DISCLOSURE OF THE RELEVANT INDICATORS IN THE ASSESSMENT METHODOLOGY FOR IDENTIFYING SISTEMICALLY IMPORTANT BANKS AT A GLOBAL LEVEL AS AT 31 DECEMBER 2025 (ART. 441 OF REGULATION EU 575/2013)

The Basel Committee on Banking Supervision (BCBS) has developed an assessment methodology to identify Global Systemic Important Banks (G SIBs), based on the framework established by the Financial Stability Board (FSB). The BCBSs methodology is based on a multi-indicator measurement approach. The indicators are designed to reflect the different aspects of potential negative externalities of a bank's failure and its critical functions for the stability of the financial system.
The European Banking Authority (EBA) has requested all banks with a leverage ratio exposure exceeding 200 billion euro to publish on an annual basis the indicators used in the assessment methodology. Banco BPM is not considered a G-SIB, however, with an exposure for leverage ratio that exceeds the aforementioned limit, it is therefore required to disclose and publish these indicators.
The indicators provided below are calculated on the basis of specific instructions by the Basel Committee on Banking Supervision and may therefore not be directly comparable with other disclosures provided by Banco BPM Group.
For further information, please refer to: www.bis.org/bcbs/gsib.

Please note that the disclosed information could be subject to changes as is currently under review by the National Supervisor Authority and the Basel Committee on Banking Supervision.

General Bank Data

Section 1 - General Information	GSIB	**Response**
a. General information provided by the relevant supervisory authority:		
(1) Country code	1001	IT
(2) Bank name	1002	BANCO BPM SPA
(3) Reporting date (yyyy-mm-dd)	1003	2025-12-31
(4) Reporting currency	1004	EUR
(5) Euro conversion rate	1005	1
(6) Submission date (yyyy-mm-dd)	1006	2026-04-30
b. General Information provided by the reporting institution:		
(1) Reporting unit	1007	1,000
(2) Accounting standard	1008	IFRS
(3) Date of public disclosure (yyyy-mm-dd)	1009	2026-04- 30
(4) Language of public disclosure	1010	Italiano
(5) Web address of public disclosure	1011	https://gruppo.bancobpm.it/en/investor-relations/pillar-3/
(6) LEI code	2015	815600E4E6DCD2D25E30

Size Indicator

Section 2 - Total Exposures	GSIB	Amounts in thousand EUR
a. Derivatives		
(1) Counterparty exposure of derivatives contracts	1012	635,915
(2) Effective notional amount of written credit derivatives	1201	0
(3) Potential future exposure of derivative contracts	1018	1,217,657
b. Securities financing transactions (SFTs)		
(1) Adjusted gross value of SFTs	1013	1,601,684
(2) Counterparty exposure of SFTs	1014	17,158,858
c. Other assets	1015	173,669,690
d. Gross notional amount of off-balance sheet items		
(1) Items subject to a 10% credit conversion factor (CCF)	1019	42,304,781
(2) Items subject to a 20% CCF	1022	1,045,532
(3) Items subject to a 40% CCF	2300	9,520,988
(4) Items subject to a 50% CCF	1023	7,536,410
(5) Items subject to a 100% CCF	1024	1,526,835
e. Regulatory adjustments	1031	4,018,041
f. Total exposures prior to regulatory adjustments (sum of items 2.a.(1) through 2.c, 0.1 times 2.d.(1), 0.2 times 2.d.(2), 0.4 times 2.d.(3), 0.5 times 2.d.(4), and 2.d.(5))	1103	207,826,824
g. Exposures of insurance subsidiaries not included in 2.f net of intragroup:		
(1) On-balance sheet and off-balance sheet assets of insurance subsidiaries	1701	21,900,484
(2) Potential future exposure of derivatives contracts of insurance subsidiaries	1205	0
(3) Investment value in consolidated entities	1208	950,140
h. Intragroup exposures included in 2.f to insurance subsidiaries reported in 2.g	2101	3,170,033
i. Total exposures indicator, including insurance subsidiaries (sum of items 2.f, 2.g.(1) through 2.g.(2) minus 2.g.(3) through 2.h)	1117	225,607,135

Interconnectedness Indicators

Section 3 - Intra-Financial System Assets	GSIB	Amounts in thousand EUR
a. Funds deposited with or lent to other financial institutions	1216	17,745,519
(1) Certificates of deposit	2102	0
b. Unused portion of committed lines extended to other financial institutions	1217	10,949,594
c. Holdings of securities issued by other financial institutions		
(1) Secured debt securities	2103	0
(2) Senior unsecured debt securities	2104	9,376,056
(3) Subordinated debt securities	2105	54,330
(4) Commercial paper	2106	0
(5) Equity securities	2107	8,237,346
(6) Offsetting short positions in relation to the specific equity securities included in item 3.c.(5)	2108	0
d. Net positive current exposure of SFTs with other financial institutions	1219	1,391,075
e. OTC derivatives with other financial institutions that have a net positive fair value		
(1) Net positive fair value	2109	1,247,855
(2) Potential future exposure	2110	415,504
f. Intra-financial system assets indicator, including insurance subsidiaries (sum of items 3.a, 3.b through 3.c.(5), 3.d, 3.e.(1), and 3.e.(2), minus 3.c.(6))	1215	49,417,279

Section 4 - Intra-Financial System Liabilities	GSIB	Amounts in thousand EUR
a. Funds deposited by or borrowed from other financial institutions		
(1) Deposits due to depository institutions	2111	1,276,507
(2) Deposits due to non-depository financial institutions	2112	4,688,825
(3) Loans obtained from other financial institutions	2113	0
b. Unused portion of committed lines obtained from other financial institutions	1223	0
c. Net negative current exposure of SFTs with other financial institutions	1224	495,296
d. OTC derivatives with other financial institutions that have a net negative fair value		
(1) Net negative fair value	2114	195,123
(2) Potential future exposure	2115	144,884
e. Intra-financial system liabilities indicator, including insurance subsidiaries (sum of items 4.a.(1) through 4.d.(2))	1221	6,800,635

Section 5 - Securities Outstanding	GSIB	Amounts in thousand EUR
a. Secured debt securities	2116	10,871,042
b. Senior unsecured debt securities	2117	3,423,900
c. Subordinated debt securities	2118	6,208,192
d. Commercial paper	2119	0
e. Certificates of deposit	2120	4,808,243
f. Common equity	2121	7,032,490
g. Preferred shares and any other forms of subordinated funding not captured in item 5.c.	2122	1,787,145
h. Securities outstanding indicator, including the securities issued by insurance subsidiaries (sum of items 5.a through 5.g)	1226	34,131,012

Substitutability/Financial Institution Infrastructure Indicators

Section 6 - Payments made in the reporting year (excluding intragroup payments)	GSIB	Amounts in thousand EUR
a. Australian dollars (AUD)	1061	1,599,087
b. Canadian dollars (CAD)	1063	2,380,571
c. Swiss francs (CHF)	1064	24,112,446
d. Chinese yuan (CNY)	1065	1,372,929
e. Euros (EUR)	1066	7,549,004,761
f. British pounds (GBP)	1067	17,210,635
g. Hong Kong dollars (HKD)	1068	296,237
h. Indian rupee (INR)	1069	1,542
i. Japanese yen (JPY)	1070	4,440,500
j. Swedish krona (SEK)	1071	611,010
k. Singapore dollar (SGD)	2133	228,845
l. United States dollars (USD)	1072	213,392,420
m. Payments activity indicator (sum of items 6.a through 6.l)	1073	7,814,650,983

Section 7 - Assets Under Custody	GSIB	Amounts in thousand EUR
a. Assets under custody indicator	1074	120,820,413

Section 8 - Underwritten Transactions in Debt and Equity Markets	GSIB	Amounts in thousand EUR
a. Equity underwriting activity	1075	0
b. Debt underwriting activity	1076	1,517,422
c. Underwriting activity indicator (sum of items 8.a and 8.b)	1077	1,517,422

Section 9 - Trading Volume	GSIB	Amounts in thousand EUR
a. Trading volume of securities issued by other public sector entities, excluding intragroup transactions	2123	338,465
b. Trading volume of other fixed income securities, excluding intragroup transactions	2124	845,124,363
c. Trading volume fixed income sub-indicator (sum of items 9.a and 9.b)	2125	845,462,828
d. Trading volume of listed equities, excluding intragroup transactions	2126	16,787,133
e. Trading volume of all other securities, excluding intragroup transactions	2127	0
f. Trading volume equities and other securities sub-indicator (sum of items 9.d and 9.e)	2128	16,787,133

Complexity indicators

Section 10 - Notional Amount of Over-the-Counter (OTC) Derivatives	GSIB	Amounts in thousand EUR
a. OTC derivatives cleared through a central counterparty	2129	163,320,031
b. OTC derivatives settled bilaterally	1905	86,615,404
c. Notional amount of over-the-counter (OTC) derivatives indicator, including insurance subsidiaries (sum of items 10.a and 10.b)	1227	249,935,435

Section 11 - Trading and Available-for-Sale Securities	GSIB	Amounts in thousand EUR
a. Held-for-trading securities (HFT)	1081	3,555,912
b. Available-for-sale securities (AFS)	1082	16,029,052
c. Trading and AFS securities that meet the definition of Level 1 assets	1083	13,094,178
d. Trading and AFS securities that meet the definition of Level 2 assets, with haircuts	1084	990,252
e. Trading and AFS securities indicator (sum of items 11.a and 11.b, minus the sum of 11.c and 11.d)	1085	5,500,535

Section 12 - Level 3 Assets	GSIB	Amounts in thousand EUR
a. Level 3 assets indicator, including insurance subsidiaries	1229	2,682,152

Cross-Jurisdictional Activity Indicators

Section 13 - Cross-Jurisdictional Claims	GSIB	Amounts in thousand EUR
a. Total foreign claims on an ultimate risk basis	1087	35,074,734
b. Foreign derivative claims on an ultimate risk basis	1146	2,052,911
c. Cross-jurisdictional claims indicator (sum of items 13.a and 13.b)	2130	37,127,645

Section 14 - Cross-Jurisdictional Liabilities	GSIB	Amounts in thousand EUR
a. Foreign liabilities on an immediate risk basis, excluding derivatives and including local liabilities in local currency	2131	25,633,912
b. Foreign derivative liabilities on an immediate risk basis	1149	996,196
c. Cross-jurisdictional liabilities indicator (sum of items 14.a and 14.b)	1148	26,630,108

Summary

Section 23 - Indicator Values (Revised methodology)	GSIB	**Amounts in thousand EUR**
a. Section 2 - Total exposures indicator, including insurance subsidiaries	2001	225,607,135
b. Section 3 - Intra-financial system assets indicator, including insurance subsidiaries	2002	49,417,279
c. Section 4 - Intra-financial system liabilities indicator, including insurance subsidiaries	2003	6,800,635
d. Section 5 - Securities outstanding indicator, including insurance subsidiaries	2004	34,131,012
e. Section 6 - Payments activity indicator	2005	7,814,650,983
f. Section 7 - Assets under custody indicator	2006	120,820,413
g. Section 8 - Underwriting activity indicator	2007	1,517,422
h. Section 9.c - Trading Volume fixed income sub-indicator	2008	845,462,828
i. Section 9.f - Trading Volume equities and other securities sub-indicator	2009	16,787,133
j. Section 10 - OTC derivatives indicator, including insurance subsidiaries	2010	249,935,435
k. Section 11 - Trading and AFS securities indicator	2011	5,500,535
l. Section 12 - Level 3 assets indicator, including insurance subsidiaries	2012	2,682,152
m. Section 13 - Cross-jurisdictional claims indicator	2013	37,127,645
n. Section 14 - Cross-jurisdictional liabilities indicator	2014	26,630,108

DECLARATION OF THE MANAGER RESPONSIBLE FOR PREPARING THE COMPANY'S FINANCIAL REPORTS

The undersigned Gianpietro Val, as Manager responsible for preparing the Company's financial reports of Banco BPM S.p.A., hereby certify, in consideration of the provision of Article 154-bis paragraph 2 of Italian Legislative Decree no. 58 of 24 February 1998, that the accounting information contained in this document is consistent with the records contained in the corporate documents, books and accounting records.

Milan, 30 April 2026

Signed by

Gianpietro Val

Manager responsible for preparing
the Company's financial reports