SUSTAINABILITY RESULTS

In continuity with its history and tradition, Banco BPM pursues sustainable business development, fully expressing its vocation to support the community and the central role of people, embracing the interests and values of all stakeholders - customers, in particular families and small and medium-sized companies, suppliers, shareholders, employees and non-employed staff and the entire local community - in full compliance with the growth path outlined in the Strategic Plan, in which Environmental, Social and Governance (ESG) factors constitute a cornerstone across the board with respect to other main objectives and integrate the traditional equity, financial and income components of corporate sustainability.

Governance of sustainability issues

Corporate bodies

Banco BPM Group is divided into several Companies, including Banco BPM acting as Parent Company and therefore exercising management, coordination and control activities over all the other Group Companies. Banco BPM adopts the "traditional" management and control model: the strategic supervision function, also from the perspective of sustainable success, and the management function are attributed to the Board of Directors, while the control function is assigned to the Board of Statutory Auditors. Both bodies are appointed by the Shareholders' Meeting. In order to ensure that sustainability issues are monitored, 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. With reference to ESG issues, the Sustainability Board Committee supports the Board of Directors in defining and approving the Group's strategic guidelines, also monitoring the Group's activities in this area in accordance with the strategic guidelines. To monitor sustainability issues, a specific managerial committee has also been established, called the "ESG Committee" — chaired by the CEO — which has proposal-making tasks in order to define the Group's social responsibility model and to supervise the implementation of the company strategies and initiatives regarding Environmental, Social and Governance matters.

Operational coordination

To further strengthen the implementation of the sustainability strategy, in 2024 the "Transition and Sustainability" function was established to report directly to the Co-General Manager - Chief Financial Officer, responsible for integrating sustainability issues into strategies, governance processes and into the operational areas of the financial conglomerate, also through continuous collaboration and coordination with the company functions and the companies that oversee the businesses in which the Group operates, each for its own scope of responsibility. The development of a methodological framework that identifies the best metrics and indicators (Key Sustainability Indicators) used to summarise the Group's sustainability profile and to allow monitoring and reporting activities, is under the responsibility of Transition and Sustainability. In addition, this function supports the development of products and services to fulfil the Group's ESG ambitions, also thanks to its contribution to providing intense internal and external training activities and in developing company regulations that facilitate the orderly and consistent execution of the relative business processes. Lastly, Transition and Sustainability contributes to dialogue on ESG issues with all stakeholders, also with a view to obtaining ESG ratings that accurately reflect the current and prospective sustainability profile of Banco BPM.

Main processes to analyse ESG drivers

The Banco BPM framework for the assessment of drivers linked to ESG issues, in particular climate and environmental issues, consists of three closely interconnected elements: (i) Business Environment Scan (BES), which analyses the current and future operating context in the short-, medium- and long-term, the results of which provide input for (ii) the Materiality Assessment (MA), through which the impact of ESG factors - deriving from the transmission channels identified in the portfolios of loans, securities and real estate used as collateral and in customer deposits - on the Group's operations (in particular, on traditional risks - credit, market, operational, liquidity, etc. - and on performance) is assessed and (iii) transition plans (TP) towards a more resilient, inclusive and sustainable economic system, also required by the EBA guidelines on ESG risks. In addition, the components of the ESG framework are also consistent with other company processes that consider ESG drivers, including, for example, credit policies, the Risk Appetite Framework (RAF) and Remuneration Policies.

This framework also includes the double materiality assessment (DMA), required by the CSRD for disclosure purposes through Sustainability Statement (SS), which in 2025 was evolved in line with the evidence and methodologies of the aforementioned processes, where possible applying the same data and analytical approaches used to assess materiality. The double materiality assessment is the strategic process that identifies and assesses the sustainability issues relevant to disclosure, considering material impacts, risks and opportunities for people and the environment along the entire upstream and downstream value chain, to support the communities and territories served, also through the involvement of important stakeholders. In particular, in 2025 the double materiality assessment of the financial conglomerate also benefited from the integration of the results of the same assessment applied to the Anima group, carried out by adopting a consistent approach, and involved the extension and completion of the asset management services and products offered to customers.

Incentive systems

The incentive systems of Banco BPM Group are structured to support the pursuit of strategic objectives and to foster the creation of value in the medium/long-term, promoting behaviour that facilitates the containment of the risks assumed (including legal and reputational risks) and customer protection and loyalty, with attention to the management of conflicts of interest. Personnel performance is assessed, guaranteeing gender neutrality, on the basis of indicators (KPIs) that integrate economic-financial, capital and risk objectives with environmental, social and governance (ESG) factors, in order to encourage balanced management, oriented towards sustainable development. By way of example, with regard to the position of Chief Executive Officer, 20% of short-term variable remuneration (Short-Term Incentive Plan) relates to the area of sustainability, while 15% of the long-term variable component (Long-Term Incentive Plan), relates to the Strategic Plan objectives referring to the People Strategy and Green, Social & Sustainable bond issues.

Results and ambitions

Main results for 2025 and strategic objectives[1]

Area	Key Sustainability Indicator	Unit	Final balance 2024	Final balance 2025	Reference period	Target
Environment	New medium/long-term Low-Carbon loans	€ million	5,712	7,594	2027	7,000
	Direct energy consumption	Thousands of Gigajoules	486	466	2027	<472
	Scope 1&2 Market-based emissions	Tonnes of CO2 equivalent	10,994	10,670	2027	10,900
	Direct exposure in the Carbon sector	€ million	0.8	0	2027	0
Social	New disbursements to the Third Sector	€ million	257 (202 MLT)	313 (236 MLT)	2027	255[2]
	Gender equality in managerial roles	%	30.7%	33.0%	2027	36%
	Contributions for social and environmental projects	€ million	6.3	6.7[3]	Average 2025-27	>5.0
	ESG Factory training for Companies	Hours	1,804	1,048	Cumulative 2025-27	>3,000
	Internal training on ESG issues	Thousands of hours	178	233	2027	200
	Hires to ensure generational turnover	Unit	n.c.	480	Cumulative 2025-26	800
ESG Finance	ESG Bond issues	€ million	1,500	1,750	Cumulative 2025-27	5,000
	ESG Bond investments – % Share of Corporate Banking Book	%	35.0%	40.0%	2027	40%
	ESG Bond issues as Joint Bookrunner or Joint Lead Manager	€ million	9,396	9,675	Cumulative 2025-27	19,500

Main findings of the processes to analyse ESG drivers

The Business Environment Scan processes, the Materiality Assessment of ESG drivers and the double materiality assessment apply a scoring methodology, conditioned by the most recent climate scenarios available and transversal to the transmission channels with respect to traditional risks. The materiality of the climate and environmental drivers

[1] They do not include the Anima Group.
[2] Overall target on all loans to the Third Sector.
[3] Environmental projects, towards the community, account for 6%.

is assessed taking account of operations in the management segments (Corporate, SME and Individuals portfolios), in the sectors of economic activity (NACE/ATECO codes) and in the territories where its customers operate, considering the location both of production assets and of real estate used as collateral and owned. The output of these activities feeds the Key Performance Indicator (KPI) and Key Risk Indicator (KRI) estimation models, through which the Group determines the potential impacts of the manifestation of material ESG risk factors on the business model (products sold and services offered), performance (profitability and financial) and exposure to risks (including business, credit and counterparty, banking and trading book market, operational and legal, liquidity, funding and reputational). The assessment made it possible to launch a monitoring process that is able to identify the most effective actions to intervene if a material deviation from the path outlined to achieve the targets is detected, promptly mitigating potential negative impacts on risk exposure and seizing any business opportunities.
In 2025, the results of the application of the ESG framework showed a material but limited exposure of Banco BPM to climate drivers, while the other environmental drivers were not material. In particular, the weighted average assessment of overall exposure to ESG drivers stood at an "average" level for all climate factors. The Group, therefore, integrated the assessments regarding in particular transition and physical climate risk, but in general all ESG drivers, including a series of detailed analyses, providing a complete methodological overview and an analytical representation for each individual risk driver, in order to be able to examine all the characterising elements considered most significant. These detailed analyses showed some clusters of operations characterised by greater relevance ("high" and "very high" score) in terms of exposure to ESG drivers by type of counterparty, sector of economic activity and geographical area. The main clusters in focus were, with respect to climate mitigation drivers, the highest emitting sectors in the Net-Zero area (see below) and the energy-intensive sectors (metallurgy) with Corporate customers and residential mortgage exposures with poor energy performance, while with respect to the territorial distribution of Banco BPM were SMEs and individuals located in the regions of Emilia-Romagna, Tuscany and Liguria for acute physical hazards and Veneto and Liguria for chronic physical hazards.

Product and service offering

The assessment of the traditional financial, equity and economic components at the time of disbursement and throughout the life of loans and products offered by the Group is integrated with the assessment of the complementary environmental, social and governance components in order to determine the overall corporate sustainability of customers. The ambition to support the transition of customers towards a more resilient and sustainable economy is achieved, from a loan brokering perspective, both by offering products aimed at financing specific "green" projects, and by encouraging companies to implement virtuous behaviour thanks to the liquidity made available through the most flexible "Sustainability-Linked Loans", which envisage better economic conditions subject to the achievement of certain sustainable objectives. The commitment in this direction is demonstrated by the above-mentioned new medium/long-term Low-Carbon loans which, in 2025, reached 7.6 billion, almost 2 billion more than the previous year.

The offer is complemented by dedicated bancassurance solutions, such as CAT/NAT policies, which ensure protection against catastrophic events, responding to the growing needs of asset security and protection. A concrete example of an innovative environmental sustainability practice is a commercial proposal dedicated to SMEs that need liquidity to carry out work to prevent or mitigate the potential damage from adverse climate events to which they are exposed. If, on the basis of specific requirements in this area, the business owner also requests to be covered by the Group's catastrophe policy, the premium is reduced thanks to the lower forward-looking exposure to risk. In addition, the bancassurance products offered are accompanied by innovative investment products, designed to integrate the traditional financial component with ESG sustainability factors - i.e. environmental, social and governance criteria - thus encouraging responsible and informed choices by customers.

The Group's sustainability strategy also encompasses numerous inclusion initiatives linked to its strong local roots, some examples of which are provided below:

- Loans to the third sector, for which Banco BPM is one of the market leaders, in support of local communities;
- Subsidised finance measures assisted by the Guarantee Fund for SMEs;
- Financial solutions for young people and students;
- Support measures for customers affected by extraordinary natural disasters;
- Measures to support women who are victims of violence or in temporary economic difficulty;
- Financial support, in collaboration with various foundations and associations, to prevent cases of usury against families in a situation of serious debt.

Net-Zero path and other environmental issues

In line with its objective of aligning the loan and investment portfolio (banking book) with the achievement of the net zero emissions target by 2050, in line with the science-based paths aligned with the EU Green Deal, in May 2025, Banco BPM published the Net-Zero Transition Plans, which outline the short-term actions already in place, and any medium-long-term actions to be activated to achieve the 2030 targets, which Banco BPM set and published in August 2024 for the five highest emitting sectors (Automotive, Cement, Coal, Oil & Gas and Power Generation) present in the aforementioned portfolios. Considering that Scope 3 emissions - calculated by adopting a methodology compliant with the Global GHG Accounting and Reporting Standard, developed by the Partnership for Carbon Accounting Financials (PCAF) - are relevant only for Automotive and Oil & Gas counterparties, the five previously mentioned sectors are representative of approximately 70% of the total emissions financed by the Group relevant to Net-Zero.
In accordance with the product and service offering, Banco BPM's Net-Zero strategy, expressed in the main business processes, is based on the development of a commercial offer and investment decisions that are able to fully meet the needs of customers who have to decarbonise production processes and make consumption more energy efficient. The progress made by customers in these areas is assessed through the application of so-called "physical WACI" metrics (Weighted-Average Carbon Intensity), which represent the average, weighted by use, of the ratio of total greenhouse gas emissions (GHG) of each financed counterparty and the quantity of output that generated these emissions, summarised through the use of a typical metric of the business sector to which they belong.

The following table shows the 2030 targets of each of the 4 highest emitting sectors identified by the Bank, expressed in terms of the percentage reduction, compared to the end of 2022, of the weighted average emission intensity of its loan and securities portfolios in the banking book.

Sector	Reference metric	2022 (base year)	TARGET Δ % 2030 vs 2022	Monitoring as at 31/12/2025	Δ % 2025 vs 2022
Automotive (Scope 1, 2 & 3)	Tonnes of CO_2e per billion passenger-kilometres travelled by vehicles sold	0.45	-48%	0.42	-7%
Cement (Scope 1 & 2)	Tonnes of CO_2e per tonne of cement product	0.50	-23%	0.36	-27%
Oil & Gas (Scope 1, 2 & 3)	Grams of CO_2e per Megajoule of oil/natural gas product produced or distributed	60.7	-14%	58.8	-3%
Power Generation (Scope 1 & 2)	Tonnes of CO_2e per megawatt-hour of energy produced	0.17	-56%	0.08	-55%

As regards the carbon-based sectors, Banco BPM opted for the application of a run-off strategy by 2026, which was already completed as at 31 December 2025, thus reaching the Strategic Plan target one year in advance. In addition, with regard to Banco BPM Group's own emissions, energy efficiency and consumption containment activities continue, which have also been gradually extended to the Anima group.

With respect to the most relevant climate and environmental issues, it should be noted that Delegated Regulation (EU) 2026/73 simplifies the European Taxonomy and taxonomy reporting. The approved reform intervenes on the technical structure of the reporting templates, significantly reducing their complexity, for example by eliminating the numerous annexes relating to Gas and Nuclear Power, of little significance for the Banco BPM financial conglomerate, summarised in some specific lines of the new proposed templates. In particular, as regards the Green Asset Ratio, the new template provides for the exclusion from the denominator of components that cannot be aligned with the taxonomy, in particular for Banco BPM, exposures to SMEs not subject to reporting obligations and that do not produce voluntary reporting. For these reasons, Banco BPM opted to apply the aforementioned Regulation already in the 2025 Sustainability Statement, obtaining the following most relevant KSIs:

Taxonomy KPI	Turnover		CapEx	
	2024 (pro-forma)	2025	2024 (pro-forma)	2025
Green Asset Ratio	7.8%	9.2%	8.7%	10.5%
Insurance investment KPI	0.8%	1.9%	1.5%	3.3%
Green Investment Ratio	n.a.	5.9%	n.a.	10.5%

ESG Training

Banco BPM confirms its firm commitment to promoting training on ESG issues, aware of the strategic importance that they have for sustainable development and for the creation of long-term value. Through refresher programmes and dedicated courses, the Bank constantly invests in enhancing the skills of employees, so that they can fully understand the challenges and opportunities related to sustainability. This approach aims to integrate ESG principles into the corporate culture, making them an integral part of daily decision-making processes.
At the same time, Banco BPM is actively committed to spreading ESG awareness also to external stakeholders, including customers, suppliers and local communities. Through the "ESG Factory" initiative, seminars, workshops and information initiatives are organised to raise awareness and involve all players in the supply chain. This synergy between internal and external training contributes to strengthening the Group's reputation as a benchmark in the sphere of sustainability.
In 2025, Banco BPM's commitment was demonstrated by the provision of 1,048 hours dedicated to training for companies through the "ESG Factory", 233 thousand hours of internal training on ESG issues, both surpassing the annual objective of the Strategic Plan, and 8,251 hours of training for the community to raise ESG awareness and for financial education, achieving over double the Plan's objective.

ESG Bond issues

Banco BPM consistently works to secure funds on financial markets to channel towards specific sustainable activities through the placement of Green, Social and Sustainability bond issues. These issues are made by applying the Group's Green, Social and Sustainability Bonds Framework, aligned with the ICMA Principles, published in 2021 and updated in 2023, to include new asset categories and European Taxonomy-alignment. In 2025, Banco BPM also published its European Green Bond Factsheet, becoming one of the first European financial issuers and the first in Italy to adopt a document fully aligned with Regulation (EU) 2023/2361.
With regard to Green Bonds, the proceeds are allocated to initiatives that include sustainable construction, renewable energy, energy efficiency, clean mobility, water infrastructure, sustainable agriculture, manufacture of organic basic chemicals, prevention and control of pollution and SACE Green Guarantee financing. Social Bonds , on the other hand, focus on supporting SMEs operating in disadvantaged areas, public entities and the Third Sector, as well as healthcare infrastructure; Sustainability-Linked Loans disbursed to SMEs to promote sustainable transition and CONSAP mortgages for fragile categories are also included. In order to ensure full alignment with the Group's ESG strategy, activities related to fossil fuels, nuclear energy, controversial weapons, tobacco and gambling are excluded from the framework.
The Group publishes a detailed annual report on the allocation of income and impacts. From 2021 to the end of 2025, under the Framework, 12 bonds for a total value of 7.5 billion were issued, divided between Green Bonds (4.5 billion) and Social Bonds (3 billion). In particular, in October 2025, the first European Green Bond was issued for a nominal amount of 500 million, aimed at refinancing mortgages for the purchase of buildings with characteristics aligned with the European Taxonomy.

Employees

The management and development of employees is a core strategic objective of the Group, which has promoted a comprehensive set of initiatives dedicated to training, skill enhancement, diversity and inclusion and organisational well-being, while maintaining rigorous control as regards health and safety, in compliance with the UNI ISO 45001 standard. The process of promoting women in managerial roles also continues, with their presence rising to 33% at the end of 2025, alongside the generational turnover plan, which in 2025 saw the hiring of 480 new resources out of a total target of 800 by 2026.
During the year, over 147 thousand training days (including the aforementioned ESG training) were provided, exceeding the set objectives. The courses covered both specialist areas - such as health and safety, anti-corruption, privacy, cybersecurity and anti-money laundering - and cross-functional and managerial skills, increasingly important

in a banking context characterised by digital transformation and organisational change. These initiatives were accompanied by innovative programmes dedicated to stress management, the prevention of aggression and work-life balance.
The new agreement on remote working has further strengthened the work-life balance, allowing head office personnel to work 38% of their hours remotely. At the same time, the Group confirmed a structured welfare system, which includes supplementary health care, insurance coverage, parenting support services, supplementary pension and care for fragile family members, as well as initiatives for psychological well-being. Particular attention was paid to diversity and inclusion through campaigns to raise awareness, the strengthening of protected whistle-blowing channels and initiatives aimed at preventing discrimination and harassment.

Customers and Communities

Banco BPM continued to strengthen stakeholder engagement, by combining listening, digital innovation, protection and inclusiveness. Dialogue with customers was supported by a structured model for collecting and managing feedback, which involved around 185 thousand customers in 2025, allowing targeted interventions on the customer experience and the transparent and effective management of complaints.
Significant improvements were also introduced to increase the clarity and accessibility of documentation and processes, also for people with disabilities, thanks to the establishment of the "ESG Accessibility and Inclusiveness" working group and the development of the DOT Programme, which has promoted the digitalisation and simplification of the customer experience. The privacy and IT security management system continued to guarantee high data protection standards, with a model consistent with the main European regulations (PSD2, GDPR, EBA Guidelines, DORA, etc.), focusing on prevention, continuous monitoring and integrated incident response. Training courses for personnel and information campaigns for customers were also carried out. No serious cybersecurity incidents were recorded in 2025, confirming the effectiveness of the technological and training controls adopted.
With regard to Artificial Intelligence, Banco BPM has introduced Guidelines that outline a framework compliant with the new AI Act, structuring governance and risk assessment. The Bank has also equipped itself with machine learning models for credit, marketing and risk management. At the same time, the Group has launched a structured process for the adoption of Generative Artificial Intelligence, thanks to the activation of projects oriented towards the development of solutions to support internal activities. This initiative meets the objective of consolidating the skills necessary to effectively manage this new and complex technology within the organisation, as well as reaping the first benefits in terms of operational efficiency and process optimisation.
Lastly, the Group has strengthened its role as a social player in the local area, supporting communities, families and non-profit organisations through partnerships, dedicated financial products and sponsorships and donations. In 2025, 313 million in new loans were disbursed to the Third Sector (of which 236 were medium/long-term) and 166 social initiatives were supported, for a total of 6.7 million sponsorships and donations, with particular attention to inclusion, combating gender-based violence, fighting poverty and educational programmes. In addition to financial support, Banco BPM promoted the direct involvement of people through corporate volunteering, with 18 days of volunteering for a total of 1,663 hours dedicated to environmental and social activities, further strengthening the bond with local communities.

Sustainability management performance indicators

Below are the definitions of the sustainability performance indicators used in this section, with separate evidence of those based on financial metrics, which can be classified as alternative performance measures according to ESMA guidelines.

Sustainability performance indicator based on financial metrics

- **New medium/long-term Low-Carbon loans**: new medium/long-term loans disbursed by the Group during the year, aimed at supporting the environmental transition towards an economy with zero net carbon dioxide emissions and/or to counterparties operating in sectors with low transition risk;
- **New disbursements to the Third Sector**: amount of "social" loans disbursed to counterparties operating in non-profit businesses identified on the basis of the relevant business segmentation;
- **ESG Bond issues**: amount of issues by the Bank of Green and Social funding instruments finalised during the year and placed within the Green, Social & Sustainability Bonds Framework defined by the Group. This aggregate also includes placements of European Green Bonds (EUGB) issued in accordance with the

European Green Bond Standards, the proceeds of which are used for the financing or refinancing of eligible green loans aligned with the EU Taxonomy, as defined in the specific Factsheet published by the Group;

- **ESG Bond investments - % Share of Corporate Banking Book**: indicator that monitors the percentage of ESG bonds calculated on the nominal management aggregate of the banking book portfolio of non-governmental Corporate securities managed by the Parent Company's Finance function. Therefore, supranational securities, securities in the commercial portfolio and GACS senior notes do not fall within this scope;
- **ESG Bond issues as Joint Bookrunner or Joint Lead Manager**: amount of issues of ESG funding instruments placed by third-party companies and/or Banco BPM, in which Banca Akros S.p.A. acted as Joint Bookrunner/Lead Manager;
- **Contributions for social and environmental projects**: amount of disbursements in the form of sponsorships or donations to local communities, voluntary associations and non-profit organisations.

Other sustainability performance indicators

- **Scope 1&2 Market-based emissions:** representation in terms of CO_2 equivalent emissions of all forms of energy consumption and climate-altering gases at Group level (excluding electricity from renewable sources, self-consumption from photovoltaic panels and HFC gas leakages, not under the direct control of the organisation);
- **Hires to ensure generational turnover:** number of hires progressively from 2025 to the end of 2026, which contribute to generational turnover (new hires on permanent contracts or apprenticeships with a level other than Executive and the stabilisation of resources with a fixed-term contract and a grade other than Executive, through permanent contracts or apprenticeships);
- **Gender equality in managerial roles:** number of women with codified responsibilities out of the total number of managers;
- **ESG Factory training for Companies:** training hours dedicated to companies to accompany their sustainable transition;
- **Internal training on ESG issues:** hours of training on ESG issues delivered to Group employees.

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For all details and specifications regarding the sustainability results described in this summary section, please refer to the overall Sustainability Statement.