



ESG Policy

Modena, 15/01/2026

CONTENTS

1 GENERAL ASPECTS 3

2 DEFINITIONS.....6

3 CONTENT OF REGULATORY SOURCES..... 8

3.1 MACROECONOMIC CONTEXT.....8

3.2 BPER GUIDING PRINCIPLES.....13

3.3 SUSTAINABILITY DISCLOSURES.....15

3.4 GOVERNANCE MODEL.....15

4 ROLES AND RESPONSIBILITIES.....16

5 ANNEXES.....26

5.1 VERSION HISTORY..... 26

5.2 REGULATORY FRAMEWORK.....27

1 General aspects

Summary of main topics/amendments made

This “ESG Policy” identifies the sustainability (hereinafter also referred to as ESG) commitments of the BPER Banca Group (hereinafter BPER”, ‘BPER Banca’, the ‘Bank’ or “the Group”).

Integration of the principles of sustainability into the value chain primarily takes on the meaning of constant commitment aimed at reconciling economic goals with social and environmental goals, generating value for the company, the stakeholders and the territories while simultaneously placing value on the positive environmental and social impacts and reducing the negative impacts to a minimum.

The BPER Group has therefore decided to structure its own route to sustainability through the adoption of an integrated strategy, capable of combining business growth and financial strength with social and environmental sustainability, thereby creating long-term shared value.

To achieve this objective, the Bank has embraced the global goals identified by international institutions to preserve the planet and the interests of future generations.

Therefore, the aim of this Policy is to foster the ESG culture across the BPER Group and steer the governance, processes, corporate functions and interactions through which sustainable success can be pursued, with particular reference to environmental, social and governance issues, in compliance with the Principles of the Corporate Governance Code and the principles established by the relevant international bodies, as well as the guidance provided by regulators such as the European Central Bank (ECB) and the European Banking Authority (EBA).

The updates to this Policy mainly concern:

- introducing the measures that BPER has adopted to draft its own Transition Plan for the management of ESG factors, in line with EBA's final Environmental, Social and Governance (ESG) Risk Management Guidelines (EBA/GL/2025/01, hereinafter also "EBA Guidelines on the management of ESG risks" or "EBA ESG Guidelines");
- updating the roles and responsibilities of the various functions involved, in line with changes in the company's organisational structure, as well as changes in the external regulatory framework and the introduction of new responsibilities as a result.

Preparer:

ESG Strategy Unit

Approver:

Board of Directors

Recipients of the document:

Banks		Companies					
Italian		Ancillary undertakings		Financial corporations		Other subsidiaries*	
x	BPER	x	Modena Terminal	- Credit		x	Adras
x	Bibanca	x	BPER Real Estate	x	BPER Factor	x	Arca Holding
x	Banco di Sardegna		BPER Trust Company	x	Sardaleasing		Commerciale Piccapietra
x	Banca Cesare Ponti	x	Sinergia Seconda	x	Finitalia		St. Anna Golf
x	Banca Popolare di Sondrio	x	PrestiNuova	x	Factorit		St. Anna Gestione Golf
x	Banca della Nuova Terra			- Non-Credit		X	Annia
- Abroad					Estense Covered Bond		Centro delle Alpi SME
x	Bper Bank Luxembourg				Estense CPT Covered Bond	X	Centro delle Alpi RE
x	Banca Popolare di Sondrio (SUISSE)			x	Arca Fondi SGR	X	Rajna Immobiliare
					Carige Covered Bond	X	Pirovano Stelvio
					Lanterna Finance	X	Servizi Internazionali e strutture integrate 2000
					Lanterna Mortgage	X	Immobiliare Borgo Palazzo
					PopSo Covered Bond	X	Immobiliare San Paolo
						X	Rent2Go

*falling within the scope of consolidation but not part of the Banking Group

Process Tree:

Process Tree	Description
Area	Management processes
Macroprocess	ESG Strategy

2 Definitions

2030 Agenda for Sustainable Development: a plan of action for people, the planet and prosperity signed by the governments of 193 UN member countries in September 2015. It incorporates the 17 Sustainable Development Goals, SDGs. The Sustainable Development Goals were officially launched at the beginning of 2016, as a tool to guide the world along the path it is expected to follow in the next 15 years: member countries undertook to achieve the goals by 2030.

Communication on Progress: a tool through which companies that have joined the Global Compact inform their stakeholders about the activities they have implemented and results they have achieved; companies that join the United Nations Global Compact undertake to integrate the Ten Principles relating to human and labour rights, the protection of the environment and tackling corruption promoted by the initiative into their strategic vision and the organisational culture and day-to-day operations of the company, and more generally, to support the broader goals of development established by the United Nations.

ESG Managerial Committee: A Management Committee facilitating the coordination of corporate and Group Functions with regard to sustainability issues and related risks and supporting the CEO in the management of ESG and sustainability issues at both Parent Company and Group level.

Internal Board Sustainability Committee: Committee performing support functions for the activities of the Board of Directors in the area of ESG and sustainability, with an impact on all the processes, branches and safeguards through which the Bank guarantees the pursuit of sustainable development, with particular reference to environmental, social and governance issues, in compliance with Article 1, Principle I, of Borsa Italiana's Corporate Governance Code and the principles drawn up by the relevant international bodies.

Energy Manager: For the purposes of this document, the Energy Manager is the resource working at Parent Company and Group companies level as an entry point for activities relating to energy sources, energy saving and the reduction of climate-changing emissions.

Environmental, Social, Governance factors (hereinafter ESG): refer to all activities linked to responsible investment (RI) that pursue the typical goals of financial management, while taking account of environmental issues, including climate change, social and governance aspects.

ESG Manager: for the purposes of this document, the ESG Manager is the resource working at Parent Company and Group Companies level with the task of providing support to the Parent Company's ESG Strategy Unit and acting as an entry point for ESG issues within his/her company/organisational unit of operation.

Physical climate risk factors: risk of losses arising from the adverse financial effects of climate events that may cause material and/or economic damage to counterparties, such as a decline in productivity or disruption of production chains, with a consequent negative impact on assets or ongoing transactions with financial institutions. Physical risk is classified as "acute" if caused by extreme events such as drought, landslides, floods, and storms, and "chronic" if caused by gradual changes such as rising temperatures or sea levels.

Climate transition risk factors: risk of losses arising from adverse financial effects due to the present or future impact of the transition to an environmentally sustainable economy on counterparties or invested assets. In particular, reference is made to the risk of financial losses generated or potentially generated by the process of adjustment towards a low-carbon and more environmentally sustainable economy; this could be caused, for example, by the sudden adoption of climate and environmental policies, technological progress, or changing market confidence and preferences, and may result in lower business profitability and asset impairment.

Non-climate-related environmental risk factors (NRR – Nature Related Risk): risk of financial losses or deterioration of the entity's risk profile arising from environmental factors other than those related to climate change, including (air, water, soil) pollution, loss of biodiversity, ecosystem degradation, unsustainable exploitation of natural resources, waste and hazardous substance management, as well as environmental events not directly related to climate phenomena.

Social risk factors: risk of financial losses or deterioration of an institution's risk profile arising from social factors. These factors include events or behaviours related to the management of relationships with employees, suppliers, customers, and local communities that negatively impact human rights, working conditions, diversity and inclusion, and, in general, stakeholder relations and the social impact of economic activities.

Governance risk factors: risk of financial losses or deterioration of an institution's risk profile resulting from deficiencies in governance systems, decision-making processes, and internal controls. Such deficiencies may relate to transparency, the composition and functioning of administrative bodies, management of conflicts of

interest, prevention of potential fraud and corruption, and violations of applicable regulations.

The United Nations Global Compact: the largest strategic corporate citizenship initiative in the world. It was founded with the aim of promoting a sustainable global economy, i.e. respectful of human and labour rights, environmental protection and the fight against corruption. It is a voluntary initiative calling on companies to commit to a set of principles that promote long-term sustainability values through political action, company practices, social and civil behaviours that are responsible and take account of future generations; it is also a commitment, signed with the United Nations by the top managers of the participating companies, to contribute to a new phase of globalisation characterised by sustainability, international cooperation and partnership from a multi-stakeholder perspective.

Greenwashing: refers to the practice whereby claims, statements, actions, or communications relating to sustainability do not clearly and fairly reflect the underlying sustainability profile of an entity, product, or financial service. This practice can be misleading for consumers, investors, or other market players. Misleading sustainability claims can occur and spread intentionally or unintentionally, so intent, negligence, or a lack of robustness and adequacy of due diligence efforts could, where applicable, constitute aggravating factors in the context of supervisory and enforcement actions.

Mobility Manager: for the purposes of this document, the Mobility Manager is the resource within the ESG Strategy Unit at Parent Company and Group companies, who acts as the entry point for activities aimed at reducing the environmental impacts of business-related and home-work mobility of employees.

NZBA (Net-Zero Banking Alliance): the initiative promoted by the United Nations to accelerate the sustainable transition of the banking sector through the commitment of member banks to align their loan and investment portfolios, with the achievement of the net-zero emissions target by 2050. Although the Alliance's mandate ended in October 2025, its principles and guidelines continue to set the benchmark for best practice in the sector.

Transition Plan: refers to the Plan pursuant to article 76, paragraph 2, of Directive 2013/36/EU, drawn up in accordance with the new EBA Guidelines on the management of environmental, social, and governance (ESG) risks (EBA/GL/2025/01). The objective of the Transition Plan is to provide an overview of the strategic measures and risk management tools defined by the BPER Group to demonstrate how they ensure their resilience to ESG risks and their preparedness for the transition to a more sustainable and climate- and environmentally-resilient economy.

PRB (Principles for Responsible Banking): programme developed through a partnership between banks from all over the world and the United Nations to foster the development of a banking sector that is sustainable and aligned with the goals of the United Nations 2030 Agenda and the Paris Agreement on climate change.

ESG Contact: for the purposes of this document, this refers to the resource within the Group companies identified annually by the competent Parent Company structure, i.e. the ESG Strategy Unit, based on the list of companies included in the sustainability reporting scope. The ESG Contact supports the Parent Company and coordinates the collection of information and data useful for drafting the Sustainability Statement, verifying its completeness.

Consolidated Sustainability Statement: it is included in Part 2 of the Directors' Report on Group Operations pursuant to art. 4 of Italian Legislative Decree 125/2024, which implements the Corporate Sustainability Reporting Directive and is prepared in accordance with the European Sustainability Reporting Standards (ESRS) that came into effect on 1 January 2024; the Consolidated Sustainability Statement is prepared in accordance with the "Group Regulation governing the Process for the Preparation of the Consolidated Sustainability Statement".

Sustainable Development Goals (SDGs): global initiative of the UNDP (United Nations Development Programme) aimed at eradicating poverty, protecting ecosystem balance, creating inclusive societies and promoting peace. It comprises 17 goals and 169 specific targets.

TCFD (Task Force on Climate-related Financial Disclosures): is understood as the 11 recommendations published by the Financial Stability Board (FSB) to help the private sector disclose consistent information to their investors, lenders and insurers about the risks and opportunities presented by climate change.

TNFD (Task Force on Nature-related Financial Disclosures): this is a global initiative providing recommendations to help companies and financial institutions identify, assess, manage, and disclose nature-related risks and opportunities, with the aim of directing financial flows towards nature-positive activities and integrating biodiversity and ecosystem services into strategic decisions.

3 Content of regulatory sources

3.1 Macroeconomic context

This document is inspired by the sustainability principles set out by international bodies and institutions such as the European Union, the Organisation for Economic Co-operation and Development and the United Nations and takes into account the main ESG regulations, such as those of the European Central Bank (ECB) mentioned in paragraph 5.2.

Below are the main international declarations, agreements, and guidelines referenced to by the Group on sustainability issues.

Please refer to the “Corporate Governance Code of the BPER Group” for more information on the behavioural rules for employees, external staff, financial promoters and general principles for the internal organisation and relationships with customers and investors.

International Declarations and Principles

2030 Agenda for Sustainable Development (2030 Agenda)

The BPER Group undertakes to make a significant contribution to the achievement of the ‘Sustainable Development Goals’ (SDGs) set out in the ‘2030 Agenda’. The Agenda defines the goals, with 169 associated Targets, to be achieved by 2030.

By making some of the SDGs its own, with particular focus on some of the identified goals, BPER builds a compass for its sustainability path.

Below is a description of the identified SDGs and related Targets:

- **Goal 1:** end poverty in all its forms everywhere.
 - Target 1.2: by 2030, reduce at least by half the proportion of men, women and children of all ages living in poverty in all its dimensions according to national definitions;
 - Target 1.4: by 2030, ensure that all men and women, in particular the poor and the vulnerable, have equal rights to economic resources, as well as access to basic services, ownership and control over land and other forms of property, inheritance, natural resources, appropriate new technology and financial services, including microfinance.
- **Goal 4:** ensure inclusive and equitable quality education and promote lifelong learning opportunities for all.
 - Target 4.4: by 2030, substantially increase the number of youth and adults who have relevant skills, including technical and vocational skills, for employment, decent jobs and entrepreneurship;
 - Target 4.7: by 2030, ensure that all learners acquire the knowledge and skills needed to promote sustainable development, including, among others, through education for sustainable development and sustainable lifestyles, human rights, gender equality, promotion of a culture of peace and non-violence, global citizenship and appreciation of cultural diversity and of culture’s contribution to sustainable development.
- **Goal 5:** achieve gender equality and empower all women and girls.
 - Target 5.5: ensure women’s full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life.
- **Goal 7:** ensure access to affordable, reliable, sustainable and modern energy for all.
 - Target 7.2: by 2030, increase substantially the share of renewable energy in the global energy mix;
 - Target 7.3: by 2030, double the global rate of improvement in energy efficiency.
- **Goal 8:** promote sustained, inclusive and sustainable economic growth, full and productive employment

and decent work for all.

- Target 8.1: sustain per capita economic growth in accordance with national circumstances and, in particular, at least 7 per cent gross domestic product growth per annum in the least developed countries;
 - Target 8.2: achieve higher levels of economic productivity through diversification, technological upgrading and innovation, including through a focus on high-value added and labour-intensive sectors;
 - Target 8.3: promote development-oriented policies that support productive activities, decent job creation, entrepreneurship, creativity and innovation, and encourage the formalization and growth of micro-, small- and medium-sized enterprises, including through access to financial services;
 - Target 8.4: improve progressively, through 2030, global resource efficiency in consumption and production and endeavour to decouple economic growth from environmental degradation, in accordance with the 10-Year Framework of Programmes on Sustainable Consumption and Production, with developed countries taking the lead;
 - Target 8.5: by 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value;
 - Target 8.10: strengthen the capacity of domestic financial institutions to encourage and expand access to banking, insurance and financial services for all.
- **Goal 9:** build resilient infrastructure, promote inclusive and sustainable industrialisation and foster innovation.
 - Target 9.4: by 2030, upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes, with all countries taking action in accordance with their respective capabilities;
 - Target 9.5: enhance scientific research, upgrade the technological capabilities of industrial sectors in all countries, in particular developing countries, including, by 2030, encouraging innovation and substantially increasing the number of research and development workers per 1 million people and public and private research and development spending.
 - **Goal 11:** make cities and human settlements inclusive, safe, resilient and sustainable.
 - Target 11.4: strengthen efforts to protect and safeguard the world's cultural and natural heritage;
 - Target 11.6: by 2030, reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management.
 - **Goal 12:** responsible consumption and production
 - Target 12.2: by 2030, achieve the sustainable management and efficient use of natural resources;
 - Target 12.5: by 2030, substantially reduce waste generation through prevention, reduction, recycling and reuse.
 - **Goal 13:** take urgent action to combat climate change and its impacts.
 - Target 13.2: integrate climate change measures into national policies, strategies and planning.
 - **Goal 15:** protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification and halt and reverse land degradation and halt biodiversity loss.
 - Target 15.1: ensure the conservation, restoration and sustainable use of terrestrial and inland freshwater ecosystems and their services, in particular forests, wetlands, mountains and drylands, in line with obligations under international agreements;
 - Target 15.2: promote the implementation of sustainable management of all types of forests, halt

deforestation, restore degraded forests and substantially increase afforestation and reforestation globally;

- Target 15.a: mobilize and significantly increase financial resources from all sources to conserve and sustainably use biodiversity and ecosystems.
- **Goal 16:** promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels.
 - Target 16.5: substantially reduce corruption and bribery in all their forms;
 - Target 16.6: develop effective, accountable and transparent institutions at all levels.

International agreements and initiatives

United Nations Global Compact (UNGC)

The Group is a signatory of the United Nations Global Compact (UNGC), a United Nations initiative that aims to promote the culture of corporate social responsibility by sharing, implementing and promoting common principles and values. The initiative has formulated 10 universal principles divided into 4 macro areas:

Human Rights

Principle 1: businesses should support and respect the protection of internationally proclaimed human rights;

Principle 2: make sure that they are not complicit in human rights abuses.

Labour

Principle 3 - businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4 - the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour;

Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility;

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-corruption

Principle 10: businesses should work against corruption in all its forms, including extortion and bribery.

The Ten Principles of the United Nations Global Compact are derived from: the Universal Declaration of Human Rights, the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

The BPER Group confirms its support for the principles of the UNGC and its intent to promote them in the company and publicly report them through the "Communication On Progress" (COP).

Universal Declaration of Human Rights, international principles and guidelines

The BPER Group undertakes to promote and respect the universally recognised human rights as set out in the Universal Declaration of Human Rights.

Furthermore, the Group is committed to promoting the fundamental principles set out in the United Nations Guiding Principles on Business and Human Rights, the ILO (International Labour Organisation) Declaration on Fundamental Principles and Rights at Work and its Follow-up, and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

The Paris Agreement on climate change

The Paris Agreement sets the long-term goal of preventing dangerous climate change by limiting global warming to well below 2° C and continuing efforts to limit it to 1.5° C.

The Agreement also aims to strengthen the capacity of signatory countries (195) in addressing the impacts of climate change and to support them in their efforts. The Paris Agreement is the first universal, legally binding treaty on climate change. It was adopted at the UN Climate Change Conference (COP 21) in Paris.

UNEP FI - Principles for Responsible Banking (PRB)

Developed through an innovative partnership between banks from all over the world and the United Nations Environment Programme - Finance Initiative, the principles are designed to promote actions to foster the development of sustainable banking by aligning it with the goals of the UN 2030 Agenda and the Paris Climate Agreement. BPER Banca became an official signatory of the PRB on 14 July 2021.

Recommendations by the Task Force on Climate-Related Financial Disclosures (TCFD)

11 recommendations published in June 2017 by the TCFD, established by the Financial Stability Board (FSB) in 2015, to help the private sector disclose consistent information to investors, lenders and insurers about the risks and opportunities presented by climate change.

BPER joined the TCFD in December 2021, in the aim to make an initial alignment of its strategies with the recommendations on climate risks and opportunities and to improve its reporting on climate-related issues. In 2023, the TCFD completed its mandate, which was transferred to the ISSB (International Sustainability Standards Board) in 2024.

Recommendations by the Task Force on Nature-Related Financial Disclosures (TNFD)

The TNFD framework, published in September 2023 by the Taskforce on Nature-related Financial Disclosures, established in 2021 as a global initiative, aims to guide the private sector in reporting the information needed by investors, lenders and insurers to assess risks and opportunities related to nature, including biodiversity, ecosystems and ecosystem services.

The recommendations are inspired by the TCFD framework and are structured around four thematic areas (Governance, Strategy, Risk Management, and Metrics and Targets), integrating the LEAP approach (Locate, Evaluate, Assess, Prepare) to help companies identify and manage their interactions with nature. Adopting the TNFD recommendations allows financial flows to be directed towards nature-positive activities and integrates the natural dimension into corporate strategies and disclosure processes, in line with global objectives for biodiversity conservation and ecosystem resilience.

Net-Zero Banking Alliance

Initiative promoted by the United Nations with the goal of accelerating the sustainable transition of the banking sector through the commitment of the member banks to align their portfolios of loans and investments with the achievement of the net-zero emissions target by 2050.

BPER Banca joined the Net Zero Banking Alliance in March 2022, thereby steering its strategy to combat climate change. Although the Net-Zero Banking Alliance's mandate ended in October 2025, BPER Banca confirms its commitment to pursuing decarbonisation goals in line with the Alliance's original principles and ambitions.

The OECD Guidelines for Multinational Enterprises

The Guidelines are a set of recommendations addressed by governments to multinational enterprises operating in or from adhering countries. They provide non-binding principles and standards for responsible business conduct in a global context consistent with applicable laws and internationally recognised standards. The Guidelines are the only multilaterally agreed and comprehensive code of responsible business conduct that governments have committed to promoting. To the extent possible, businesses are called upon to encourage their business partners, including suppliers and subcontractors, to apply principles of responsible business conduct in accordance with the Guidelines. The Guidelines describe responsible conduct in relation to the main social and environmental risks of doing business in the global marketplace.

3.2 BPER guiding principles

This Policy was drawn up in accordance with the corporate strategy and values which the Group is inspired by, and represents the programmatic tool used to encourage the spread of the ESG culture and the incorporation of the guiding principles (described below) into the value chain through the definition of an *ESG Proposition*.

This document contributes to reinforcing and implementing the values of responsibility, loyalty and substantiality in the respect for persons, the environment and society as a whole, as already specified in the Code of Ethics and the Corporate Governance Code that applies to representatives, employees, external partners and financial consultants of the Group.

Specifically, the Policy describes the BPER Group's five ESG guiding principles:

1. integrity and transparency;
2. sustainable development of society;
3. fair business practices and customer protection;
4. protection of workers, diversity and equal opportunities;
5. environmental protection and assessment of the direct and indirect impacts associated thereto.

Reported in detail below are the 5 guiding principles.

3.2.1 *Integrity and transparency*

The BPER Group and its stakeholders consider integrity as a fundamental value in corporate conduct.

To this end, the BPER Group undertakes to carry out its activities in accordance with the highest ethical standards and does not tolerate any active or passive acts of corruption.

The BPER Group operates in compliance with all applicable laws and regulations.

The main companies of the BPER Group have an organisation, management and control model and procedures designed to prevent the perpetration of crimes and offences in their operations.

Specific training is guaranteed to all the BPER Group employees in order to raise awareness of the culture of legality and prevent fraudulent behaviour or episodes of corruption or money-laundering.

Procedures are also in place for the internal reporting of actual or alleged unlawful actions or breaches of laws and standards to the relevant company bodies.

3.2.2 *Sustainable development of society*

For the BPER Group, supporting the development of society means focusing its commitment on the main goal of improving the quality of life, proposing solutions for the protection, support and implementation of projects and acting as a partner of enterprises, institutions and communities with a view to supporting development and promoting well-being, without any discrimination, favouring financial inclusion and education initiatives among other aspects.

It also means offering support to the local community, in partnership with the other social players, to experiment with and consolidate innovation with high social and environmental value.

The BPER Group undertakes to be the driver of sustainable growth to promote a development model that encourages collective, widespread well-being.

3.2.3 *Honest business practices and customer protection*

The BPER Group bases its success on the relationship of trust it has established with its customers, characterised as it is by fairness, transparency and the desire to propose the best solutions to customers for their requirements and development.

In the company's philosophy, the customer is first and foremost a person with their own projects and difficult

situations.

The process is based on a bond of trust that goes beyond the mere regulations governing the relationship between the bank and customers.

Dialogue and listening are at the basis of the relationship that the BPER Group's companies wish to instil with people to support them along a path of sustainable growth.

3.2.4 *Protection of workers, diversity and equal opportunities*

The BPER Group puts people at the heart of its business project.

In addition to the mandatory respect for equal human rights and dignity, the BPER Group promotes values of fairness and objectivity and undertakes to protect the maximum expression of the potential of the individual as an element of distinctiveness.

Great attention has always been paid to Human Resources. The focus is placed in particular on the implementation of career paths aimed at enhancing the value and development of professional and personal skills.

Employees are a crucial resource for the growth of the Group as they are the first to bear witness to its values, providing customers with excellent services and products and maintaining relationships of mutual trust.

The BPER Group recognises the value of diversity in terms of gender, age, persons with disabilities, state of health, ethnicity, geographical origin, sexual orientation or identity, religion and political ideology, as a key resource for innovation, productivity and growth of the organisation and the country. Special attention is paid to aspects linked to gender diversity with the commitment to ensure equal opportunities and treatment to all employees in order to encourage the full and effective participation of women at all levels of company activity, promoting excellence.

3.2.5 *Environmental protection and assessment of the direct and indirect impacts associated thereto*

The BPER Group pays attention to the protection of the environment as a primary resource for the well-being of man, and directs its choices so as to ensure compatibility between economic initiatives and environmental requirements in accordance with the law.

The Group has identified the main environmental impacts around which to organise its commitment through suitable planning and the identification of specific goals. They are divided into direct and indirect environmental impacts.

With regard to direct impacts (a.k.a. direct transition), the Group promotes the efficient use of energy resources and the reduction of greenhouse gas emissions through the implementation of highly energy-efficient technologies and the promotion of renewable sources. With regard to the indirect impacts of its operations, or connected to financing or investment activities (a.k.a. indirect transition), the Group undertakes to incorporate sustainability into the value chain and improve its processes and behaviour to reduce the associated impacts.

The fight against climate change specifically involves new risks, but also offers important new opportunities to create shared value in the Group's footprint areas. For this reason, the BPER Group intends all the more to be a partner for its customers by providing solutions and expertise capable of supporting families and businesses in designing and implementing growth and improvement projects with a view to environmental and social sustainability, through products and services that help adapt to climate change, support businesses on their path to sustainability, and offer protection from the effects of extreme weather events.

3.3 Sustainability disclosures

In order to avoid the risk of greenwashing, the Group makes every effort to avoid conduct that is not in the customer's best interest and ensures that claims, statements, actions or disclosures relating to sustainability reflect the underlying sustainability profile of the various Group companies in a clear, fair, accurate and non-misleading manner. Reported below are some of the principles to consider for the preparation and dissemination of sustainability disclosures:

- Accuracy: the information disclosed must be accurate, clear, correct and consistent with the actual sustainability profile of the products and/or the Company;
- Accessibility: the information disclosed must be easily accessible to the market and investors and must be sufficiently detailed to be comprehensible to them;
- Justifiability: information must be demonstrated and supported by concrete sources, i.e. processes, analysis methodologies and justifiable rationales;
- Updating: information must be kept in line with changes occurring in the processes and sustainability profiles of the products and/or the Company.

Finally, the dissemination of communications on sustainability must comply with the principles and safeguards set out in the BPER regulations concerning Brand Governance and the Governance of Advertising Practice, as well as with the relevant external regulatory framework, including, for example, Directive (EU) 2024/825 and the Final Report on Greenwashing published by the European Supervisory Authorities (ESAs: EBA, ESMA ed EIOPA).

3.4 Governance Model

ESG issues across the Group revolve around a well-defined role in the organisation of the company, namely the ESG Manager.

The role of the ESG Manager is identified in the organisational structure of both the Parent and - if requested - the Group companies and lies with the Head of the organisational function in the General Management that is most involved in ESG-specific issues, or that is considered to have the best competence to perform the activities.

The ESG Manager is appointed by the ESG Strategy Unit after obtaining the prior opinion of the People Management Department and the Organisation Department and after consulting the higher-level supervisor whom the ESG Manager reports to in the organisation.

ESG Managers are listed by Legal Entity in a dedicated list, which may be updated, regardless of whether or not this Policy is updated, according to the process described above, in line with the evolution of the organisational structures.

In its capacity as the owner of ESG issues in his/her structure of operation, the ESG Manager:

- supports the ESG Strategy Unit in identifying the ESG objectives of the structure in which he/she operates;
- coordinates and monitors the activities defined to achieve the objectives;
- analyses the impacts of ESG issues in his/her structure of operation, for the issues within his/her competence, identifying risks and opportunities;
- coordinates relations with the stakeholders he/she comes into contact with on behalf of his/her structure of operation.

The ESG Managers support and assist the ESG Strategy Unit in the implementation of ESG projects.

With regard to the roles and responsibilities described in the paragraph below, the ESG Strategy Unit is responsible for preparing and updating the Consolidated Sustainability Statement (CSDR)¹ and the Transition Plan pursuant to EBA/GL/2025/01, to be submitted to the Parent Company's Board of Directors for approval. The Transition Plan is also submitted to the Control and Risk Committee and the Sustainability Committee for their opinion and to the Board of Statutory Auditors for information.

In consideration of the cross-sectoral nature of the Transition Plan, the ESG Strategy Unit cooperates with different relevant corporate Functions, mainly relating to the Risk, Credit and Finance Areas, which are called to provide their contributions to ensure updating and accuracy.

¹ For further details please refer to the "Regulation governing the Process for the Preparation of the Consolidated Sustainability Statement"

4 Roles and responsibilities

- of the Parent Company:

Corporate Body/Organisational Unit	Description of Roles and Responsibilities
Board of Directors	<ul style="list-style-type: none"> ● Defines Group guidelines and strategies relating to ESG issues and, in particular, approves: <ul style="list-style-type: none"> ○ the Consolidated Sustainability Statement included in the Directors' Report on Group Operations of the Consolidated Financial Report of the BPER Banca Group; ○ the Business Plan; ○ the Risk Appetite Framework and risk governance policies, complementing them with ESG factors over time; ○ the Transition Plan pursuant to the EBA Guidelines. ● Oversees, through the Chief Financial Officer and the ESG Strategy Unit, the implementation of the Transition Plan pursuant to the EBA Guidelines, through regular disclosure of relevant developments and progress on the defined objectives. ● Makes sure that the Group has adequate capabilities, skills and resources to implement the transition "process", promoting dedicated in-house training and ESG culture dissemination.
Sustainability Committee	<ul style="list-style-type: none"> ● Reviews and assesses, at least once a year, the content of this Policy and its ability to ensure the achievement of sustainable development objectives through ongoing dialogue with all stakeholders; ● Reviews and assesses ESG-related regulatory documents, final reports, ESG statements and disclosures - including the Consolidated Sustainability Statement prepared by the ESG Strategy Unit; ● Reviews and assesses the Transition Plan, including its objectives, implementation strategies and targets for ESG risk management; ● Reviews and assesses any reports by the Chief Executive Officer on problems and critical issues concerning sustainability that may have arisen in the course of his work or of which he has otherwise become aware; ● Assesses the Bank's positioning against sustainability metrics, indices and market benchmarks; ● Monitors relevant initiatives (forums, associations, study and analysis events) organised at international and domestic level in order to promote and strengthen awareness of sustainability issues, also assessing, on the basis of their relevance and effectiveness, the degree of engagement of the Bank in achieving sustainable development objectives; ● Monitors initiatives and programmes aimed at disseminating the culture of sustainability and the awareness, on the part of its resources, of the need to pursue sustainable development; ● Assesses technological, environmental, social, economic, political and geopolitical scenarios and macro-trends that are likely to have a significant impact on society as a whole in the long term and, in turn, on the Bank's corporate purpose and the way it relates to society; ● Promotes and/or supports initiatives aimed at analysing the scenarios mentioned in the previous point;

	<ul style="list-style-type: none"> • Reports at least annually to the Board of Directors on the overall activities carried out.
Control and Risk Committee	<ul style="list-style-type: none"> • Supports the Board of Directors in assessing the ESG factors falling within its area of competence, in compliance with the Committee's Operating Rules in force at any given time; • Supports the Board of Directors in identifying risks ("Group Risk Map"), in assessing and defining risk objectives ("Risk appetite") and tolerance thresholds ("Risk tolerance"), including in terms of ESG indicators; • Supports the Board of Directors in assessing the adequacy and effectiveness of the internal control and risk management system in the ESG area, with respect to the company's characteristics and risk profile; • Supports the Board of Directors in assessing the autonomy, adequacy, effectiveness and efficiency of the company's control functions in the ESG area; • Makes sure, without prejudice to the competences of the Remuneration Committee, that the incentives underlying the Bank's remuneration and incentive system are consistent with the risk appetite framework, including in ESG terms; • Supports the Board of Directors in the assessment of strategies for capital and liquidity management, as well as for all relevant risks of the Bank and the BPER Group that are also impacted by ESG issues, such as market, credit, operational (including legal and IT), strategic and reputational risks, in order to assess their appropriateness with respect to the Group's risk appetite and approved risk strategy; • Supports the Board of Directors in periodically assessing a number of possible scenarios, including stress scenarios, to determine how the ESG risk profile of the Bank and the BPER Group might react to external and internal events; • Supports the Board of Directors in examining and assessing the Transition Plan, including its objectives, implementation strategies and targets for ESG risk management.
Chief Executive Officer	<ul style="list-style-type: none"> • Implements, within the scope of his delegated powers, the strategic guidelines set out in the Business Plan as approved by the Board of Directors • Oversees sustainability-related operational activities and actions to be implemented and monitored with the support of the ESG Strategy Unit and the ESG Managerial Committee.
Board of Statutory Auditors	<ul style="list-style-type: none"> • Supervises compliance of preparation of the Consolidated Sustainability Statement with the regulatory framework; • Verifies the efficiency of internal control and ESG risk management systems.
ESG Managerial Committee	<ul style="list-style-type: none"> • Facilitates the coordination of corporate and Group functions with regard to sustainability matters and associated risks; • Supports the CEO in managing ESG matters at both Parent Company and Group level; • Promotes, manages and monitors the strategy for sustainability issues, in compliance with the Business Plan, with the support of the ESG Strategy Unit; • Monitors the position of the BPER Group with respect to sustainability matters and the 17 UN goals (SDGs) • Defines, assesses and monitors the effectiveness of the Diversity, Equity and Inclusion Policy and the Strategic Plan for gender equality, as required by the UNI/PdR 125:2022 reference practice and its relevant Management System; • Defines, assesses and monitors the effectiveness of the Policy governing the Management of Environmental and Energy Issues and of the Integrated

	<p>Environment and Energy Management System (EEMS), in compliance with ISO 14001 and 50001;</p> <ul style="list-style-type: none"> • Verifies the capacity of the GSS Eligible Assets, i.e. balance sheet assets that can support Green, Social or Sustainable bond issuances as against the amount of securities outstanding, according to the guidelines of the GSS Bond Framework. • Examines the contents proposed by the ESG Strategy Unit for the Transition Plan pursuant to the EBA Guidelines, including the objectives, implementation strategies and targets for ESG risk management.
ESG Strategy Unit	<ul style="list-style-type: none"> • Prepares the Consolidated Sustainability Statement (CSRSD) to be submitted to the BoD for approval, defining the relevant issues and the sustainability indicators to be described; • Contributes to the preparation of the Business Plan in terms of projects impacting ESG issues; • Contributes to the preparation of the ESG template for the Pillar 3 disclosure; • Prepares, at any given time, other ESG reports deemed necessary (e.g. PRB Report); • Supports the Internal Board Sustainability Committee in promoting and managing the strategy on sustainability issues; • Supports the ESG Management Committee in the operational management of sustainability issues in line with the Business Plan; • Coordinates ESG Managers and corporate functions on ESG issues; • Assesses the ESG impacts resulting from Group initiatives and provides support to the divisions of the Parent Company and the Group in their implementation; • Manages ESG ratings; • Manages relations and communications with international bodies regarding compliance with sustainability frameworks and ESG ratings; • Promotes external and internal communication on the issues relating to ESG matters, encouraging the dissemination of the sustainability culture among colleagues, customers and all the stakeholders of the Bank as much as possible; • Supports the Chair of the Board-internal Sustainability Committee in the management of all strategic sustainability issues; • Supports the CEO and the CFO in the management of all sustainability-related operational issues; • Manages relations with the ECB on issues relating to climate and environmental risks falling within its competence (e.g. disclosure, organisational structures, ESG strategy), coordinates cross-sectoral ESG exercises initiated by the Supervisory Authority (e.g. ECB Climate and Environmental Risk questionnaires), and helps the ESG Managers correctly identify ESG issues for their dialogue with the ECB on the processes they own; • Supports the Parent Company and Group companies on ESG issues, including by identifying and providing training and advisory services on sustainability issues and sustainability reporting, with reference to specific areas of application; • Manages reputational aspects related to sustainability issues; • Manages and promotes, at Group level, the development of Social Responsibility activities, with social and environmental reverberations, through the identification and implementation of dedicated activities;

	<ul style="list-style-type: none"> • Collaborates with all structures of the Parent company and Group companies on ESG issues; • Monitors regulatory developments of sustainability issues at national and EU level; • Monitors and supervises the management of direct and indirect environmental impact; • Manages Portfolio Alignment activity in order to monitor the emission alignment of the portfolio to de-carbonisation goals; • Manages processes linked to stated de-carbonisation objectives; • Manages the sustainability projects within its remit that are part of the Business Plan and identifies strategic ESG objectives; • Provides support in defining the budget ESG objectives; • Provides support in defining, monitoring and reporting ESG KPIs for the remuneration policies; • Monitors the progress of Business Plan activities that have an ESG impact for the achievement of defined objectives; • Manages key projects and events in the area of Corporate Social Responsibility, financial education and the fight against compulsive gambling; • Assesses operations in the branches, in close collaboration with them, in order to monitor full compliance with the “Policy governing the Relations of the BPER Group Banks and Companies with Defence Operators, Weapons Manufacturers and Dealers”; • Coordinates Energy management and Mobility management activities; • Defines the activities concerning energy sources, energy savings and reduction in climate-changing emissions, on the basis of the findings of the Energy Working Group; • Defines the activities aimed at reducing environmental impacts due to business travel and staff commuting, on the basis of the findings of the Mobility Working Group; • Maps the ESG disclosure requirements and the coordination of the ESG data acquisition/purchase and management processes; • Prepares the Transition Plan, in compliance with the EBA Guidelines, to be later submitted to the BoD, following a review by the Chief Financial Officer; • Regularly monitors and updates the Transition Plan in compliance with the EBA Guidelines, ensuring an adequate information flow to the Chief Financial Officer and the Board of Directors and the activation of escalation actions to the Chief Financial Officer, in the event of major deviations.
CFO	<ul style="list-style-type: none"> • Steers and coordinates the ESG Strategy; • Incorporates, to the extent of his/her competence, ESG elements into the Company’s defined strategy and steers its adoption in the processes he/she oversees, making sure they are monitored through appropriate management control systems; • Oversees the preparation of the Transition Plan, in compliance with the EBA Guidelines, by the ESG Strategy Unit, to be submitted to the BoD for approval; • Oversees the implementation of the Transition Plan in compliance with the EBA Guidelines, including through periodical disclosure of progress made on the defined objectives and taking corrective measures in the event of major deviations by the ESG Strategy Unit.

Planning and Control Department	<ul style="list-style-type: none"> • Develops the Business Plan, Capital Plan and Funding Plan (including the Issuance plan) in consideration of ESG factors and in line with the Transition Plan and the RAF; • Defines ESG KPIs and their monitoring, with the support of the ESG Strategy Unit; • Updates the management control and strategic planning model and the internal transfer rate mechanisms by taking ESG factors into consideration.
Finance Governance Unit	<ul style="list-style-type: none"> • Oversees the incorporation of ESG elements into the investment policies of the Company's banking book and monitors its trend.
ALM & Banking Book Office	<ul style="list-style-type: none"> • Incorporates ESG elements into the investment policies of the Company's banking book and monitors its trend.
CRO	<ul style="list-style-type: none"> • Collaborates in defining the RAF and the risk governance policies, managing their implementation also through the processes for the management of the risks within the CRO's remit (including ESG risk factors).
Risk Governance Unit	<ul style="list-style-type: none"> • Coordinates the integration of ESG risk factors into risk governance processes (Risk Map, RAF, ICAAP, risk forecasting and stress testing...).
Credit Risk Department Financial Risks Unit Operation, ICT & Reputational Risk Unit	<ul style="list-style-type: none"> • Manage the integration of ESG risk factors into the processes for the management of the risks within their remit.
Risk Audit Unit	<ul style="list-style-type: none"> • Steers, coordinates and oversees i) risk assessments to determine audit priorities for the purposes of planning activities, and ii) assurance activities on the Group's ESG and sustainability initiatives.
Audit Risk Governance & ESG Office	<ul style="list-style-type: none"> • Carries out i) risk assessments to determine audit priorities for the purposes of planning activities, and ii) assurance activities on the Group's ESG and sustainability initiatives.
Credit Risk Department / Financial Risks Unit / Operational, ICT & Reputational Risk Unit	<ul style="list-style-type: none"> • Each unit/office, depending on the specific type of risk being monitored, incorporates ESG factors into routine risk management processes (routine maintenance of risk management policies, measurement and reporting, mitigation processes, ...)
CLO	<ul style="list-style-type: none"> • Steers the adjustment of lending policies, loan origination, customer management and monitoring processes by ensuring the incorporation of ESG-related strategic guidance and compliance with the relevant supervisory expectations.
Credit Policies & Support Department	<ul style="list-style-type: none"> • Proposes (sectoral and single name) credit policies and strategies by considering the impact of ESG factors in terms of risk/opportunity and the Group's commitments, including on a voluntary basis; • Proposes credit models by incorporating ESG considerations, where relevant; • Proposes the adjustment of credit origination and monitoring processes, by incorporating relevant ESG metrics and KPIs into the assessment of borrowers and collateral/assets; • Proposes the process, rules and methodologies for the acquisition, management and enforcement of collateral by taking into account any elements arising from physical/transition risk factors.
Credit Department	<ul style="list-style-type: none"> • Steers the loan origination activities so that ESG factors are taken into account by the decision-makers, including by means of any available external ratings and/or scores, for the purpose of assessing borrowers and collateral/assets in terms of their influence on the solvency of credit exposures, including in a forward-looking perspective.
Credit Management & Workout Department	<ul style="list-style-type: none"> • Takes into account environmental, social and governance elements that have an influence on the viability of workout/restructuring/bilateral agreements;

	<ul style="list-style-type: none"> • Incorporates ESG considerations in the assessment of borrowers and exposures, so as to take account of any possible impacts on the classification and definition of expected recovery flows from non-performing loans.
Regulation & ESG Credit Adequacy Office	<ul style="list-style-type: none"> • Carries out “infusion activities” involving the organisational structure that reports to the CLO so that policies, processes and analysis tools and methodologies used in the credit chain are in line with the ESG objectives of the Bank and Supervisory Requirements; • Coordinates lending relations and communications with all internal functions and external stakeholders with regard to credit-linked ESG issues, so as to consistently achieve the Bank’s ESG objectives.
Credit Strategies & Policies Office	<ul style="list-style-type: none"> • Prepares the proposals for the Group’s credit policies, including by having them incorporate the ESG strategic guidelines;
CRCBO	<ul style="list-style-type: none"> • Manages customer relations from an ESG perspective and identifies new customer needs; • Evolves the catalogue of products and services offered to all types of retail customers; • Oversees commercial planning and adjusts pricing policies.
CCIBO	<ul style="list-style-type: none"> • Manages customer relations from an ESG perspective and identifies new customer needs; • Evolves the catalogue of products and services offered to all types of corporate customers; • Oversees commercial planning and adjusts pricing policies.
CPWMO	<ul style="list-style-type: none"> • Adjusts the development of the proposition of financial content products and services (asset management and life insurance products) and non-financial content products and services (specialist wealth advisory); • Integrates the catalogue of investment options for its customers by including ESG criteria in the investment proposition; • Manages relations with its customers; • Updates customer profiles, in accordance with the defined taxonomy; • Ensures the provision of an adequate level of service; • Updates the customer satisfaction survey model; • Promotes financial education projects in the ESG area and is in charge of communication regarding products offered.
Retail Department / POE & Small Business Department	<p>Each department, in its area of responsibility:</p> <ul style="list-style-type: none"> • Adjusts the product and service proposition development; • Supplements the commercial catalogue by activating the product approval process; • Manages relations with its customers; • Updates the profiles of customers, assets and collateral from an ESG perspective and in accordance with the defined taxonomy; • Ensures the provision of an adequate level of service; • Promotes financial education projects in the ESG area and is in charge of communication regarding products offered.
Bancassurance Product & Services Unit	<ul style="list-style-type: none"> • Adjusts the value proposition in bancassurance and insurance strategies (demand, products, channels, campaigns); • Updates the bancassurance budget targets (roll-out of commercial actions,

	monitoring and corrective actions).
Corporate & Investment Banking – Strategic Marketing Unit	<ul style="list-style-type: none"> • Carries out coordination activities also in the CCIBO area and for the Group in terms of supplementing the commercial catalogue and defining the value proposition; • Proposes the pricing of ESG products in cooperation with the Pricing Department through the implementation of pricing tools, with economic benefits being awarded in connection with the achievement of ESG targets/KPIs; • Updates the survey model to measure the satisfaction of its customer segment and quality of the service level provided; • Updates budget targets (roll-out of commercial actions, monitoring and corrective actions).
Lending Products, Solutions & Sales Office	<ul style="list-style-type: none"> • Adjusts the value proposition and commercial strategies (demand, products, channels, campaigns); • Supports all corporate service models and structured finance in defining ESG loans, through a dedicated ESG team; • Supplements the commercial catalogue by activating the product approval process; • Manages relations with corporate customers; • Updates the profiles of corporate customers, assets and collateral from an ESG perspective and in accordance with the defined taxonomy; • Maintains and manages relations with national and supranational third parties (MCC, Sace, EIF and EIB) for the creation of ESG-qualifying loan portfolios backed by RWA-compliant collateral; • Maintains relations with and presides over the technical panels of the Italian Banking Association (ABI) working on the definition of ESG-qualifying lending products and processes and, more in general, on issues of sustainability; • Maintains relations and contacts with trade associations and institutional counterparties, in relation to the service models offered, the promotion of ESG-qualifying lending products, by additionally facilitating communication and training activities; • With regard to the commercial proposition in the ESG area, is in charge of communication and promotes in-house and external training courses; • Promotes financial education projects in the ESG area and is in charge of communication regarding products offered.
Branch Network and Direct Channels	<ul style="list-style-type: none"> • Integrates value proposition strategies with ESG elements; • Enhances customer relations by promoting ESG products; • Promotes the dissemination of ESG values to customers;
Procurement Unit	<ul style="list-style-type: none"> • Adjusts and integrates procurement policies and vendor assessment frameworks from an ESG perspective, making sure an appropriate organisational and governance model is in place.
Business Continuity Office	<ul style="list-style-type: none"> • Via the Business Continuity Manager, updates the Business Continuity and Disaster Recovery plans to include the issue of climate and environmental risk, with particular reference to physical risk.
Organisation Department	<ul style="list-style-type: none"> • Updates the organisational model to ensure the correct allocation of roles and responsibilities in the ESG area, updates organisational structures, organisational charts and function charts; • Ensures adequate staffing; • Helps each process owner adjust all processes and procedures impacted by ESG issues;

	<ul style="list-style-type: none"> • Supports and coordinates the process of updating the company's internal regulations; • Adjusts the outsourcing risk governance framework, in agreement with the relevant specialist functions
CDO	<ul style="list-style-type: none"> • Defines an ESG Data Strategy; • Ensures the evolution of the company's data assets to supplement ESG disclosures according to business and regulatory needs.
CIO	<ul style="list-style-type: none"> • Ensures that the information system and the systems supporting the various functions of the Bank can manage ESG information and supports the production of the necessary KPIs and reports.
CPO	<ul style="list-style-type: none"> • Integrates, within the scope of his/her delegated powers, People department strategies with the ESG strategic guidelines approved by the Board of Directors, governing the policies and guidelines on diversity, equity and inclusion for the Company's population.
People Transformation Department	<ul style="list-style-type: none"> • Oversees and promotes the incorporation of ESG elements in the definition of training programmes for the company's population; • Adjusts Total Reward policies (including remuneration policies, the MBO scheme, Long Term Incentives, etc.) from an ESG perspective.
People Project & Planning Office	<ul style="list-style-type: none"> • Adjusts Inclusion & Diversity initiatives from an ESG perspective in line with the relevant policies and guidelines approved by the competent bodies.
Internal Communication & Digital Workplace Department	<ul style="list-style-type: none"> • Adjusts the Group's internal communication strategy with ESG elements and supports the storytelling of all of the Group's ESG initiatives through the internal digital channels.
CCO	<ul style="list-style-type: none"> • Complements his/her non-compliance risk assessment framework and the scope of inspections/audits by introducing ESG elements on the basis of his/her methodology.
Manager responsible for preparing the Company's financial reports	<ul style="list-style-type: none"> • Updates the preparation of Pillar 3 disclosures from an ESG perspective and integrates financial reporting verification activities; • Certifies, with a specific report, that the Consolidated Sustainability Statement included in the Directors' Report on Group Operations has been prepared 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 the legislative decree adopted in implementation of Article 13 of Law No. 15 of 21 February 2024, and 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.
Financial Reporting and Reports Department	<ul style="list-style-type: none"> • Adjusts the preparation of the Pillar 3 disclosure by having it incorporate ESG information; • Ensures consistency between the content of the Consolidated Sustainability Statement and the Transition Plan.
Financial & Sustainability Reporting Supervision Unit	<ul style="list-style-type: none"> • Ensures the implementation of an adequate process for the preparation of the Consolidated Sustainability Statement and the related assessment of its adequacy and actual application; • Ensures the assessment of the drafting and disclosure rules applied to the Sustainability Statement, as well as its compliance with the new European Sustainability Reporting Standards (ESRS). • Ensures consistency of sustainability reporting with the Transition Plan in accordance with the EBA Guidelines, the Pillar 3 Public Disclosure Document (ESG section) and financial reporting (Connectivity).
ESG Manager	<ul style="list-style-type: none"> • Analyses the impacts of ESG issues in his/her structure of operation,

	<p>identifying risks and opportunities;</p> <ul style="list-style-type: none"> • Supports the ESG Strategy Office in identifying the ESG objectives of the structure in which he/she operates; • Coordinates and monitors, with the support of the competent functions, the activities defined for the achievement of the objectives identified within his/her area of reference; • Coordinates relations with the stakeholders he/she comes into contact with on behalf of his/her structure of operation.
Energy Manager	<ul style="list-style-type: none"> • Defines the activities related to energy sources, energy saving, the reduction of climate-changing emissions.
Mobility Manager	<ul style="list-style-type: none"> • Defines the activities aimed at reducing environmental impacts from business travel and staff commuting.

- of the other Group companies:

Corporate Body / O.U.	Description of Roles and Responsibilities
ESG Contact	<ul style="list-style-type: none"> • Provides support to the Parent Company's ESG Strategy Unit and coordinates the collection of information and data useful for the preparation of the ESG reports, making sure they are complete.
ESG Manager	<ul style="list-style-type: none"> • Collaborates with the Parent Company's ESG Strategy Unit analyses the impacts of ESG issues in his/her structure of operation and identifies risks and opportunities; • Supports the ESG Strategy Unit in identifying the ESG objectives of the structure in which he/she operates; • Coordinates and monitors the activities defined for the achievement of the objectives identified within his/her area of reference; • Coordinates relations with the stakeholders he/she comes into contact with on behalf of his/her structure of operation.
Energy Manager	<ul style="list-style-type: none"> • Collaborates with the Parent Company's ESG Strategy Unit on activities relating to energy sources, energy saving, and the reduction of climate-changing emissions.
Mobility Manager	<ul style="list-style-type: none"> • Collaborates with the Parent Company's ESG Strategy Unit in the activities aimed at reducing environmental impacts due to business travel and staff commuting.

5 Annexes

5.1 Version history

The version history is provided below:

Version	Date of approval	Directive No.	Summary of amendments
1.0	24/11/2022	81/2022	Release

5.2 Regulatory framework

External regulations:

- Legislative Decree 231/01 - Regulation on the administrative liability of legal entities, of companies and of associations, including those without legal personality, pursuant to article 11 of Italian Law no. 300 of 29 September 2000
- Legislative Decree No. 125 of 6 September 2024 Implementation of Directive 2022/2464/EU of the European Parliament and of the Council of 14 December 2022, amending Regulation 537/ 2014/EU, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU as regards corporate sustainability reporting. (24G00145).
- Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU as regards corporate sustainability reporting
- Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards.
- Directive (EU) 2025/794 of the European Parliament and of the Council of 14 April 2025 amending Directives (EU) 2022/2464 and (EU) 2024/1760 as regards the dates from which Member States are to apply certain corporate sustainability requirements relating to corporate sustainability reporting and due diligence requirements
- Commission Delegated Regulation (EU) 2025/1416 of 11 July 2025 amending Delegated Regulation (EU) 2023/2772 as regards the postponement of the date of application of the disclosure requirements for certain undertakings
- Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector
- Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment
- European Central Bank (ECB) “Guide on climate-related and environmental risks (2020)”;
- European Banking Authority (EBA) “Guidelines on loan origination and monitoring (2020)”.
- EBA Report on management and supervision of ESG risks for credit institutions and investment firms (2021)
- EBA Guidelines on the management of GL risks ((ESG) (EBA/GL/2025/01)
- Guidelines on Environmental Scenario Analysis (EBA/GL/2025/04)
- Directive (EU) 2024/825 of the European Parliament and of the Council of 28 February 2024 amending Directives 2005/29/EC and 2011/83/EU as regards empowering consumers for the green transition through better protection against unfair practices and through better information
- Final Report on Greenwashing published by the three European Supervisory Authorities EBA, ESMA and EIOPA
- Thematic note on sustainability-related claims used in non-regulatory communications (1 July 2025 - ESMA36-429234738-154)

Internal regulations:

- Code of Ethics
- Corporate Governance Code of the BPER Group
- Organisation and Management Model - General section and related annexes
- Organisation and Management Model - Special section and related annexes
- Group Guidelines on Information flows
- Policy governing the Management of Environmental and Energy Issues
- Human resources Management Policy
- BPER Group Governance Policy
- Group Policy on the Internal Control System
- Policy governing the Relations of the BPER Group Banks and Companies with Defence Operators, Weapons Manufacturers and Dealers
- Diversity, Equity and Inclusion Policy
- ESG Investment Policy for the Management of the Group's banking book
- ESG (Environmental, Social and Governance) Loan Origination Policy
- Policy governing the Risk of Non-Compliance in relation to the Provision of Investment and Ancillary Services
- Policy governing the Risk of Non-Compliance in relation to Sustainability in the Provision of Investment Services
- Anti-corruption Policy
- Strategic and Business Risk Governance Policy
- Personal Data Protection Policy
- Policy governing the Risk of Non-Compliance in relation to Product Governance
- Policy governing the risk of Unintentional Errors and Fraud in Financial Reporting
- Policy governing the Risk of Non-Compliance
- Banking Transparency and Usury Policy
- Reputational Risk Governance Policy
- Credit Risk Governance Policy
- Operational Risk Governance Policy
- Liquidity and Funding Risk Governance Policy
- Market Risk Governance Policy
- Control and Risks Committee - Rules of Operation
- Sustainability Committee - Rules of Operation
- Regulation governing the Risk Management Function
- Regulation governing the Process for Relations with the Supervisory Authorities, Bodies and Institutions
- Anti-Corruption Programme

Repealed regulations:

- ESG Policy of 24/11/2022