provisions relating to the remuneration policy;
- the deed amending the Implementing Regulation of articles 4-undecies and 6, paragraph 1, letters b) and c-bis) of the Consolidated Finance Law;
- articles 123-*ter* of Italian Legislative Decree 58/1998 and 84-*quater* of the Issuers' Regulation (CONSOB Resolution no. 11971/1999) apply, which have implemented the provisions contained in the Shareholder Rights Directive 2 (2017/828/EU). In addition, in terms of self-regulation, the Corporate Governance Code of January 2020 applies.

The highest level of management responsible for the enforcement of the Policy coincides with the Board of Directors. The Parent Company's Audit function verifies compliance of the procedures implemented by the Group and by the Group Companies with respect to the Policy approved and the regulations in force.
The same control activity is carried out in the insurance companies by the Internal Audit function.

When defining the Policy, the Group considers and integrates the interests of the various stakeholders inside and outside the Group in its remuneration system, and in particular:

- shareholders: the alignment of the interests of shareholders and management is guaranteed, recognising the latter part of the remuneration in shares;
- customers: the criteria used to assess increases in the fixed and variable components of remuneration of all staff comply with the remuneration requirements of MiFID II and do not create conflicts of interest that encourage staff to act against the interests of customers. In addition, the Remuneration Policy provides malus and claw-back mechanisms, which affect the incentive until it is eliminated, to discourage misconduct, further align the interests of staff with those of customers and adjust the variable remuneration if unlawful conduct towards the customer is ascertained;
- workforce: the 2024 Policy includes mechanisms which, in compliance with the legislative framework, enable the Group to attract and retain individuals whose professionalism and expertise meet the Company's needs,

with a view to achieving a competitive advantage and good governance. Pursuing internal fairness as regards remuneration has a profound impact on staff motivation and therefore, on performance; evaluating it with respect to the external labour market enables the best talents to be retained as well as attracting external ones. For this purpose, the Group has implemented a system for assessing positions with the support of a leading consultancy company using the international IPE (International Position Evaluation) methodology;
- Social Parties: the criteria and methods for determining and disbursing the company bonus, intended for non-executive staff of the banking Group companies that apply the National Credit Agreement, are subject to discussion and negotiation with the Social Parties.

The Policy is made available to all stakeholders on the Group's institutional website. Internal stakeholders can consult the document on the company intranet.

Actions related to the management of IROs in relation to equal treatment and opportunities for own workforce

The actions implemented by the Group in relation to equal pay and opportunities for its own workforce illustrated below also include the activities envisaged in response to and to mitigate the negative impacts identified during the dual materiality analysis and also defined within the Strategic Plan. In particular, given the negative impact on fair remuneration issues, the Group undertakes various actions, as described below, aimed at:
- promoting fairness in the recruitment and selection of staff;
- spreading the culture of respect and open communication and denouncing discriminatory acts;
- promoting accessibility and training for diversity and disability management;
- listening to individual professional aspirations and evaluating performance;
- implementing competitive remuneration programmes;
- enhancing female talent and monitoring the gender pay gap;
- favouring the coaching of young people and accelerated growth paths.

<u>Promoting fairness in staff recruitment and selection</u>

Within the context of staff selection, the Group has defined a standardised and fair process, applying objective and transparent selection criteria based on the competence and professionalism of the candidates which guarantees equal opportunities for all, as well as allowing the identification of the most suitable candidates in line with the vacant positions. Among the activities implemented for recruitment, Employer Branding initiatives allow the Banco BPM Group to interact with young university talents within career orientation programmes, career days, testimonials and projects in collaboration with the main universities, entering in contact with a large number of potential candidates. The initiatives are carried out for the benefit of all Group Companies operating in Italy and cover the entire country, in line with the recruitment objectives published in the Strategic Plan.

<u>Spreading a climate of respect and open communication</u>

Within the context of promoting a climate of respect and open communication within the workplace, the Banco BPM Group has implemented a series of actions and initiatives related to the issue of inclusion, dedicated to all employees of the Banco BPM Group:
- the "Dialogue between generations" project includes the delivery of a course with the aim of promoting knowledge of the characteristics of the different generations cooperating within the company;
- “The LGBTQAI+ Inclusion Journey” event, in collaboration with the Parks Liberi e Uguali Association, focused on strategies to prevent and deal with both systemic and occasional discriminatory practices;
- training and awareness-raising through video snippets published on the company intranet on the issues of stereotypes and prejudices related to inclusion, an online course on the topic of harassment and a webinar entitled “Financial education for inclusion and the prevention of economic violence”;
- the agreement with Trade Unions to support people who are victims of violence, harassment and discrimination.

On the occasion of the international Day for the Elimination of Violence against Women, the Group has also published the new circular “Combating harassment, violence and all forms of discrimination in the workplace”. In addition to the “Combating harassment, violence and all forms of discrimination” course for all employees activated in 2024, the circular provides specific training which will be provided to employees during 2025, in addition to training dedicated to the people involved in the Whistleblowing Process. In addition, inclusion initiatives on the issue of emotional, sexual orientation and gender identity will continue in 2025.

Promoting accessibility and inclusion of disabilities and diversity

Through the "GuardiamOltre" project, the Group has launched the introduction of the Universal Design approach in various areas, including communication, in order to make it accessible through various media such as, for example: subtitles, sign language interpreters, speech synthesis software and video magnifiers. All Group employees can take advantage of these communication aids and individual needs are identified through a database dedicated to "Mapping needs". Within the "GuardiamOltre" project, reports are also collected - from both staff and customers - on the possible presence of architectural barriers, in order to allow the activation of consequent mitigation actions (for example, elimination of barriers or the provision of reasonable accommodations). To promote inclusion, the Banco BPM Group has provided training courses and personalised interventions dedicated to managers and workers of teams where people with disabilities are present. In addition, the team of internal psychologists provides consulting to managers and human resources managers and interventions with working groups aimed at facilitating the inclusion of people with disabilities.
Moreover, in 2024, 12 Disability Managers were trained - obtaining the relative certification - who participated in the dedicated executive course the Università Cattolica del Sacro Cuore in Milan and 12 Diversity Managers who followed a professional training course at ABI. The training courses will be followed throughout 2025, with the aim of progressively updating the audience of recipients.

Listening to professional aspirations and performance evaluations

The Group has implemented several initiatives dedicated to increasing staff satisfaction, which contribute to the mitigation of work-related stress.
Among these, since 2023 it has provided a space in its application that allows all staff to share their development objectives, with the aim of intercepting and promoting the satisfaction of the professional aspirations of each person.
At the same time, in order to annually assess the qualitative performance of its people and measure the ability to effectively manage the activities for which each person is responsible, the Group has introduced a new professional performance evaluation tool for all employees of the companies that meet the Credit National Collective Labour Agreement and Banco BPM Vita, with the exclusion of Top Management, which is evaluated with a dedicated system.
In this context, to accompany the evolution of the performance evaluation model, the Group has activated:

- new training courses, started in 2024 and continuing in 2025, aimed at all managers and focused on new performance management;
- since 2025, the Continuous Feedback process has sought to disseminate evolutionary and constructive feedback on a continuous basis between managers and collaborators (bidirectional).

Implementing competitive remuneration programmes

In order to enhance the commitment and dedication of employees and increase talent retention, the Group has established that staff remuneration is based on:

- fixed components, which reflect professional experience, organisational responsibilities and technical expertise, according to a principle of equal opportunities and fair pay;
- variable components related to performance, which allows staff to be valued, recognising their individual contribution to achieving results. In particular, the variable components are divided into short-term components (STI) for all staff and long-term components (LTI) for specific groups. In addition to the variable incentive plans, it should be noted in particular that in December 2024, an agreement was reached with the Trade Unions regarding staff to which the Credit National Collective Labour Agreement applies, in relation to a company bonus and a welfare bonus (for more information, see the description "Activation of a Welfare Plan and the free Welfare Coach service") for employees. Since the incentive (both short-term and long-term) of the identified staff during the year is paid over a period of five or six years, divided into an up-front portion and four or five annual deferred portions subject to the positive verification of future conditions, the time horizon within which the company carries out each existing incentive plan (short or long term) in force ends, without prejudice to the treatment on the occasion of extraordinary events, in 2033. The Short Term Incentive for non-identified staff, the company bonus and the welfare bonus are paid in 2025.

The financial resources intended to support the short and long-term incentive plans are disbursed in cash or in ordinary shares of Banco BPM, while the company bonus can be used in cash or welfare according to the criteria and methods of individual choice established by the current tax regulations.
The dedicated financial resources amount to €84.7 million for the STI plan[1] and €25 million for the share component of the 2024 STI Plan and 2024-2026 LTI[2] (current and future amount distributed over the performance and accrual period of the existing plans, i.e. in the period 2024-2031).
The actual expense will be determined based on the performance achieved in the respective incentive plans. With regard to the company bonus and the welfare bonus, €36.6 million[3] was allocated to be used in cash or welfare mode according to the criteria and methods of individual choice established by current tax regulations.

Empowering female talent

In order to encourage virtuous behaviour and the spread of an inclusive culture, the Group has envisaged, within the 2024-2026 LTI Plan, the inclusion of a KPI related to the increase in the percentage incidence of female staff in managerial roles out of the total of managerial roles as at 31 December 2026 (compared to the figure recorded as at 31 December 2023). The monthly monitoring of the target achievement level allows a precise calibration of the management actions to prestigiously achieve the targets that the Group has set itself. The increase of female staff in managerial roles is a strategic element for enhancing diversity within the organisation, which reflects the Group's commitment to creating a more inclusive environment and to fostering a corporate culture that recognises and values talent in all its forms. The KPI refers to the managerial roles of the entire Group. The 2024-2026 LTI Plan, including this KPI, is specifically for about 80 positions (excluding those belonging to functions with control tasks), selected on the basis of the level of the position, the impact on the business or for retention purposes. At the end of 2026, a further 20% growth is expected in the percentage incidence of female staff in managerial roles out of the total number of managerial roles (compared to the figure recorded as at 31 December 2023).
The actions adopted in the Group's People Strategy processes have contributed to significantly increasing the presence of women in managerial roles. In particular, the representation of women in managerial roles has increased over time at almost all managerial levels, both in the Headquarters and in the Commercial Network, reflecting Banco BPM's huge commitment to creating a correctly balanced pipeline between both genders. In the processes of the identification and validation of candidates for managerial roles, the presence of an adequate number of female profiles is always guaranteed.
Banco BPM undertakes to implement actions and carry out projects to increase and enhance female participation within the Group: in fact, it is a supporting member of "Valore D", the first business association that promotes gender balance and an inclusive culture for the growth of companies and the country. In this regard, it should also be noted that BBPM Life has joined the Women In Finance Charter, a commitment to gender balance in financial services.

Monitoring the gender pay gap and remedial actions

With the aim of contributing to mitigating the negative impact on diversity in salary remuneration between individuals of different genders who cover roles of equal value, the Group has defined a process for measuring and monitoring the gender pay gap for all staff; it is based on the provisions of the banking regulatory framework according to criteria and approaches outlined in compliance with the EBA guidelines and Bank of Italy Circular 285/2013[4]. Furthermore, considering the implications of EU Directive 2023/970 on remuneration transparency, the Group has already taken steps to refine its process of constructing and measuring Equal Pay for Equal Work, which will be recognised on the basis of a new architecture of the professions that can enhance a skill-based approach and consider professional complexities and levels of expertise as fundamental elements, also with the aim of guaranteeing fairness and transparency in career progression paths. Lastly, starting from 2025, the Group will adopt additional analysis tools to neutralise pay differences stemming from additional objective factors, to which gender gaps can be attributed.

[1] Remuneration for the year is included in the Consolidated Income Statement under item "190 a) personnel expenses" as a balancing entry to item "100. Provisions for risks and charges - c) personnel expenses" of the Consolidated Balance Sheet;
[2] This remuneration component is classified in the Consolidated Income Statement under item "190 a) personnel expenses" as a balancing entry to Shareholders' Equity item "150. Reserves" of the Consolidated Balance Sheet;
[3] This component is included in the Consolidated Income Statement under item "190 a) personnel expenses".
[4]The overall difference between the average remuneration of men and women expressed as a percentage of the average remuneration of men (raw gap), albeit being a material indicator, does not take into account the type of work carried out and is therefore affected by the different gender distribution in the organisation (different distribution of women and men among the highest paid roles). As required by said regulatory framework which establishes that banks can identify additional methods for recognising and monitoring the gender pay gap, Banco BPM, in line with the best practices observed in banking, has adopted an analysis methodology (Equal Pay for Equal Work) which splits the population into clusters (Job Class): for managers, the responsibilities and complexity of the activities managed are considered (evaluated by means of the International Position Evaluation (IPE) methodology) and for the remaining staff the type of activity carried out.

By June 2027, the Group must publish the report on the gender pay gap relating to the 2026 data pursuant to EU Directive 2023/970, which requires an explanation of whether the pay gaps are due to objective and gender-neutral factors with respect to the characteristics of the company. For further details on the remuneration and pay gap metrics, please see the section "Diversity and pay gap metrics".

Activation of initiatives dedicated to young people: Mentoring Project, Youth Project and Boost Your Talent programme

With specific reference to Companies based in Italy operating in the credit and insurance sector, the Group has activated various initiatives dedicated to the growth of young talents. For the period 2024-2025, the third edition of the "Mentoring Project" continued with the aim of facilitating and supporting the growth path of young new hires, supporting them in reading and understanding the organisation and developing their talent, in order to make them feel part of the corporate identity. In addition, also for the year 2024, the Group renewed the "Youth Project", aimed at young employees who, based on age, role and classification criteria, are involved in a two-year professional knowledge and soft skills development path to enhance their individual potential.
In addition to these initiatives, there is the "Boost Your Talent" programme carried out annually; it is dedicated to talented people currently in professional and commercial roles, created to fuel the development of roles that are decisive for the Group's future and to encourage generational turnover. The path is divided into several stages that promote empowerment, the development of soft skills and the consolidation of a new vision of one's leadership.

Activation of accelerated growth paths towards first management roles

In order to promote and enhance its talents, in 2024 the Group prepared accelerated growth paths throughout the country towards first management roles, aimed at young Network Managers under the age of 35 hired in the last three years and professional Network Managers who have stood out for their high growth potential. The initiative is aimed at encouraging planning more complex professional experiences, offering specific dedicated training and providing coaching within the relevant Regional Department. With regard to recently appointed Branch Managers, in addition to the role training course, support is guaranteed by working alongside a Director with proven managerial experience, known as the "Supporter". This coaching allows the new Directors to have an experiential exchange that can be immediately spent in the field and the "Supporter" Directors to increase their awareness of the role and the ability to support people in their professional development. Specific "mentoring" and "company visit" initiatives were also dedicated to young people and growing professionals; the objective is to develop an overall vision and organisational awareness, promote synergies and inter-functional relationships, as well as to increase transversal and specialist knowledge. The paths described were launched in 2024 and will be continued throughout 2025.

Objectives related to equal treatment and opportunities for own workforce

The main objectives aimed at managing matters related to equal pay and opportunities for its own workforce as well as monitoring the effectiveness of policies and actions are:

- increasing the percentage of women in managerial roles;
- annual delivery of training for Group employees;
- delivery of training on ESG issues.

Increasing the percentage of women in managerial roles

In the 2023-26 Strategic Plan, the Group[1] planned to achieve a 20% increase in the proportion of women in managerial roles by 2026 compared to 31 December 2023 (when the incidence was equal to 29.7%), with a target of 35.6% in absolute terms. Following the recent approval of the updated 2024-27 Strategic Plan, the target was updated to 36% by 2027 in absolute terms.
The target was defined in line with the Group's Staff Remuneration Policies, pursuing the aim of further improving the People Strategy and the integration of the ESG strategy into Group policies.
The indicator relates the number of women in managerial roles to the total of managerial roles, without considering managers belonging to the Sales Network for the purposes of the calculation. The objective was defined taking into account any corporate reorganisations and the organisational developments envisaged over the course of the Plan, on the basis of the data collected through the company management programme.
The figure as at 31 December 2024 shows an increase of +46.9% in the period 2021-2024. The proportion of female staff in managerial positions is therefore 30.7% at present.

[1] Excluding the Company Sagim S.r.l. Società agricola and Terme Ioniche S.r.l..

Annual delivery of training to Group employees

The Group undertakes to provide 140,000 training days[1] per year to its employees, for the 2024-26 time horizon. The annual target, defined in the context of the 2023-26 Strategic Plan and also confirmed for the year 2027 in the recent update of the 2024-27 Strategic Plan, is consistent with the values expressed in the Guidelines on respecting and safeguarding human rights and pursues, through the Academy, the following purposes:

- training for the inclusion and professional growth of young people in the company;
- management training programmes aimed at spreading a leadership style based on trust, respect and cooperation;
- organisation of training by business segment to increase customisation and effectiveness, with particular attention to digitalisation;
- support for all internal initiatives in the field of ESG and Digital, Privacy & Cybersecurity.

The target includes the training provided to resources with whom the employment relationship is terminated during the year and was defined taking into consideration both the mandatory course days envisaged for each employee in compliance with the different regulations to which the Group is subject (for example health and safety, anti-corruption) and a number of days of voluntary training linked to the needs of the role. To define the total amount of training days to be provided, market benchmark analyses were carried out and the data available in the system were used on the number of employees receiving the activities envisaged in the Strategic Plan.
The figure as at 31 December 2024 shows a value of 140,319 training days provided, confirming the full achievement of the annual target for the reference year.

Delivery of training on ESG issues

Within its training programmes and in line with the values underlying the Guidelines on respecting and safeguarding human rights, the Group has defined in the 2023-26 Strategic Plan the target of providing its employees 200,000 cumulative hours of training related to ESG issues in the 2024-26 time horizon. Rescheduled to 2027 on the occasion of the update of the 2024-27 Strategic Plan, the target pursues the aim of increasing the skills and awareness of employees in the ESG field, contributing to providing useful knowledge for the purposes of measuring the related risks, consistent with the evolution of external regulations and with the materiality of these risks.
The Group has determined the target by considering the types of mandatory training courses to which it is subject and supplementing the training envisaged on relevant ESG issues, on the basis of the data available in the system regarding the number of employees receiving these courses.
The figure as at 31 December 2024 shows a value of 177,790 hours provided.

Diversity and pay gap metrics

The breakdown of employees by age bracket and type of employment is shown below. In defining and clustering the roles shown in the first column, the Group considered the classification envisaged by the National Collective Labour Agreement applied for employees in Italy. Employees at companies abroad, for which there is no collective bargaining or classification, fall into the category of "office workers".

Number of employees	< 30 years	30-50 years	> 50 years	Total staff
Executives	0	40	276	316
% of executives out of total staff	0.00%	0.21%	1.42%	1.62%
Middle Managers	5	2,301	6,024	8,330
% of middle managers out of total staff	0.03%	11.81%	30.91%	42.74%
Office workers	646	4,800	5,357	10,803
% of office workers out of total staff	3.31%	24.63%	27.49%	55.43%
Labourers	2	14	25	41
% of labourers out of staff	0.01%	0.07%	0.13%	0.21%
Total staff	**653**	**7,155**	**11,682**	**19,490**

[1] The ESG training mentioned in the following target is included.

As at 31 December 2024, the roles of Senior Management (i.e., those who exercise executive functions and who are responsible for day-to-day management, reporting directly to the management body) are held by nine people, all men. The criteria for defining Senior Management were shared with ABI.

The gender pay gap, calculated in compliance with the methods defined in the standard ESRS S1 section S1-16 Application Requirements 98 as the difference between the average hourly remuneration levels paid to female and male workers expressed as a percentage of the hourly remuneration level of the average hourly remuneration of male workers amounts to 16.6%. In particular, in calculating the average remuneration level paid, the Group considers the gross hourly remuneration of employees by adding the basic remuneration (RAL) to all the other components of remuneration paid during the year (role indemnity, agreements, incentive systems, benefits, one-offs, company bonus, etc.) and dividing it by the number of weekly hours envisaged by the reference National Collective Labour Agreement and the actual working weeks of the year. The portions paid in shares are valued at the market price upon assignment. The Group believes that the indicator calculated according to the logic cited therein (hereinafter also "raw gap"), although significant, cannot be considered representative of potential gender inequalities, since it would not allow a comparison between the salaries of men and women who perform similar functions according to an Equal Pay for Equal Work principle.
In this sense and in line with the best practices observed, Banco BPM is moving towards the adoption of a methodology for calculating and monitoring the pay gap which, in line with the principle of Equal Pay for Equal Work:

- divides the population of employees into job clusters on the basis of responsibility, level of complexity managed and type of activities carried out;
- neutralises the effects of any other "gender-neutral" factors that could affect a person's remuneration (e.g., level of education, seniority in the role, etc.).

It should be noted that the indicator calculated as the average of the raw gap of each job class weighted by the relative number of people has decidedly lower values than the raw gap, as it is not affected by the different gender distribution within the organisation. Despite this, the raw gap of Banco BPM is getting smaller, supported by an improvement in the representativeness of women in managerial roles and the associated remuneration actions and, in the context of generational change, by the exit of men in greater numbers than women.

The number and gender of employees with disabilities present in the Group as at 31 December 2024 are shown below, including in the definition of disability assumptions of lasting physical, mental, intellectual or sensory impairments, for which interaction for the individual person with a barrier of a different nature can hinder full and effective participation in society on an equal basis with others.

Employees with disabilities	Number	% incidence with respect to gender category
Women	637	7.0%
Men	689	6.6%
Total staff with disabilities	1,326	6.8%

The figure related to the number of employees with disabilities is also reported in the Prospectus (i.e., communication made by the employer to the Ministry of Labour) where the employment situation of the Group with respect to the recruitment obligations of disabled employees and/or employees belonging to the other protected categories as envisaged by Italian Law 68/1999.

Training and skills development metrics

The Group provides its employees with the Performance Management process for performance evaluation (Professional Evaluation and Top Management Evaluation). In particular, the number of employees who participated in periodic performance reviews during 2024 is shown below.

	Number of employees who participated in periodic reviews	% incidence with respect to the reference category
Women	8,645	94.9%
Men	9,985	96.2%
Total	**18,630**	**95.6%**

In addition, with respect to the portion of employees who participated in the periodic audits, referred to in the previous point, the breakdown by category (i.e., managers, middle managers, office workers) is also shown below:

	Number of employees who participated in periodic reviews	% incidence with respect to the reference category
Executives	299	94.6%
Middle Managers	8,119	97.5%
Office workers	10,212	94.5%
Total	**18,630**	**95.6%**

On average, the Group's employees received 54 hours of training in 2024 (56 hours on average for female employees and 52 for male employees), while non-employees received an average of 12 hours of training. For the calculation of the average, the actual hours of training provided to employees during the year were considered.
The training programmes provided are broken down into specific areas, identifiable as: compulsory, technical/professional, qualifying, relationship/capacity development/commercial and managerial. The topics proposed include those dedicated to ESG aspects and cybersecurity (mainly classified as mandatory).

Metrics related to incidents, complaints and severe human rights impacts

The Group notes that during 2024, four incidents of discrimination among its own workforce were reported.
Specifically, two reports were submitted through the specific email address *segnalo@bancobpm.it*, dedicated to reporting harassment and discriminatory acts, which was activated after the publication - on 25 November 2024 - of the thematic circular "Combating harassment, violence and all forms of discrimination in the workplace".
The other two reports came directly to the attention of the Human Resources Legal structure, respectively, through forwarding from the Staff Management Department and through communication sent via certified email by the lawyer of the reporting employee.
In particular, there were three reports of harassment and one report for discrimination based on race or ethnicity. The figure is extracted manually from the Human Resources Legal structure of Banco BPM, together with the Diversity Inclusion and Social structure.
In any case, the Group announces that during the reference period no serious human rights incidents related to its own workforce were recorded and, consequently, no amount was paid for fines, penalties or compensation for damages in this sense.

Confidentiality and correct processing of data

Policies related to the confidentiality and correct processing of own workforce data

Regulation on IT Security

The Regulation on IT Security applied by the entire Group governs the principles, roles and responsibilities regarding IT security.

The objective of the Regulation in question is the prevention of IT and cyber risk with particular reference to any episodes of data leaks and/or losses related to cyber attacks and IT security incidents, favouring positive impacts related to the protection of data confidentiality and workforce information.
Through the enforcement of the Regulation, the Group undertakes to comply with the following national and European regulations in the field of financial services and/or privacy:

- Bank of Italy Circular 285/2013;
- ECB recommendations;
- EBA guidelines;
- PSD2 regulations on payments;
- European and national regulations on privacy (e.g., GDPR).

The Board of Directors is the highest management level responsible for enforcing the Regulation and the overall monitoring of IT security at Group level, and is promptly informed of possible serious events relating to IT risk.
The Regulation can be consulted by internal stakeholders on the company intranet.

Actions related to the management of IROs in relation to the confidentiality and correct processing of own workforce data

The Group ensures that its practices do not cause or contribute to causing material negative impacts on its workforce in terms of procurement, sales and use of data through the formalisation and supervision/monitoring activities with respect to the implementation of the principles outlined in the Code of Ethics, in the Guidelines on respecting and safeguarding human rights, in the Regulation on privacy, processing and protection of personal data, in the Privacy Process Standard - Management of the rights of data subjects and in the Privacy Policy Circular - Data processing and protection of personal data, as well as any other internal regulations on the matter.

<u>Implementation of an Annual Cybersecurity Training and Awareness-raising Plan</u>

In order to ensure that all Group employees, including resources with key roles and customers, have an adequate level of awareness and knowledge on cybersecurity, an "Annual Cybersecurity Training and Awareness-raising Plan" was implemented for the year 2024. The activities carried out to achieve these objectives were implemented in different ways, with the aim of developing the essential skills to identify and reduce cyber threats and promote a solid and aware culture of cybersecurity. In detail, the following initiatives were planned:

- delivery of mandatory basic training and refresher courses to all Group employees, supplemented by training snippets built around gaming and interactive training;
- publication of four new online courses dedicated to cybersecurity and a course dedicated to new hires, as well as the opportunity to participate in Masters, workshops, inter-company training events and observatories and university-level research groups for professionals;
- provision of phishing campaigns for employees of the Group's banking companies in order to simulate scams through counterfeit emails, disseminated to obtain personal information in a deceptive way, followed by focused training activities on specific targets, based on the results of the test.

Objectives related to confidentiality and proper processing of own workforce data

The Banco BPM Group has not adopted specific objectives regarding the protection of employee privacy, as it is regulated through the adoption of the "Regulation on privacy, processing and protection of personal data" which governs the principles, roles and responsibilities regarding privacy, processing and protection of personal data. This Regulation implements the provisions deriving from the European Regulation (EU) 2016/679 (also "GDPR"), applied to natural persons, including freelancers and sole proprietorships, and from Italian Legislative Decree 196/2003 as amended by Italian Legislative Decree 101/2018 (also "Privacy Code").
The issue of the protection of personal data is of fundamental importance for a Group that manages data and information whose violation would not only have economic and reputational repercussions on the Group itself, but would compromise the serenity of its stakeholders. From this perspective, the priority objective is to ensure the maximum possible security and confidentiality of the data managed.
As of 2018, regulations and procedures are constantly updated, in line with the GDPR and all relevant legislation, and are overseen by the Data Protection Officer (also "DPO", identified as the Compliance Department Manager, who reports directly to the CEO, with direct access to the Corporate Bodies) supported by a dedicated organisational unit. Supported by specific IT solutions, the DPO also manages a mailbox (*protezionedati@bancobpm.it*) dedicated to

the collection of personal data requests from data subjects. As required by internal regulations, the DPO carries out compliance checks and indicates the mitigation actions of the risk of non-compliance with a view to privacy by design and by default.

Affected communities

The following table provides a description of the impacts, risks and opportunities that the Group has assessed as material in relation to the topic of affected communities following its dual materiality assessment.

ESRS topic, sub-topic, or sub-sub-topic	IRO	Perimeter	Description	Metrics used to assess performance and effectiveness in relation to a material IRO
Economic, social and cultural rights of communities, Civil and political rights of communities	Positive impact	Own operations	Territorial initiatives to support the community, donations, sponsorships and local presence of foundations dedicated to the Third Sector	*Entity-Specific Metric* - ESG Sponsorships and donations *Entity-Specific Metric* - (Of which) Financial contribution to foundations in accordance with the Articles of Association *Entity-Specific Metric* - Corporate Volunteering *Entity-Specific Metric* - Financial education for schools
	Opportunity	Downstream value chain	Improvement of the Group's reputation by strengthening its position of leadership as a Third Sector lender	*Entity-Specific Metric* - Third Sector Customers

Material impacts, risks and opportunities for the affected communities and their interaction with strategy and business model

During the identification of the material impacts, all the affected communities that may suffer such impacts by the Group were included in the scope of application of the disclosure.
In particular, the communities subject to material positive impacts are mainly those present in the area where the Group operates and where it focuses its interventions consisting of both support, through donations to local associations and foundations, and of offering products and loan services designed ad hoc for Third Sector companies. In particular, the philanthropic activity relates to supporting initiatives in solidarity and social areas such as art and culture, sport, education and training, environment and territory, as well as various research centres and institutional bodies. In addition, the Group provides targeted support to populations affected by extreme weather events, schools and recreational centres for young people.
With regard to the identification of IROs, during the dual materiality process, an actual positive impact was identified deriving from the donations and sponsorships provided by the Group to Third Sector entities in order to support activities and projects for social improvement and the protection and enhancement of the territory in which the communities concerned reside.
With regard to financial materiality, on the other hand, no major risks were identified for the Group, but an opportunity was identified downstream of the value chain, relating to the improvement of the Group's reputation thanks to the strengthening of its leading position as a lending bank of the Third Sector.
The opportunity identified has an impact on all the affected communities that benefit from the projects supported by the activities of the Third Sector and non-profit entities financed by the Group.

Processes for engaging with affected communities and channels which allow to raise concerns

The Group identifies its activities based on listening to its reference communities. In fact, although there is no formal process (including phases, roles and responsibilities) for engaging and listening to the communities, engagement activities are carried out on an ongoing basis thanks to the involvement of the Regional Committees (composed of representatives of the economic, professional and associative world). These collect both the opinion of the affected communities on a large scale, and the requests of specific groups in situations of economic and social fragility, representing a point of reconciliation between the Group and the communities and favouring the identification, management and monitoring of any critical issue and discontent.
In particular, although it does not envisage specific channels that allow communities to express concerns, the Sales Network leverages the relationship established with the community and the pervasiveness of dissemination with respect to the reference territory, and is fully responsible for the collection of any reports and for the dissemination of the same

within the Group. Please see the chapter "Stakeholder Engagement Activities" for further details on the interests and opinions of the affected communities.

Policies related to affected communities

The policies related to the affected communities, including the relevant human rights policy commitments and the processes and mechanisms for monitoring compliance with these principles, are consistent with the content of the Group's Code of Ethics (described in the section "Policies related to corporate culture and business conduct") and the Guidelines on respecting and safeguarding human rights (described in the section "Policies related to working conditions and well-being of own workforce"). These principles comply with international recognised standards for indigenous communities and peoples, including the UN Guiding Principles on Business and Human Rights. In addition, it should be noted that the Group's activities are carried out mainly in Italy, Switzerland and Ireland, where there are no indigenous peoples and that in its own transactions or those upstream and downstream of the value chain, no cases of non-compliance with these principles have been reported, nor have reports of serious human rights problems and incidents been received from the affected communities.
The main policies adopted by the Group to manage the material sustainability topics related to the affected communities are:

- the Regulation on promotional measures and sponsorships;
- the Regulation on Management Committees;
- the Guidelines on respecting and safeguarding human rights (for further details, please see the section "Policies related to working conditions and the well-being of own workforce").

Regulation on promotional measures and sponsorships

The Regulation on promotional measures and sponsorships, applied by the entire Group and related to the downstream value chain, aims to promote the positive impact of local initiatives in support of the community and sponsorships. In addition, it makes it possible to seize the opportunity to improve the Group's reputation by consolidating the relationship with companies of the Third Sector, an area in which the Group holds a leading position as a lending bank.
The management of sponsorships is inspired by principles to:

- ensure compliance and compatibility with the external and internal regulations in force, prudence and proportionality in the recruitment of risks (direct, indirect and reputational), as well as compliance with the approved budget;
- guarantee alignment with internal communication policies and preparation for commercial development actions;
- promote the image and visibility of the Group's name and brand, creating positive and lasting value over time, supporting the progress and well-being of the territories in which it operates;
- regulate the rotation of sponsorship requests, their traceability and reporting, as well as defining the potential beneficiaries of sponsorships;
- establish the minimum requirements necessary for sponsorships to be carried out and identify prohibited and non-permitted sponsorships.

The Regulation also establishes how the management of promotional measures and sponsorships is subject to the investigation and decision-making procedures defined by the reference legislation on anti-laundering and conflicts of interest. The Chief Executive Officer represents the highest level of management responsible for the enforcement of the Regulation, which is made available to internal stakeholders through the company intranet.

Regulation on Management Committees

The Regulation on Management Committees is applied by the entire Group and related to the downstream value chain; it defines the principles, criteria, tasks and responsibilities regarding the functioning of these committees, established at the Parent Company and operating at Group level. Specifically, taking into account the importance of the direct relationship with the territory and the opportunity to promptly intervene to support initiatives in favour of the multiple needs of the community, the Regulation favours the positive impact of local initiatives to support the community, defining the responsibility of the Donations Committee to resolve:

- on donations related to areas not covered by Foundations, such as the Tyrrhenian and Central-South Local Committees, subject to the favourable opinion of the Regional Consultation Committees, where present;

- on donations aimed at supporting projects and/or initiatives not attributable to a specific area of reference of the Group.

Also in this case, the Board of Directors represents the highest level of management responsible for the enforcement of the Regulation, which is made available to internal stakeholders through the company intranet.

Actions related to the management of IROs in relation to the communities concerned

The Group has adopted multiple actions in order to manage relevant sustainability issues related to the affected communities, as well as to achieve the purposes and objectives of its policies. The actions described below are implemented in line with the Group's Code of Ethics, which emphasises the importance of the role of the Third Sector with regard to the promotion of sustainable, cohesive and resilient communities, as well as the promotion of the activities and initiatives of the operating parties through services, products and assistance dedicated thereto.
In particular, the main actions adopted by the Group concern:

- corporate volunteering for the environment and social issues;
- stipulation of commercial agreements in support of religious entities and the Third Sector;
- sponsorships and social donations, initiatives for local communities, schools and students;
- participation in events and initiatives for the enhancement of non-profit companies and Third Sector entities.

These actions pursue the primary objective of producing positive impacts for the affected communities, in line with the objectives of the Strategic Plan. The material opportunities for the Group are also pursued through initiatives aimed at Third Sector entities, with the goal of strengthening the relationship and signing specific dedicated commercial agreements. These actions are monitored through the specific structures dedicated to relations with the affected communities, also responsible for managing the impacts associated therewith.

Corporate volunteering for the environment and social issues

Also in 2024, the Group continued its support for the corporate volunteering project "Volontariamo" in collaboration and support of non-profit organisations and associations present in the area. The volunteers of the Banco BPM Group participated in countless activities that contributed, for example, to cleaning parks and city spaces, to the maintenance, cleaning and restoration of internal and external spaces, vegetable gardens and natural areas, as well as canteen and food sorting services.
The “Volontariamo” project also envisages “remote” volunteering and support for associations operating in the social field, committed to helping and assisting vulnerable people, children, adolescents, families living in difficult situations, social marginality and poverty.
Banco BPM Group employees participate by voluntarily registering and volunteer during working hours, based on the territoriality of the initiatives activated.

Stipulation of commercial agreements in support of religious entities and the Third Sector

Again in 2024, the Group renewed and signed a series of commercial agreements that allow it to build and maintain numerous relationships throughout the country, aimed at:

- territorial associations;
- consortia and associated social cooperatives;
- Italian Sports Centre and Confcooperative.

The Group has also supported various initiatives for projects financed by the National Recovery and Resilience Plan (NRRP), confirming the important agreements stipulated in recent years with some Archdioceses and Dioceses, with the aim of anticipating the contributions assigned thereto and favouring the opening of new current accounts in the area.
For the Banco BPM Group, the importance of customers belonging to the Third Sector is confirmed by the offer of products dedicated to this customer segment, which in 2024 led to the opening of new current accounts with a conversion rate of 27%.

Sponsorships and social donations and initiatives for local communities, schools and students

Also in 2024, the Parent Company and its foundations provided sponsorships and donations to associations and non-profit organisations, supporting initiatives for the reference communities, schools and students in continuity with the line traced in previous years, understanding and welcoming their needs and developing the most appropriate intervention tools through the donations in question.

The main areas supported by the Group are:

- research and health through support for research projects, structures and associations, the purchase of medical material and support for prevention initiatives;
- solidarity and social work, through initiatives to help weaker segments of the population;
- disability and the world of children, as well as initiatives aimed at enhancing diversity and inclusion;
- art and culture through support for literature, theatre and art initiatives, as well as the enhancement and protection of cultural heritage;
- environment, through initiatives to raise awareness of communities on environmental issues;
- education and training, through support to schools and programmes against leaving school early;
- sport, through the support of local associations to spread sporting values and the promotion of sport as a vehicle for inclusion.

Participation in events and initiatives for the enhancement of non-profit companies and Third Sector entities

The Group is involved in continuous dialogue with Third Sector organisations, also confirmed in 2024 through the organisation of events and collaborations such as:

- the National Third Sector Forum, which aims to foster meeting and mutual knowledge between financial operators and Third Sector Entities (also "TSE");
- Confcooperative, which promotes continuous dialogue with national and local cooperatives.

These collaborations allow the Group to promote and organise numerous events throughout the country, aimed, inter alia, at promoting the exchange of ideas and reflections on the role of volunteering, encouraging the involvement of local associations and operators of the Service Centres for Volunteering (also "SCV").
The Group has also undertaken a collaboration based on Social Impact Banking together with QUID, a social cooperative, resulting in an event to support female empowerment, the recruitment of women in difficult conditions and the promotion of the values of beauty and ethics and sustainability within companies.
Lastly, the Group launched the Call4Ideas to promote crowdfunding and support local social projects together with the foundations of the territories of Lodi, Palermo and Modena, with the support of the Rete del Dono platform and the Service Centres for Volunteering of the corresponding territories.

Targets related to the communities affected

The main objectives aimed at managing material sustainability topics related to the affected communities, as well as monitoring the effectiveness of policies and actions, cover the following areas:

- provision of corporate volunteering for non-profit associations;
- new disbursements to customers in the Third Sector;
- provision of sponsorships and donations;
- social initiatives supported for local communities, schools and students;
- provision of training on ESG awareness and financial education.

The definition of sustainability targets on topics related to the affected communities takes into consideration the requests collected through the Sales Network and during moments of listening and direct discussion planned by the Local Committees. The various functions responsible for the matter also envisaged a formal step involving Top Management in order to share the methodologies and approaches employed.

Provision of corporate volunteering for non-profit associations

The Group is committed to providing an average of over 2,000 hours of volunteer work to the communities per year, through employees and in collaboration with various voluntary associations, in the period between 2024 and 2026.

The annual target defined in the 2023-26 Strategic Plan and confirmed in the recent update of the 2024-27 Strategic Plan is consistent with the Guidelines on respecting and safeguarding human rights, in which the Group's widespread commitment in relation to promoting the active participation of its workforce in corporate volunteering initiatives through non-profit organisations is declared
The objective was defined based on historical data related to the Group's participation in volunteer activities, as well as the benchmarking analysis carried out.
The target monitoring activity showed that as at 31 December 2024, the working hours of employees dedicated to volunteering activities amounted to 2,288, exceeding the pre-established annual target.

New disbursements to the Third Sector

In line with the Code of Ethics, which emphasises the importance of the role of the Third Sector for promoting sustainable, cohesive and resilient communities, as well as activities and initiatives of various parties operating in this regard by offering services, products and assistance, within its 2023-26 Strategic Plan, the Group planned to reach annual disbursements of medium/long-term loans and residual short-term components for an amount of €200 million to customers belonging to the Third Party Sector by 2026. With the recent approval of the updated 2024-27 Strategic Plan, the target was updated to €255 million for 2027.
The target was set considering the origination capacity of the specialists supporting the branches and assuming the grounding of the commercial agreements that the Group has with customers of the Third Sector.
The Group's disbursements in 2024 exceeded the defined targets, amounting to €257 million[1].

Provision of sponsorships and donations to non-profit organisations

In line with the citizenship model adopted, also at the statutory level, and based on economic support and the sharing of resources in order to contribute to the growth of communities, within the 2023-26 Strategic Plan the Group planned to disburse a cumulative amount for sponsorships and donations of at least €15 million in the period between 2024 and 2026, with an average annual target of €5 million or more. It should be noted that with the recent approval of the updated 2024-27 Strategic Plan, the target of at least €5 million in disbursements was also confirmed for 2027. The disbursement of this target refers to sponsorships and donations intended to support projects for local communities, voluntary associations and non-profit organisations.
The target was defined on the basis of the historical data related to the Group's disbursements and the forecasts of the budget, and in line with the Regulation on promotional measures and sponsorships and the Regulation on Management Committees which establishes the responsibilities of the Donations Committee.
The monitoring activities show that the amount of disbursements of the Group in 2024 exceeded the defined targets. For further details, please see the section "Entity-specific metrics on IROs related to the affected communities".

Social initiatives supported for local communities, schools and students through disbursements

Within the 2023-26 Strategic Plan, the Group aims to support, through sponsorships and donations, an average of over 100 social initiatives for local communities, schools and students from 2024 to 2026. It should be noted that with the recent approval of the update of the Strategic Plan 2024-27, this annual target was also confirmed for the year 2027.
The target was defined based on historical data related to Group disbursements and budget forecasts, and in line with the Regulations on promotional measures and sponsorships and the Regulation on Management Committees.
The monitoring activity shows that in 2024, the number of social initiatives supported by the Group exceeded the defined targets, standing at 159.

Provision of training on ESG awareness and financial education

Within the 2023-26 Strategic Plan, the Group planned to provide, in the horizon between 2024 and 2026, more than 4,000 hours of training per year for communities dedicated to creating ESG awareness and providing financial education. In particular, the initiative involves holding training sessions at schools and at the various communities in the areas in which it operates. It should be noted that with the recent approval of the update of the Strategic Plan 2024-27, the target was confirmed at more than 4,000 hours per year also with reference to the year 2027.

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[1] New disbursements to customers belonging to the Third Sector are classified under the Consolidated Balance Sheet item "40. Financial assets at amortised cost - b) loans to customers".

The target was defined starting from the 2021-24 Strategic Plan and the analysis of the actual data recorded in previous years, obtained by multiplying the training hours provided by the number of participants.
From the monitoring activity, the number of training hours provided by the Group in 2024 exceeded the defined objectives, standing at 6,283.

Entity-specific metrics on IROs related to the affected communities

Corporate volunteering

In 2024, the Group provided 2,288 hours of corporate volunteering through voluntary activities carried out by its employees, participating in activities organised in collaboration with non-profit associations. This figure is reported by counting all the working hours of staff dedicated to volunteering initiatives organised by the Group.

ESG sponsorships and donations

During the reference year, Banco BPM disbursed €6.3 million in sponsorships and donations[1]. The data related to sponsorships are extracted through the dedicated application, through the purchase request procedure and the minutes of the Sponsorship Commission. The source of data on donations is, on the other hand, the minutes of the Donations Committee and the purchase request procedure with regard to payments.

(Of which) Economic contribution to foundations in accordance with the Articles of Association[2]
Banco BPM disbursed €4.2 million to its Foundations in 2024. The figure shown refers to the amounts allocated to the Foundations, resolved by the Shareholders' Meeting on 18 April 2024 and by the Board of Directors on 6 August 2024.

Third Sector Customers

Banco BPM had 36,063 Third Sector customers in 2024. Third Sector customers include all customers belonging to the Third Sector segments and religious entities with an active commercial current account, cards with IBAN and deposit or service accounts.

Financial education in schools

In 2024, the Group provided 2,365 hours of financial education in schools. The calculation of the hours is based on the multiplication of the number of participants by the hours of training in which they participated.

[1] These disbursements are included in the Consolidated Income Statement under item "190 b) other administrative expenses" and in the allocation of the result for the year 2023 as resolved by the Shareholders' Meeting of 18 April 2024.
[2] These disbursements are included in the Consolidated Income Statement under item "190 b) other administrative expenses" and in the allocation of the result for the year 2023 as resolved by the Shareholders' Meeting of 18 April 2024.

Consumers and end-users

The following table provides a description of the impacts, risks and opportunities that the Group has assessed as material in relation to the topic of consumers and end-users following its dual materiality assessment.

ESRS Topic, sub-topic, or sub-sub-topic	IRO	Perimeter	Description	Metrics used to assess performance and effectiveness in relation to a material IRO
Confidentiality[1]	Impact positive	Upstream value chain	Use of suppliers that guarantee the protection and correct processing of customers' personal data	*Entity-Specific Metric* - Number of incidents involving data leaks or losses at the ICT suppliers of the Group *Entity-Specific Metric*- ISO 27001 certified ICT suppliers or equivalent listed in the Parent Company's Supplier Register
	Impact positive	Own operations	Protection and correct processing of customers' personal data through transparent disclosure	
	Opportunity	Own operations	Improvement of the Group's reputation through a digital transformation that guarantees sound privacy and IT security management, also by leveraging cybersecurity skills and tools	*Entity-Specific Metric* - Serious IT security incidents and data loss or unauthorised access to Group banks
Freedom of expression	Impact positive	Own operations	Promotion of the right to freedom of expression through the implementation of effective communication channels and processes for managing complaints/customer engagement	*Entity-Specific Metric* - Complaints *Entity-Specific Metric - Customer Satisfaction Surveys*
Access to quality information	Impact positive	Own operations	Dissemination of financial awareness through transparent and non-misleading communication and the promotion of an informed shopping experience	*Entity-Specific Metric* - Mandatory training on transparency in banking operations towards the customer
Access to products and services, Responsible business practices	Impact positive	Own operations	Innovation and digital transformation, initiatives aimed at spreading a culture of innovation and loan/investment policies/strategies to support companies and start-ups whose business is based on digital innovation and initiatives aimed at promoting ethical and transparent business practices	*Entity-Specific Metric* - ESG awareness for businesses
	Opportunity	Downstream value chain	Expansion of customers through the development of omnichannels to digitalise customers and sales and through the development of new digital solutions (new App and Remote Banking), smart and digital lending	*Entity-Specific Metric* - Webank virtual branch for pure digital customers and remote transactions

Significant impacts, risks and opportunities for consumers and their interaction with the strategy and business model

In the context of this reporting, all consumers and end-users (hereinafter also "customers" or "clientele") who may be subject to material impacts by the Group have been considered. In particular, the customers subject to the material impacts caused by the Group (only positive impacts were recorded) are both private individuals and companies. The activities implemented by the Group generate material positive impacts on the Group's customers through multiple initiatives undertaken with reference to:

- guaranteeing the necessary channels and controls to manage customer requests and needs (including complaints);
- guaranteeing sound management of privacy and IT security, also by leveraging cybersecurity skills and tools;
- investments in innovation and digital transformation to guarantee customers full access to products and services.
- guaranteeing the necessary channels and controls to manage customer requests and needs (including complaints);
- guaranteeing sound management of privacy and IT security, also by leveraging cybersecurity skills and tools;
- investments in innovation and digital transformation to guarantee customers full access to products and services.

As part of the dual materiality analysis conducted, no major risks were identified for the Group deriving from impacts and dependencies in terms of customers and/or end-users. However, it is worth noting the opportunity to:

- improve the Group's brand reputation through sound management of customer privacy and confidentiality and by developing digital transformation, strictly interconnected with the positive impacts generated on customers in terms of correct data processing;

[1] With regard to confidentiality, although there were material positive impacts and opportunities, all metrics related to this area have been reported.

- expand clientele by developing omnichannel systems aimed at digitalising and facilitating the commercial relationship and new digital, smart and digital lending solutions, all closely interconnected with the positive impacts generated on customers in terms of innovation and digital transformation and the development social inclusion and accessibility.

As a result of the dual materiality analysis, there were no material risks and/or negative impacts with reference to the Group's customers.

Processes for engaging with consumers and end-users and channels for consumers and end-users to express concerns

As stated in the Code of Ethics, we have always "... *focused on customers and worked to create and develop long-lasting relationships based on trust and mutual satisfaction, offering products and services that meet their needs, in line with their individual risk profile. For this reason, we promote a constant dialogue with them, aimed at gathering their needs and expectations, and setting up a responsible management of the relationship, and of any critical issues that may arise...*". The point of view of consumers and end-users guides decisions and activities aimed at managing customer relations through a listening model that aims to monitor the customer experience in almost all moments of the customer life-cycle. Evidence is collected and constantly monitored, also thanks to the support of a customer feedback management platform dedicated to collecting and managing customer feedback. The Close the Loop process is used to address these customer opinions; it pertains to all actions to improve a company's products and services, divided into two subgroups:

- the inner loop concerns contact with the individual customer, in order to solve a specific problem in real time;
- the outer loop concerns the management and resolution of problems extended to broader customer segments, through projects for the improvement of processes and platforms, and through inter-functional round tables.

In particular, the Marketing and Omnichannel Department of the Parent Company is the operational manager of the engagement activities, ensuring that the results guide the Group's approach.
This model of listening and collecting feedback takes place via telephone or online (directly on the platform or via email) in different phases:

- after subscribing to a product (branch/online);
- after performing a transaction (branch/online);
- after using the assistance service (operator/chatbot);
- at other times in the relationship (customer satisfaction, ad hoc research).

Customer satisfaction surveys are carried out annually, while the other surveys are scheduled to take place every three months.
For the Group Companies which employ customer engagement activities (Banco BPM S.p.A., Banco BPM Vita S.p.A., Vera Vita S.p.A. and BBPM Life), the effectiveness of this engagement is constantly monitored by means of appropriate KPIs, first and foremost the rate of response to surveys (redemption). Although there are no Service Level Agreements with suppliers in terms of achieving specific levels on the aforementioned KPIs, the values are in line with the market.
In addition, specific channels are set up so that customers can communicate any concerns or needs and receive assistance in this regard.
The Group announces the availability of channels for submitting complaints through advertising in the branches of the Bank and insurance companies and through a special banner on the Group's websites. Anyone wishing to file a complaint can do so in writing, free of charge:

- by filling in the appropriate web form (available on the website of the bank or insurance company);
- by email to: reclami@bancobpm.it or reclami@bancobpmvita.it or reclami@veravitaassicurazioni.it;
- by letter, hand-delivered (with confirmation of "receipt") to any branch of the Banco BPM Group;
- by ordinary mail or preferably by registered letter with return receipt to: Banco BPM S.p.A. Reclami, Via Polenghi Lombardo 13, 26900 Lodi or to: Banco BPM Vita S.p.A. Gestione Reclami, Via Massaua 6, 20146 Milan or to: Vera Vita S.p.A. Gestione Reclami, Via Massawa 6, 20146 Milan;
- by certified email to: reclami@pec.bancobpmspa.it or comunicazioni@pec.bancobpmvita.it or comunicazioni@pec.veravitaassicurazioni.it.

The Group ensures control and monitoring of the problems raised and addressed, as well as the verification of the effectiveness of the channels made available above.

In particular, each report is subject to registration through a specific "RecLam" procedure in which the subject of the complaints is associated with the product and one of the possible reasons for complaints set out in the ABI taxonomy. In the presence of recurring issues, the procedure includes the allocation of an additional flag to ensure the possibility of launching targeted analyses on these cases. In any case, the operational application includes the possibility of obtaining, through parametric extractions, reports containing the main personal, management and economic information of each complaint, at any time.
In this context, the Parent Company's complaints office:

- periodically sees to the production and dissemination of periodic reports shared with the Bodies (Management Committee and Chief Executive Officer) and with the various control functions of the Parent Company, with the aim of sharing the trend of complaints and any critical issues;
- publishes annual reports on complaint management activities and related data on the websites of the Group Companies;
- the Group's Insurance Companies record complaints in their Electronic Complaints Register according to the provisions issued by the Italian Insurance Supervisory Authority (IVASS) and, as regards Supplementary Pension Plans, by the Supervisory Commission on Pension Funds (COVIP).

In order to continuously verify the ability of the complaints office to meet customer expectations, indicators are constantly monitored, including the number of replies and decisions for and against of the Banking and Financial Ombudsman (ABF) and the Financial Disputes Arbitrator (ACF).
Although the management of complaints does not guarantee customers protection from retaliation, through specific internal policies, free and unlimited access to the channels represents a protection factor. In addition, the management processes implemented in this regard, in addition to meeting the needs and requirements of customers, guarantee compliance with the principles of fairness and autonomy. In fact, the requests received from customers are treated, in the same cases, in a fair, homogeneous and independent manner from the complainant; in addition, the structure responsible for handling complaints is independent from the structures responsible for marketing the products and services. The autonomy is not only of an organisational nature, but also of an operational and economic nature (the head of the unit has spending autonomy).
Finally, the confidentiality and protection of consumers' personal data are also fundamental values underlying the complaint management process, in particular the data related to the complaint can only be consulted by the central and network structures specifically selected (profiling).

Policies related to consumers and end-users

The main policies adopted by the Group to manage material sustainability topics related to its customers are:

- Code of Ethics (see "Policies on business culture and business conduct");
- the Guidelines on respecting and safeguarding human rights (see "Policies related to working conditions and the well-being of own workforce");
- Regulation on privacy, processing and protection of personal data;
- Regulation on complaints;
- Regulation on the transparency of banking and financial transactions and services;
- Regulation on the approval of new products and markets and product distribution;
- Regulation on governance and control of Banco BPM Vita products;
- Regulation on the approval and distribution of new products and services of Banco BPM Invest SGR;
- Regulation on usury risk prevention.

In the relationship with its customers, the Group considers it fundamental to ensure compliance with the principles set out in the Guidelines on respecting and safeguarding human rights, published on the company website and accessible by all stakeholders (including collaborators, suppliers and business partners) so that there is full awareness and drive to promote human rights as an integral part of the Group's value system.
The aforesaid Guidelines imprint the Group's conduct on integrity, fairness and transparency, refusing in particular any form of discrimination in access to the products and services offered and paying the utmost attention to dialogue and listening to the real needs of customers, in order to build relationships of trust and mutual satisfaction based on respect.
Therefore, the Group avoids starting and managing commercial relationships in contrast with the principles set out above and ensures that the products and services offered to customers meet their real needs, prohibiting the use of elusive, tiring practices or in any case tending to force the judgement or behaviour of the latter.

Customers are provided with clear and comprehensive information regarding the products and services offered, including details about sustainability risks (such as environmental, social and governance events or conditions that may negatively affect investment value) and the terms and conditions applied, in order to facilitate understanding and the making of informed choices. Specifically, as part of the provision of investment services, ESG factors are integrated through a methodology outlined in the Guidelines on the integration of sustainability risks in the provision of investment services (see "Policies related to climate change mitigation and adaptation") which identifies investment opportunities linked to a sustainable development model and offers customers quality products and services that align with market and societal trends while respecting clients' ESG preferences.
In order to guarantee customers access to products and services, particular attention is paid to providing them with support in the assessment and management of loans, especially with regard to those who are in temporary financial difficulty. In doing so, the Group takes into account the sustainability of the relationship in financial terms, particularly if resulting from exceptional and external events with respect to the activity carried out and relations with the Group (as better detailed in the section dedicated to "Actions related to managing IROs related to consumers and end-users" in which specific reference is made to financial inclusion).
Moreover, the Group is committed to being accessible to all thanks to the "design for all" approach and guarantees respect for the right to privacy and safeguarding the data and personal information of all parties involved in its activities in compliance with regulations in force.
In relation to respecting and safeguarding human rights, the Group manages and monitors the application of its approach to clients through clear assignments of roles and responsibilities, procedures for the identification and periodic assessment of risks, a system for reporting violations, a system of sanctions and constant dialogue activities with the reference stakeholders.
Lastly, it should be noted that the policies related to consumers and end-users, in particular with regard to the Code of Ethics and the Guidelines on human rights, comply with international recognised standards. In this regard, it should be noted that no violations of the principles of the United Nations Global Compact were found in the downstream value chain in the reference period.
In addition, the production and distribution of Group products and services is governed by solid national and European regulations, which also aim to avoid causing, or contributing to causing, material negative impacts on consumers and end-users. In addition to this regulation, as highlighted by the Regulation on the approval of new products and markets and product distribution, ensuring compliance with current regulations, the Group has adopted general principles for the approval of:

- products and services that are created and offered;
- new activities or initiatives that are proposed;
- new channels or markets in which it is inserted.

The definition of the Group's products and services must be based on the analysis of the interests, needs and characteristics of customers. In defining proposals for products and services intended for consumer, retail and other customer categories that deserve the highest level of protection, the level of potential risk for the customer and the complexity of the product or degree of innovation introduced must be taken into account, as well as possible conflicts of interest, in line with the type of product or service. The products and services issued or distributed must be compatible with the needs, objectives and characteristics of the customers, or of a specific reference market (or target market) to which they are intended and must guarantee proper management of conflicts of interest, mitigating and avoiding any prejudice for the customer.

Confidentiality and correct processing of data

<u>Regulation on privacy, processing and protection of personal data</u>

The Regulation on privacy, processing and protection of personal data applied by the entire Group at the level of the entire value chain, including its own operations, governs the principles, roles and responsibilities regarding privacy, processing and protection of personal data. In particular, it defines the principles and values that guide the Group in this area, guiding its strategic and operational choices.
In this regard, the Regulation identifies:

- the general principles that must safeguard personal data processing activities;
- the roles and tasks of the subjects that process personal data and the tasks of the Data Protection Officer (DPO);
- the principles of privacy by design and by default that must be applied to personal data processing activities;

- the roles and responsibilities of the Parent Company, the other Group companies and the Corporate functions.

Furthermore, the enforcement of this Regulation makes it possible to:
- favour the positive impacts related to the protection of data and information confidentiality, both in its own operations and along the upstream and downstream value chain;
- seize the opportunity related to data confidentiality in the management of its operations and the consequent benefit in terms of reputation, leveraging skills and tools in the cybersecurity area.

Within the Group, the Process Rules "Privacy - Management of the rights of data subjects", "Privacy - Tracking banking transactions" and the thematic Circular "Privacy and processing personal data" are also applied.
These Rules regulate the activities to be carried out in order to guarantee the rights that the legislation on the processing and protection of personal data recognises for data subjects and the activities to be carried out for the management, verification and monitoring of access to customer banking data that is carried out through IT systems by the persons authorised to process the data. The Circular governs the fundamental aspects for the application of the provisions set forth in current legislation on personal data protection, with particular reference to the assessment of the impact on data protection and the phases of acquisition, use, storage and the deletion of personal data.
Through the application of the aforementioned Regulation, the Group implements the provisions deriving from:
- European Regulation EU 2016/679 ("GDPR"), applied to natural persons, including freelancers and sole proprietorships;
- Italian Legislative Decree 196/2003 as amended by Italian Legislative Decree 101/2018 ("Privacy Code").

The highest level of management responsible for enforcing Regulation is the Board of Directors.
The Regulation can be consulted by internal stakeholders on the company intranet.

Freedom of expression

Regulation on complaints

The Regulation on complaints is applied to the Parent Company as well as to Banca Akros, Banca Aletti, Banco BPM Invest SGR, Aletti Suisse, to all companies for which the central depository system of complaints is active and to those that may receive complaints from customers, regardless of the organisational model adopted for the management thereof (Aletti Fiduciaria and Insurance Companies). It governs the process of handling complaints by defining the parties involved and the principles guiding this process. The Regulation is prepared in order to ensure that, if a customer deems their expectations not met and presents a complaint, it is managed according to principles of correctness, fairness and transparency. Its enforcement makes it possible to foster a positive impact on the freedom of expression of customers, generated by the Group's own operations. Any customer complaints are considered an opportunity for improvement and, as such, managed with a view to overcoming conflicts while increasing customer confidence and satisfaction.
The objectives of the regulation in question are:
- ensuring exhaustive and timely responses;
- preventing disputes;
- identifying, on a case-by-case basis and on an ongoing basis, opportunities to improve performance and services.

The company structure responsible for handling complaints is independent and autonomous with respect to the structures responsible for marketing products and managing related services, guaranteeing impartiality of judgement and ensuring the absence of situations of conflict of interest with the structures and subjects whose conduct may be the subject of a complaint.
By enforcing the aforementioned Regulation, the office responsible for managing the requests received undertakes to consider:
- regulatory and jurisprudential changes (for example, the PSD2 Regulation and the Lexitor Ruling);
- ABF and ACF guidelines;
- the indications of the Bank of Italy.

The highest management level responsible for the enforcement of the Regulation coincides with the role of the Chief Executive Officer.

The Regulation can be consulted by internal stakeholders on the company intranet.

Access to quality information

Regulation on the transparency of banking and financial transactions and services

The Regulation on the transparency of banking and financial transactions and services applied by Banco BPM, Banca Aletti, Banca Akros, Banca Aletti Suisse, with exclusive reference to banking products sold in Italy under the freedom to provide services, serves to make the offer of products and services consistent with the different types of customers and their actual needs, as well as to mitigate legal and reputational risk through the full adoption and application of the principles of fairness and transparency towards customers, in every phase of the brokerage activity. All information documents on transparency must be drawn up and presented in a manner that guarantees the correctness, completeness and comprehensibility thereof in order to allow the customer to easily understand and compare the characteristics and costs of the product or service, as well as to adopt thoughtful and informed decisions.
The enforcement of this Regulation makes it possible to seize the opportunity related to the dissemination of financial awareness through transparent and non-misleading communication and the promotion of an informed shopping experience.
With reference to the Regulation, the process rules "Transparency of banking and financial transactions and services - operations of central structures" and "Transparency of banking and financial transactions and services - network operations" are also applied. In particular, these rules govern the activities and controls put in place by the central and network structures regarding the transparency of banking and financial transactions and services.
The highest management level responsible for enforcing the Regulation is the Board of Directors.
The Regulation can be consulted by internal stakeholders on the company intranet.

Access to products and services

Regulation on the approval of new products and markets and product distribution

The Regulation on the approval of new products and markets and product distribution applies to certain Group companies[1] and governs the general principles for the approval of products and services that the Group intends to create and/or offer new activities or initiatives that it intends to assume, as well as the new channels or markets which it intends to enter.
The purpose of this Regulation is to ensure the compliance of new commercial initiatives with current regulations and to assess their impacts in terms of costs, revenues or benefits, resources, risks, any internal skills required, as well as technical, operational and IT repercussions. The proposals for new products are supported by an investigation process that must necessarily consider the description of the proposal characteristics for its target customers, the offer channels and distribution mechanisms, the results of the preventive analyses in terms of costs and benefits. In addition, the proposal in question must comply with correct risk management (including sustainability risks related to environmental, social and governance impact issues and in line with the gradual entry into force of the relevant legislation), as well as the appropriate representation of accounting, price adequacy and, in general, compliance with internal and external regulations.
Furthermore, since the scope of this Regulation includes new initiatives on omnichannels and digitalisation, which are therefore evaluated from all points of view, including the social one, the rules not only contribute to the pursuit of opportunities for customer expansion, but also promote the dissemination of the culture of innovation and inclusion.
With reference to the aforementioned Regulation, the Process Rules "Product Governance of banking, insurance and related activities" and "Design, approval and monitoring of investment products and services" apply. In particular, these regulations govern the processes related to the product life cycle (also third-party products) created, distributed or reported by the Group companies identified in the scope of application and the design of new financial products,

[1] The Regulation applies to the following Group Companies:
- Banco BPM; Banca Aletti; Banca Akros; Aletti Fiduciaria; Oaklins Italy; Banco BPM Invest SGR, limited to the premises, the general principles and that which is consistent with the reference regulations and with the specific regulations of the company related to the investigation and approval of products and the assignment of roles and responsibilities;
- Banca Aletti & C. (Suisse) (this Regulation applies to the products of Banca Aletti & C. (Suisse) promoted or placed in Italy; passage to the Committee is envisaged for the products offered in Switzerland, without prejudice to the specificities envisaged Swiss legislation);
- Insurance companies, limited to the premises, the general principles and those consistent with the reference regulations of the insurance sector and with the specific regulations of the Company related to the investigation and approval of products and the assignment of roles and responsibilities.

starting from the analysis of the characteristics and customers needs, from the periodic review of the product range, as well as from the market context, in application of the principles of product governance.
The highest level of management responsible for enforcing Regulation is the Board of Directors.
The Regulation can be consulted by internal stakeholders on the company intranet.

Responsible commercial practices

Regulation on governance and control of Banco BPM Vita products

The Regulation on product governance and control applied to the Group's Italian insurance companies governs the principles, roles and responsibilities to ensure the development and adoption of product governance and control measures and of distribution, regulating the phases of insurance product design, control, review, distribution and continuous monitoring, in line with the reference regulatory framework and with the provisions of the "Regulation on the approval of new products and markets and distribution of products" of the Parent Company.
The enforcement of this Regulation makes it possible to promote positive impacts related to initiatives aimed at promoting ethical and transparent commercial practices.
Consistent with what is defined in the Regulation, the highest management level responsible for enforcing the Regulation is the Board of Directors of Banco BPM Vita.
The Regulation can be consulted by internal stakeholders on the company intranet.

Regulation on the approval and distribution of new products and services of Banco BPM Invest SGR

The Regulation on the approval and distribution of new products and services, which applies to Banco BPM Invest SGR, defines the general principles for the design, control, review, distribution and continuous monitoring of products and services that the SGR intends to implement, in order to ensure the adoption of safeguards on their governance and control, as well as their distribution. The definition of products and services is based on the analysis of the interests, needs and characteristics of customers so as to minimise potential conflicts of interest.
The enforcement of this Regulation makes it possible to promote positive impacts related to initiatives aimed at promoting ethical and transparent commercial practices.
Consistent with what is defined in the Regulation, the highest management level responsible for enforcing the Regulation is the Board of Directors of Banco BPM Invest SGR.
The Regulation can be consulted by internal stakeholders on the company intranet.

Regulation on usury risk prevention

The Regulation on usury risk prevention applies to Banco BPM, Banca Akros and Banca Aletti, and governs the principles, roles and responsibilities regarding the prevention of usury risk pursuant to Italian Law 108 of 7 March 1996 "Provisions on usury" and subsequent amendments, as well as the criteria put in place to avoid exceeding the "usury threshold" on the rates applied by the Group companies mentioned above to transactions and in the management of relations with customers. Through the enforcement of the Regulation, the Group acknowledges and complies with the aforementioned legislation.
Consistent with what is defined in the Regulation, the highest management level responsible for enforcing the Regulation is the Board of Directors of the individual companies.
The Regulation can be consulted by internal stakeholders on the company intranet.

Actions related to the management of IROs in relation to consumers and end-users

In order to continuously improve the relationship with customers, preserve the soundness thereof and share information and challenges, while simultaneously achieving the goals and objectives of internal policies, the Group has adopted and planned multiple actions, the main ones being:

- the Digital Omnichannel Transformation programme;
- training employees on cybersecurity;
- organising training sessions for corporate customers on ESG issues;
- service accessibility and improving communication;
- evolution of the processing register.

The Group has adequate organisational controls (through the allocation of roles and responsibilities to dedicated company functions), an adequate number of human resources (to whom ad hoc specialised training is provided) and sufficient economic resources for the implementation of the above actions, in order to ensure the best management of material impacts.
With the aim of pursuing the opportunity to improve the Group's reputation thanks to the digital transformation that guarantees sound privacy and IT security management, also by leveraging cybersecurity skills and tools, the update of the 2024-27 Strategic Plan confirmed the investments in cybersecurity and the internalisation of specialised technical skills in this area, also through new targeted hires of IT-tech specialists.
Among the other actions aimed at establishing a lasting relationship with customers and strengthening reputation, the Group promotes financial inclusion as a tool to combat difficult situations by offering tools and benefits to groups of vulnerable customers such as households and companies affected by extreme climate events, students without sufficient financial means to complete their studies, women who are victims of violence who find themselves in situations of economic difficulty.
Widespread economic development and combating hardship are fundamental to an inclusive and sustainable community. That is why the offer also includes tools and facilities that can put customers in a position to have financial resources to achieve their projects or overcome difficult times.
Also in 2024, the Group confirmed its commitment to:

- supporting families and companies affected by disasters through, for example, the suspension of mortgage and loan instalments, providing loans for the reconstruction of damaged properties/goods etc.;
- suspending payment of the principal of mortgages and loans, with corresponding extension of the repayment plan for a maximum period of 18 months, for women who are victims of violence and included in protection programmes, and who are in situations of economic difficulty;
- supporting young people in their life projects, such as the purchase of their first home, by offering the possibility of obtaining up to 100% of the value of the property and subsidised conditions;
- supporting deserving young students lacking sufficient financial means to undertake a course of study, offering economic support represented by a secured loan;
- making our offices, branches, services and communications accessible to all.

No improvement actions were identified in 2024 in relation to the protection and correct processing of customers' personal data by ICT suppliers, as the process of selecting these suppliers requires verification of the possession of adequate characteristics to ensure their protection and correctness.

Digital, Omnichannel Transformation programme

The quest for quality in customer relations is accompanied by the understanding that the introduction of new technologies and the adoption of innovative approaches play a crucial role in changing customer interaction: digitalisation offers the opportunity to overcome traditional limitations, allowing for greater service customisation as well as a faster response to customer needs. The Group is embracing this transformation, not only to adapt to the change, but also to make the most of the potential offered by digital technology in consolidating and improving the relationship with its customers.
In particular, to improve the usability, even remotely, of its products and services, in 2024 the Parent Company carried out several interventions that concerned:

- the extension of the scope of products that can be purchased remotely, for example, the BBPM and Webank deposit account on the web and App and the credit card for WeBank customers in remote offers. In addition, the Cardless service was reactivated, which allows withdrawals without a physical card, but with the help of apps on a mobile phone;
- the improvement of the offer of personal loans on digital channels, through the extension of the most advanced solutions for signing contracts with digital signatures, which make it possible to rationalise the steps taken by the customer. In addition, the pre-contractual phase of Agos loans was also digitalised and the automatic loan liquidation function was also issued into production;
- the evolution of platforms (APP and WEB) and of the tools that allow customers, both private and business, to interact digitally remotely and in the branch. For example, evolutionary interventions were carried out on the conversational app and an appointment function was activated in the Branch;
- the extension of the use of digital signatures in Branches to further processes for the sale of products and services, the release of the document upload functionality for individuals from the App and web and for companies from the web, the extension of video collaboration to the Customer Center and interventions to improve current onboarding solutions for new customers through remote digital processes;

- the evolutionary interventions of Customer Relationship Management (CRM), in order to promote the utmost understanding of customers and ensure that the proposal of products and services addressed to them is always in line with their actual needs;
- as part of financial consulting, the development of a digital and remote compilation function, through platforms (APP and WEB), of the MiFid questionnaire that collects information about the customer in terms of understanding, preferences and risk appetite in relation to services of investment, also in the ESG field.

Training employees on cybersecurity

In order to guarantee adequate protection levels for customers against potential cyber threats, the Group offers employees continuous training to acquire and update their cybersecurity skills. The meetings include mandatory and free-to-use training courses as well as specialised events and workshops dedicated to professionals. The primary purpose is for each employee, depending on the role held, to develop the essential knowledge and skills to face the challenges related to IT security for better data and customer protection. For further details on the training and awareness-raising plan on cybersecurity, please see the section "Actions related to the management of IROs in relation to the confidentiality and correct processing of own workforce data" and in particular to the action: "Implementation of an annual cybersecurity training and awareness-raising plan".

Organising training sessions for corporate customers on ESG issues

In order to increase ESG awareness, and on the basis of the initiatives undertaken also as part of the last Strategic Plan, the Group organises training meetings for companies[1] on ESG issues (offering support, for example, in the definition of the sustainability strategy, in the preparation of ESG reporting, in the definition of policies, etc.).
In particular, the contents shared therein are the result of:

- the engagement of specialised external trainers;
- internal skills developed through training dedicated to internal professionals able to meet the different needs of customers.

These activities are planned in advance on an annual basis at the time of strategic planning (considering the three-year reference period of the Strategic Plan). In fact, since 2021, the Group has been committed to a process dedicated to spreading awareness on sustainability issues and the importance of ESG factors in corporate strategy. This initiative has become increasingly structured with the formalisation of the ESG Factory project, which provides concrete support to corporate clients embarking on the green transformation process.
For the development and implementation of these initiatives, the Group has allocated human and financial resources (the latter to an insignificant extent) for both the creation and disbursement of content, as well as the definition and implementation of the various logistical aspects relating to the meetings.

Service accessibility and improving communication

During 2024, several actions were taken to make internal processes, documents and digital platforms for private customers and companies accessible, clear and written in an easily understandable language while still guaranteeing comprehensive content to facilitate the customer's interpretation of the relationship and in line with the guidelines on the subject (Web Content Accessibility Guidelines). From the results of some platform accessibility audits, the corrective actions undertaken during 2024 led to significant improvements compared to previous years in terms of accessibility of digital channels.
Efforts to improve the level of accessibility and use of digital tools have been undertaken by the Group since 2022 and include activities to adapt digital platforms to the requirements of Italian legislation (Agency for Digital Italy and its implementing regulations). The primary objective is to constantly monitor and improve the usability of the Group's digital assets (e.g., websites and apps for private and corporate customers) by removing barriers to entry and ensuring inclusive access, with particular attention to the needs of people with various difficulties.
In this context, contractual documentation accessibility measures have been introduced, with an extension to other types of documents in 2025. Specialised training programmes were also initiated for more technical staff, aimed at promoting accessibility-related skills in the design, maintenance and updating of digital services, documents and products.

[1] The recipients of ESG awareness initiatives are not only the corporate customers of the Banco BPM Group, but also companies operating in Italy that are not yet Group customers.

Lastly, with a view to continuous improvement, the Bank has also launched an update and revision of the documents for Banco BPM customers, which included:

- the documentation provided to the customer during the first contact for specific loan products (entry into force expected by the end of 2025). In this sense, as a producer and distributor of loan products, Banco BPM aims to create complete and clear documents that are immediately useful for understanding and comparing offers on the market;
- the layout and accounting records generated as a result of payment transactions (in force since the first half of 2024) to facilitate immediate understanding.

The Group has implemented these initiatives using a dedicated inter-functional working group, to which it has allocated dedicated financial resources (to an insignificant extent).

Evolution of the processing register

In order to allow the qualitative improvement of the information collected on the Group's personal data processing activities and to promote compliance with the obligations set out in the regulations (in particular by Art. 30 of the GDPR), the Group took action in 2024 to develop its Processing Register. In addition, to ensure adequate monitoring of the issues in question, ad hoc training sessions were provided to employees who hold positions of responsibility on issues relating to personal data protection.

Targets related to consumers and end-users

The main targets aimed at managing material sustainability issues related to Group clients, as monitoring the effectiveness of policies and actions are:

- training dedicated to creating ESG awareness for corporate customers to accompany the sustainable transition;
- strengthening internal IT security controls, in particular through the recruitment of IT tech specialists with cybersecurity skills.

The definition of sustainability objectives is part of the more complex strategic planning process to which the various company functions contribute by competence and which take into account both the considerations and requests that have emerged during meetings with stakeholders and past performance and resources provision in the determination of company objectives.
The performance monitoring linked to these objectives is carried out by the Planning and Value Management function and by the Transition and Sustainability function at least on a quarterly basis.
In this context, the performance recorded periodically is compared with intermediate objectives (where available) in order to detect any gaps and, if necessary, launch remedial initiatives with the company structures responsible for pursuing these objectives. The results of the monitoring activity described above are brought to the attention of the Corporate Bodies also in order to direct any remedial actions

Training dedicated to creating ESG awareness for corporate customers

Over the 2024-2026 time horizon, the Group expects to provide more than 3,000 hours of cumulative training dedicated to creating ESG awareness with companies and corporate customers[1] to accompany the sustainable transition. The cumulative objective, defined in the 2023-26 Strategic Plan, was rescheduled to 2027 in the recent update.
The objective was set on the basis of what has actually been achieved in the past and taking into account the resources available, as well as in line with the commitments undertaken and declared by the Group in supporting customers in a transition process, through communication and development of the potential of companies and on the basis of the performance recorded in recent years in the field of ESG training delivery to companies.
An interim target of 1,000 hours delivered in 2024 was set for this objective. The monitoring activities show that the hours provided, calculated as a multiplication of the number of participants and the number of training hours as at 31 December 2024, is equal to 1,804, therefore well above the interim target.

[1] In addition to non-customer companies operating in Italy

Strengthening internal controls by recruiting IT tech specialists with cybersecurity skills

It should be noted that the objective "Promoting of generational turnover and investing in young talent" described in the section "Objectives related to working conditions and well-being of own workforce" also contributes to strengthening the control that the Group guarantees on the security of customer data and information.

Entity-specific metric for the management of IROs

Virtual Webank branch for "pure digital" customers and remote transactions

The Group has provided its "pure digital" customers some virtual branches, registered with the Bank of Italy and with unique Banking Codes (CAB). The branches are present in the internal database of the GESTOR bank (Group Organisational Management System).

The percentage of transactions carried out remotely out of the total transactions carried out by **private customers** (natural persons) is equal to:

- 87% for transactions carried out online and at the ATM[1];
- 79% for transactions carried out online and at the branch[2];
- *71% for transactions carried out via app[3].*

The percentage of transactions carried out remotely out of the total transactions carried out by **client companies** (legal entities) is equal to:

- 85% for transactions carried out online and at the ATM[4];
- 80% for transactions carried out online.[5]

Mandatory training on transparency in banking operations towards the customer

The percentage of employees who receive mandatory training on transparency in banking operations towards customers is 35% of the target population.
The figure is calculated as: ratio of employees in service at the end of the period who received training on transparency compared to the total number of employees active at the end of the period.

ESG awareness for companies

The Group is committed to disseminating ESG-related issues among its business customers and provided a total of 1,804 hours of dedicated training in 2024. The training hours provided are calculated by multiplying the number of participating customers by the number of training hours received by each customer.

Complaints

Complaint management is a crucial activity that allows the Group to interact with customers to fulfil the various requests and needs that may arise, while maintaining a high degree of customer satisfaction. Among the entity-specific metrics monitored by the Group, complaints represent an important area of information that includes, in 2024, 5,679 complaints received[6] through the RecLam application, of which:

- 559 complaints accepted;

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[1] Ratio between the sum of online transactions (i.e., handling current accounts on the web and You and We apps) and movements carried out at the ATM on total transactions carried out (online, ATM, branch).

[2] Ratio between the number of online transactions (i.e. handling current accounts on the web and You and We apps) out of total transactions carried out online and in the branch.

[3] Ratio between the number of transactions carried out through the You and We app, out of total transactions carried out online (i.e., handling current accounts on the web and the You and We app).

[4] Ratio between the sum of online transactions (i.e., handling current accounts on the web and Youbusiness app) and movements carried out at the ATM on total transactions carried out (online, ATM, branch).

[5] Ratio between the number of online transactions (i.e., handling current accounts on the web and Youbusiness app) out of total transactions carried out online, at the ATM and in the branch.

[6] The data of the complaints accepted, partially accepted and rejected relate to complaints addressed which do not coincide with those received (for example, the complaints received in December 2024 could be dealt with in 2025)

- 1,660 complaints partially accepted;
- 3,524 rejected.

For each case reported above, complaint management takes place through the "RecLam" application that allows the extraction of the data required to calculate the indicated metrics.

Customer Satisfaction Surveys

There were approximately 166,000 customers involved in customer satisfaction surveys during 2024. These surveys were conducted by interviewing a representative sample of Banco BPM customers contacted once a year by telephone and email; by combining both channels, the feedback received is considered statistically solid.
The NPS index (Net Promoter Score) obtained from the surveys is an international recognised indicator that indicates how much customers would recommend Banco BPM to friends and relatives and is calculated as the difference between the % of "promoter" customers and the % of "detractor" customers[1] in a range between -100 and +100. The Banco BPM index stood at 31 in 2024, a value validated by the external company BVA Doxa, which carried out the customer surveys.

Serious IT security incidents and data loss or unauthorised access to Group banks

One serious IT security incident occurred in 2024. The count of "serious" incidents is based on the value assigned to the severity of the event. In particular, the degree of impact in the event of potential data loss is assessed in terms of:

- availability of the data, i.e., if it has made the data temporarily or permanently inaccessible or unusable at the request of the financial entity, its customers or its counterparties;
- authenticity of the data, i.e., if it has compromised the reliability of the data source;
- data integrity, i.e., if it led to an unauthorised modification of the data that made them inaccurate or incomplete;
- data confidentiality, i.e., if it involved access to the data by an unauthorised person or system or their disclosure to that person or system.

If the assessment assumes the degree of potentially serious severity (threshold of regulatory relevance) it means that the incident has or will have a negative impact on the achievement of the commercial objectives of the financial entity, on the ability to meet the regulatory requirements, i.e., at least one application present in the "Classification Framework" in the "Regulatory constraints" sheet is involved, and the impact conditions described therein have been verified or in the case in which the IT and network systems detect unauthorised, malicious and successful access, where such accesses may lead to data loss.
No significant episodes of data loss or unauthorised access occurred that required notification to the Data Protection Authority or to the interested parties.

Number of incidents involving data leaks or losses at the ICT suppliers of Group banks

During the reporting year, one incident occurred that led to data leakage or loss at the ICT suppliers of Group banks. The methodology for determining this figure is based on the regulatory framework that refers to the Guidelines contained in regulation 285 and which keeps track of all events related to operational and safety incidents.

ISO 27001 ICT certified suppliers or equivalent registered in the Parent Company's Supplier Register

The Banco BPM Group is engaged in the selection and monitoring of suppliers who have IT security certifications, in particular ISO 27001 and equivalent. The percentage of suppliers required to hold this certification with respect to the total number of suppliers registered in the Parent Company's Register is 31% in 2024.
In obtaining the data, the suppliers surveyed with positive turnover and an indication of said certification are considered, collected during the registration of the same through the compilation of dedicated ESG questionnaires.

[1] The customers interviewed can give an answer between 0 and 10 when asked. Customers who associate a value from 0 to 6 are considered detractors, from 7 to 8 neutral and from 9 to 10 advisors.

GOVERNANCE INFORMATION

Business conduct

The following table provides a description of the impacts, risks and opportunities that the Group has assessed as material in relation to Business Conduct following its dual materiality assessment.

ESRS Topic, sub-topic, or sub-sub-topic	IRO	Perimeter	Description	Metrics used to assess performance and effectiveness in relation to a material IRO
Corporate culture	Potential negative impact	Own operations	Potential litigation and other legal proceedings associated with fraud, insider trading, antitrust, anti-competitive behaviour, market manipulation, negligence, etc.	
Corporate culture	Impact positive	Own operations	Dissemination of an aware and adequate culture of ethics and corporate integrity based on fairness of conduct and on combating tax evasion, money laundering and anti-competitive behaviour	
Protection of whistleblowers	Impact positive	Own operations	Definition and monitoring of whistleblower reporting and protection processes	
Management of relations with suppliers, including payment practices	Impact positive	Own operations	Compliance with payment deadlines to own supply chain and awareness-raising through supplier analysis procedures according to ESG criteria	G1-6 - Payment practices
Corruption and bribery	Potential negative impact	Own operations	Possible occurrence of corruption and bribery	G1-3 Prevention and detection of corruption and bribery G1-4 Incidents of corruption and bribery

Policies related to corporate culture and business conduct

The main policies adopted by the Banco BPM Group to manage the corporate culture and business conduct are:

- Code of Ethics;
- Integrated Internal Control System Regulation;
- Internal Violation Reporting System (Whistleblowing) Process Standard;
- Organisation, Management and Control Model pursuant to Italian Legislative Decree 231/01;
- Anti-Corruption Regulation;
- Regulations on the Prevention of Money Laundering and Terrorist Financing;
- Regulation for Managing the Purchase of Goods and Services;
- Guidelines regarding operations in the weapon materials and systems industry.

Code of Ethics

The Banco BPM Group recognises the importance of its role in the economy and in the communities in which it operates, committing itself to shared growth with all stakeholders on a daily basis. It addresses social, environmental and economic challenges by having sustainability integrated into its operating model and corporate culture since its foundation. It promotes an approach based on concrete actions and on the values of diversity, inclusion, respect and well-being of people. Internally, the Group is committed to strengthening the employee engagement, promoting the corporate culture and sharing the main innovations through tools such as the company intranet, Corporate TV and newsletters. These tools support both people and commercial activities, strengthening the sense of belonging and participation. In addition, the Group enhances the interests and passions of employees, offering spaces and initiatives that promote inclusion and cohesion, making the work environment stronger and more united.
The Group provides training programmes on business conduct: the Academy function organises annual courses for all employees with a level of in-depth analysis that varies from basic training to specialised programmes, guaranteeing continuous growth of skills and ethical awareness within the Organisation (including training courses for its stakeholders with the aim of developing the ability to recognise, analyse and resolve doubts that may arise in common operations regarding the provisions of the Code of Ethics).

The Code of Ethics is a governance tool which formalises our guidelines of good conduct based first and foremost on ethical principles, legality, fairness, transparency and respect for each individual, without any form of discrimination. The principles and provisions of the Code are binding for directors, statutory auditors, all persons bound by an employment relationship with the Group and all those who work for the Group, regardless of the relationship that binds them to it.

The Code of Ethics governs in particular the guiding principles in relations with stakeholders such as customers, investors and the financial community, staff, suppliers, communities, the Supervisory Authority, Judicial Authority and Public Administration, as well as respect for the environment.

The Code supports the dissemination of a culture of compliance with the rules and attention to risks, ensuring the quality of the activities carried out, improvement in terms of sustainable and responsible business development and favouring the positive impacts related to the dissemination of a conscious and adequate culture of ethics and corporate integrity based on fair conduct and combating tax evasion, money laundering and anti-competitive behaviour.
The Banco BPM Group, also thanks to compliance with the values and principles set out in the Code of Ethics, acts by placing the customer at the centre, with whom it builds transparent and lasting relationships and for which it constantly works by proposing an offer oriented towards its needs.

Finally, the Group is committed to providing the financial market with fair, transparent, comprehensive and timely disclosure of its strategies and results and sets itself the objective of creating sustainable value in the medium and long-term, also in the best interest of investors (shareholders and bondholders). The Code also places due care in respecting contractual agreements with suppliers and business partners. In the same way, it seeks to value people and maintain a system of relationships with employees aimed at nourishing their motivation and sense of belonging to the Group.

Non-compliant behaviour could give rise to civil and/or criminal and/or administrative liability for the Group pursuant to the law, resulting in the application of sanctions against it, as well as, for employees, disciplinary liability and, in the most serious cases, civil and/or criminal and/or administrative liability.
The Code of Ethics is inspired by the main international treaties, and in particular by the OECD Guidelines for multinational companies, the principles of the United Nations Global Compact which the Group has formally endorsed, the fundamental Conventions of the International Labour Organisation, the Guidelines of the Organisation for Economic Cooperation and Development as well as the Universal Declaration of Human Rights of the United Nations and the European Convention on Human Rights.

The highest management level responsible for approving and implementing the Regulation is the Board of Directors.
The Code of Ethics and its updates are made available to the recipients and the public through publication on the intranet portal and on the websites of the Group Companies, where present. Each recipient is required to direct the colleagues of their organisational units to fully comply with the Code of Ethics and disclose it to all those who work directly or indirectly for the Group and its Subsidiaries. In addition, the Group's suppliers are also required to sign and comply with the principles of the Code of Ethics (through express reference in supply contracts).

Integrated Internal Control System Regulation

The Integrated Internal Control System Regulation governs the criteria, roles and responsibilities regarding the internal control systems of the Banco BPM Group (with the exclusion of BBPM Life, which adopts an internal control system compliant with Irish legislation and consistent with the principles of the Group policy), representing the duties and responsibilities of the corporate bodies and control functions, as well as the related coordination and collaboration methods in compliance with legal and supervisory provisions (in particular with reference to Bank of Italy Circular 285 of 17 December 2013 and IVASS Regulation 38 of 3 July 2018 and subsequent amendments and additions).
In this context, the Regulation defines criteria and guidelines on the internal system for reporting violations, allowing to strengthen the positive impact generated through the definition and monitoring of whistleblower reporting and protection processes. The Board of Directors is responsible for the implementation of the Regulation and therefore approves the internal reporting systems and appoints the head of the internal reporting system (coinciding with the Audit Manager), responsible for ensuring the correct management of the reporting process, reporting directly and without delay to the relevant corporate bodies and/or to the Supervisory Body the information subject to reporting, where deemed pertinent, and draws up an annual report. The Regulation can be consulted by internal Stakeholders on the company intranet.

Internal Violation Reporting System (Whistleblowing) Process Standard

The Group provides mechanisms for identifying and reporting concerns regarding unlawful conduct or that is in conflict with its own Code of Conduct or internal regulations.
In particular, in line with the provisions of the Internal Violation Reporting System (Whistleblowing) Process Standard, it requires those who have become aware of an offence in the workplace, also in the pre-contractual phase or after the termination of the employment relationship, to transmit detailed indications of unlawful conduct (including alleged).
In particular, ad hoc internal channels are envisaged for sending reports through a guided procedure on the dedicated IT platform or by filling in the reporting forms attached to the regulations.
Regardless of the channel of receipt of the report (platform, vocally, direct meeting, physical mail), the whistleblower receives confirmation of the report's receipt and acceptance within seven days.

In addition to the dedicated (whistleblowing) channel, those who believe they need to report unlawful conduct or assumptions can contact the Supervisory Body (hereinafter also "SB") by sending an e-mail to the dedicated e-mail box or by post, even anonymously, sent to the SB (including violations of the Code of Ethics). If the report is deemed worthy of further investigation, it is forwarded to the relevant Group structures (primarily the Complaints Management and Audit Function).
Report management activities are implemented in compliance with the rules and regulations in force and in compliance with the principles of confidentiality and fairness, as well as with EU Regulation 2016/679 (GDPR) and Italian Legislative Decree 196 of 30 June 2003 as amended by Italian Legislative Decree 101 of 10 August 2018 and Italian Legislative Decree 24 of 10 March 2023.
Seven reports were received in 2024, not relating to sustainability issues, which gave rise to audits by the Audit Function, and a case in which the audits are still in progress, for which it is not possible to associate any information at present.

Group whistleblowing reports are managed in the cloud (excl. BBPM Life) by an external Company to protect whistleblowers who, by law and internal regulations, are protected from any form of retaliation or discrimination in the professional sphere.
In this sense, the confidentiality of the identity is guaranteed within the limits established by law or determined by the Company's need for protection. Report management activities are implemented in compliance with the rules and regulations in force and in compliance with the principles of confidentiality and fairness, as well as with EU Regulation 2016/679 (GDPR) and Italian Legislative Decree 196 of 30 June 2003 as amended by Italian Legislative Decree 101 of 10 August 2018 and Italian Legislative Decree 24 of 10 March 2023.

Sanctions are envisaged for those who violate the protection measures of the whistleblower and other interested parties, as well as those who make reports with fraudulent intent or gross negligence that prove to be unfounded. Five reports were received in 2024, all via the SB mailbox. The body requested further information from the competent Functions for each individual case, and the appropriate specifications.

The Group protects whistleblowers in various ways, including activities such as dissemination of information and training to its workers on how to use the channels made available as well as training programmes for the staff who receive and process such reports.
In particular, detailed information on the establishment of internal channels is made available to the workforce in the Circular Internal Violation Reporting System (Whistleblowing) Process Standard and in the banner present on the company intranet ("Whistleblowing Policy" in the case of BBPM Life), both freely accessible to employees. In addition, the Academy function and the Audit function (in agreement with the Administration and reporting function for some subsidiaries) provide ad hoc courses[1] on the issues in question to employees in their entirety and to those who receive and manage the reports, respectively.

To strengthen the positive impact generated through the definition and monitoring of reporting and whistleblower protection processes, the Internal Violation Reporting System Process Standard (applied by all Group Companies with the exclusion of BBPM Life, to the which the "Whistleblowing Policy" applies, in compliance with Irish legislation and the principles adopted by the Group policy) governs the Internal Violation Reporting System relating to unlawful conduct as required by Italian Legislative Decree 24 of 10 March 2023, by specific sector regulations, Bank of Italy, IVASS

[1] For BBPM Life alone, the Compliance function (of the Company) is responsible for the delivery of an annual course and training at the time of recruitment.

and ANAC Regulatory Bodies and in line with the guiding principles of the Integrated Internal Control System (internal) Regulations. The highest management level responsible for the enforcement of the Process Standard coincides with the person responsible for the Internal Violation Reporting System. The Process Standard is made available to internal stakeholders through publication on the company intranet.

Organisational, Management and Control Model pursuant to Italian Legislative Decree 231/01

The Companies of the Banco BPM Group adopt and implement their own Organisation, Management and Control Model suitable for preventing the commission of the offences referred to in Italian Legislative Decree 231/2001, considering it a fundamental element of the overall governance system. It is aimed at ensuring that the company activities are in line with company strategies and policies and are based on sound and prudent management.
The 231 Model adopted complies with the principles of Italian Legislative Decree 231, the self-regulatory codes and the recommendations of the Supervisory Authorities, as well as the Guidelines issued by ABI and the sector associations to which the Company belongs. The provisions contained in the 231 Model supplement those envisaged by the Code of Ethics, which constitutes their essential foundation. With the adoption of the Model, the Group intends to make the system of controls and corporate governance more effective, with particular reference to the objective of preventing the commission of the offences envisaged by Italian Legislative Decree 231/200 as well as by the laws that expressly refer to it.
The 231 Model is adopted primarily to avoid the direct liability of the entity for the commission of certain offences by persons functionally linked thereto and, consequently, to avoid the applicability of sanctions against the entity. The entity's liability arises only in the cases and within the limits expressly provided for by law and by Italian Legislative Decree 231 of 8 June 2001, which regulates the entity's direct liability for the commission of certain offences by persons functionally linked thereto and envisages the applicability of administrative sanctions against the entity.

The Model also supports the dissemination of a culture of compliance with rules and attention to risks, promoting the quality of the activities carried out and constant improvement towards sustainable and responsible business development. The Group, also through the Model, rejects and sanctions any conduct that does not comply with the law and with the provisions of the Model itself and the Code of Ethics, and also any behaviour implemented in order to evade the provisions of the Model itself, even if the conduct is implemented in the belief that it pursues, even partly, the interest of the Group or with the intention of obtaining a benefit.
The Group, having adopted an organisational structure that distinguishes it as a substantially and economically unified enterprise, gives guidance on the choices for implementing Italian Legislative Decree 231/2001, defining guidelines and frameworks of reference for preparing the Organisation, Management and Control 231 models of the Group Companies. In relation to the foregoing, the Parent Company has prepared a model which, without prejudice to the autonomy of each company in adopting its own, represents the paradigm to be adopted by other Companies.
Specifically:

- the subsidiaries based in Italy, bearing in mind the 231 risk profile attributable to the Company, adopt their own Organisation, Management and Control Model;
- the structures with which the Group operates abroad, not having autonomous legal personality (representative offices), are for all intents and purposes recipients of the Company's 231 Model, irrespective of the jurisdictions in which they operate. If the legislation of the countries in which those structures are based do not envisage similar levels of attention, the latter must comply, in particular, with the contents of the chapter "General principles for the prevention of crimes and offences" of the Parent Company's 231 Model, adjusting them to the peculiar aspects of their own situation in coherence with the local regulations in force. If any of the provisions contained in the model are less restrictive than the local legislation, the aforementioned structures adopt the local legislation;
- in relation to foreign subsidiaries, the Parent Company adopts all initiatives aimed at guaranteeing standards of control and safeguards comparable to those envisaged by the Italian supervisory provisions, even in cases where the legislation of the countries in which the branches are based does not envisage the same standards of attention.

As part of the 231 Model, the Group continuously updates the risk mapping pursuant to Italian Legislative Decree 231/01, making use of the managers of the organisational structures, who are responsible for:

- the execution, proper functioning and effective application over time of the processes, proposing changes to the procedures under their remit, when those changes appear to be necessary for the effective implementation of the model;

- verifying the existence and remedies for any deficiencies in the regulations that could give rise to foreseeable risks of commission of the crimes as part of the activities under their remit;
- reporting to the Body any situations of irregularity or anomalous behaviours;
- keeping constantly updated the risk assessment sheet, making it available to the Body.

The highest management level responsible for approving and implementing the Model is the Parent Company Board of Directors. The Regulation and its updates are made available to the recipients and the public through publication on the intranet portal of the Group companies and on their websites, where present.
The update of the model also involves keeping a log of the document being read by the recipients. New recruits receive, at the time of hiring, the instruction to access the legal section of the company intranet to read the 231 Model in full and they undertake to comply with its requirements, signing a specific declaration in that sense.

Anti-Corruption Regulation

The Group has set up procedures to quickly, independently and objectively investigate incidents concerning the conduct of the company, including cases of corruption and bribery. In particular, in addition to the investigation process linked to whistleblowing reports, the Parent Company's Audit Function analyses all available evidence, also deriving from anomaly indicators, reporting the need to carry out further, more specific investigations or any interventions to the competent internal or external structures.

The Group Organisation function regularly carries out assessments to verify the exposure of each individual activity managed by the structures to any 231/01 risks, including corruption and bribery against private individuals and subjects belonging to/linked to public administration. Therefore, it implements a system of internal regulations and controls to minimise these risks which, as emerged from the aforementioned assessments, have a greater impact on activities and managers with economic relations and external relations.

The corporate control functions and the Supervisory Bodies established pursuant to Italian Legislative Decree 231/01 of the Group companies contribute to the periodic assessment and monitoring of risk and subsequently report to the Management and Control Bodies.

In addition, the Anti-Corruption Regulation constitutes a 'protocol' pursuant to the regulations on the administrative liability of Companies referred to in Italian Legislative Decree 231/01 and is adopted by all Group companies, including those operating abroad, also in compliance with the local regulations even in cases where such regulations do not call for similar levels of attention. In addition, any provisions of local regulations which are more restrictive than those contained in the Regulation prevail over the latter and the foundations covered by the Articles of Association of Banco BPM.
The Regulation governs the fundamental principles, guidelines, roles and responsibilities for preventing and combating corruption, in compliance with current legislation on the matter.

In particular, it is part of the system of regulations and organisational controls that aim to:

- assign prevention responsibilities to corruption and bribery;
- mitigate the potential negative impact of corruption and bribery;
- define company processes and a financial resources management system that, in compliance with current external and internal regulations, guarantees the traceability of transactions and their timely identification and registration, also in order to prevent the creation of hidden funds instrumental to the commission of corrupt acts.

In this sense, the Regulation outlines the organisational, IT and control measures necessary to prevent and counter the commission of corrupt acts directly and indirectly against the public administration, private individuals, public officials or persons responsible for public services, by all staff, including collaborators, employees, Top Management and counterparties who operate on behalf of or in the interest of the Parent Company or of the other Group companies on the basis of professional relationships that determine their inclusion in the company organisation or collaboration.
Any alleged violation of applicable anti-corruption laws or the Anti-Corruption Regulation committed by Group staff must be reported immediately through the dedicated channels governed by the internal regulations on reporting violations.
The highest management level responsible for approving and implementing the Anti-Corruption Regulation is the Board of Directors.

The Regulation and its updates are made available to the recipients and the public through publication on the website of the Banco BPM Group and Group Companies, where present.

Regulations on the Prevention of Money Laundering and Terrorist Financing

The Regulations describe and justify the choices made by the Banco BPM Group to prevent the risk of being involved in money laundering and financing of international terrorism. Through the above, the Group responds to the complexity and danger of money laundering and the financing of international terrorism through a responsible and dedicated approach, paying particular attention to the quality and ongoing refinement of the instruments for preventing and combating money laundering and terrorism financing, extending them also to those areas not directly foreseen through full knowledge of the counterparty.
In addition, it is a measure against the negative impact of potential litigation and other legal proceedings associated with fraud, insider trading, antitrust, anti-competitive behaviour, market manipulation, and negligence.
The Regulations apply:

- to the financial intermediaries belonging to the Group with registered offices in Italy (subject to the anti-money laundering provisions of Italian Legislative Decree 231/2007);
- to other parties carrying out financial activities belonging to the Group with registered offices in Italy (subject to the anti-money laundering provisions of Italian Legislative Decree 231/2007).

Moreover, despite not being subject to the provisions on the prevention of money laundering and terrorist financing laid down in Italian Legislative Decree 231/2007, to facilitate the application of the measures envisaged by Italian Legislative Decree 109/2007 as amended, the Regulations apply:

- to all the other Group Companies with registered offices in Italy, limited to the principles of full knowledge of their respective counterparties;
- to the Banks belonging to the Banking Group with registered offices abroad, in compliance and compatibly with current local laws and regulations, to strengthen the organisational controls in the area of the prevention of money laundering and terrorist financing and to allow the assessment of the specific risk exposure also during the Group's internal assessment.

The company BBPM Life has implemented Banco BPM's Anti-money Laundering and Terrorism Financing Activities Policy.

- national and European regulations, including applicable sector regulations to combat money laundering and the financing of terrorism, which aim to ensure the efficiency of markets, the promotion of competition, correct behaviour, the honourableness of company representatives, the transparency of ownership structures and relations with customers, and the effectiveness of the organisational structure and internal controls;
- the United Nations Sustainable Development Goals that promote the significant reduction of illicit cash flows and weapons as well as corruption and bribes in all their forms and the use of financial mechanisms for money laundering and terrorist financing.

The Regulation and subsequent amendments are subject to the approval of the Banco BPM Board of Directors; the Chief Executive Officer is responsible for enforcing strategic policies for governing the risk of money laundering, as required by the relevant regulatory provisions.
The Regulation is made available to all staff through publication on the company intranet and to all external stakeholders through publication on the Group's institutional website.

Regulation for Managing the Purchase of Goods and Services

The Regulation for Managing the Purchase of Goods and Services (applied to all Group companies, including those abroad that have granted the mandate and signed the intercompany contract for relying on the purchase services of the Parent Company structure) governs the principles, criteria, roles and responsibilities regarding the management of expenditure deriving from purchases of goods and services. In particular, it governs the operating model adopted by the Group for managing:

- relations with suppliers;
- purchase requests;
- supplier selection process;
- process of negotiation, contracting and purchase order issue (including monitoring and control activities).

The Regulation is part of the organisational controls and processes implemented by the Group to foster the positive impact generated, ensuring compliance with payment deadlines towards its supply chain and strengthening awareness-raising on these areas. The Rules are approved by Banco BPM's Board of Directors and implemented by the competent Administrative Bodies of the subsidiaries, which not only decide on the adoption of the Regulation, but also ensure that any internal rules of their own are consistent with the Group's rules.
The Regulation and its updates are made available to internal stakeholders through publication on the Group's intranet.

Guidelines regarding operations in the weapon materials and systems industry

The guidelines govern operations in the defence sector, and in particular with respect to counterparties operating in the weapons materials and systems sector, setting out a more rigid authorisation process with a view to sustainability.

In fact, the Guidelines regarding operations in the weapon materials and systems sector include adequate controls to assess the potential ESG impacts of the individual transactions subject to approval. The Board of Directors is expected to authorise these credit granting operations, subject to the non-binding opinion of the ESG Committee.[1]
In addition, the Board of Directors defines the list of countries - in particular non-NATO and non-EU countries - with which it is possible to work.

Actions related to the management of IROs in relation to corporate culture and conduct

The Group has adopted and planned multiple actions in order to manage material matters related to business conduct, as well as to achieve the purposes and objectives of its internal policies.
In particular, in order to achieve the objectives defined in internal regulations, the main actions adopted by the Group concern:

- the enforcement of corruption risk management processes, regulatory and operational compliance with regulations and the risk of money laundering and terrorist financing;
- the activation of mandatory training programmes for the envisaged recipients on anti-money laundering and anti-corruption and the preparation of a training plan on anti-money laundering.

Together, these actions allow to make a positive contribution to remedying the potential negative impacts in terms of issues related to business conduct and referring to the Group’s own operations. In particular, the initiatives launched are aimed at managing:

- the (potential) negative impact on customers and its workforce in the event of disputes, unlawful conduct and disputes attributable, for example, to fraud, insider trading, anti-competitive behaviour, etc.;
- the (potential) negative impact on people in the event of corruption and bribery.

Lastly, the Group has not and does not (currently) envisage the adoption of specific actions in this area by virtue of the high standards envisaged in the procedures for analysing suppliers according to ESG criteria, management of relations and payments to suppliers which guarantee compliance with payment deadlines.

Implementation of the corruption risk management process and regulatory and operational compliance

Banco BPM's Compliance function ensures the implementation of the corruption risk management process and regulatory and operational compliance with standards, including self-regulatory ones on the subject, and performs the functions of guidance, coordination and control for the compliance structures of Group Companies that have not outsourced this function to the Parent Company.
In its control activities on the Group Companies it oversees, the Audit function of Banco BPM monitors compliance with the relevant regulations with the aim of preventing or detecting the occurrence of anomalous and risky behaviours or situations and guarantees the consistency with the policies established by the Competent Bodies and internal regulations. With reference to the companies excluded from the scope of monitoring of the Parent Company's Audit function, the activities are carried out by specific functions in compliance with the same roles and responsibilities, taking into account the specific operating characteristics of the individual Companies.
Also with reference to the risks of corruption and bribery, the company control functions plan control activities on an annual basis and present a report to the Corporate Bodies on the activity carried out. It illustrates the checks conducted, the results emerged, the points of weaknesses identified, and it proposes the actions to be taken to remove them.

[1] The ESG Committee has the right to authorise transactions that do not envisage any use of credit lines, with reference to foreign countries authorised by the Board of Directors, pursuant to Italian Law 185 of 1990.

The Supervisory Bodies pursuant to Italian Legislative Decree 231/2001 of the companies with a Model, prepared in accordance with the regulations, monitor, as far as they are concerned, the observance of the provisions envisaged on the issue of corruption.

Implementation of the anti-money laundering and terrorist financing risk management process

The Anti-Money Laundering function of Banco BPM monitors, in full autonomy, the risk of money laundering and terrorist financing and carries out the functions of guidance, coordination and control for the anti-money laundering structures of the Companies belonging to the Group that have not outsourced the same function to the Parent Company. Also with reference to the risks of money laundering, the company control functions plan control activities on an annual basis and present a report to the Corporate Bodies on the activity carried out. It illustrates the checks conducted, the results emerged, the points of weaknesses identified, and it proposes the actions to be taken to remove them.
Pursuant to Italian Legislative Decree 231/2001 of the Companies with a Model prepared in accordance with the regulations, the Supervisory Bodies also supervise compliance with the provisions on anti-money laundering, to the extent of their competence.

Mandatory training programmes for the envisaged recipients on anti-money laundering and anti-corruption and the preparation of a training plan on anti-money laundering

In compliance with the provisions of the reference regulations, through the Academy structure of Banco BPM, the Group has prepared the mandatory annual training on anti-money laundering and anti-corruption for the intended recipients in order to:

- spread a culture focused on combating these phenomena, mitigating the related risks and increasing awareness of the controls put in place in these areas;
- raising awareness and updating all Group staff on the evolution of money laundering risks and on the typical schemes of criminal financial transactions.

Objectives related to corporate culture and conduct

The regulations on anti-corruption and anti-money laundering issues, as well as those on other areas relevant to the Group's business sectors, are part of a context of regulations that permeates all operations of the Banco BPM Group. Since the training programmes on the subject are mandatory and already involve the entire company population, they do not give rise to the definition of specific objectives. In any case, the Group constantly monitors the effectiveness of its policies and actions regarding the material impacts, risks and opportunities related to the issues in question. In particular, the use of training on the topics of preventing corruption and money laundering is constantly monitored through the Academy platform, which makes it possible to keep track of the regular use of the courses and the successful passing of the verification test. In addition, considering the sensitivity of the activities carried out, the Group imposes a maximum level of ambition on the aforementioned issues. As reported in the Anti-Corruption Regulation, "*in line with the Code of Ethics and the Organisation, Management and Control Models adopted pursuant to Italian Legislative Decree 231/01, the Banco BPM Group puts in place all the organisational, IT and control measures necessary in order to prevent and combat the commission of acts of corruption directly and indirectly by all staff, including collaborators, employees, Top Management and counterparties operating on behalf of or in the interest of the Parent Company or other Group Companies*".

Prevention and identification of corruption and bribery and confirmed cases of corruption

With reference to the processes and the report management chain of cases of corruption and bribery, the reports are viewed by the Audit Manager or their nominee and sent to the Audit colleagues in the Parent Company, divided according to the topic/problem. If the SISV Manager is:

- hierarchically or functionally subordinate to any reported party or;
- the person allegedly responsible for the violation or;
- has or is believed to have a potential interest related to the report such as to compromise impartiality and independence of judgement.

The report of the violation must be made on a paper, addressed by ordinary or internal mail, to the Head of the Compliance Function of the Parent Company or the Companies (or the Board of Statutory Auditors of the Company in the case of involvement of one or more members of the Board of Directors) which for the specific case assume the role

of Violation Reporting System Manager. In this case, it is also possible to make an external report to ANAC (for the methods and conditions for using ANAC's external channel, see https://www.anticorruzione.it/-/Whistleblowing).
In the case of BBPM Life, the reports are presented to the reference manager or the Chief Compliance Officer or the Chief of Internal Audit or the Chief Executive Officer. Finally, the report containing the outcome of the investigation and the recommendations is reviewed and approved by the Chief Executive Officer and subsequently sent to the whistleblower. If the whistleblower is not satisfied with the contents of the report or deems the fact reported to be particularly serious, they may contact the director/chairman of the Audit Committee, directly. In this case, it is also possible to make an external report either to the website of the Irish government www.gov.ie or to the Office of the Protected Disclosures Commissioner on the website OPDC Home | Protected Disclosures Commissioner | OPDC.ie).
At the end of the reporting process, the results are communicated to the administrative, management and control bodies. Specifically:

- for the Parent Company, Banca Akros, Banca Aletti, Banco BPM Vita, Vera Vita and Banco BPM Invest SGR, annual reporting is envisaged through an ad hoc report;
- for BBPM Life, Ge.Se.So., Sagim, BRF Property, Lido dei Coralli, Partecipazioni Italiane, Sirio Immobiliare, Terme Ioniche, PMG and Agriurbe, reporting is envisaged 'per event'.

Training programmes on the prevention and detection of corruption and bribery are aimed at all employees of the Group companies. They are focused on informing and training on external and internal anti-corruption regulations and on the importance of compliance therewith in order to develop the necessary awareness of risks and personal and administrative responsibilities, as well as to inform staff about the actions to be taken to identify, report and combat corruption as well as potential sanctions in the event of violation of the rules.

These programmes are differentiated by target and adapted to the different levels of responsibility, guaranteeing specialised and specific training to the top positions on the risks and the reference regulations and to all the remaining staff of the banking area basic training or in-depth training in relation to the role performed and the responsibilities attributed. Training is carried out on an annual or biennial basis, ensuring that all recipient employees are constantly updated (meetings are scheduled approximately monthly in the period October-June for representatives of Banco BPM and the main Subsidiaries).

As part of the periodic assessment, the company activities and responsibilities with a higher risk of corruption offences being committed are also identified: specific anti-corruption training courses are defined for the staff carrying out these activities or assuming these responsibilities, which may be modulated according to their duties and roles within the Company. In addition, for newly hired staff, these paths are envisaged in the period immediately following recruitment. Each structure manager, depending on the activities and responsibilities at greatest risk, must ensure that their staff periodically complete the training courses provided. As part of the training sessions for staff most exposed to the risk of corruption, the topics covered concern: the definition of corruption and bribery, the procedures regarding suspicious transactions and the policies adopted.
The percentage of functions exposed to risk covered by the training programmes is shown below, as well as the methods of delivery and the intended duration of the training programmes.

Training for staff exposed to corruption risk	**Administrative, Management and Supervisory Bodies (*)**	**Executives**	**Functions at risk**	**Other own workers**
Total people at risk	65	171	185	19,133
Total training recipients	43	134	145	17,608
Percentage of functions at risk covered by the training programmes by reference category	66%	78%	78%	92%
Classroom training (hours)	3[1]	3	3	7.5
E-learning (hours)	3	3	3	4
Voluntary e-learning (hours)	0	1	3	4

(*) Meetings scheduled (indicatively) monthly in the period October-June for the representatives of Banco BPM and the main subsidiaries.

The data on the number of training hours provided to the individuals identified were extracted from the HR Information System.

[1] For BBPM Life, a mandatory one-hour training is provided once a year

The Legal structure of Human Resources of Banco BPM consults the 'Legal Suite', an application that records any cases of violations of Italian Legislative Decree 231/2007 (anti-money laundering legislation) and the Model pursuant to Italian Legislative Decree 231/2001 (regulations on the administrative liability of entities) by Group employees. This consultation ascertained that in 2024 there were no cases of violation of the laws against corruption and bribery or cases related to contracts with commercial partners that have been resolved or not renewed due to violations related to corruption or bribery.

Management of relations with suppliers and metrics related to payment practices

As part of the management of relations with its suppliers, the Group ensures compliance with the payment terms through a procedural process that involves various company functions and is described in the specific Process Standard and in the Regulation for Managing the Purchase of Goods and Services.
Compliance with these internal regulations and IT procedure process tracking guarantee timely payments to all suppliers.
The relationship with the Group's supply chain is managed through the Integrated Procurement Management function, which includes the structures responsible for the negotiations and finalisation of contracts/orders with suppliers as well as a structure that deals with the registration and management of suppliers themselves.
To be included in the Supplier List, the Group requires the completion of an ESG questionnaire that assigns suppliers a sustainability rating. The outcome of this questionnaire does not currently bind the Group in the selection of the supplier.
The relationship with the supply chain of BRF Property S.p.A., Tecmarket Servizi S.p.A., Agriurbe Srl, Ge.Se.So. S.r.l., Sagim S.r.l. Società Agricola and Banca Aletti & C. (Suisse) SA is normally managed directly by each Company (mostly through members of the administrative body) both for negotiations and for the finalisation of contracts/orders with suppliers. It should be noted that the suppliers selected are then recorded by the Integrated Procurement Management function of the Parent Company.
Lastly, it should be specified that the relationship with the supply chain of the company BBPM Life is managed directly through the staff responsible for the negotiations and finalisation of contracts/orders with suppliers.
It should be noted that the Companies detailed above (BRF Property, Tecmarket, Agriurbe, Ge.Se.So., Sagim, Banca Aletti & C. (Suisse) and BBPM Life) do not currently take into account sustainability criteria for the selection of suppliers.

With particular reference to the payment practices adopted, the Group envisages standard payment terms with payment at 30 or 60 days from the invoice date, which, with reference to a sample analysis of payments made in 2024, were respected in 76% of cases. On average, the Group paid the invoices to suppliers on the date coinciding with the contractual or legal payment term (0 days).
It should be noted that to calculate the average days taken by the Group to pay an invoice and the percentage of payments that meet the standard conditions defined for payments to suppliers, the payments made in 2024 for invoices recorded in 2023 and in 2024 on behalf of Banco BPM, Banca Aletti and Banca Akros were considered. The sample used was considered significant, as the aforementioned Companies contribute (at aggregate level) around 90% to the aggregate of the consolidated financial statements of Banco BPM with reference to 'Other administrative expenses', 'Fee and commission expense' and 'Operating expenses' (figures as at 31 December 2024, net of intercompany items).
Finally, in calculating and indicating the average time taken to pay invoices to suppliers, any payments made in advance (with a 'minus' sign in the calculation of days) were also included, consequently also impacting the percentage of payments that respects the standard terms which, in turn, will also include the portion of payments made in advance with respect to the standard terms envisaged.
The number of legal proceedings currently pending due to late payment to suppliers amounted to nine cases (lawsuits managed by Banco BPM Legal Procedures and lawsuits related to 'invoice payment').

CERTIFICATION OF SUSTAINABILITY REPORTING

The undersigned, Giuseppe Castagna, as Chief Executive Officer of Banco BPM S.p.A. and Gianpietro Val, as Manager responsible for preparing the Company's financial reports of Banco BPM S.p.A., hereby certify[1], pursuant to Art. 154-bis, paragraph 5-ter, of Italian Legislative Decree no. 58 dated 24 February 1998, that the Sustainability Reporting included in the Consolidated Report on Operations was prepared:

a) in accordance with the reporting standards applied pursuant to Directive 2013/34/EU of the European Parliament and of the Council of 26 June 2013, and Italian Legislative Decree no. 125 of 6 September 2024;
b) with the specifications adopted pursuant to Article 8, paragraph 4 of Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020.

Milan, 13 March 2025

Signed by	Signed by
Giuseppe Castagna Chief Executive Officer	Gianpietro Val Manager responsible for preparing the Company’s financial reports

[1] Certification produced according to the model included in the consultation document “Amendments to secondary legislation in enforcement of Italian Legislative Decree no. 125 of 6 September 2024, which transposes into national law Directive 2022/2464/EU of the European Parliament and of the Council on corporate sustainability reporting” published by CONSOB on 13 December 2024.

Independent auditor's limited assurance report on the consolidated sustainability report

in accordance with article 14-bis of Legislative Decree No. 39 of 27 January 2010

To the shareholders of
Banco BPM SpA

Conclusion

In accordance with articles 8 and 18, paragraph 1, of Legislative Decree No. 125 of 6 September 2024 (hereinafter also the "Decree"), we have undertaken a limited assurance engagement on the consolidated sustainability report of the Banco BPM group (hereinafter also the "Group") for the year ended 31 December 2024 prepared in accordance with article 4 of the Decree, presented in the specific section of the consolidated report on operations.

Based on the procedures performed, nothing has come to our attention that causes us to believe that:

- the consolidated sustainability report of the Banco BPM group for the year ended 31 December 2024 is not prepared, in all material respects, in accordance with the reporting criteria adopted by the European Commission pursuant to Directive (EU) 2013/34/UE (*European Sustainability Reporting Standards*, hereinafter also the "ESRS");

- the information set out in paragraph *"Taxonomy pursuant to Article 8 of Regulation (EU) 2020/852"* of the consolidated sustainability report is not prepared, in all material respects, in accordance with article 8 of Regulation (UE) No. 852 of 18 June 2020 (hereinafter also the "Taxonomy Regulation").

Basis for conclusion

We conducted our limited assurance engagement in accordance with the Standard on Sustainability Assurance Engagements - SSAE (Italia). The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for a reasonable assurance engagement.

Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed. Our responsibilities under this Standard are further described in the *Auditor's responsibilities for the limited assurance conclusion on the consolidated sustainability report* section of this report.

We are independent in accordance with the principles of ethics and independence applicable to assurance engagements on consolidated sustainability reporting under Italian law.

Our firm applies International Standard on Quality Management 1 (ISQM Italia 1), which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the evidence we have obtained is sufficient and appropriate to provide a basis for our conclusion.

Other matters

The consolidated sustainability report for the year ended 31 December 2024 contains, in the specific section *"Taxonomy pursuant to Article 8 of Regulation (EU) 2020/852"*, the comparative information referred to in article 8 of the Taxonomy Regulation in relation to the year ended 31 December 2023, which was not subjected to any assurance procedures.

Responsibilities of the directors and the board of statutory auditors of Banco BPM SpA for the consolidated sustainability report

The directors of Banco BPM SpA are responsible for developing and implementing the procedures adopted to identify the information included in the consolidated sustainability report in accordance with the provisions of the ESRS (hereinafter the "materiality assessment process") and for describing those procedures in the paragraph *"Process of identifying and assessing impacts, risks and opportunities"* of the consolidated sustainability report.

The directors are also responsible for preparing the consolidated sustainability report, which contains the information identified through the materiality assessment process, in accordance with the provisions of article 4 of the Decree, including:

- its compliance with the ESRS;
- its compliance with article 8 of the Taxonomy Regulation of the information set out in paragraph *"Taxonomy pursuant to Article 8 of Regulation (EU) 2020/852"*.

That responsibility involves designing, implementing and maintaining, in the terms prescribed by law, such internal control as they determine is necessary to enable the preparation of a consolidated sustainability report in accordance with article 4 of the Decree that is free from material misstatement, whether due to fraud or error. That responsibility also involves selecting and applying appropriate methods for processing the information, as well as developing hypotheses and estimates about specific items of sustainability information that are reasonable in the circumstances.

The board of statutory auditors is responsible for overseeing, in the terms prescribed by law, compliance with the Decree.

Inherent limitations in the preparation of the consolidated sustainability report

As reported in paragraph "*Disclosures in relation to specific circumstances*", section "*General information*", for the purpose of reporting forward-looking information in accordance with ESRS, the directors are required to prepare such information on the basis of assumptions, described in the consolidated sustainability report, about future events and possible future actions by the Group. Because of the uncertainty connected with any future event, in terms both of occurrence and of the extent and timing of occurrence, variances between actual results and forward-looking information may be significant.

As reported in paragraph "*Estimates regarding the value chain*", section "*General information*", the disclosure about Scope 3 emissions is subject to greater inherent limitations compared with Scope 1 and 2 emissions, because of the poor availability and relative accuracy of the information used to define both qualitative and quantitative information on Scope 3 emissions related to the value chain.

Auditor's responsibilities for the limited assurance conclusion on the consolidated sustainability report

Our objectives are to plan and perform procedures to obtain limited assurance about whether the consolidated sustainability report is free from material misstatement, whether due to fraud or error, and to issue a limited assurance report that contains our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the decisions of users taken on the basis of the consolidated sustainability report.

As part of our engagement designed to achieve limited assurance in accordance with the Standard on Sustainability Assurance Engagements - SSAE (Italia), we exercised professional judgement and maintained professional scepticism throughout the engagement.

Our responsibilities include:

- performing risk assessment procedures to identify the disclosures where a material misstatement, whether due to fraud or error, is likely to arise;

- designing and performing procedures to verify the disclosures where a material misstatement is likely to arise. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control;

- directing, supervising and performing a limited assurance engagement on the consolidated sustainability report and assuming full responsibility for the conclusion on the consolidated sustainability report.

Summary of the work performed

An engagement designed to obtain limited assurance involves performing procedures to obtain evidence as a basis for our conclusion.

The procedures performed were based on our professional judgement and included inquiries, primarily of personnel of Banco BPM SpA responsible for the preparation of the information presented in the consolidated sustainability report, analyses of documents, recalculations and other procedures designed to obtain evidence considered useful.

We performed the following main procedures:

- we understood the Group's business model and strategies, and the environment in which it operates with reference to sustainability issues;
- we understood the processes underlying the generation, collection and management of the qualitative and quantitative information included in the consolidated sustainability report;
- we understood the process implemented by the Group to identify and assess the material impacts, risks and opportunities, in accordance with the double materiality principle, related to sustainability issues and, based on the information thus obtained, we considered whether any contradictory items emerged that could point to the existence of sustainability issues not considered by the company in the materiality assessment process;
- we identified the disclosures where a material misstatement is likely to arise;
- we defined and performed procedures, based on our professional judgement, to address the risks of material misstatement identified;
- we understood the process implemented by the Group to identify the eligible exposures and to determine the proportion aligned in accordance with the provisions of the Taxonomy Regulation, and we verified the related disclosures in the consolidated sustainability report;
- we reconciled the information reported in the consolidated sustainability report with the information reported in the consolidated financial statements in accordance with the applicable financial reporting framework, or with the accounting information used for the preparation of the consolidated financial statements, or with management accounting information;
- we verified the structure and presentation of disclosures included in the consolidated sustainability report in accordance with the ESRS;
- we obtained management's representation letter.

Milan, 31 March 2025

PricewaterhouseCoopers SpA

Signed by

Sara Bettoni
(Partner)

This report has been translated from the Italian original solely for the convenience of international readers.