

**BPER:**

**PUBLIC DISCLOSURE  
AS AT 30 JUNE 2025**

**PILLAR 3**

**2025**

*This is an English translation of the original Italian document "Informativa al pubblico al 30 giugno 2025 - Pillar 3".  
In case of discrepancies between the English and the Italian versions, the latter shall prevail.*

**BPER Banca s.p.a.**

Head office in Via San Carlo 8/20, Modena, Italy

Tel. +39 059/2021111 – Fax +39 059/2022033

Register of Banks no. 4932

Parent Company of the BPER Banca s.p.a. Banking Group

Registered in the Register of Banking Groups with ABI code 5387.6

<http://www.bper.it> – <https://group.bper.it>

E-mail: [servizio.clienti@gruppobper.it](mailto:servizio.clienti@gruppobper.it) – Certified e-mail (PEC): [bper@pec.gruppobper.it](mailto:bper@pec.gruppobper.it)

Company belonging to the BPER Banca VAT Group, VAT no. 03830780361

Tax Code and Modena Companies' Register no. 01153230360

C.C.I.A.A. Modena Chamber of Commerce 222528 Share capital Euro 2,953,383,946.57

Member of the Interbank Deposit Protection Fund and of the National Compensation Fund

Ordinary shares listed on the regulated Euronext Milan market

**BPER:**

**PUBLIC DISCLOSURE  
AS AT 30 JUNE 2025**

**PILLAR 3**

2025

# CONTENTS

INTRODUCTION	4
1. GENERAL DISCLOSURE REQUIREMENTS	11
2. OWN FUNDS	17
3. CAPITAL REQUIREMENTS	26
4. FINANCIAL LEVERAGE	32
5. LIQUIDITY RISK	36
6. CREDIT RISK: CREDIT QUALITY	43
7. CREDIT RISK MITIGATION TECHNIQUES	49
8. CREDIT RISK: DISCLOSURE ON THE STANDARDISED APPROACH	50
9. CREDIT RISK: DISCLOSURE ON THE IRB APPROACH	55
10. EXPOSURES TO COUNTERPARTY CREDIT RISK	70
11. SECURITISATION EXPOSURES	73
12. MARKET RISK	77
13. EXPOSURES TO INTEREST RATE RISK ON POSITIONS NOT HELD IN THE TRADING BOOK	78
14. ESG RISK	79
CERTIFICATION ON DISCLOSURE REQUIREMENTS PURSUANT TO PART EIGHT, PARA. 3 OF ART. 431 OF REGULATION (EU) 575/2013 DATED 26 JUNE 2013 AND SUBSEQUENT ADDITIONS AND AMENDMENTS	164
DECLARATION OF THE MANAGER RESPONSIBLE FOR PREPARING THE COMPANY'S FINANCIAL REPORTS	165

# INTRODUCTION

Prudential rules for banks and investment companies contained in Regulation (EU) no. 575/2013 of 26 June 2013 (Capital Requirements Regulation, CRR) as later amended and supplemented in Directive 2013/36/EU of 26 June 2013 (Capital Requirements Directive, CRD) entered into force on 1 January 2014. These rules transpose the standards defined by the Basel Committee for Banking Supervision (so-called Basel 3 framework) into the European Union.

Regulation (EU) no. 876/2019 of 20 May 2019 (Capital Requirements Regulation II, hereinafter also CRR II) amends Regulation (EU) no. 575/2013. The main changes introduced relate to the change in the frequency of disclosure and the quantitative information to be incorporated in the submission. With regard to the formal policy that the institution must adopt, clarification has been provided in Article 431:

- the management body or senior management shall put in place and maintain internal processes, systems and controls to verify that the institutions' disclosures are appropriate and in compliance with the requirements laid down in the CRR;
- information to be disclosed shall be subject to the same level of internal verification as that applicable to the management report included in the institution's consolidated financial report;
- one member of the management body or senior management shall attest in writing that the relevant institution has made the disclosures required in accordance with the formal policies and internal processes, systems and controls.

On 19 June 2024, regulations updating the Capital Requirements Regulation (CRR3) and Capital Requirements Directive (CRD 6) were published in the Official Journal of the European Union.

The new standards, issued as part of the Basel III framework (Basel III plus, also known as Basel IV), are respectively implemented in the following regulatory documents:

- Regulation (EU) no. 1623/2024 (CRR3) of the European Parliament and of the Council of 31 May 2024 amending Regulation (EU) no. 575/2013 as regards requirements for credit risk, credit valuation adjustment risk, operational risk, market risk and the output floor;
- Directive (EU) no. 1619/2024 (CRD6) of the European Parliament and of the Council of 31 May 2024 amending Directive 2013/36/EU as regards supervisory powers, sanctions, third-country branches, and environmental, social and governance risks.

The introduction of the new framework is aimed at ensuring:

- greater resilience of the EU-wide banking system to potential future economic shocks, through more risk-sensitive assessments including under the standardised approach;
- greater comparability of different approaches across institutions including on account of the introduction of the output floor, which sets a lower limit to the capital requirements that are produced by institutions' internal models to 72.5 % of the capital requirements that would apply if standardised approaches were used.

The recommended dates of application of these new standards are 1 January 2025<sup>1</sup> for the CRR3 Regulation and 11 January 2026 for CRD6.

This regulatory framework aims at improving the prudential regulations and risk management in the banking sector, with a gradual implementation starting in 2025 and to be completed by 2033.

The regulatory framework is completed with the implementing measures contained in the Regulatory or Implementing Technical Standards (RTS and ITS) adopted by the European Commission on the proposal of the European Supervisory Authorities.

The harmonised legislation has been transposed into national law through the Bank of Italy Circular 285 of 17 December 2013 and subsequent updates entitled "Supervisory Instructions for Banks".

<sup>1</sup> On 24 July 2024, the European Commission adopted Regulation no. 2795/2024 which, pursuant to article 461a of Regulation (EU) no. 575/2013 (CRR) as amended by Regulation (EU) no. 1623/2024 (CRR3), introduced article 520a concerning the application of own funds requirements for market risk. With this article, the application of the revised market risk framework in the EU, the so-called Fundamental Review of the Trading Book (FRTB), is postponed by one year to 1 January 2026. On 19 September 2025, Commission Delegated Regulation (EU) no. 1496/2025 of 12 June 2025 was published, postponing its application until 1 January 2027.

The regulatory framework is designed to strengthen the banks' capacity to absorb shocks deriving from financial and economic tensions, regardless of their origin, to improve risk management and governance, as well as to strengthen transparency and disclosure to the market. The function of the Third Pillar (Pillar 3) - market discipline - is to integrate with the minimum capital requirements (Pillar 1) and the prudential control process (Pillar 2). It aims to encourage market discipline by identifying a set of disclosure transparency requirements that allow operators to have fundamental information on Own Funds, the scope of recognition, exposure and risk assessment processes and, consequently, on the capital adequacy of intermediaries. These requirements are particularly relevant in the present situation, where the current provisions, when adequate and permissible, rely extensively on internal risk assessment methods, giving banks significant discretion when determining capital requirements.

Public disclosures by institutions (Pillar 3) are governed directly by:

- CRR, Part Eight "Disclosure by Institutions", as amended by CRR II, applicable as of 28 June 2021 and by CRR3, applicable as of 1 January 2025<sup>2</sup>;
- European Commission regulations containing regulatory and implementing technical standards to regulate standard templates and tables for the public disclosure by institutions of the information referred to in Part Eight of the CRR and subsequent updates.

On 26 June 2020, Regulation (EU) no. 873/2020 of 24 June 2020 (CRR "quick fix") was published on the website of the Official Journal of the European Union. This regulation, amending Regulation (EU) no. 575/2013 and Regulation (EU) no. 876/2019, introduces rapid solutions in response to the Covid-19 pandemic.

On 12 May 2021 the Official Journal of the European Union published Regulation (EU) no. 763/2021 of 23 April 2021 laying down implementing technical standards for the application of Regulation (EU) no. 575/2013 of the European Parliament and of the Council and Directive 2014/59/EU of the European Parliament and of the Council with regard to the supervisory reporting and public disclosure of the minimum requirement for own funds and eligible liabilities. Pursuant to Article 17 of the aforementioned Regulation, Title II "Public Disclosure by Institutions" applies from 1 January 2024, as the BPER Banca Group is not a G-SII institution. The frequency of disclosure is set by Article 9 of the Regulation and is different depending on whether institutions are identified as "resolution entities that are a G-SII or part of a G-SII" or as "resolution entities that are neither G-SIIs nor part of a G-SII". As at the date of preparation of this report, the BPER Banca Group falls within the latter category; disclosure under Regulation no. 763/2021 has applied starting from the disclosure as at 30 June 2024 on a six-monthly basis.

On 7 June 2024, Commission Implementing Regulation (EU) no. 1618/2024 of 6 June 2024 amending Commission Implementing Regulation (EU) no. 763/2021 was published in the Official Journal of the European Union<sup>3</sup>.

This regulation applies from 27 December 2024.

On 31 December 2024, Implementing Regulation (EU) no. 3172/2024 was published on the Official Journal of the European Union establishing the technical implementing rules for application of the provisions relating to public disclosures by institutions of the information referred to in Part Eight, Titles II and III of CRR3. This regulation, applicable from 1 January 2025, repeals Implementing Regulation (EU) no. 637/2021.

New Commission Implementing Regulation (EU) no. 3172/2024 also adopts information templates and the relating instructions previously introduced by Commission Implementing Regulation (EU) no. 2453/2022 and by Commission Implementing Regulation (EU) no. 631/2022, both amending previous Commission Implementing Regulation (EU) no. 637/2021 and developed to comply with the disclosure requirements laid down in Articles:

- 449a of the CRR, which requires that credit institutions should disclose information on ESG risks, including physical risks and transition risks;
- 448 of the CRR, relating to the disclosure of exposures to interest rate risk on positions not held in the trading book (IRRBB – Interest Rate Risk in the Banking Book).

<sup>2</sup> See previous note.

<sup>3</sup> With more specific regard to Public Disclosure - Pillar 3, Regulation (EU) no. 1618/2024 amends Implementing Regulation (EU) no. 763/2021 by replacing EU TLAC1 - Composition - MREL and, where applicable, G-SII requirement for own funds and eligible liabilities (in millions) and EU ILAC "Internal loss-absorbing capacity: internal MREL and, where applicable, requirement for own funds and eligible liabilities for non-EU G-SIIs".

More specifically, with reference to the ESG risk disclosure, on 22 May 2025, the EBA launched a consultation to modify the disclosure requirements set forth in Implementing Regulation (EU) no. 3172/2024. The document being considered, i.e. the “Draft Implementing Technical Standards amending Commission Implementing Regulation (EU) 2024/3172, as regards the disclosures on ESG risks, equity exposures and the aggregate exposure to shadow banking entities” (EBA/CP/2025/07), aims at enhancing the transparency and consistency of disclosures, while simplifying the reporting process for credit institutions. As regards the disclosure on ESG risks, in accordance with the CRR3 mandate, the proposal broadens the scope of institutions required to disclose ESG information to include not only large listed institutions, but also large unlisted entities and other types, small and non-complex entities, and large subsidiaries. The consultation ended on 22 August 2025 and the Final Report is currently being awaited. On 6 August 2025, the EBA published a no-action letter on the application of the ESG Pillar 3 disclosure requirements under the EBA disclosure ITS. This letter aims to address legal and operational uncertainties linked to the evolving ESG disclosure framework, in light of the proposed amendments under the European Commission’s Omnibus legislative package on sustainability reporting. More specifically, the EBA recommends that, for the period starting from the reference date of 30 June 2025 and until the adoption and entry into force of amendments to the EBA’s technical implementing standards on disclosure, for large institutions which have issued securities that are admitted to trading on a regulated market of any Member State, the competent authorities should not prioritise the enforcement of:

- the disclosure of ESG quantitative templates, notably EU 6 to EU 10, and column c (“of which environmentally sustainable (CCM)”) in Templates 1 and 4 of Commission Implementing Regulation (EU) 2024/3172;
- the collection of ESG quantitative templates EU 6 to 10, and column c in ESG Templates 1 and 4, pursuant to EBA Decision EBA/DC/498 of 6 July 2023.

In light of the above, as of 30 June 2025, the publication of ESG Templates EU 6 to EU 10 and column c of ESG Templates 1 and 4 will be omitted.

Implementing Regulation (EU) no. 637/2021 ceased to apply on 1 January 2025, with the exception of article 15 and Annexes XXIX and XXX, which will continue to apply until 31 December 2025<sup>4</sup> solely for the purposes of Article 16 (“Disclosure of the use of the standardised approach and of the alternative internal models for market risk”) of Implementing Regulation (EU) no. 3172/2024.

By decision dated 22 November 2024, the Bank of Italy, identified, for the year 2025, the BPER Banca Group as other systemically important institutions (hereinafter also “O-SII”) authorised to operate in Italy. In particular, the BPER Banca Group fits within the first of eight buckets of systemic importance and shall maintain an O-SII buffer of 0.25 per cent of its total risk-weighted exposure as of 1 January 2025.

For the purposes of current legislation, as at 30 June 2025, the BPER Banca Group is considered a significant institution.

This document, entitled “Public Disclosure as at 30 June 2025 – Pillar 3”, has been prepared by BPER Banca, Parent Company, on a consolidated basis with reference to the scope of consolidation used for supervisory purposes.

As required by Article 433 of the CRR, the European Banking Authority publishes the quarterly disclosure on its website on the date of publication of the institution’s financial report for the corresponding period, or as soon as possible after that date. The document is made available by publication in the institutional area of the Bank’s website, as allowed by the relevant regulations<sup>5</sup>.

Based on Article 433 of the CRR, institutions shall publish the information required under Titles II and III in the manner set out in Article 433a and using the templates set out in Regulation (EU) no. 3172/2024<sup>6</sup> and Regulation (EU) no. 763/2021.

On the basis of Article 434a of the CRR3, an initiative launched by the EBA is currently being finalised with the aim of centralising prudential information through a single electronic access point on the EBA website, the so-called Pillar 3 Data Hub, to enhance transparency and comparability in the Pillar 3 Disclosures.

According to the timetable set out in the Final Draft ITS (EBA/ITS/2025/01), a gradual transition to this new system is planned, with adoption by large institutions (including the BPER Banca Group) and other institutions starting on 30 June 2025 as the first reference date for Pillar 3 disclosures, and by small and non-complex institution by 31 December 2025.

The “Public Disclosure as at 30 June 2025 – Pillar 3” document was prepared on a collaborative basis by the various bodies and internal organisations involved in the governance and performance of processes, consistent with the duties assigned to them in the internal regulations of the BPER Banca Group.

4 On 19 September 2025, Commission Delegated Regulation (EU) no. 1496/2025 of 12 June 2025 was published, postponing the application of the revised market risk framework in the EU until 1 January 2027.

5 Article 434 of the CRR.

6 Regulation (EU) no. 637/2021 shall continue to apply until 31 December 2025 limited to Article 15 and to Annexes XXIX and XXX solely for the purposes of Article 16 of Regulation (EU) no. 3172/2024.

The document is accompanied by the:

- Declaration of the Manager responsible for preparing the company's financial reports, pursuant to para. 2 of Article 154-bis of the Consolidated Law on Finance (TUF);
- Joint Statement of the CEO and the Manager responsible for preparing the company's financial reports in order to comply with the disclosure requirements laid down in Article 431, paragraph 3 of the CRR, as later amended and supplemented.

It should be noted that Articles 437a<sup>7</sup> (Disclosure on own funds and eligible liabilities), 441<sup>8</sup> (Indicators of global systemic importance), 447 (Disclosure on key metrics) letter h)<sup>9</sup>, 451b (Disclosure of crypto-asset exposures and related activities), 454 (Use of the advanced measurement approaches to operational risk) and 455 (Use of Internal Market Risk models) of Regulation (EU) no. 575/2013 as later amended do not apply, regardless of the frequency of publication of the templates.

All of the amounts shown in the document are expressed in millions of Euro, unless otherwise specified. Any misalignment between the data in the models of this document only depends on rounding.

The persistent uncertainty in the general and sectoral macroeconomic scenario, mainly due to the geopolitical tensions caused by the armed conflicts in Russia-Ukraine, accompanied by measures to combat climate risk with unpredictable effects on the economic and production system, have led the BPER Banca Group to maintain constant control and continuous monitoring in particular of credit risk and its assessment for treatment in the Financial Report.

---

7 The BPER Banca Group not being a G-SII.

8 The BPER Banca Group not being a G-SII.

9 The BPER Banca Group not being a G-SII.

## Reference to the regulatory requirements of CRR Part VIII as at 30 June 2025

The following table summarises where to find the information provided to the market on a quarterly and half-yearly basis in accordance with European regulatory requirements including, in particular, CRR Part VIII as later amended, in force as at 30 June 2025.

CRR Articles	Pillar 3 Chapter
art. 431, 432	INTRODUCTION
art. 437	2. OWN FUNDS
art. 437a	Not applicable
art. 438	1. GENERAL DISCLOSURE REQUIREMENTS 9. CREDIT RISK: DISCLOSURE ON THE IRB APPROACH 10. EXPOSURES TO COUNTERPARTY CREDIT RISK 12. MARKET RISK
art. 439	10. EXPOSURES TO COUNTERPARTY CREDIT RISK
art. 440	3. CAPITAL REQUIREMENTS
art. 442	6. CREDIT RISK: CREDIT QUALITY
art. 444	2. OWN FUNDS 8. CREDIT RISK: DISCLOSURE ON THE STANDARDISED APPROACH 10. EXPOSURES TO COUNTERPARTY CREDIT RISK
art. 445	12. MARKET RISK
art. 447 (*)	1. GENERAL DISCLOSURE REQUIREMENTS
art. 448	13. EXPOSURES TO INTEREST RATE RISK ON POSITIONS NOT HELD IN THE TRADING BOOK
art. 449	11. SECURITISATION EXPOSURES
art. 449a	14. ESG RISK
art. 449b	Not applicable
art. 451	4. FINANCIAL LEVERAGE
art. 451a	5. LIQUIDITY RISK
art. 452	9. CREDIT RISK: DISCLOSURE ON THE IRB APPROACH 10. EXPOSURES TO COUNTERPARTY CREDIT RISK
art. 453	7. CREDIT RISK MITIGATION TECHNIQUES 8. CREDIT RISK: DISCLOSURE ON THE STANDARDISED APPROACH 9. CREDIT RISK: DISCLOSURE ON THE IRB APPROACH
art. 455	Not applicable

(\*) Article 447 letter h), introduced by Regulation (EU) 2019/876 does not apply, as the BPER Banca Group is not a G-SII.

The following table shows where to find, on a quarterly and half-yearly basis<sup>10</sup>, the disclosure requirements laid down in Regulation (EU) no. 3172/2024<sup>11</sup> in the Pillar 3 - Public Disclosure as at 30 June 2025. The reasons why individual templates are deemed not applicable to the BPER Banca Group are also reported, if required.

<sup>10</sup> The frequency of disclosure by large institutions is precisely regulated by Article 433a of the CRR3 ("Disclosure by large Institutions").

<sup>11</sup> Regulation (EU) no. 637/2021 ceased to apply on 1 January 2025, with the exception of article 15 and Annexes XXIX and XXX, which will continue to apply until 31 December 2025 solely for the purposes of Article 16 of Regulation (EU) no. 3172/2024. On 19 September 2025, Commission Delegated Regulation (EU) no. 1496/2025 of 12 June 2025 was published, postponing the application of the revised market risk framework in the EU until 1 January 2027.

Code	Title	Pillar 3 chapter
EU KM1	Key metrics template	01. GENERAL DISCLOSURE REQUIREMENTS
EU KM2	Key metrics - MREL and, where applicable, G-SII Requirement for own funds and eligible liabilities	01. GENERAL DISCLOSURE REQUIREMENTS
EU OV1	Overview of total risk exposure amounts	01. GENERAL DISCLOSURE REQUIREMENTS
EU CMS1	Comparison of modelled and standardised risk weighted exposure amounts at risk level	01. GENERAL DISCLOSURE REQUIREMENTS
EU CMS2	Comparison of modelled and standardised risk weighted exposure amounts for credit risk at asset class level	01. GENERAL DISCLOSURE REQUIREMENTS
EU CC1	Composition of regulatory own funds	02. OWN FUNDS
EU CC2	Reconciliation of regulatory own funds to balance sheet in the audited financial statements	02. OWN FUNDS
EU CCYB1	Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer	03. CAPITAL REQUIREMENTS
EU CCYB2	Amount of institution-specific countercyclical capital buffer	03. CAPITAL REQUIREMENTS
EU LR1	LRSum: Summary reconciliation of accounting assets and leverage ratio exposures	04. FINANCIAL LEVERAGE
EU LR2	LRCom: Leverage ratio common disclosure	04. FINANCIAL LEVERAGE
EU LR3	LR Spl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures)	04. FINANCIAL LEVERAGE
EU LIQ1	Quantitative information of LCR	05. LIQUIDITY RISK
EU LIQB	Qualitative information on LCR, which complements template EU LIQ1	05. LIQUIDITY RISK
EU LIQ2	Net Stable Funding Ratio	05. LIQUIDITY RISK
EU CR1-A	Maturity of exposures	06. CREDIT RISK: CREDIT QUALITY
EU CR1	Performing and non-performing exposures and related provisions	06. CREDIT RISK: CREDIT QUALITY
EU CQ1	Credit quality of forborne exposures	06. CREDIT RISK: CREDIT QUALITY
EU CQ7	Collateral obtained by taking possession and execution processes	06. CREDIT RISK: CREDIT QUALITY
EU CR2	Changes in the stock of non-performing loans and advances	06. CREDIT RISK: CREDIT QUALITY
EU CQ4 <sup>(1)</sup>	Quality of non-performing exposures by geography	06. CREDIT RISK: CREDIT QUALITY
EU CQ5 <sup>(1)</sup>	Credit quality of loans and advances to non-financial corporations by industry	06. CREDIT RISK: CREDIT QUALITY
EU CR3	CRM techniques overview: Disclosure of the use of credit risk mitigation techniques	07. CREDIT RISK MITIGATION TECHNIQUES
EU CR4	Standardised approach – Credit risk exposure and CRM effects	08. CREDIT RISK: DISCLOSURE ON THE STANDARDISED APPROACH
EU CR5	Standardised approach	08. CREDIT RISK: DISCLOSURE ON THE STANDARDISED APPROACH
EU CR7-A	IRB approach – Disclosure of the extent of the use of CRM techniques	09. CREDIT RISK: DISCLOSURE ON THE IRB APPROACH
EU CR8	RWEA flow statements of credit risk exposures under the IRB approach	09. CREDIT RISK: DISCLOSURE ON THE IRB APPROACH
EU CR6	IRB approach – Credit risk exposures by exposure class and PD range	09. CREDIT RISK: DISCLOSURE ON THE IRB APPROACH
EU CR7	IRB approach – Effect on the RWEAs of credit derivatives used as CRM techniques	09. CREDIT RISK: DISCLOSURE ON THE IRB APPROACH
EU CR10 <sup>(2)</sup>	Specialised lending and equity exposures under the simple risk-weighted approach	09. CREDIT RISK: DISCLOSURE ON THE IRB APPROACH
EU CCR1	Analysis of CCR exposure by approach	10. EXPOSURES TO COUNTERPARTY CREDIT RISK
EU CCR3	Standardised approach – CCR exposures by regulatory exposure class and risk weights	10. EXPOSURES TO COUNTERPARTY CREDIT RISK
EU CCR4 <sup>(3)</sup>	IRB approach – CCR exposures by exposure class and PD scale	10. EXPOSURES TO COUNTERPARTY CREDIT RISK
EU CCR5	Composition of collateral for CCR exposures	10. EXPOSURES TO COUNTERPARTY CREDIT RISK
EU CCR6 <sup>(4)</sup>	Credit derivatives exposures	10. EXPOSURES TO COUNTERPARTY CREDIT RISK
EU CCR7 <sup>(5)</sup>	RWEA flow statements of CCR exposures under the IMM	10. EXPOSURES TO COUNTERPARTY CREDIT RISK
EU CCR8	Exposures to CCPs	10. EXPOSURES TO COUNTERPARTY CREDIT RISK
EU SEC1	Securitisation exposures in the non-trading book	11. SECURITISATION EXPOSURES
EU SEC2 <sup>(6)</sup>	Securitisation exposures in the trading book	11. SECURITISATION EXPOSURES
EU SEC3	Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor	11. SECURITISATION EXPOSURES
EU SEC4	Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor	11. SECURITISATION EXPOSURES
EU SEC5	Exposures securitised by the institution - Exposures in default and specific credit risk adjustments	11. SECURITISATION EXPOSURES
EU MR1	Market risk under the standardised approach	12. MARKET RISK
EU MR2-A <sup>(7)</sup>	Market risk under the internal Model Approach (IMA)	12. MARKET RISK

(continued)

Code	Title	Pillar 3 chapter
EU MR2-B <sup>(7)</sup>	RWEA flow statements of market risk exposures under the IMA	12. MARKET RISK
EU MR3 <sup>(7)</sup>	IMA values for trading portfolios	12. MARKET RISK
EU MR4 <sup>(7)</sup>	Comparison of VaR estimates with gains/losses	12. MARKET RISK
EU CVA4 <sup>(8)</sup>	RWEA flow statements of credit valuation adjustment risk under the Standardised Approach (SA)	Not applicable
EU IRRBB1	Interest rate risks of non-trading book activities	13. EXPOSURES TO INTEREST RATE RISK ON POSITIONS NOT HELD IN THE TRADING BOOK
Table 1	Qualitative information on environmental risk	14. ESG RISK
Table 2	Qualitative information on social risk	14. ESG RISK
Table 3	Qualitative information on governance risk	14. ESG RISK
Template 1 <sup>(9)</sup>	Banking book - Indicators of potential climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	14. ESG RISK
Template 2	Banking book - Indicators of potential climate change transition risk: loans collateralised by immovable property - Energy efficiency of the collateral	14. ESG RISK
Template 3	Banking book - Indicators of potential climate change transition risk: Alignment metrics	14. ESG RISK
Template 4 <sup>(9)</sup>	Banking book - Indicators of potential climate change transition risk: Exposures to top 20 carbon-intensive firms	14. ESG RISK
Template 5	Banking book - Indicators of potential climate change physical risk: Exposures subject to physical risk	14. ESG RISK
Template 6 <sup>(9)</sup>	Summary of key performance indicators (KPIs) on the Taxonomy-aligned exposures	14. ESG RISK
Template 7 <sup>(9)</sup>	Mitigating actions: Assets for the calculation of GAR	14. ESG RISK
Template 8 <sup>(9)</sup>	GAR (%)	14. ESG RISK
Template 9.1 <sup>(9)(10)</sup>	Mitigating actions: Assets for the calculation of BTAR	14. ESG RISK
Template 9.2 <sup>(9)(10)</sup>	BTAR %	14. ESG RISK
Template 9.3 <sup>(9)(10)</sup>	Summary table – BTAR %	14. ESG RISK
Template 10 <sup>(9)</sup>	Other climate change mitigating actions that are not covered in Regulation (EU) 2020/852	14. ESG RISK

(1) Templates with supplementary columns with yearly frequency of disclosure. For further details, please refer to chapter 6 “Credit risk: credit quality”.

(2) Please note that only the templates applicable to the type of financing/exposure present at the reference date have been produced.

(3) Only the standardised approach is used for counterparty risk.

(4) There are no credit derivative exposures.

(5) No internal models are applied to exposures subject to CCR.

(6) There are no securitisation exposures in the trading book

(7) No internal models are used for market risk.

(8) The standardised approach for credit valuation adjustment risk is not used.

(9) Templates EU 6 to EU 10, and column c (“of which environmentally sustainable (CCM)”) in Templates 1 and 4 are not presented in compliance with the EBA consultation document of 22 May 2025 (EBA/CP/2025/07) and the no action letter published by the EBA on 6 August 2025.

(10) Templates not presented as subject to voluntary disclosure.

# 1. GENERAL DISCLOSURE REQUIREMENTS

## 1.1 Key metrics of the BPER Banca Group

Based on the requirements of Article 447 CRR II (Disclosure of key metrics), the table shows the key capital and risk metrics of the BPER Banca Group. For further details, please refer to para. 3.1 “Specific regulatory requirements” of this document.

### Template EU KM1 – Key metrics template (in millions)

		a	b	c	d	e
		30.06.2025	31.03.2025	31.12.2024	30.09.2024	30.06.2024
<b>Available own funds (amounts)</b>						
1	Common Equity Tier 1 (CET1) capital	9,018	8,835	8,579	8,401	8,153
2	Tier 1 capital	10,133	9,951	9,695	9,022	8,799
3	Total capital	11,691	11,530	11,266	10,798	10,579
<b>Risk-weighted exposure amounts</b>						
4	Total Risk exposure amount	55,597	55,871	54,228	53,241	53,417
4a	Total risk exposure pre-floor	55,597	55,871			
<b>Capital ratios (as a percentage of risk-weighted exposure amount)</b>						
5	Common Equity Tier 1 ratio (%)	16.22%	15.81%	15.82%	15.78%	15.26%
5b	Common Equity Tier 1 ratio considering unfloored TREA (%)	16.22%	15.81%			
6	Tier 1 ratio (%)	18.23%	17.81%	17.88%	16.95%	16.47%
6b	Tier 1 ratio considering unfloored TREA (%)	18.23%	17.81%			
7	Total capital ratio (%)	21.03%	20.64%	20.77%	20.28%	19.81%
7b	Total capital ratio considering unfloored TREA (%)	21.03%	20.64%			
<b>Additional own funds requirements to address risks other than the risk of excessive leverage (as a percentage of risk-weighted exposure amount)</b>						
EU 7d	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	2.25%	2.25%	2.25%	2.25%	2.25%
EU 7e	<i>of which: to be made up of CET1 capital (percentage points)</i>	1.27%	1.27%	1.27%	1.27%	1.27%
EU 7f	<i>of which: to be made up of Tier 1 capital (percentage points)</i>	1.69%	1.69%	1.69%	1.69%	1.69%
EU 7g	Total SREP own funds requirements (%)	10.25%	10.25%	10.25%	10.25%	10.25%
<b>Combined buffer and overall capital requirement (as a percentage of risk-weighted exposure amount)</b>						
8	Capital conservation buffer (%)	2.50%	2.50%	2.50%	2.50%	2.50%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)	-	-	-	-	-
9	Institution specific countercyclical capital buffer (%)	0.056%	0.057%	0.041%	0.042%	0.043%
EU 9a	Systemic risk buffer (%)	0.745%	0.341%	0.362%	-	-
10	Global Systemically Important Institution buffer (%)	-	-	-	-	-
EU 10a	Other Systemically Important Institution buffer (%)	0.250%	0.250%	0.125%	0.125%	0.125%
11	Combined buffer requirement (%)	3.550%	3.148%	3.028%	2.667%	2.668%
EU 11a	Overall capital requirements (%)	13.80%	13.40%	13.28%	12.92%	12.92%
12	CET1 available after meeting the total SREP own funds requirements (%)	10.45%	10.05%	10.05%	9.26%	8.78%

**continued: Template EU KM1 – Key metrics template (in millions)**

		a	b	c	d	e
		30.06.2025	31.03.2025	31.12.2024	30.09.2024	30.06.2024
<b>Leverage ratio</b>						
13	Total exposure measure	149,894	147,222	145,976	145,381	144,449
14	Leverage ratio (%)	6.76%	6.76%	6.64%	6.21%	6.09%
<b>Additional own funds requirements to address the risk of excessive leverage (as a percentage of total exposure measure)</b>						
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)	-	-	-	-	-
EU 14b	<i>of which: to be made up of CET1 capital (percentage points)</i>	-	-	-	-	-
EU 14c	Total SREP leverage ratio requirements (%)	3.00%	3.00%	3.00%	3.00%	3.00%
<b>Leverage ratio buffer and overall leverage ratio requirement (as a percentage of total exposure measure)</b>						
EU 14d	Leverage ratio buffer requirement (%)	-	-	-	-	-
EU 14e	Overall leverage ratio requirement (%)	3.00%	3.00%	3.00%	3.00%	3.00%
<b>Liquidity Coverage Ratio</b>						
15	Total high-quality liquid assets (HQLA) (Weighted value - average)	26,185	25,904	25,615	24,898	24,658
EU 16a	Cash outflows - Total weighted value	19,055	19,014	19,006	18,823	18,661
EU 16b	Cash inflows - Total weighted value	3,523	3,488	3,484	3,562	3,692
16	Total net cash outflows (adjusted value)	15,532	15,525	15,522	15,261	14,969
17	Liquidity coverage ratio (%)	168.645%	166.852%	165.050%	163.213%	165.402%
<b>Net Stable Funding Ratio</b>						
18	Total available stable funding	103,495	102,746	104,901	103,465	104,528
19	Total required stable funding	76,665	76,440	76,190	76,036	77,664
20	NSFR ratio (%)	134.997%	134.414%	137.683%	136.073%	134.589%

It should be noted that the 2025 capital ratios are to be considered phased-in with respect to the new prudential supervisory framework in force as of 1 January 2025 (Basel IV).

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

The increase in Tier 1 Capital as at 30 June 2025 as compared to 31 March 2025, is primarily traceable to lower deductions from Tier 1 capital in relation to deferred tax assets that are dependent on future profitability and that do not arise from temporary differences for an amount of Euro 66.7 million. The CET1 amount as at 30 June 2025 was calculated to include the portion of profit for the period that can be allocated to equity, totalling Euro 235.3 million (Euro +105.1 million compared to the previous quarter).

## Template EU KM2 – Key metrics - MREL and, where applicable, G-SII requirement for own funds and eligible liabilities (in millions)

		Minimum requirement for own funds and eligible liabilities (MREL)
		a
		30.06.2025
<b>Own funds and eligible liabilities, ratios and components</b>		
1	Own funds and eligible liabilities	19,086
EU-1a	<i>Of which own funds and subordinated liabilities</i>	13,209
2	Total risk exposure amount of the resolution group (TREA)	55,597
3	Own funds and eligible liabilities as a percentage of the TREA	34.33%
EU-3a	<i>Of which own funds and subordinated liabilities</i>	23.76%
4	Total exposure measure (TEM) of the resolution group	149,894
5	Own funds and eligible liabilities as percentage of the TEM	12.73%
EU-5a	<i>Of which own funds or subordinated liabilities</i>	8.81%
6a	Does the subordination exemption in Article 72(b)(4) of Regulation EU no. 575/2013 (CRR) apply? (5% exemption)	
6b	Aggregate amount of permitted non-subordinated eligible liabilities instruments if the subordination discretion in accordance with Article 72b(3) of Regulation EU no. 575/2013 is applied (max 3.5% exemption)	
6c	If a capped subordination exemption applies under Article 72(b)(3) of the CRR, the amount of funding issued that ranks <i>pari passu</i> with excluded liabilities and that is recognised under row 1, divided by funding issued that ranks <i>pari passu</i> with excluded liabilities and that would be recognised under row 1 if no cap was applied (%)	
<b>Minimum requirement for own funds and eligible liabilities (MREL)</b>		
EU-7	MREL expressed as a percentage of the TREA	25.46%
EU-8	<i>Of which to be met with own funds or subordinated liabilities</i>	18.60%
EU-9	MREL expressed as a percentage of the TEM	6.52%
EU-10	<i>Of which to be met with own funds or subordinated liabilities</i>	6.52%

The BPER Group Bank is not a G-SII entity (no TLAC requirement is necessary).

## Template EU OV1 – Overview of total risk exposure amounts (in millions)

		Total risk exposure amounts (TREA)		Total own funds requirements
		a	b	c
		30.06.2025	31.03.2025	30.06.2025
<b>1</b>	<b>Credit risk (excluding CCR)</b>	<b>44,580</b>	<b>44,785</b>	<b>3,566</b>
2	<i>Of which standardised approach</i>	20,838	18,066	1,667
3	<i>Of which the Foundation IRB (F-IRB) approach</i>	4,646	7,897	372
4	<i>Of which slotting approach</i>	188	163	15
EU 4a	<i>Of which equities under the simple risk-weighted approach</i>	-	-	-
5	<i>Of which the Advanced IRB (A-IRB) approach</i>	18,620	18,371	1,490
<b>6</b>	<b>Counterparty credit risk - CCR</b>	<b>482</b>	<b>523</b>	<b>39</b>
7	<i>Of which standardised approach</i>	438	394	35
8	<i>Of which internal model method (IMM)</i>	-	-	-
EU 8a	<i>Of which exposures to a CCP</i>	17	8	1
9	<i>Of which other CCR</i>	27	121	2
<b>10</b>	<b>Credit valuation adjustments risk - CVA risk</b>	<b>140</b>	<b>94</b>	<b>11</b>
EU 10a	<i>Of which the standardised approach (SA)</i>	-	-	-
EU 10b	<i>Of which the basic approach (F-BA and R-BA)</i>	140	94	11
EU 10c	<i>Of which the simplified approach</i>	-	-	-
<b>15</b>	<b>Settlement risk</b>	-	-	-
<b>16</b>	<b>Securitisation exposures in the non-trading book (after the cap)</b>	<b>87</b>	<b>101</b>	<b>7</b>
17	<i>Of which SEC-IRBA approach</i>	-	-	-
18	<i>Of which SEC-ERBA (including IAA)</i>	1	4	-
19	<i>Of which SEC-SA approach</i>	49	59	4
EU 19a	<i>Of which 1250% / deduction</i>	31	32	2
<b>20</b>	<b>Position, foreign exchange and commodities risks (Market risk)</b>	<b>696</b>	<b>755</b>	<b>56</b>
<b>EU 22a</b>	<b>Large exposures</b>	-	-	-
<b>23</b>	<b>Reclassifications between trading and non-trading books</b>	-	-	-
<b>24</b>	<b>Operational risk</b>	<b>9,618</b>	<b>9,618</b>	<b>769</b>
<b>EU 24a</b>	<b>Exposures to crypto-assets</b>	-	-	-
<b>25</b>	<b>Amounts below the thresholds for deduction (subject to 250% risk weight)</b>	<b>2,617</b>	<b>2,769</b>	<b>209</b>
<b>26</b>	<b>Output floor applied (%)</b>	<b>50.00%</b>	<b>50.00%</b>	
<b>27</b>	<b>Floor adjustment (before application of transitional cap)</b>	-	-	
<b>28</b>	<b>Floor adjustment (after application of transitional cap)</b>	-	-	
<b>29</b>	<b>Total</b>	<b>55,603</b>	<b>55,877</b>	<b>4,448</b>

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts. Figures in column c) are 8% of the amounts posted in each row of column a).

Row 1 "Credit Risk (excluding CCR)" includes Other Risks for an amount of approximately Euro 288 million. Total exposure (row 29) includes securitisations deducted from Own Funds in the amount of about Euro 6 million.

Until the date of application of the alternative methods under Part Three, title IV, Chapters 1-bis and 1-ter of Regulation (EU) no. 575/2013 for the actual calculation of own funds requirements pursuant to art. 92, para. 4, letter b), item i) and letter c), and paragraph 5, letters b) and c), of the same Regulation, lines 21, 21a and 22 do not apply.

RWAs as at 30 June 2025 were slightly down with respect to the previous quarter (Euro -274 million).

The key drivers of this change include:

- Credit and Counterparty Risk (Euro -261 million):
  - with regard to the Standard portfolio, there was an increase in RWAs compared to the previous quarter (Euro +2,715 million), primarily attributable to:
    - transition to the Standardised Approach of Other Assets (Euro +2,498 million);
    - the increase in lending (Euro +573 million);
    - the decrease in deferred tax assets (Euro -155 million).
  - With regard to the IRB portfolio, there was a reduction in RWAs for an amount of Euro -2,976 million, primarily attributable to:
    - transition to the Standardised Approach of Other Assets (Euro -3,456 million);
    - change in the risk profile of the portfolio (Euro +496 million).
- Market Risk (Euro -59 million); the reduction is attributable mainly to debt securities (Euro -89 million), partly offset by an increase in equity instruments (Euro +31 million).
- CVA (Euro +46 million): the rise is linked to increased exposure to a specific counterparty.

### Template EU CMS1 – Comparison of modelled and standardised risk weighted exposure amounts at risk level (in millions)

	a	b	c	d	EU d
	RWEAs for modelled approaches that banks have supervisory approval to use	RWEAs for portfolios where standardised approaches are used	Total actual RWEAs (a + b)	RWEAs calculated using full standardised approach	RWEAs that is the base of the output floor
1 Credit risk (excluding Counterparty credit risk)	23,455	20,838	44,292	56,795	54,687
2 Counterparty credit risk	-	482	482	482	482
3 Credit valuation adjustment		140	140	140	140
4 Securitisation exposures in the banking book	-	81	81	81	81
5 Market risk	-	696	696	696	696
6 Operational risk		9,618	9,618	9,618	9,618
7 Other risk-weighted exposure amounts		288	288	-	-
<b>8 Total</b>	<b>23,455</b>	<b>32,148</b>	<b>55,597</b>	<b>67,812</b>	<b>65,704</b>

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

Column (a) reports the values of RWAs referring to the exposures under the advanced approach, while column (b) reports the values referring to exposures under the standardised approach in compliance with regulatory changes to CRR3.

Column (c) shows total RWAs as the sum of columns (a) and (b), where row 8 includes securitisations deducted from Own Funds for an amount of about Euro 6 million.

Column (d) shows the value of full standardised RWAs calculated exclusively in accordance with the standardised calculation metrics for the application of the fully loaded output floor pursuant to art. 465 CRR3. Transitional arrangements still apply only to the provisions of art. 495 of CRR3.

Column (EU d) shows the value of full standardised RWAs calculated exclusively in accordance with the standardised calculation metrics for the application of the output floor pursuant to art. 465 CRR3.

## Template EU CMS2 – Comparison of modelled and standardised risk weighted exposure amounts for credit risk at asset class level (in millions)

		a	b	c	d	EU d
		Risk-weighted exposure amounts (RWEAs)				
		RWEAs for modelled approaches that institutions have supervisory approval to use	RWEAs for column (a) if re-computed using the standardised approach	Total actual RWEAs	RWEAs calculated using full standardised approach	RWEAs that is the base of the output floor
<b>1</b>	Central governments and central banks	-	-	1,940	1,940	1,940
<b>EU 1a</b>	Regional government or local authorities	-	-	121	121	121
<b>EU 1b</b>	Public sector entities	-	-	291	291	291
<b>EU 1c</b>	Categorised as Multilateral Development Banks in SA	-	-	-	-	-
<b>EU 1d</b>	Categorised as International organisations in SA	-	-	-	-	-
<b>2</b>	Institutions	-	-	993	993	993
<b>3</b>	Equity	-	-	1,430	1,430	1,430
<b>5</b>	Corporates	15,600	16,173	22,588	25,243	23,160
<b>5.1</b>	<i>Of which: F-IRB is applied</i>	4,646	6,748	4,646	7,698	6,748
<b>5.2</b>	<i>Of which: A-IRB is applied</i>	10,954	11,584	10,954	12,742	11,584
<b>EU 5a</b>	<i>Of which: Corporates - General</i>	15,412	16,009	22,400	18,092	16,009
<b>EU 5b</b>	<i>Of which: Corporates - Specialised lending</i>	188	164	188	164	164
<b>EU 5c</b>	<i>Of which: Corporates - Purchased receivables</i>	-	-	-	-	-
<b>6</b>	Retail	7,854	6,605	8,702	7,453	7,453
<b>6.1</b>	<i>Of which: Retail – Qualifying revolving</i>	196	333	196	333	333
<b>EU 6.1a</b>	<i>Of which: Retail – Purchased receivables</i>	-	-	-	-	-
<b>EU 6.1b</b>	<i>Of which: Retail – Other</i>	4,450	954	4,450	954	954
<b>6.2</b>	<i>Of which: Retail – Secured by residential real estate</i>	3,208	6,543	3,208	6,543	6,543
<b>EU 7a</b>	Categorised as secured by immovable properties and ADC exposures in SA	-	10,431	2,273	12,730	12,704
<b>EU 7b</b>	Collective investment undertakings (CIU)	-	-	1,035	1,035	1,035
<b>EU 7c</b>	Categorised as exposures in default in SA	-	639	200	839	839
<b>EU 7d</b>	Categorised as subordinated debt exposures in SA	-	-	727	727	727
<b>EU 7e</b>	Categorised as covered bonds in SA	-	-	370	370	370
<b>EU 7f</b>	Categorised as claims on institutions and corporates with a short-term credit assessment in SA	-	-	-	-	-
<b>8</b>	Other non-credit obligation assets	-	-	3,624	3,624	3,624
<b>9</b>	<b>Total</b>	<b>23,455</b>	<b>33,849</b>	<b>44,292</b>	<b>56,795</b>	<b>54,687</b>

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

The table only reports the values of the IRB credit risk positions treated under the standardised approach and are presented following the standardised asset class approach.

Column (a) shows the values of the RWAs referring to exposures under the advanced approach while column (b) reports the values of the same exposures of column (a) to which the standardised approach applies under the new regulatory provisions of CRR3.

Column (c) shows total RWAs for Credit Risk.

Column (d) shows the value of full standardised RWAs calculated exclusively in accordance with the standardised calculation metrics for the application of the fully loaded output floor pursuant to art. 465 CRR3. Transitional arrangements still apply only to the provisions of art. 495 of CRR3.

Column (EU d) shows the value of full standardised RWAs calculated exclusively in accordance with the standardised calculation metrics for the application of the output floor pursuant to art. 465 and 495 of CRR3.

## 2. OWN FUNDS

### Template EU CC1 – Composition of regulatory own funds (in millions)

	a)	a)	b)
	Amounts 30.06.2025	Amounts 31.12.2024	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
<b>Common Equity Tier 1 (CET1) capital: instruments and reserves</b>			
1	3,373	3,366	A
	<i>of which: ordinary shares</i>	<i>3,373</i>	<i>A</i>
2	5,096	4,615	B
3	943	880	C
EU-3a	-	-	
4	-	-	
5	3	2	D
EU-5a	235	550	E
<b>6</b>	<b>9,650</b>	<b>9,413</b>	
<b>Common Equity Tier 1 (CET1) capital: regulatory adjustments</b>			
7	(12)	(11)	F
8	(441)	(477)	G
10	(39)	(196)	H
11	1	-	I
12	-	-	
13	-	-	
14	36	44	L
15	-	-	
16	(9)	(37)	M
17	-	-	
18	-	-	
19	-	-	
EU-20a	-	-	
EU-20b	-	-	
EU-20c	-	-	
EU-20d	-	-	

## continued: Template EU CC1 – Composition of regulatory own funds (in millions)

		a)	a)	b)
		Amounts 30.06.2025	Amounts 31.12.2024	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
<b>continued: Common Equity Tier 1 (CET1) capital: regulatory adjustments</b>				
21	Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met) (negative amount)	-	-	
22	Amount exceeding the 17,65% threshold (negative amount)	-	-	
23	of which: direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities	-	-	
24	Not applicable	-	-	
25	<i>of which: deferred tax assets arising from temporary differences</i>	-	-	
EU-25a	Losses for the current financial year (negative amount)	-	-	
EU-25b	Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (negative amount)	-	-	
27	Qualifying AT1 deductions that exceed the AT1 items of the institution (negative amount)	-	-	
27a	Other regulatory adjustments (*)	(168)	(156)	N
<b>28</b>	<b>Total regulatory adjustments to Common Equity Tier 1 (CET1)</b>	<b>(633)</b>	<b>(834)</b>	
<b>29</b>	<b>Common Equity Tier 1 capital (CET1)</b>	<b>9,018</b>	<b>8,579</b>	
<b>Additional Tier 1 (AT1) capital: instruments</b>				
30	Capital instruments and related share premium accounts	1,116	1,116	O
31	<i>of which: classified as equity under applicable accounting standards</i>	1,116	1,116	O
32	<i>of which: classified as liabilities under applicable accounting standards</i>	-	-	
33	Amount of qualifying items referred to in Article 484 (4) CRR and the related share premium accounts subject to phase out from AT1	-	-	
EU-33a	Amount of qualifying items referred to in Article 494a(1) CRR subject to phase out from AT1	-	-	
EU-33b	Amount of qualifying items referred to in Article 494b(1) CRR subject to phase out from AT1	-	-	
34	Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties	1	1	P
35	<i>of which: instruments issued by subsidiaries subject to phase out</i>	-	-	
<b>36</b>	<b>Additional Tier 1 (AT1) capital before regulatory adjustments</b>	<b>1,116</b>	<b>1,116</b>	
<b>Additional Tier 1 (AT1) capital: regulatory adjustments</b>				
37	Direct, indirect and synthetic holdings by an institution of own AT1 instruments (negative amount)	-	-	
38	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	-	
39	Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-	
40	Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-	-	
42	Qualifying T2 deductions that exceed the T2 items of the institution (negative amount)	-	-	
42a	Other regulatory adjustments to AT1 capital	-	-	
<b>43</b>	<b>Total regulatory adjustments to Additional Tier 1 (AT1) capital</b>	<b>-</b>	<b>-</b>	
<b>44</b>	<b>Additional Tier 1 (AT1) capital</b>	<b>1,116</b>	<b>1,116</b>	
<b>45</b>	<b>Tier 1 capital (T1 = CET1 + AT1)</b>	<b>10,133</b>	<b>9,695</b>	

(\*) Includes mainly voluntary deductions (for NPE coverage expectations) in the amount of Euro 120 million.

## continued: Template EU CC1 – Composition of regulatory own funds (in millions)

	a)	a)	b)	
	Amounts 30.06.2025	Amounts 31.12.2024	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation	
<b>Tier 2 (T2) capital instruments</b>				
46	Capital instruments and related share premium accounts	1,412	1,413	Q
47	Amount of qualifying items referred to in Article 484 (5) CRR and the related share premium accounts subject to phase out from T2 as described in Article 486(4) CRR	-	-	
EU-47a	Amount of qualifying items referred to in Article 494a(2) CRR subject to phase out from T2	-	-	
EU-47b	Amount of qualifying items referred to in Article 494b (2) CRR subject to phase out from T2	-	-	
48	Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties	6	9	R
49	<i>of which: instruments issued by subsidiaries subject to phase out</i>	-	-	
50	Credit risk adjustments	141	149	S
<b>51</b>	<b>Tier 2 (T2) capital before regulatory adjustments</b>	<b>1,558</b>	<b>1,572</b>	
<b>Tier 2 (T2) capital: regulatory adjustments</b>				
52	Direct, indirect and synthetic holdings by an institution of own T2 instruments and subordinated loans (negative amount)	(1)	(1)	T
53	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (negative amount)	-	-	
54	Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (negative amount)	-	-	
55	Direct, indirect and synthetic holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (negative amount)	-	-	
EU-56a	Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (negative amount)	-	-	
EU-56b	Other regulatory adjustments to T2 capital	-	-	
<b>57</b>	<b>Total regulatory adjustments to Tier 2 (T2) capital</b>	<b>(1)</b>	<b>(1)</b>	
<b>58</b>	<b>Tier 2 capital (T2)</b>	<b>1,557</b>	<b>1,571</b>	
<b>59</b>	<b>Total capital (TC = T1 + T2)</b>	<b>11,691</b>	<b>11,266</b>	
<b>60</b>	<b>Total Risk exposure amount</b>	<b>55,597</b>	<b>54,228</b>	
<b>Capital ratios and requirements including buffers</b>				
61	Common Equity Tier 1 capital	16.22%	15.82%	
62	Tier 1 capital	18.23%	17.88%	
63	Total capital	21.03%	20.77%	
64	Institution CET1 overall capital requirements	9.316%	8.793%	
65	<i>of which: capital conservation buffer requirement</i>	2.50%	2.50%	
66	<i>of which: countercyclical buffer requirement</i>	0.056%	0.041%	
67	<i>of which: systemic risk buffer requirement</i>	0.745%	0.362%	
EU-67a	<i>of which: Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer requirement</i>	0.250%	0.125%	
EU-67b	<i>of which: additional own funds requirements to address the risks other than the risk of excessive leverage</i>	1.266%	1.266%	
<b>68</b>	<b>Common Equity Tier 1 capital (as a percentage of risk exposure amount) available after meeting the minimum capital requirements</b>	<b>10.45%</b>	<b>10.05%</b>	

## continued: Template EU CC1 – Composition of regulatory own funds (in millions)

		a)	a)	b)
		Amounts 30.06.2025	Amounts 31.12.2024	Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation
<b>Amounts below the thresholds for deduction (before risk weighting)</b>				
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	155	148	
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% thresholds and net of eligible short positions)	491	478	
75	Deferred tax assets arising from temporary differences (amount below 17,65% threshold, net of related tax liability where the conditions in Article 38 (3) CRR are met)	556	642	
<b>Applicable caps on the inclusion of provisions in Tier 2</b>				
76	Credit risk adjustments included in T2 in respect of exposures subject to standardised approach (prior to the application of the cap)	-	-	
77	Cap on inclusion of credit risk adjustments in T2 under standardised approach	-	-	
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)	263	350	
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	141	149	
<b>Capital instruments subject to phase-out arrangements (only applicable between 1 January 2014 and 1 January 2022)</b>				
80	Current cap on CET1 instruments subject to phase out arrangements	-	-	
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)	-	-	
82	Current cap on AT1 instruments subject to phase out arrangements	-	-	
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)	-	-	
84	Current cap on T2 instruments subject to phase out arrangements	-	-	
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)	-	-	

Reported in column b) are the references to Template EU CC2: reconciliation of regulatory own funds to balance sheet in the audited financial statements.

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

The elements of Own Funds are:

- Common Equity Tier 1 - CET1;
- Additional Tier 1 - AT1;
- Tier 2 - T2.

CET1 and AT1 constitute Total Tier 1 Capital which, added to T2, leads to the determination of Own Funds.

## Common Equity Tier 1 capital - CET1

Common Equity Tier 1 capital (CET1) is made up of positive and negative elements:

- Share capital and related share premiums;
- revenue reserves;
- positive and negative valuation reserves (from OCI);
- other reserves;
- minority interests;
- prudential filters;
- deductions.

Prudential filters are positive or negative adjustments of CET1, their purpose being to stabilise the balance sheet aggregate of reference as much as possible, reducing potential volatility. The prudential filters exclude from CET1 the valuation reserve generated by cash flow hedges and gains/losses arising from changes in own creditworthiness. CET1 also takes account of valuation adjustments on positions measured at fair value that should be considered in the context of prudent valuation.

Deductions are negative elements of CET1 such as mainly goodwill, intangible assets, except for prudently valued software assets the value of which is not negatively affected by resolution, insolvency or liquidation of the institution, deferred tax assets that rely on future profitability but do not arise from temporary differences, significant and non-significant investments in a financial sector entity and deferred tax assets that are dependent on future profitability and arise from temporary differences for amounts above certain CET1 thresholds; the excess of expected credit losses over total provisions on an aggregate basis (shortfall) for portfolios under the IRB approaches, the institution's direct, indirect and synthetic holdings of own Common Equity Tier 1 instruments, the applicable amount of insufficient coverage for non-performing exposures as required by Regulation (EU) no. 630/2019; and other accounting items deducted directly from CET1.

On a fully phased basis, the equity instruments listed above have to meet clearly defined requirements (art. 28 CRR):

- the instruments must be fully paid up;
- they must be classified as equity instruments for accounting purposes;
- they must have a perpetual duration, i.e. not have any maturity;
- they must not be subject to obligations in terms of remuneration;
- they must not be subject to distribution caps;
- any cancellation of distributions must not result in any kind of restriction on the issuer;
- they must be the first to absorb business losses as soon as they occur;
- they are the most subordinated instruments in the event of bankruptcy or liquidation of the entity in question;
- they must not enjoy any form of guarantee or contractual clause that can raise their level of seniority.

To date, only ordinary shares are included in the calculation of Common Equity.

## Additional Tier 1 capital (AT1)

“Additional Tier 1 Capital” (AT1) consists of the following positive and negative elements:

- equity instruments and related share premiums;
- instruments issued by affiliates and included in AT1;
- deductions.

On a fully phased basis, the equity instruments listed above have to meet clearly defined requirements (art. 52 CRR):

- the instruments must be issued and fully paid up;
- the purchase of instruments cannot be funded by the entity, neither directly nor indirectly;
- the capital receivable for these instruments is fully subordinated to the receivables of all unsubordinated creditors;
- the instruments are not hedged or covered by a guarantee that allows the receivable's ranking to be increased by the entity or its subsidiaries, parent company and any company that has close links with the entity;
- the instruments are not subject to any provision that allows the receivable's ranking to be increased in any other way;
- the instruments are perpetual;
- the provisions governing the instruments must not contain any incentive that encourages the entity to reimburse or repay the principal amount prior to maturity;

## 2. Own funds

- if the instruments include one or more call or early repayment options, these may be exercised at the sole discretion of the issuer;
- the instruments cannot be repaid or repurchased or repaid in advance earlier than five years from the date of issue or assignment;
- the provisions governing the instruments must not indicate, expressly or implicitly, that they shall or may be redeemed, repurchased or repaid in advance by the entity in cases other than those of insolvency or liquidation;
- the provisions governing the instruments must not give the holder the right to accelerate future scheduled payments of interest or principal, except in the event of insolvency or liquidation;
- the level of payments of interest or dividends due on these instruments cannot be changed on the basis of the creditworthiness of the entity or its parent company.

As at 30 June 2025, the AT1 category includes the convertible bonds issued by BPER Banca with a total nominal value of Euro 1,115.6 million, as well as certain instruments issued by affiliates where there are minority interests.

### Tier 2 capital (Tier 2 - T2)

Tier 2 capital (T2) consists of the following positive and negative elements:

- equity instruments, subordinated loans and related share premiums;
- T2 instruments subject to transitional provisions (“grandfathering”);
- instruments issued by affiliates and included in T2;
- general adjustments;
- deductions.

On a fully phased basis, the equity instruments listed above have to meet clearly defined requirements (art. 63 CRR):

- the instruments must be issued and fully paid up;
- the assignment of the instrument cannot be financed by the entity, neither directly nor indirectly;
- the claim on the principal amount of the instruments must rank below any claim from eligible liabilities instruments;
- the instruments cannot be hedged, nor subject to any form of guarantee;
- these instruments should not be subject to any provision that increases their credit ranking;
- the instruments must have an original maturity of at least five years;
- the provisions governing these instruments must not contain any kind of incentives that encourage the entity to reimburse or repay the principal prior to maturity;
- in the event that the instruments include in their rules one or more call or early repayment options, they can only be exercised at the discretion of the issuer;
- the provisions do not give the holder the right to accelerate future scheduled payments, except in the event of the entity’s insolvency or liquidation;
- these instruments can be reimbursed, also in advance, but only in the event that the entity asks for prior authorisation from the competent authority, and not earlier than five years from the date of issue, except in the following cases:
  - the entity of reference replaces the above instruments with other instruments of Own Funds of equal or higher quality, at conditions that are sustainable considering its earning capacity,
  - the entity can demonstrate that it complies with the minimum capital requirements imposed by the regulations to the satisfaction of the competent authority.

T2 instruments include the following debt issuances: “BPER Banca EMTN Tier II 3.625% 30/11/2020 – 30/11/2030 Callable”, “BPER Banca EMTN Tier II 3.875% 25/01/2022 – 25/07/2032 Callable”, “BPER Banca Subordinated Tier II – 5% 20/06/2022 – 20/12/2032 Callable” and “BPER Banca EMTN Tier II 8.625% 20/09/2022 – 20/01/2033 Callable”.

## Transitional arrangements

Considering the various transitional periods and arrangements, the new standards issued as part of the Basel III framework (Basel 3 plus, also known as Basel IV) will only be fully operational as of 2033.

## Conditions for the inclusion of interim or year-end earnings

With reference to Regulation (EU) no. 575/2013 (CRR), on 4 February 2015 the ECB issued a “Decision” published in the Official Journal of the European Union on 25 April 2015, that laid down the procedures to be followed by banks under its direct supervision (Regulation (EU) no. 468/2014) with regard to the inclusion in CET1 of interim or year-end earnings before a formal decision is taken confirming the result.

They can only be included (art. 26 CRR) with the prior approval of the competent Authority, which in this case is the ECB, and it will only give approval if the following conditions are met:

- earnings must be checked and certified by the Independent Auditors;
- the Bank must provide a specific declaration about the earnings, with particular reference to the accounting standards applied and the inclusion of foreseeable charges and dividends.

The “Decision” also provides a standard letter and certification form that the Banks have to use when asking for approval.

With regard to the above, the amount calculated for CET1 includes that portion of the profit for the year allocable to equity, Euro 235.3 million, as determined in accordance with the process envisaged in art. 3 of ECB Decision (EU) 656/2015 dated 4 February 2015 and art. 26, para. 2 of Regulation (EU) no. 575/2013 (CRR) for its inclusion.

## Template EU CC2 – Reconciliation of regulatory own funds to balance sheet in the audited financial statements (in millions)

		a = b (*)	c
		Balance sheet as in published financial statements and under regulatory scope of consolidation	Reference to “Template EU CC1 - Composition of regulatory own funds”
		As at period end	
<b>Assets - Breakdown by asset classes according to the balance sheet in the published financial statements</b>			
10.	Cash and cash equivalents	7,585	
20.	Financial assets measured at fair value through profit or loss	1,787	
a)	Financial assets held for trading	804	
c)	Other financial assets mandatorily measured at fair value	983	
30.	Financial assets measured at fair value through other comprehensive income	5,377	
40.	Financial assets measured at amortised cost	119,093	
a)	Loans to banks	6,850	
b)	Loans to customers	112,243	
50.	Hedging derivatives	629	
60.	Change in value of macro-hedged financial assets	(9)	
70.	Equity investments	305	
	- goodwill included in the valuation of significant investments	38	G
90.	Property, plant and equipment	2,454	
100.	Intangible assets	713	G
	- of which: goodwill	170	G
110.	Tax assets	1,460	
a)	Current	309	
b)	Deferred	1,151	
	- DTAs that rely on future profitability and do not arise from temporary differences	39	H
120.	Non-current assets and disposal groups classified as held for sale	52	
130.	Other assets	5,082	
<b>Total assets</b>		<b>144,528</b>	
<b>Liabilities - Breakdown by liability classes according to the balance sheet in the published financial statements</b>			
10.	Financial liabilities measured at amortised cost	121,558	
a)	Due to banks	3,922	
b)	Due to customers	107,426	
c)	Debt securities issued	10,211	
	- Subordinated liabilities	1,412	Q
20.	Financial liabilities held for trading	217	
30.	Financial liabilities designated at fair value	3,200	
40.	Hedging derivatives	160	
50.	Change in value of macro-hedged financial liabilities (+/-)	(55)	
60.	Tax liabilities	133	
a)	Current	67	
b)	Deferred	66	
70.	Liabilities associated with assets classified as held for sale	5	
80.	Other liabilities	6,301	
90.	Employee termination indemnities	109	
100.	Provisions for risks and charges	1,266	
a)	Commitments and guarantees granted	100	
b)	Pensions and similar obligations	112	
c)	Other provisions for risk and charges	1,054	
<b>Total liabilities</b>		<b>132,894</b>	

**continued: Template EU CC2 – Reconciliation of regulatory own funds to balance sheet in the audited Financial Report (in millions)**

		a = b (*)	c
		Balance sheet as in published financial statements and under regulatory scope of consolidation	Reference to “Template EU CC1 - Composition of regulatory own funds”
		As at period end	
<b>Shareholders' equity</b>			
120.	Valuation reserves	280	
	- Equity instruments measured at fair value through other comprehensive income	190	C
	- Hedging of equity instruments designated at fair value through other comprehensive income	(9)	C
	- Financial assets (other than equities) measured at fair value through other comprehensive income	(44)	C
	- Property, plant and equipment	138	C
	- Cash-flow hedges	(1)	C - I
	- Financial liabilities designated at fair value through profit or loss (variation due to changes in creditworthiness)	(36)	C - L
	- Actuarial gains (losses) on defined benefit plans	(145)	C
	- Share of the valuation reserves of equity investments carried under the equity method	8	
	- Special revaluation laws	179	C
140.	Equity instruments	1,116	O
150.	Reserves	5,766	
	- from profits	5,096	B
	- other	670	C
160.	Share premium reserve	1,251	A
170.	Share capital	2,122	A
180.	Treasury shares (-)	(4)	M
190.	Minority interests (+/-)	200	
200.	Profit (Loss) for the year (+/-)	903	E
<b>Total shareholders' equity</b>		<b>11,634</b>	
<b>Other items</b>			
	Profit not included for dividends	(668)	E
	Additional adjustments	(12)	F
	Exception to the deduction of intangible assets from CET1	(309)	G
	Further adjustments on own instruments held by the institution	(5)	M
	Other regulatory adjustments	(168)	N
	Further adjustments on own instruments held by the institution	(1)	T
	Excess	141	S
	Instruments issued by affiliates and included in CET1;	3	D
	Instruments issued by affiliates and included in AT1	1	Q
	Instruments issued by affiliates and included in T2	6	R
<b>Total Other items</b>		<b>(1,012)</b>	
<b>Total Own Funds</b>		<b>11,691</b>	

(\*) The BPER Banca Group has decided to adopt the methodology required for the purposes of prudential supervision also for producing financial information, thus standardising the two consolidation perimeters ('for accounting purposes' and 'for prudential purposes').

## 3. CAPITAL REQUIREMENTS

### 3.1 Specific regulatory requirements

The Supervisory rules introduced by Bank of Italy Circular no. 285/2013 require Italian banks belonging to banking groups to fully comply with the following minimum ratios for 2025:

- CET1 Ratio of 4.5%;
- Tier 1 Ratio of 6%;
- Total Capital Ratio of 8%.

In addition to the mandatory requirements prescribed in Regulation (EU) no. 575/2013<sup>12</sup>, the following reserves have been added:

- Capital Conservation Buffer (CCB): this consists of Common Equity Tier 1 capital, corresponding to an additional requirement of 2.5%;
- Countercyclical Capital Buffer: this is also made up of Tier 1 capital and must be accumulated in periods of economic growth against possible future losses on the basis of a specific coefficient established on a national basis. On 28 March 2025, the Bank of Italy, in its capacity as the designated authority for the adoption of macro-prudential measures for the banking sector, published a document with which it set the Countercyclical Capital Buffer (CCyB) also for the second quarter of 2025 (relating to exposures to Italian counterparties) at 0%;
- Additional reserves for so-called Global & Other Systemically Important Institutions (G-SII & O-SII): both consist of Tier 1 capital and make direct reference to institutions of particular importance at a global level (G-SII) or other systemically important institutions (O-SII). The buffer for G-SII can vary between a minimum level of 1% and a maximum of 3%, whereas the buffer for O-SII only provides for a maximum threshold of up to 3% of the overall risk exposure or, subject to prior authorisation by the European Commission, even higher than 3%;
- Capital reserve for systemic risk: it is at least 1% of the related risk exposures and is established by each Member State; it is essentially used to mitigate the risk of non-cyclical macro-prudential long-term risk, i.e. to deal with the negative effects related to unexpected crises in the banking system.

For the year 2025, the Bank of Italy identified the BPER Banca Group as other systemically important institution (hereinafter also “O-SII”) authorised to operate in Italy, which is required to maintain an O-SII capital buffer of 0.25% from 1 January 2025.

On 03 December 2024, after completing the annual SREP prudential review and evaluation process, the BPER Banca received notification from the ECB of the latest prudential requirements to be met on a consolidated basis pursuant to art. 16 of Regulation (EU) no. 1024/2013.

Based on the outcome of the SREP assessment conducted in 2024 with reference date 31 December 2023 and any other relevant information received thereafter, the ECB has established that, with effect from 1 January 2025, BPER shall maintain a minimum consolidated capital ratio in terms of Common Equity Tier 1 of 8.93%, consisting of the sum of the minimum regulatory Pillar 1 requirement of 4.5%, the additional Pillar 2 requirement of 1.27%<sup>13</sup> and the Combined Buffer Requirement of 3.16%<sup>14</sup> while the minimum Total Own Funds Requirement (“Total Capital Ratio”) shall be 13.41%.

Capital requirements to be met by 30 June 2025 are listed below:

- Common Equity Tier 1 Ratio: of 9.32%, being the sum of Pillar 1 minimum regulatory requirement pursuant to Article 92 of Regulation (EU) no. 575/2013 (4.50%), plus the additional Pillar 2 requirement in accordance with Article 16 of Regulation (EU) no. 1024/2013 (P2R component of 1.27%<sup>15</sup>), plus the combined buffer requirement in accordance with Article 129-131 of Directive 2013/36/EU as transposed into national law (3.55%<sup>16</sup>);

<sup>12</sup> The Group does not use capital ratios calculated differently from the CRR provisions.

<sup>13</sup> The Pillar 2 additional own funds requirement is 2.25% to be held in the form of 56.25% of CET1 capital and 75% of Tier 1 capital, as a minimum.

<sup>14</sup> The Combined Buffer Requirement is made up of the Capital Conservation Buffer (2.50%), the O-SII Buffer (0.25%) and the Countercyclical Capital Buffer (0.04% as at 30 September 2024) and the Systemic Risk Buffer (0.37%).

<sup>15</sup> The additional Pillar 2 requirement communicated by the ECB to BPER on 03 December 2024 in the Final SREP Letter was 2.25%, to be held in the form of 56.25% of CET1 capital as a minimum.

<sup>16</sup> The Combined Buffer Requirement is made up of the Capital Conservation Buffer (2.50%), the O-SII Buffer (0.25%) and the Countercyclical Capital Buffer (0.0555% as at 30 June 2025) and the Systemic Risk Buffer (0.7448% as at 30 June 2025).

- Tier 1 Ratio: of 11.24%, being the sum of the minimum requirement pursuant to art. 92 of Regulation (EU) no. 575/2013 (6.00%), plus the additional Pillar 2 requirement in accordance with art. 16 of Regulation (EU) no. 1024/2013 (P2R component of 1.69%<sup>17</sup>), plus the combined buffer requirement in accordance with art. 129-131 of Directive 2013/36/EU as transposed into Italian law (3.55%);
- Total Capital Ratio: of 13.80%, being the sum of the minimum requirement pursuant to art. 92 of Regulation (EU) no. 575/2013 (8.00%), plus the additional Pillar 2 requirement in accordance with art. 16 of Regulation (EU) no. 1024/2013 (P2R component of 2.25%), plus the combined buffer requirement in accordance with art. 129-131 of Directive 2013/36/EU as transposed into national law (3.55%).

It was on the basis of these parameters that supervisory reporting was made as at 30 June 2025.

In accordance with regulations for the prudential supervision of banks, failure to comply with the CET1 Ratio and Total Capital Ratio minimum requirements leads to limitations on the distribution of earnings and the need to adopt a plan for the conservation of capital.

The ECB has confirmed that the Italian Group banks and the Luxembourg bank must constantly meet the requirements for Own Funds and liquidity on the basis of Regulation (EU) no. 575/2013, of national legislation enabling Directive 2013/36/EU, and of any applicable national liquidity requirement, in compliance with Article 412 paragraph 5 of EU Regulation (EU) no. 575/2013.

Please refer to chapter 1 “General disclosure requirements” for a description of the BPER Banca Group’s key metrics and chapter 3 “Own funds” for information on their key features.

## 3.2 Institution specific countercyclical capital buffer

Below is the disclosure relating to the “Countercyclical Capital Buffer”, prepared on the basis of the applicable ratios as at 30 June 2025 and of the Commission Implementing Regulation (EU) no. 637/2021 of 15 March 2021 which supplements Regulation (EU) no. 575/2013 of the European Parliament and of the Council (the Capital Requirements Regulation or CRR) as regards the regulatory technical standards for the publication of information on the compliance of banks that are obliged to hold a countercyclical capital buffer pursuant to art. 440 of the CRR.

As set out in article 140 paragraph 1 of Directive 2013/36/EU (CRD IV), the bank’s specific countercyclical buffer consists of the weighted average of the countercyclical ratios that apply in the countries where the relevant credit exposures are located. The CRD IV obliges the designated national authorities to activate an operational framework for defining the countercyclical capital buffer ratio (CCyB) from 1 January 2016.

The coefficient is subject to revision every three months. The European legislation was implemented in Italy with the Bank of Italy’s Circular no. 285 which contains specific rules on CCyB. Based on the analysis of reference indicators, the Bank of Italy decided to maintain the countercyclical ratio (for exposures to Italian counterparties) at 0% during the second quarter of 2025. Relevant credit exposures include all exposure classes other than those referred to in art. 112, letter from a) to f), Regulation (EU) no. 575/2013. The following portfolios are *de facto* excluded: exposures to central governments or central banks; exposures to regional governments or local authorities; exposures to public sector entities; exposures to multilateral development banks; exposures to international organisations; exposures to institutions.

### Template EU CCyB2 – Amount of institution-specific countercyclical capital buffer (in millions)

	<b>a</b>
1 Total Risk exposure amount	55,597
2 Institution specific countercyclical capital buffer rate	0.056%
3 Institution specific countercyclical capital buffer requirement	31

The requirement is calculated on amounts not rounded to the nearest million.

<sup>17</sup> The additional Pillar 2 requirement communicated by the ECB to BPER on 3 December 2024 in the Final SREP Letter was 2.25%, to be held in the form of 75% of Tier 1 capital as a minimum.

### 3. Capital requirements

With reference to 30 June 2025:

- the countercyclical capital ratios at individual country level have been set, using the methods explained above, generally at 0%, with the exception of the following countries: Denmark (2.5%), Iceland (2.5%), Hungary (0.5%), Norway (2.5%), Hong Kong (0.5%), Czech Republic (1.25%), Slovak Republic (1.5%), Bulgaria (2%), Luxembourg (0.5%), Sweden (2%), Estonia (1.5%), Romania (1%), Great Britain (2%), Croatia (1.5%), Germany (0.75%), France (1%), Ireland (1.5%), Netherlands (2%), Cyprus (1%), Lithuania (1%), Slovenia (1%); Belgium (1%), Latvia (1%);
- at a consolidated level, BPER Banca's specific countercyclical ratio is 0.0555%.

#### Template EU CCyB1 – Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer (in millions)

	a		b		c		d	e	f
	GENERAL CREDIT EXPOSURES		RELEVANT CREDIT EXPOSURES - MARKET RISK		Securitisation exposures -		Exposure value for non-trading book	Total exposure value	
	Exposure value under the Standardised Approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for Standardised Approach	Value of trading book exposures for internal models					
<b>010</b>	<b>Breakdown by country</b>								
	Italy	31,941	68,513	56	-	580		101,090	
	France	1,617	194	3	-	-		1,814	
	Netherlands	608	65	9	-	-		683	
	Germany	514	137	3	-	-		653	
	Austria	571	-	-	-	-		572	
	Luxembourg	450	15	3	-	-		467	
	U.S.A.	103	296	3	-	-		401	
	Spain	260	12	-	-	-		272	
	Finland	253	6	-	-	-		259	
	Sweden	217	24	-	-	-		240	
	United Kingdom	167	63	1	-	-		231	
	Switzerland	89	108	-	-	-		197	
	Belgium	94	21	-	-	-		115	
	Denmark	70	30	-	-	-		100	
	Bermuda	100	-	-	-	-		100	
	San Marino	1	40	-	-	-		42	
	Czech Republic	41	-	-	-	-		41	
	Ireland	12	25	-	-	-		37	
	Turkey	31	-	-	-	-		31	
	Algeria	28	-	-	-	-		28	

**continued: Template EU CCyB1 – Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer (in millions)**

	OWN FUNDS REQUIREMENTS			Total	Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)
	g Relevant credit risk exposures - Credit risk	h Relevant credit exposures – Market risk	i Relevant credit exposures – Securitisation positions in the non-trading book	j	k	l	m
Italy	3,079	4	6	3,089	38,616	93.024%	0.0000%
France	40	-	-	40	496	1.196%	1.0000%
Netherlands	22	-	-	22	274	0.660%	2.0000%
Germany	23	-	-	23	289	0.697%	0.7500%
Austria	9	-	-	9	107	0.258%	0.0000%
Luxembourg	34	-	-	34	422	1.016%	0.5000%
U.S.A.	16	-	-	16	199	0.479%	0.0000%
Spain	7	-	-	7	88	0.212%	0.0000%
Finland	8	-	-	8	96	0.231%	0.0000%
Sweden	11	-	-	11	139	0.335%	2.0000%
United Kingdom	14	-	-	14	173	0.417%	2.0000%
Switzerland	12	-	-	12	148	0.355%	0.0000%
Belgium	5	-	-	5	61	0.147%	1.0000%
Denmark	2	-	-	2	31	0.074%	2.5000%
Bermuda	-	-	-	-	-	0.000%	0.0000%
San Marino	1	-	-	1	12	0.029%	0.0000%
Czech Republic	1	-	-	1	12	0.028%	1.2500%
Ireland	1	-	-	1	14	0.033%	1.5000%
Turkey	2	-	-	2	24	0.058%	0.0000%
Algeria	1	-	-	1	17	0.042%	0.0000%

**continued: Template EU CCyB1 – Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer (in millions)**

	a	b	c	d	e	f
	GENERAL CREDIT EXPOSURES		RELEVANT CREDIT EXPOSURES - MARKET RISK		Securitisation exposures - Exposure value for non-trading book	Total exposure value
	Exposure value under the Standardised Approach	Exposure value under the IRB approach	Sum of long and short positions of trading book exposures for Standardised Approach	Value of trading book exposures for internal models		
<b>010</b>	<b>Breakdown by country</b>					
British Virgin Islands	-	25	-	-	-	26
Portugal	20	-	-	-	-	21
Poland	18	3	-	-	-	20
Congo	20	-	-	-	-	20
Dubai	18	-	-	-	-	18
Saudi Arabia	16	-	-	-	-	16
Slovak Republic	16	-	-	-	-	16
Hungary	12	-	-	-	-	12
Romania	9	2	-	-	-	11
Norway	4	6	-	-	-	10
Slovenia	5	-	-	-	-	5
Croatia	3	-	-	-	-	3
Hong Kong	2	1	-	-	-	3
Lithuania	2	-	-	-	-	2
Bulgaria	1	-	-	-	-	2
Estonia	1	-	-	-	-	1
Latvia	1	-	-	-	-	1
Cyprus	-	-	-	-	-	-
Iceland	-	-	-	-	-	-
Other countries	270	51	1	-	-	322
<b>020</b>	<b>Total</b>	<b>37,581</b>	<b>69,638</b>	<b>80</b>	<b>580</b>	<b>107,879</b>

**continued: Template EU CCyB1: Geographical distribution of credit exposures relevant for the calculation of the countercyclical buffer (in millions)**

	g		h	i	j	k	l	m
	OWN FUNDS REQUIREMENTS			Total	Risk-weighted exposure amounts	Own fund requirements weights (%)	Countercyclical buffer rate (%)	
	Relevant credit risk exposures - Credit risk	Relevant credit exposures – Market risk	Relevant credit exposures – Securitisation positions in the non-trading book					
British Virgin Islands	-	-	-	-	3	0.006%	0.0000%	
Portugal	1	-	-	1	11	0.026%	0.0000%	
Poland	1	-	-	1	13	0.032%	0.0000%	
Congo	1	-	-	1	16	0.040%	0.0000%	
Dubai	1	-	-	1	14	0.033%	0.0000%	
Saudi Arabia	1	-	-	1	13	0.030%	0.0000%	
Slovak Republic	-	-	-	-	2	0.006%	1.5000%	
Hungary	1	-	-	1	9	0.022%	0.5000%	
Romania	-	-	-	-	6	0.014%	1.0000%	
Norway	-	-	-	-	4	0.008%	2.5000%	
Slovenia	-	-	-	-	3	0.008%	1.0000%	
Croatia	-	-	-	-	2	0.005%	1.5000%	
Hong Kong	-	-	-	-	2	0.006%	0.5000%	
Lithuania	-	-	-	-	1	0.003%	1.0000%	
Bulgaria	-	-	-	-	1	0.003%	2.0000%	
Estonia	-	-	-	-	-	0.001%	1.5000%	
Latvia	-	-	-	-	-	0.001%	1.0000%	
Cyprus	-	-	-	-	-	0.000%	1.0000%	
Iceland	-	-	-	-	-	0.000%	2.5000%	
Other countries	16	-	-	16	194	0.467%	0.0000%	
<b>Total</b>	<b>3,310</b>	<b>4</b>	<b>6</b>	<b>3,321</b>	<b>41,512</b>	<b>100.000%</b>		

The individual percentages shown in the above table may not agree with the total because of rounding.

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

The BPER Banca Group's countercyclical capital buffer rate of 0.0555%, only includes exposures to countries with a non-zero countercyclical capital buffer rate; the scope of Template EU CCyB1 is limited to credit exposures relevant for the calculation of CCyB in accordance with Article 140(4) of Directive (EU) 2013/36 ("CRD IV").

## 4. FINANCIAL LEVERAGE

The Basel 3 prudential regulation (BCBS) introduced the leverage ratio from 1 January 2015, in order to contain the accumulation of financial leverage within the banking system, with a view to preventing the destabilisation of deleveraging processes and strengthening capital requirements with a simple supplementary parameter not based on risk.

Financial leverage ratio:

- defined as the ratio of Tier 1 capital to the total exposure of the banking group (total exposure to all assets and off-balance sheet elements not deducted from Tier 1 capital);
- expressed as a percentage, with a regulatory Pillar 1 minimum of 3% (approved by the European Parliament on 15 April 2019);
- calculated quarterly;
- monitored at both separate and banking group level.

### Template EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures (in millions)

		a
		Applicable amount
		30.06.2025
1	Total assets as per published financial statements	144,528
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of regulatory consolidation	-
3	(Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference)	-
4	(Adjustment for temporary exemption of exposures to central bank (if applicable))	-
5	(Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the leverage ratio total exposure measure in accordance with Article 429a(1)(i) CRR)	-
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	-
7	Adjustment for eligible cash pooling transactions	-
8	Adjustments for derivative financial instruments	(628)
9	Adjustments for securities financing transactions (SFTs)	31
10	Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of off-balance sheet exposures)	6,524
11	(Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital)	-
EU-11a	(Adjustment for exposures excluded from the total exposure measure in accordance with point (c) and point (ca) of Article 429a (1) CRR)	-
EU-11b	(Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Article 429a (1) CRR)	-
12	Other adjustments	(562)
<b>13</b>	<b>Total exposure measure</b>	<b>149,894</b>

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

## Template EU LR2 - LRCom: Leverage ratio common disclosure (in millions)

		CRR Leverage ratio exposure	
		a	b
		30.06.2025	31.12.2024
<b>On-balance sheet exposures (excluding derivatives and SFTs)</b>			
1	On-balance sheet items (excluding derivatives, SFTs, but including collateral)	142,757	138,989
2	Gross-up for derivatives collateral provided, where deducted from the balance sheet assets pursuant to the applicable accounting framework	-	-
3	(Deductions of receivables assets for cash variation margin provided in derivatives transactions)	-	-
4	(Adjustment for securities received under securities financing transactions that are recognised as an asset)	-	-
5	(General credit risk adjustments to on-balance sheet items)	-	-
6	(Asset amounts deducted in determining Tier 1 capital)	(586)	(767)
7	<b>Total on-balance sheet exposures (excluding derivatives and SFTs)</b>	<b>142,170</b>	<b>138,222</b>
<b>Derivative exposures</b>			
8	Replacement cost associated with SA-CCR derivative transactions (i.e. net of eligible cash variation margin)	232	183
EU-8a	Derogation for derivatives: replacement costs contribution under the simplified standardised approach	-	-
9	Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	416	318
EU-9a	Derogation for derivatives: potential future exposure contribution under the simplified standardised approach	-	-
EU-9b	Exposure determined under Original Exposure Method	-	-
10	(Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	-	-
EU-10a	(Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)	-	-
EU-10b	(Exempted CCP leg of client-cleared trade exposures) (original exposure method)	-	-
11	Adjusted effective notional amount of written credit derivatives	-	-
12	(Adjusted effective notional offsets and add-on deductions for written credit derivatives)	-	-
13	<b>Total derivatives exposures</b>	<b>649</b>	<b>501</b>
<b>Securities financing transaction exposures (SFTs)</b>			
14	Gross SFT assets (with no recognition of netting), after adjusting for sales accounting transactions	520	344
15	(Netted amounts of cash payables and cash receivables of gross SFT assets)	-	-
16	Counterparty credit risk exposure for SFT assets	31	365
EU-16a	Derogation for SFTs: Counterparty credit risk exposure in accordance with Article 429e(5) and 222 CRR	-	-
17	Agent transaction exposures	-	-
EU-17a	(Exempted CCP leg of client-cleared SFT exposure)	-	-
18	<b>Total securities financing transaction exposures</b>	<b>551</b>	<b>709</b>
<b>Other off-balance sheet exposures</b>			
19	Off-balance sheet exposures at gross notional amount	39,459	38,388
20	(Adjustments for conversion to credit equivalent amounts)	(32,934)	(31,844)
21	(General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)	-	-
22	<b>Off-balance-sheet exposures</b>	<b>6,524</b>	<b>6,544</b>
<b>Excluded exposures</b>			
EU-22a	(Exposures excluded from the total exposure measure in accordance with point (c) and point (ca) of Article 429a(1) CRR)	-	-
EU-22b	(Exposures exempted in accordance with point (j) of Article 429a (1) CRR (on and off balance sheet))	-	-
EU-22c	(Excluded exposures of public development banks (or units) - Public sector investments)	-	-
EU-22d	(Excluded exposures of public development banks (or units) - Promotional loans)	-	-
EU-22e	(Excluded passing-through promotional loan exposures by non-public development banks (or units))	-	-
EU-22f	(Excluded guaranteed parts of exposures arising from export credits)	-	-
EU-22g	(Excluded excess collateral deposited at triparty agents)	-	-
EU-22h	(Excluded CSD related services of CSD/institutions in accordance with point (o) of Article 429a(1) CRR)	-	-
EU-22i	(Excluded CSD related services of designated institutions in accordance with point (p) of Article 429a(1) CRR)	-	-
EU-22j	(Reduction of the exposure value of pre-financing or intermediate loans)	-	-
EU-22k	(Excluded exposures to shareholders according to Article 429a (1), point (da) CRR)	-	-
EU-22l	(Exposures deducted in accordance with point (q) of Article 429a(1) CRR)	-	-
EU-22m	(Total exempted exposures)	-	-

## continued: Template EU LR2 - LRCom: Leverage ratio common disclosure (in millions)

		CRR Leverage ratio exposure	
		a	b
		30.06.2025	31.12.2024
<b>Capital and total exposure measure</b>			
23	Tier 1 capital	10,133	9,695
24	Total exposure measure	149,894	145,976
<b>Leverage ratio</b>			
25	Leverage ratio (%)	6.76%	6.64%
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	6.76%	6.64%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) (%)	6.76%	6.64%
26	Regulatory minimum leverage ratio requirement (%)	3.00%	3.00%
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)	-	-
EU-26b	of which: to be made up of CET1 capital	-	-
27	Leverage ratio buffer requirement (%)	-	-
EU-27a	Overall leverage ratio requirement (%)	3.00%	3.00%
<b>Choice on transitional arrangements and relevant exposures</b>			
EU-27b	Choice on transitional arrangements for the definition of the capital measure	Transitional provision	Transitional provision
<b>Disclosure of mean values</b>			
28	Mean of daily values of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivable	29	311
29	Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	520	344
30	Total exposures measure (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	149,403	145,944
30a	Total exposures measure (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	149,403	145,944
31	Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	6.78%	6.64%
31a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	6.78%	6.64%

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

### Template EU LR3 - LRSpl: Split-up of on balance sheet exposures (excluding derivatives, SFTs and exempted exposures) (in millions)

		a
		CRR leverage ratio exposure
		30.06.2025
<b>EU - 1</b>	<b>Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures), of which:</b>	<b>142,757</b>
EU - 2	Trading book exposures	1,566
EU - 3	Banking book exposures, of which:	141,190
EU - 4	Covered Bonds	3,699
EU - 5	Exposures treated as sovereigns	33,217
EU - 6	Exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	575
EU - 7	Institutions	4,621
EU - 8	Secured by mortgages of immovable properties	34,468
EU - 9	Retail exposures	18,293
EU - 10	Corporates	34,876
EU - 11	Exposures in default	1,078
<b>EU - 12</b>	<b>Other exposures (e.g. equity, securitisations, and other non-credit obligation assets)</b>	<b>10,365</b>

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

# 5. LIQUIDITY RISK

## Liquidity Coverage Ratio (LCR)

Quantitative information on the BPER Banca Group's Liquidity Coverage Ratio (LCR), disclosed in compliance with the European regulatory framework, is provided below.

Values are calculated as the unweighted average of end-of-month observations in the twelve months preceding the end of each quarter.

### Template EU LIQ1 – Quantitative information of LCR (in millions)

Scope of consolidation: (solo/consolidated)		a	b	c	d	e	f	g	h
		Total unweighted value (average)				Total weighted value (average)			
EU 1a	Quarter ending on	30.06.2025	31.03.2025	31.12.2024	30.09.2024	30.06.2025	31.03.2025	31.12.2024	30.09.2024
EU 1b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
<b>HIGH-QUALITY LIQUID ASSETS</b>									
1	Total high-quality liquid assets (HQLA)					26,185	25,904	25,615	24,898
<b>CASH OUTFLOWS</b>									
2	Retail deposits and deposits from small business customers, of which:	71,064	71,259	70,887	70,350	4,625	4,630	4,620	4,601
3	Stable deposits	54,970	55,038	55,043	54,987	2,748	2,752	2,752	2,749
4	Less stable deposits	15,105	15,079	14,945	14,746	1,877	1,878	1,868	1,852
5	Unsecured wholesale funding	26,687	26,037	25,533	24,786	11,993	11,822	11,748	11,536
6	Operational deposits (all counterparties) and deposits in networks of cooperative banks	875	712	569	507	206	169	137	124
7	Non-operational deposits (all counterparties)	25,730	25,245	24,873	24,178	11,706	11,573	11,520	11,312
8	Unsecured debt	82	81	91	100	82	81	91	100
9	Secured wholesale funding					202	307	308	314
10	Additional requirements	4,697	4,581	4,504	4,260	896	903	913	872
11	Outflows related to derivative exposures and other collateral requirements	514	543	566	553	514	543	560	538
12	Outflows related to loss of funding on debt products	-	-	-	-	-	-	-	-
13	Credit and liquidity facilities	4,183	4,038	3,938	3,706	382	360	353	333
14	Other contractual funding obligations	89	85	125	194	89	85	125	194
15	Other contingent funding obligations	36,573	36,399	36,095	36,465	1,249	1,267	1,292	1,305
16	<b>TOTAL CASH OUTFLOWS</b>					<b>19,055</b>	<b>19,014</b>	<b>19,006</b>	<b>18,823</b>

## continued: Template EU LIQ1 – Quantitative information of LCR (in millions)

Scope of consolidation: (solo/consolidated)		a	b	c	d	e	f	g	h
		Total unweighted value (average)				Total weighted value (average)			
EU 1a	Quarter ending on	30.06.2025	31.03.2025	31.12.2024	30.09.2024	30.06.2025	31.03.2025	31.12.2024	30.09.2024
EU 1b	Number of data points used in the calculation of averages	12	12	12	12	12	12	12	12
<b>CASH - INFLOWS</b>									
17	Secured lending (e.g. reverse repos)	86	37	58	77	26	26	27	8
18	Inflows from fully performing exposures	2,329	2,301	2,247	2,304	1,411	1,395	1,384	1,451
19	Other cash inflows	9,445	9,404	9,421	9,540	2,087	2,068	2,074	2,104
EU-19a	(Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)					-	-	-	-
EU-19b	(Excess inflows from a related specialised credit institution)					-	-	-	-
20	<b>TOTAL CASH INFLOWS</b>	<b>11,860</b>	<b>11,741</b>	<b>11,726</b>	<b>11,921</b>	<b>3,523</b>	<b>3,488</b>	<b>3,484</b>	<b>3,562</b>
EU-20a	Fully exempt inflows	-	-	-	-	-	-	-	-
EU-20b	Inflows subject to 90% cap	-	-	-	-	-	-	-	-
EU-20c	Inflows subject to 75% cap	11,860	11,741	11,726	11,921	3,523	3,488	3,484	3,562
<b>TOTAL ADJUSTED VALUE</b>									
EU-21	<b>LIQUIDITY BUFFER</b>					<b>26,185</b>	<b>25,904</b>	<b>25,615</b>	<b>24,898</b>
22	<b>TOTAL NET CASH OUTFLOWS</b>					<b>15,532</b>	<b>15,525</b>	<b>15,522</b>	<b>15,261</b>
23	<b>LIQUIDITY COVERAGE RATIO</b>					<b>168.645%</b>	<b>166.852%</b>	<b>165.050%</b>	<b>163.213%</b>

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

The 12-month average value of the LCR Indicator remained stable in the second quarter of 2025 (at 168.6%) as against the previous quarter (166.9%).

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

The following table shows the information required under Article 451a(2) of the CRR.

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

As illustrated in template EU LIQ1, over the last 12 months, the BPER Banca Group has maintained an average LCR of 168.6%, which is significantly greater than the current minimum regulatory requirement (100%).

Net cash outflows are obtained by applying to liabilities and assets the coefficients set out in the regulatory framework or in Delegated Regulation (EU) no. 61/2015, reflecting the potential liquidity inflows and outflows in a combined market and idiosyncratic stress scenario.

More specifically, the main component of cash outflows includes retail deposits, wholesale funding and contingent funding obligations resulting from the use of revocable credit facilities.

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

The BPER Banca Group's Liquidity Coverage Ratio (LCR) is calculated according to the European regulatory requirements in force and reported periodically to the relevant Supervisory Authority.

In 2019, the 'additional outflows for other products and services' (referred to in row 15 of the EU LIQ1 template 'Other contingent funding obligations'), assessed on the basis of guidance provided in Delegated Regulation (EU) no. 61/2015 (Article 23), were revised to reflect the guidance received from the ECB at the end of May 2019.

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

Funding concentration risk may arise when sources of funding are concentrated on a limited number of counterparties, the significance of which may give rise to liquidity problems in the event of deposit withdrawal.

The BPER Banca Group operates with the objective of maintaining a diversified funding profile in terms of borrowers, products, maturities and currencies. The Group's liquidity and funding risk management provides for the regular monitoring of operational and regulatory funding concentration metrics, by type of counterparty and product.

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

The average level, over 12 months, of high-quality liquid assets that can be immediately converted into cash amounts to Euro 26.2 billion. As at 30 June 2025 (point-in-time figure) the liquidity buffer consists mainly of excess European Central Bank reserves and government bonds, which together account for 72.7% of the total liquidity buffer.

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

The BPER Banca Group engages in derivative contracts with both central counterparties and third parties (OTC). The risk factors underlying these contracts may, depending on changes in market conditions, affect the Group's future derivative exposures, thereby impacting the Group's liquidity position following collateral calls in the form of cash or other liquid collateral.

The method of calculation of potential liquidity absorption, corresponding to additional collateral needs resulting from the impact of an adverse market scenario, is based on the Historical Look Back Approach, which focuses on net collateral outflows.

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

Under the EU regulatory framework, an institution shall monitor and report currencies when they are material, i.e. if the foreign currency-denominated liabilities are equal to or higher than 5% of the institution's total liabilities.

The BPER Banca Group's liabilities are mainly denominated in Euro, and at 30 June 2025 the Group had no exposures in foreign currencies defined as material according to EU regulatory guidelines.

#### g) Other items in the LCR calculation that are not captured in the LCR disclosure template but that the institution considers relevant for its liquidity profile.

Intraday liquidity risk arises when a bank does not have sufficient funds to meet its payment and settlement obligations on a timely basis during the business day.

Intraday liquidity management therefore aims to ensure the Group's ability to meet its expected or unexpected payment and settlement obligations on an ongoing basis during its opening hours. Maintaining a sustainable funding gap between cash inflows and outflows during the day is an essential condition for the pursuit of business as usual in the banking industry.

The BPER Banca Group's intraday liquidity risk is monitored using the tools defined by the Basel Committee on Banking Supervision (BCBS - Monitoring tools for intraday liquidity management", April 2013).

To cover intraday liquidity risk, an immediately available buffer of unencumbered assets is held for the Group to meet expected and unexpected payment and settlement obligations on a timely basis.

## Net Stable Funding Ratio

Quantitative information on the BPER Banca Group's Net Stable Funding Ratio (NSFR), disclosed in compliance with the European regulatory framework, is provided below. In particular, as required by the instructions included in Regulation (EU) no. 3172/2024 end quarter data are published in template EU LIQ2 for each quarter of the relevant reporting period. Two series of data are therefore reported below, covering the first and second quarter of 2025.

- EU LIQ2 - Second quarter 2025

### Template EU LIQ2: Net Stable Funding Ratio (in millions)

		a	b	c	d	e
		Unweighted value by residual maturity				Weighted value
		No maturity	< 6 months	from 6 months to < 1 yr	≥ 1 yr	
<b>Available stable funding (ASF) Items</b>						
1	Capital items and instruments	10,757	-	-	1,158	11,915
2	Own funds	10,757	-	-	1,157	11,915
3	Other equity instruments		-	-	-	-
4	Retail deposits		70,325	665	3,180	69,803
5	Stable deposits		54,637	-	-	51,905
6	Less stable deposits		15,688	665	3,180	17,897
7	Wholesale funding:		37,267	1,641	8,047	21,520
8	Operational deposits		967	-	-	484
9	Other wholesale funding		36,300	1,641	8,047	21,037
10	Interdependent liabilities		-	-	-	-
11	Other liabilities:	-	7,748	-	257	257
12	NSFR derivative liabilities	-				
13	All other liabilities and capital instruments not included in the above categories		7,748	-	257	257
<b>14</b>	<b>Total available stable funding (ASF)</b>					<b>103,495</b>

## continued: Template EU LIQ2: Net Stable Funding Ratio (in millions)

		Unweighted value by residual maturity				Weighted value
		a	b	c	d	
		No maturity	< 6 months	from 6 months to < 1 yr	≥ 1 yr	
<b>Required stable funding (RSF) Items</b>						
15	Total high-quality liquid assets (HQLA)					1,046
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		-	-	3,623	3,080
16	Deposits held at other financial institutions for operational purposes		-	-	-	-
17	Performing loans and securities:		21,725	5,779	62,007	59,690
18	<i>Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut</i>		520	-	-	-
19	<i>Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions</i>		1,452	106	608	807
20	<i>Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:</i>		15,651	1,503	16,956	56,034
21	<i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		23	36	621	22,360
22	<i>Performing residential mortgages, of which:</i>		4,020	4,089	41,403	-
23	<i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		1,826	1,982	30,718	-
24	<i>Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products</i>		83	81	3,040	2,849
25	Interdependent assets		-	-	-	-
26	Other assets:	-	1,283	9	12,205	12,457
27	<i>Physical traded commodities</i>					-
28	<i>Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs</i>		208			177
29	<i>NSFR derivative assets</i>		67			67
30	<i>NSFR derivative liabilities before deduction of variation margin posted</i>		-		-	-
31	<i>All other assets not included in the above categories</i>		1,008	9	12,205	12,213
32	Off-balance sheet items		380	1,162	4,575	392
<b>33</b>	<b>Total RSF</b>					<b>76,665</b>
<b>34</b>	<b>Net Stable Funding Ratio (%)</b>					<b>134.997%</b>

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

- EU LIQ2 - First quarter 2025

### Template EU LIQ2: Net Stable Funding Ratio (in millions)

	Unweighted value by residual maturity				Weighted value	
	a	b	c	d		
	No maturity	< 6 months	from 6 months to < 1 yr	≥ 1 yr		
<b>Available stable funding (ASF) Items</b>						
1	Capital items and instruments	10,601	-	-	1,178	11,779
2	<i>Own funds</i>	10,601	-	-	1,178	11,778
3	<i>Other equity instruments</i>	-	-	-	-	-
4	Retail deposits	-	69,795	149	3,568	69,240
5	<i>Stable deposits</i>	-	54,434	-	-	51,712
6	<i>Less stable deposits</i>	-	15,361	149	3,568	17,528
7	Wholesale funding:	-	34,735	947	9,031	21,463
8	<i>Operational deposits</i>	-	1,080	-	-	540
9	<i>Other wholesale funding</i>	-	33,656	947	9,031	20,923
10	Interdependent liabilities	-	-	-	-	-
11	Other liabilities:	6	7,987	-	265	265
12	<i>NSFR derivative liabilities</i>	6	-	-	-	-
13	<i>All other liabilities and capital instruments not included in the above categories</i>	-	7,987	-	265	265
<b>14</b>	<b>Total available stable funding (ASF)</b>					<b>102,746</b>

## continued: Template EU LIQ2: Net Stable Funding Ratio (in millions)

		Unweighted value by residual maturity				Weighted value
		a	b	c	d	
		No maturity	< 6 months	from 6 months to < 1 yr	≥ 1 yr	
<b>Required stable funding (RSF) Items</b>						
15	Total high-quality liquid assets (HQLA)					1,070
EU-15a	Assets encumbered for a residual maturity of one year or more in a cover pool		-	-	4,334	3,684
16	Deposits held at other financial institutions for operational purposes		-	-	-	-
17	Performing loans and securities:		20,603	5,567	60,456	57,744
18	<i>Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut</i>		50	-	-	-
19	<i>Performing securities financing transactions with financial customer collateralised by other assets and loans and advances to financial institutions</i>		1,479	32	309	473
20	<i>Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs, of which:</i>		14,662	1,503	16,830	54,414
21	<i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		30	42	682	22,999
22	<i>Performing residential mortgages, of which:</i>		4,251	3,967	40,299	-
23	<i>With a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk</i>		1,974	2,036	31,431	-
24	<i>Other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products</i>		162	64	3,018	2,858
25	Interdependent assets		-	-	-	-
26	Other assets:		1,020	4	13,498	13,559
27	<i>Physical traded commodities</i>		-	-	-	-
28	<i>Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs</i>		66	-	-	56
29	<i>NSFR derivative assets</i>		-	-	-	-
30	<i>NSFR derivative liabilities before deduction of variation margin posted</i>		17	-	-	1
31	<i>All other assets not included in the above categories</i>		937	4	13,498	13,502
32	Off-balance sheet items		262	1,173	4,574	382
<b>33</b>	<b>Total RSF</b>					<b>76,440</b>
<b>34</b>	<b>Net Stable Funding Ratio (%)</b>					<b>134.414%</b>

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

The Net Stable Funding Ratio (NSFR) is measured with a view to reporting any mismatches between the Company's liquid assets and liabilities. At 30 June 2025, the NSFR was 135.0% (vs. 134.4% as at 31 March 2025), broadly in excess of the regulatory threshold of 100%.

## 6. CREDIT RISK: CREDIT QUALITY

With reference to templates EU CR2a, EU CQ2, EU CQ6, EU CQ8 (“additional templates”) and EU CQ4 and EU CQ5 (“templates with additional columns” - columns b and d), exceeding the threshold at consolidated level was verified (“Gross NPE Ratio”) pursuant to article 9, paragraph 2 et seq. of Regulation (EU) no. 3172/2024. The 5% threshold was not exceeded for the last three consecutive quarters during the four quarters prior to the reporting date for the disclosure. The aforementioned information pursuant to art. 442, letters c) and f), of Regulation (EU) no. 575/2013 containing supplementary templates/templates with supplementary columns are therefore not published.

### Template EU CR1: Performing and non-performing exposures and related provisions (in millions)

		a	b	c	d	e	f
		Gross carrying amount/nominal amount					
		Performing exposures		Non-performing exposures			
		of which stage 1	of which stage 2	of which stage 2		of which stage 3	
<b>005</b>	<b>Cash balances at central banks and other demand deposits</b>	<b>7,896</b>	<b>7,896</b>	-	-	-	-
<b>010</b>	<b>Loans and advances</b>	<b>92,743</b>	<b>84,792</b>	<b>7,488</b>	<b>2,382</b>	-	<b>2,086</b>
020	Central Banks	-	-	-	-	-	-
030	General governments	3,101	3,080	21	5	-	5
040	Credit institutions	345	325	20	-	-	-
050	Other financial corporations	6,220	5,815	377	32	-	31
060	Non-financial corporations	39,107	34,300	4,472	1,464	-	1,245
070	of which SMEs	18,086	15,557	2,348	1,297	-	1,113
080	Households	43,970	41,271	2,598	880	-	805
<b>090</b>	<b>Debt securities</b>	<b>29,476</b>	<b>28,873</b>	<b>578</b>	<b>344</b>	-	<b>344</b>
100	Central Banks	-	-	-	-	-	-
110	General governments	20,344	20,344	-	-	-	-
120	Credit institutions	6,691	6,244	447	-	-	-
130	Other financial corporations	1,414	1,287	103	343	-	343
140	Non-financial corporations	1,026	998	28	-	-	-
<b>150</b>	<b>Off-balance-sheet exposures</b>	<b>41,150</b>	<b>32,044</b>	<b>2,015</b>	<b>388</b>	-	<b>306</b>
160	Central Banks	-	-	-	-	-	-
170	General governments	1,151	1,058	67	1	-	-
180	Credit institutions	1,726	1,460	1	-	-	-
190	Other financial corporations	2,163	1,554	103	-	-	-
200	Non-financial corporations	34,069	26,170	1,729	357	-	277
210	Households	2,042	1,804	115	30	-	29
<b>220</b>	<b>Total</b>	<b>171,266</b>	<b>153,606</b>	<b>10,081</b>	<b>3,114</b>	-	<b>2,735</b>

## continued: Template EU CR1: Performing and non-performing exposures and related provisions (in millions)

	g	h	i	j	k	l	m	n	o	
	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received		
	Performing exposures - Accumulated impairment and provisions		Non-performing exposures - Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions					On performing exposures	On non-performing exposures	
	of which stage 1	of which stage 2		of which stage 2	of which stage 3					
<b>005</b>	<b>Cash balances at central banks and other demand deposits</b>	<b>(1)</b>	<b>(1)</b>	-	-	-	-	-	-	
<b>010</b>	<b>Loans and advances</b>	<b>(602)</b>	<b>(200)</b>	<b>(389)</b>	<b>(1,325)</b>	-	<b>(1,122)</b>	<b>(15)</b>	<b>59,304</b>	<b>868</b>
020	Central Banks	-	-	-	-	-	-	-	-	-
030	General governments	(2)	(2)	-	(3)	-	(3)	-	60	-
040	Credit institutions	(20)	-	(20)	-	-	-	-	-	-
050	Other financial corporations	(70)	(34)	(36)	(26)	-	(26)	-	1,504	4
060	Non-financial corporations	(311)	(109)	(192)	(858)	-	(700)	(15)	18,750	504
070	of which SMEs	(159)	(67)	(85)	(757)	-	(624)	(12)	12,764	462
080	Households	(199)	(55)	(141)	(439)	-	(394)	-	38,990	360
<b>090</b>	<b>Debt securities</b>	<b>(11)</b>	<b>(9)</b>	<b>(2)</b>	<b>(10)</b>	-	<b>(10)</b>	-	<b>1,320</b>	<b>334</b>
100	Central Banks	-	-	-	-	-	-	-	-	-
110	General governments	(6)	(6)	-	-	-	-	-	403	-
120	Credit institutions	(2)	(1)	-	-	-	-	-	467	-
130	Other financial corporations	(3)	(1)	(2)	(10)	-	(10)	-	450	334
140	Non-financial corporations	-	-	-	-	-	-	-	-	-
<b>150</b>	<b>Off-balance-sheet exposures</b>	<b>(47)</b>	<b>(11)</b>	<b>(4)</b>	<b>(52)</b>	-	<b>(33)</b>		<b>5,060</b>	<b>75</b>
160	Central Banks	-	-	-	-	-	-		-	-
170	General governments	-	-	-	-	-	-		-	-
180	Credit institutions	-	-	-	-	-	-		38	-
190	Other financial corporations	-	-	-	-	-	-		188	-
200	Non-financial corporations	(39)	(4)	(3)	(50)	-	(32)		4,493	73
210	Households	(8)	(6)	(1)	(1)	-	(1)		340	2
<b>220</b>	<b>Total</b>	<b>(662)</b>	<b>(221)</b>	<b>(395)</b>	<b>(1,387)</b>	-	<b>(1,165)</b>	<b>(15)</b>	<b>65,684</b>	<b>1,277</b>

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts. Under "Off-balance sheet exposures", the breakdown values by stages only refer to exposures measured under IFRS9.

**Template EU CR1-A: Maturity of exposures (in millions)**

		a	b	c	d	e	f
		Net exposure value					
		On demand	<= 1 year	> 1 year <= 5 years	> 5 years	No stated maturity	Total
1	Loans and advances	9,507	11,465	20,528	51,533	165	93,198
2	Debt securities	4	1,416	9,487	18,891	-	29,798
3	<b>Total</b>	<b>9,511</b>	<b>12,881</b>	<b>30,015</b>	<b>70,424</b>	<b>165</b>	<b>122,996</b>

**Template EU CR2: Changes in the stock of non-performing loans and advances (in millions)**

		a
		Gross carrying amount
<b>010</b>	<b>Initial stock of non-performing loans and advances</b>	<b>2,212</b>
020	Inflows to non-performing portfolios	783
030	Outflows from non-performing portfolios	(613)
040	Outflows due to write-offs	(60)
050	Outflow due to other situations	(553)
<b>060</b>	<b>Final stock of non-performing loans and advances</b>	<b>2,382</b>

Inflows to the non-performing portfolio primarily include reclassifications from forborne and non-forborne performing exposures (Euro 532 million).

Outflows from the Non-Performing portfolio mainly comprise outflows related to collections and reclassifications on positions other than those sold (Euro 449 million), outflows related to the disposal of UTPs and bad loans (Euro 87 million) and write-offs (Euro 60 million).

For classification of non-performing exposures, the BPER Banca Group applies a policy of identification of “defaulted exposures” pursuant to the definition according to Article 178 of the CRR. No differences in the scope of consolidation are therefore observed.

### Template EU CQ1: Credit quality of forborne exposures (in millions)

	a	b	c	d	e	f	g	h
	Gross carrying amount/ nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		Collateral and financial guarantees received on forborne exposures	
	Performing forborne	Non-performing forborne		Of which impaired	On performing forborne exposures	On non-performing forborne exposures	Of which collateral and financial guarantees received on non-performing exposures with forbearance measures	
		Of which defaulted						
005 Cash balances at central banks and other demand deposits	-	-	-	-	-	-	-	-
<b>010 Loans and advances</b>	<b>902</b>	<b>606</b>	<b>606</b>	<b>606</b>	<b>(64)</b>	<b>(337)</b>	<b>860</b>	<b>249</b>
020 Central Banks	-	-	-	-	-	-	-	-
030 General governments	13	-	-	-	-	-	6	-
040 Credit institutions	-	-	-	-	-	-	-	-
050 Other financial corporations	22	5	5	5	(2)	(4)	21	1
060 Non-financial corporations	630	418	418	418	(50)	(243)	531	161
070 Households	237	183	183	183	(12)	(90)	301	87
080 Debt securities	-	-	-	-	-	-	-	-
090 Loan commitments given	55	14	14	14	-	-	5	1
<b>100 Total</b>	<b>957</b>	<b>619</b>	<b>619</b>	<b>619</b>	<b>(64)</b>	<b>(337)</b>	<b>865</b>	<b>250</b>

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

## Template EU CQ4: Quality of non-performing exposures by geography (in millions)

	a	b	c	d	e	f	g
	Gross carrying amount/nominal amount			of which subject to impairment	Accumulated impairment	Provisions on off-balance sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
	of which non-performing		of which defaulted				
<b>010</b>	<b>TOTAL ON-BALANCE SHEET EXPOSURES</b>		<b>124,944</b>	<b>2,725</b>	<b>(1,948)</b>		-
020	Italy	109,760	2,703		(1,909)		-
030	France	4,154	-		(1)		-
040	Germany	1,839	4		(1)		-
050	Spain	1,318	-		(1)		-
060	United States	1,143	1		(1)		-
070	Other countries	6,730	17		(35)		-
<b>080</b>	<b>TOTAL OFF-BALANCE SHEET EXPOSURES</b>		<b>41,539</b>	<b>388</b>		<b>(100)</b>	
090	Italy	39,405	388			(99)	
100	China	223	-			-	
110	Netherlands	162	-			-	
120	Algeria	127	-			-	
130	Saudi Arabia	124	-			-	
140	Other countries	1,497	-			-	
<b>150</b>	<b>TOTAL</b>	<b>166,483</b>	<b>3,113</b>		<b>(1,948)</b>	<b>(100)</b>	-

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

The template reports exposures to the top five countries in decreasing order of on and off-balance sheet exposure, which represent over 90% of the respective overall exposures. The total of balance sheet exposures, amounting to Euro 125 billion, includes approximately Euro 196 million worth of exposures not subject to impairment. The geographic distribution as at 30 June 2025 shows a variation of approximately Euro 5.3 billion compared to 31 December 2024, due mainly to an increase in the securities portfolio with public administrations and in loans to households and financial corporations.

### Template EU CQ5: Credit quality of loans and advances to non-financial corporations by industry (in millions)

		a	b	c	d	e	f
		Gross carrying amount			Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures	
		of which non-performing		of which defaulted	of which loans and advances subject to impairment		
010	Agriculture, forestry and fishing	1,041		49		(34)	-
020	Mining and quarrying	129		1		(1)	-
030	Manufacturing	13,219		326		(268)	-
040	Electricity, gas, steam and air-conditioning supply	1,335		18		(28)	-
050	Water supply	819		11		(10)	-
060	Construction	2,811		230		(180)	-
070	Wholesale and retail trade	6,901		273		(202)	-
080	Transport and storage	1,642		61		(45)	-
090	Accommodation and food service activities	1,561		114		(70)	-
100	Information and communication	1,098		27		(44)	-
110	Financial and insurance activities	8		-		-	-
120	Real estate activities	3,493		223		(182)	-
130	Professional, scientific and technical activities	3,571		35		(39)	-
140	Administrative and support service activities	1,208		25		(17)	-
150	Public administration and defence, compulsory social security	-		-		-	-
160	Education	46		2		(1)	-
170	Human health services and social work activities	472		22		(17)	-
180	Arts, entertainment and recreation	208		27		(19)	-
190	Other services	1,011		21		(11)	-
<b>200</b>	<b>Total</b>	<b>40,571</b>		<b>1,464</b>		<b>(1,169)</b>	<b>-</b>

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

### Template EU CQ7: Collateral obtained by taking possession and execution processes (in millions)

		a	b
		Collateral obtained by taking possession	
		Value at initial recognition	Accumulated negative changes
010	Property, Plant and Equipment (PP&E)	-	-
020	Other than PP&E	154	(65)
030	Residential immovable property	86	(22)
040	Commercial Immovable property	68	(43)
050	Movable property (auto, shipping, etc.)	-	-
060	Equity and debt instruments	-	-
070	Other collateral	-	-
<b>080</b>	<b>Total</b>	<b>154</b>	<b>(65)</b>

# 7. CREDIT RISK MITIGATION TECHNIQUES

## Template EU CR3 – CRM techniques overview: Disclosure of the use of credit risk mitigation techniques (in millions)

		Unsecured carrying amount	Secured carrying amount			
			of which secured by collateral	of which secured by financial guarantees	of which secured by credit derivatives	
		a	b	c	d	e
1	Loans and advances	40,921	60,172	48,330	11,842	-
2	Debt securities	28,145	1,654	-	1,654	-
<b>3</b>	<b>Total</b>	<b>69,066</b>	<b>61,826</b>	<b>48,330</b>	<b>13,496</b>	<b>-</b>
4	<i>of which: non-performing exposures</i>	189	1,202	534	668	-
EU-5	<i>of which: defaulted</i>	189	1,202			

The change compared to the previous half-year is mainly attributable to the increase in net loans and in the debt securities portfolio at amortised cost with General Government counterparties.

## 8. CREDIT RISK: DISCLOSURE ON THE STANDARDISED APPROACH

The following tables show the distribution of exposures subject to credit and counterparty risk after the application of weighting factors, in accordance with the rules for preparing supervisory reports set forth by the prudential regulations.

### Template EU CR4 – Standardised approach – Credit risk exposure and CRM effects (in millions)

Exposure classes		Exposures before CCF and before CRM		Exposures post CCF and post CRM		RWEAs and RWEA density	
		On-balance-sheet exposures	Off-balance-sheet exposures	On-balance-sheet exposures	Off-balance-sheet exposures	RWEA	RWEA density (%)
		a	b	c	d	e	f
1	Central governments or central banks	30,222	-	40,084	37	1,940	4.83%
2	Non-central government public sector entities	1,554	1,130	1,568	406	412	20.87%
EU 2a	Regional government or local authorities	997	650	1,008	258	121	9.59%
EU 2b	Public sector entities	557	480	560	149	291	41.02%
3	Multilateral development banks	950	-	1,089	1	-	-
EU 3a	International organisations	974	-	974	-	-	-
4	Institutions	4,610	1,311	3,909	91	993	24.83%
5	Covered Bonds	3,699	-	3,699	-	370	10.00%
6	Corporates	11,728	5,605	8,098	639	6,987	79.97%
6.1	<i>Of which: Specialised lending</i>	-	-	-	-	-	-
7	Subordinated debt exposures and equity	1,422	-	1,422	-	2,157	151.67%
EU 7a	Subordinated debt exposures	485	-	485	-	727	150.00%
EU 7b	Equity	937	-	937	-	1,430	152.54%
8	Retail	6,496	787	1,355	29	847	61.23%
9	Secured by mortgages on immovable property and ADC exposures	5,349	19	5,349	5	2,273	42.46%
9.1	Secured by mortgages on residential immovable property – non-IPRE	2,908	5	2,908	1	768	26.41%
9.2	Secured by mortgages on residential immovable property – IPRE	89	-	89	-	69	77.73%
9.3	Secured by mortgages on commercial immovable property - non IPRE	2,128	5	2,128	1	1,210	56.85%
9.4	Secured by mortgages on commercial immovable property – IPRE	163	1	163	-	133	82.10%
9.5	Acquisition, Development and Construction (ADC)	60	8	60	3	92	144.04%
10	Exposures in default	437	42	182	6	200	106.43%
EU 10a	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-
EU 10b	Collective investment undertakings (CIU)	767	-	767	-	1,035	134.95%
EU 10c	Other items	6,737	-	6,737	-	3,624	53.80%
<b>12</b>	<b>TOTAL</b>	<b>74,944</b>	<b>8,893</b>	<b>75,232</b>	<b>1,214</b>	<b>20,838</b>	<b>27.26%</b>

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

## Template EU CRS - Standardised approach (in millions)

Exposure class		Risk weight							
		0%	2%	4%	10%	20%	30%	35%	40%
		a	b	c	d	e	f	g	h
1	Central governments or central banks	38,907	-	-	-	104	-	-	-
2	Non-central government public sector entities	970	-	-	-	739	-	-	-
EU 2a	Regional government or local authorities	656	-	-	-	609	-	-	-
EU 2b	Public sector entities	313	-	-	-	130	-	-	-
3	Multilateral development banks	1,090	-	-	-	-	-	-	-
EU 3a	International organisations	974	-	-	-	-	-	-	-
4	Institutions	-	423	-	-	2,255	834	-	20
5	Covered Bonds	-	-	-	3,699	-	-	-	-
6	Corporates	-	-	-	-	269	-	-	-
6.1	Of which: Corporates - Specialised lending	-	-	-	-	-	-	-	-
7	Subordinated debt exposures and equity	244	-	-	-	-	-	-	-
EU 7a	Subordinated debt exposures	-	-	-	-	-	-	-	-
EU 7b	Equity	244	-	-	-	-	-	-	-
8	Retail exposures	-	-	-	-	-	-	-	-
9	Secured by mortgages on immovable property and ADC exposures	-	-	-	-	2,597	1	1	-
9.1	Secured by mortgages on residential immovable property non-IPRE	-	-	-	-	2,533	-	-	-
9.1.1	no loan splitting applied	-	-	-	-	-	-	-	-
9.1.2	loan splitting applied (secured)	-	-	-	-	2,533	-	-	-
9.1.3	loan splitting applied (unsecured)	-	-	-	-	-	-	-	-
9.2	Secured by mortgages on residential immovable property - IPRE	-	-	-	-	37	1	1	-
9.3	Secured by mortgages on commercial immovable property - non IPRE	-	-	-	-	27	-	-	-
9.3.1	no loan splitting applied	-	-	-	-	16	-	-	-
9.3.2	loan splitting applied (secured)	-	-	-	-	-	-	-	-
9.3.3	loan splitting applied (unsecured)	-	-	-	-	11	-	-	-
9.4	Secured by mortgages on commercial immovable property - IPRE	-	-	-	-	-	-	-	-
9.5	Acquisition, Development and Construction (ADC)	-	-	-	-	-	-	-	-
10	Exposures in default	-	-	-	-	-	-	-	-
EU 10a	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-
EU 10b	Collective investment undertakings (CIU)	101	-	-	-	10	20	-	-
EU 10c	Other items	2,574	-	-	-	673	-	-	-
<b>EU 11c</b>	<b>TOTAL</b>	<b>44,859</b>	<b>423</b>	<b>-</b>	<b>3,699</b>	<b>6,647</b>	<b>856</b>	<b>1</b>	<b>20</b>

8. Credit risk: disclosure on the standardised approach

**continued: Template EU CR5 – Standardised approach (in millions)**

Exposure class		Risk weight							
		45%	50%	60%	70%	75%	80%	90%	100%
		i	j	k	l	m	n	o	p
1	Central governments or central banks	-	51	-	-	-	-	-	503
2	Non-central government public sector entities	-	-	-	-	-	-	-	265
EU 2a	Regional government or local authorities	-	-	-	-	-	-	-	-
EU 2b	Public sector entities	-	-	-	-	-	-	-	265
3	Multilateral development banks	-	-	-	-	-	-	-	-
EU 3a	International organisations	-	-	-	-	-	-	-	-
4	Institutions	-	364	-	-	68	-	-	20
5	Covered Bonds	-	-	-	-	-	-	-	-
6	Corporates	-	1,219	-	-	2,562	-	-	4,563
6.1	Of which: Corporates - Specialised lending	-	-	-	-	-	-	-	-
7	Subordinated debt exposures and equity	-	-	-	-	-	-	-	202
EU 7a	Subordinated debt exposures	-	-	-	-	-	-	-	-
EU 7b	Equity	-	-	-	-	-	-	-	202
8	Retail exposures	247	-	-	-	1,062	-	-	75
9	Secured by mortgages on immovable property and ADC exposures	-	75	1,635	-	438	-	7	338
9.1	Secured by mortgages on residential immovable property non-IPRE	-	-	-	-	335	-	-	41
9.1.1	no loan splitting applied	-	-	-	-	198	-	-	33
9.1.2	loan splitting applied (secured)	-	-	-	-	-	-	-	-
9.1.3	loan splitting applied (unsecured)	-	-	-	-	137	-	-	9
9.2	Secured by mortgages on residential immovable property – IPRE	-	-	-	-	-	-	-	1
9.3	Secured by mortgages on commercial immovable property - non IPRE	-	75	1,635	-	103	-	-	288
9.3.1	no loan splitting applied	-	13	-	-	33	-	-	147
9.3.2	loan splitting applied (secured)	-	-	1,635	-	-	-	-	-
9.3.3	loan splitting applied (unsecured)	-	62	-	-	69	-	-	141
9.4	Secured by mortgages on commercial immovable property - IPRE	-	-	-	-	-	-	7	-
9.5	Acquisition, Development and Construction (ADC)	-	-	-	-	-	-	-	8
10	Exposures in default	-	-	-	-	-	-	-	164
EU 10a	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-
EU 10b	Collective investment undertakings (CIU)	-	26	-	-	30	-	-	402
EU 10c	Other items	-	-	-	-	-	-	-	3,490
<b>EU 11c</b>	<b>TOTAL</b>	<b>247</b>	<b>1,735</b>	<b>1,635</b>	<b>-</b>	<b>4,160</b>	<b>-</b>	<b>7</b>	<b>10,022</b>

## continued: Template EU CR5 - standardised approach (in millions)

Exposure class		Risk weight							
		105%	110%	130%	150%	250%	370%	400%	1250%
		q	r	s	t	u	v	w	x
1	Central governments or central banks	-	-	-	-	556	-	-	-
2	Non-central government public sector entities	-	-	-	-	-	-	-	-
EU 2a	Regional government or local authorities	-	-	-	-	-	-	-	-
EU 2b	Public sector entities	-	-	-	-	-	-	-	-
3	Multilateral development banks	-	-	-	-	-	-	-	-
EU 3a	International organisations	-	-	-	-	-	-	-	-
4	Institutions	-	-	-	15	-	-	-	-
5	Covered Bonds	-	-	-	-	-	-	-	-
6	Corporates	-	-	-	124	-	-	-	-
6.1	<i>Of which: Corporates - Specialised lending</i>	-	-	-	-	-	-	-	-
7	Subordinated debt exposures and equity	-	-	-	485	491	-	-	-
EU 7a	Subordinated debt exposures	-	-	-	485	-	-	-	-
EU 7b	Equity	-	-	-	-	491	-	-	-
8	Retail exposures	-	-	-	-	-	-	-	-
9	Secured by mortgages on immovable property and ADC exposures	1	36	-	121	-	-	-	-
9.1	Secured by mortgages on residential immovable property non-IPRE	-	-	-	-	-	-	-	-
9.1.1	no loan splitting applied	-	-	-	-	-	-	-	-
9.1.2	loan splitting applied (secured)	-	-	-	-	-	-	-	-
9.1.3	loan splitting applied (unsecured)	-	-	-	-	-	-	-	-
9.2	Secured by mortgages on residential immovable property - IPRE	1	-	-	48	-	-	-	-
9.3	Secured by mortgages on commercial immovable property - non IPRE	-	-	-	2	-	-	-	-
9.3.1	no loan splitting applied	-	-	-	-	-	-	-	-
9.3.2	loan splitting applied (secured)	-	-	-	-	-	-	-	-
9.3.3	loan splitting applied (unsecured)	-	-	-	2	-	-	-	-
9.4	Secured by mortgages on commercial immovable property - IPRE	-	36	-	15	-	-	-	-
9.5	Acquisition, Development and Construction (ADC)	-	-	-	56	-	-	-	-
10	Exposures in default	-	-	-	24	-	-	-	-
EU 10a	Claims on institutions and corporates with a short-term credit assessment	-	-	-	-	-	-	-	-
EU 10b	Collective investment undertakings (CIU)	-	-	-	8	-	56	-	2
EU 10c	Other items	-	-	-	-	-	-	-	-
<b>EU 11c</b>	<b>TOTAL</b>	<b>1</b>	<b>36</b>	<b>-</b>	<b>776</b>	<b>1,047</b>	<b>56</b>	<b>-</b>	<b>2</b>

8. Credit risk: disclosure on the standardised approach

**continued: Template EU CR5 – Standardised approach (in millions)**

Exposure class		Risk weight	Total	Of which unrated
		Other		
		y	z	aa
1	Central governments or central banks	-	40,121	40,087
2	Non-central government public sector entities	-	1,974	1,960
EU 2a	Regional government or local authorities	-	1,265	1,262
EU 2b	Public sector entities	-	708	699
3	Multilateral development banks	-	1,090	1,090
EU 3a	International organisations	-	974	974
4	Institutions	-	3,999	3,535
5	Covered Bonds	-	3,699	3,330
6	Corporates	-	8,737	5,869
6.1	<i>Of which: Corporates - Specialised lending</i>	-	-	-
7	Subordinated debt exposures and equity	-	1,422	1,422
EU 7a	Subordinated debt exposures	-	485	485
EU 7b	Equity	-	937	937
8	Retail exposures	-	1,384	1,384
9	Secured by mortgages on immovable property and ADC exposures	105	5,354	5,235
9.1	Secured by mortgages on residential immovable property non-IPRE	-	2,909	2,904
9.1.1	no loan splitting applied	-	231	225
9.1.2	loan splitting applied (secured)	-	2,533	2,533
9.1.3	loan splitting applied (unsecured)	-	145	145
9.2	Secured by mortgages on residential immovable property - IPRE	-	89	89
9.3	Secured by mortgages on commercial immovable property - non IPRE	-	2,129	2,020
9.3.1	no loan splitting applied	-	209	190
9.3.2	loan splitting applied (secured)	-	1,635	1,635
9.3.3	loan splitting applied (unsecured)	-	285	195
9.4	Secured by mortgages on commercial immovable property - IPRE	105	163	159
9.5	Acquisition, Development and Construction (ADC)	-	64	64
10	Exposures in default	-	188	188
EU 10a	Claims on institutions and corporates with a short-term credit assessment	-	-	-
EU 10b	Collective investment undertakings (CIU)	111	767	767
EU 10c	Other items	-	6,737	6,737
<b>EU 11c</b>	<b>TOTAL</b>	<b>216</b>	<b>76,446</b>	<b>72,577</b>

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

Pursuant to Article 444(e), the exposure values deducted from Own Funds are presented in the EU CC1 template.

With reference to exposures in equity instruments under the standardised approach, please refer to chapter 9 “Credit risk: disclosure on the IRB approach” presented in the EU CR10.5 template.

# 9. CREDIT RISK: DISCLOSURE ON THE IRB APPROACH

Template EU CR6 – IRB approach: Credit risk exposures by exposure class and PD range (in millions)

A-IRB	PD range	On-balance-sheet exposures	Off-balance-sheet exposures pre-CCF	Exposure weighted average CCF	Exposures post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors
		a	b	c	d	e	f
	0.00 to < 0.15	626	1,273	5.73%	700	0.06%	1,108
	0.00 to < 0.10	578	1,165	5.73%	645	0.05%	324
	0.10 to < 0.15	49	108	5.74%	55	0.14%	784
	0.15 to < 0.25	1,659	3,782	4.39%	1,825	0.16%	4,499
	0.25 to < 0.50	2,386	2,939	5.39%	2,545	0.43%	4,954
	0.50 to < 0.75	1,305	1,390	5.39%	1,380	0.73%	4,281
	0.75 to < 2.50	5,119	3,611	7.63%	5,396	1.68%	9,178
	0.75 to < 1.75	2,801	2,247	6.91%	2,957	1.20%	5,361
	1.75 to < 2.5	2,319	1,365	8.83%	2,439	2.25%	3,817
	2.50 to < 10.00	3,179	1,270	12.93%	3,344	4.89%	6,058
	2.5 to < 5	1,822	735	11.82%	1,909	3.61%	3,177
	5 to < 10	1,357	535	14.45%	1,434	6.61%	2,881
	10.00 to < 100.00	518	185	13.59%	543	25.35%	3,424
	10 to < 20	342	113	18.03%	362	14.65%	917
	20 to < 30	48	12	1.06%	48	24.73%	208
	30.00 to < 100.00	128	59	7.66%	133	54.82%	2,299
	100.00 (Default)	482	170	9.96%	500	100.00%	938
	<b>Sub-total</b>	<b>15,275</b>	<b>14,619</b>	<b>6.53%</b>	<b>16,234</b>	<b>2.65%</b>	<b>34,440</b>
Exposures to corporates – general	PD range	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
		g	h	i	j	k	l
	0.00 to < 0.15	26.49%	2.09	72	10.34%	-	-
	0.00 to < 0.10	26.72%	2.05	65	10.08%	-	-
	0.10 to < 0.15	23.87%	2.65	7	13.36%	-	-
	0.15 to < 0.25	26.40%	1.79	314	17.19%	1	(1)
	0.25 to < 0.50	30.67%	2.03	911	35.79%	3	(2)
	0.50 to < 0.75	33.41%	1.67	546	39.57%	3	(2)
	0.75 to < 2.50	38.20%	1.98	3,911	72.49%	35	(26)
	0.75 to < 1.75	34.23%	2.02	1,705	57.66%	12	(7)
	1.75 to < 2.5	43.01%	1.94	2,207	90.46%	23	(19)
	2.50 to < 10.00	43.52%	2.35	3,676	109.92%	70	(63)
	2.5 to < 5	42.71%	2.43	1,907	99.86%	29	(22)
	5 to < 10	44.61%	2.25	1,769	123.30%	42	(41)
	10.00 to < 100.00	49.08%	2.48	1,077	198.19%	67	(59)
	10 to < 20	48.87%	2.50	712	196.49%	26	(35)
	20 to < 30	45.56%	2.75	97	201.35%	5	(8)
	30.00 to < 100.00	50.96%	2.33	267	201.69%	36	(15)
	100.00 (Default)	48.57%	2.16	259	51.79%	238	(316)
	<b>Subtotal (exposure class)</b>	<b>36.56%</b>	<b>2.04</b>	<b>10,766</b>	<b>66.32%</b>	<b>419</b>	<b>(469)</b>

## continued: Template EU CR6 – IRB approach: Credit risk exposures by exposure class and PD range (in millions)

A-IRB	PD range	On-balance-sheet exposures	Off-balance-sheet exposures pre-CCF	Exposure weighted average CCF	Exposures post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors
		a	b	c	d	e	f
	0.00 to < 0.15	191	-	72.57%	191	0.12%	2,264
	0.00 to < 0.10	-	-	-	-	-	-
	0.10 to < 0.15	191	-	72.57%	191	0.12%	2,264
	0.15 to < 0.25	183	-	72.57%	183	0.16%	2,204
	0.25 to < 0.50	738	2	0.55%	738	0.33%	8,291
	0.50 to < 0.75	344	-	0.59%	344	0.57%	4,113
	0.75 to < 2.50	1,272	1	18.79%	1,272	1.44%	13,793
	0.75 to < 1.75	1,006	-	14.02%	1,006	1.20%	11,364
	1.75 to < 2.5	266	1	22.62%	266	2.37%	2,429
	2.50 to < 10.00	683	1	30.26%	683	4.67%	6,519
	2.5 to < 5	363	-	-	363	3.18%	3,422
	5 to < 10	319	1	34.12%	320	6.35%	3,097
	10.00 to < 100.00	192	-	-	192	22.61%	2,148
	10 to < 20	112	-	-	112	13.30%	1,205
	20 to < 30	44	-	-	44	23.69%	527
	30.00 to < 100.00	35	-	-	35	50.82%	416
	100.00 (Default)	152	-	94.11%	152	100.00%	1,556
	<b>Sub-total</b>	<b>3,754</b>	<b>5</b>	<b>20.57%</b>	<b>3,755</b>	<b>2.74%</b>	<b>40,888</b>
Retail exposures – secured by residential immovable property, SMEs	PD range	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
		g	h	i	j	k	l
	0.00 to < 0.15	5.79%	-	2	1.17%	-	-
	0.00 to < 0.10	0.00%	-	-	0.00%	-	-
	0.10 to < 0.15	5.79%	-	2	1.17%	-	-
	0.15 to < 0.25	5.91%	-	3	1.56%	-	-
	0.25 to < 0.50	7.27%	-	24	3.24%	-	-
	0.50 to < 0.75	6.94%	-	16	4.68%	-	-
	0.75 to < 2.50	13.64%	-	212	16.64%	3	(4)
	0.75 to < 1.75	12.74%	-	138	13.69%	2	(3)
	1.75 to < 2.5	17.05%	-	74	27.79%	1	(1)
	2.50 to < 10.00	21.25%	-	347	50.85%	7	(12)
	2.5 to < 5	20.65%	-	148	40.76%	2	(4)
	5 to < 10	21.93%	-	199	62.30%	4	(7)
	10.00 to < 100.00	23.84%	-	182	94.67%	10	(21)
	10 to < 20	23.36%	-	101	90.31%	4	(9)
	20 to < 30	25.96%	-	50	113.62%	3	(6)
	30.00 to < 100.00	22.71%	-	30	84.71%	4	(6)
	100.00 (Default)	31.53%	-	52	34.17%	47	(85)
	<b>Subtotal (exposure class)</b>	<b>13.63%</b>	<b>-</b>	<b>838</b>	<b>22.31%</b>	<b>67</b>	<b>(122)</b>

## continued: Template EU CR6 – IRB approach: Credit risk exposures by exposure class and PD range (in millions)

A-IRB	PD range	On-balance-sheet exposures	Off-balance-sheet exposures pre-CCF	Exposure weighted average CCF	Exposures post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors
		a	b	c	d	e	f
	0.00 to < 0.15	4,431	-	29.69%	4,431	0.12%	50,084
	0.00 to < 0.10	-	-	-	-	-	-
	0.10 to < 0.15	4,431	-	29.69%	4,431	0.12%	50,084
	0.15 to < 0.25	4,148	-	59.47%	4,148	0.16%	51,949
	0.25 to < 0.50	4,180	1	3.67%	4,180	0.26%	54,139
	0.50 to < 0.75	4,354	-	16.38%	4,354	0.56%	52,930
	0.75 to < 2.50	6,197	-	1.77%	6,197	1.67%	74,318
	0.75 to < 1.75	3,865	-	1.57%	3,865	1.18%	45,298
	1.75 to < 2.5	2,332	-	2.67%	2,332	2.49%	29,020
	2.50 to < 10.00	1,454	-	12.72%	1,454	5.15%	17,411
	2.5 to < 5	692	-	19.61%	692	3.68%	8,471
	5 to < 10	762	-	3.73%	762	6.49%	8,940
	10.00 to < 100.00	430	-	119.07%	430	20.35%	5,410
	10 to < 20	301	-	-	301	12.25%	3,761
	20 to < 30	53	-	-	53	24.35%	666
	30.00 to < 100.00	77	-	119.07%	77	49.46%	983
	100.00 (Default)	265	-	46.78%	265	100.00%	3,332
	<b>Sub-total</b>	<b>25,459</b>	<b>2</b>	<b>10.80%</b>	<b>25,459</b>	<b>1.24%</b>	<b>309,573</b>
Retail exposures – secured by residential immovable property, non-SMEs	PD range	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
		g	h	i	j	k	l
	0.00 to < 0.15	6.31%	-	74	1.67%	-	-
	0.00 to < 0.10	0.00%	-	-	0.00%	-	-
	0.10 to < 0.15	6.31%	-	74	1.67%	-	-
	0.15 to < 0.25	6.74%	-	97	2.33%	-	-
	0.25 to < 0.50	7.16%	-	147	3.52%	1	(1)
	0.50 to < 0.75	7.05%	-	260	5.97%	2	(1)
	0.75 to < 2.50	13.25%	-	1,391	22.44%	14	(16)
	0.75 to < 1.75	13.68%	-	739	19.12%	6	(7)
	1.75 to < 2.5	12.53%	-	652	27.95%	7	(9)
	2.50 to < 10.00	15.65%	-	766	52.67%	12	(19)
	2.5 to < 5	12.99%	-	251	36.28%	3	(5)
	5 to < 10	18.06%	-	515	67.56%	9	(15)
	10.00 to < 100.00	18.90%	-	407	94.62%	16	(42)
	10 to < 20	18.97%	-	277	92.07%	7	(24)
	20 to < 30	18.75%	-	57	108.62%	2	(6)
	30.00 to < 100.00	18.73%	-	73	95.00%	7	(12)
	100.00 (Default)	21.81%	-	73	27.47%	55	(118)
	<b>Subtotal (exposure class)</b>	<b>9.24%</b>	<b>-</b>	<b>3,214</b>	<b>12.62%</b>	<b>101</b>	<b>(197)</b>

## continued: Template EU CR6 – IRB approach: Credit risk exposures by exposure class and PD range (in millions)

A-IRB	PD range	On-balance-sheet exposures	Off-balance-sheet exposures pre-CCF	Exposure weighted average CCF	Exposures post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors
		a	b	c	d	e	f
	0.00 to < 0.15	99	267	59.26%	284	0.12%	130,689
	0.00 to < 0.10	-	-	-	-	-	-
	0.10 to < 0.15	99	267	59.26%	284	0.12%	130,689
	0.15 to < 0.25	76	73	72.57%	154	0.16%	103,820
	0.25 to < 0.50	96	68	66.79%	170	0.26%	114,256
	0.50 to < 0.75	87	49	70.74%	145	0.56%	92,244
	0.75 to < 2.50	123	53	56.98%	182	1.71%	123,291
	0.75 to < 1.75	71	31	57.84%	108	1.18%	73,616
	1.75 to < 2.5	52	21	55.73%	74	2.49%	49,675
	2.50 to < 10.00	56	19	55.13%	77	5.17%	57,537
	2.5 to < 5	26	9	54.29%	37	3.68%	28,013
	5 to < 10	30	10	55.94%	40	6.52%	29,524
	10.00 to < 100.00	18	5	57.60%	26	24.06%	55,651
	10 to < 20	12	5	58.49%	16	11.70%	14,751
	20 to < 30	2	-	50.84%	2	24.34%	3,740
	30.00 to < 100.00	5	-	50.27%	8	49.46%	37,160
	100.00 (Default)	33	1	88.36%	41	100.00%	30,896
	<b>Sub-total</b>	<b>588</b>	<b>535</b>	<b>62.76%</b>	<b>1,080</b>	<b>1.47%</b>	<b>708,384</b>
Retail exposures – qualifying revolving	PD range	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
		g	h	i	j	k	l
	0.00 to < 0.15	50.76%	-	10	3.42%	-	-
	0.00 to < 0.10	0.00%	-	-	0.00%	-	-
	0.10 to < 0.15	50.76%	-	10	3.42%	-	-
	0.15 to < 0.25	51.86%	-	7	4.69%	-	-
	0.25 to < 0.50	52.22%	-	12	6.94%	-	-
	0.50 to < 0.75	52.20%	-	18	12.72%	-	-
	0.75 to < 2.50	52.36%	-	53	29.36%	2	-
	0.75 to < 1.75	52.38%	-	24	22.63%	1	-
	1.75 to < 2.5	52.32%	-	29	39.12%	1	-
	2.50 to < 10.00	52.51%	-	49	63.84%	2	(1)
	2.5 to < 5	52.64%	-	19	51.76%	1	-
	5 to < 10	52.40%	-	30	74.83%	1	-
	10.00 to < 100.00	60.09%	-	38	144.73%	4	(2)
	10 to < 20	53.49%	-	17	107.24%	1	(1)
	20 to < 30	57.86%	-	3	159.82%	-	-
	30.00 to < 100.00	74.24%	-	17	218.30%	3	(1)
	100.00 (Default)	57.61%	-	8	19.62%	24	(23)
	<b>Subtotal (exposure class)</b>	<b>52.22%</b>	<b>-</b>	<b>196</b>	<b>18.13%</b>	<b>33</b>	<b>(26)</b>

## continued: Template EU CR6 – IRB approach: Credit risk exposures by exposure class and PD range (in millions)

A-IRB	PD range	On-balance-sheet exposures	Off-balance-sheet exposures pre-CCF	Exposure weighted average CCF	Exposures post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors
		a	b	c	d	e	f
	0.00 to < 0.15	176	661	6.54%	220	0.14%	6,741
	0.00 to < 0.10	-	-	-	-	0.05%	1
	0.10 to < 0.15	175	661	6.54%	220	0.14%	6,740
	0.15 to < 0.25	40	66	14.50%	50	0.16%	1,689
	0.25 to < 0.50	1,152	1,211	27.89%	1,506	0.35%	80,400
	0.50 to < 0.75	411	433	12.03%	465	0.70%	9,476
	0.75 to < 2.50	1,982	1,023	22.16%	2,228	1.43%	110,357
	0.75 to < 1.75	1,495	736	25.01%	1,698	1.21%	100,786
	1.75 to < 2.5	487	286	14.85%	531	2.13%	9,571
	2.50 to < 10.00	1,641	647	25.70%	1,819	4.68%	84,086
	2.5 to < 5	964	396	23.02%	1,061	3.35%	42,890
	5 to < 10	677	251	29.93%	758	6.53%	41,196
	10.00 to < 100.00	323	86	33.65%	356	22.06%	45,048
	10 to < 20	219	57	28.33%	238	13.97%	20,517
	20 to < 30	54	7	31.45%	57	23.74%	9,953
	30.00 to < 100.00	49	22	47.99%	61	52.33%	14,578
	100.00 (Default)	437	144	23.20%	483	100.00%	38,802
	<b>Sub-total</b>	<b>6,163</b>	<b>4,270</b>	<b>21.03%</b>	<b>7,127</b>	<b>3.08%</b>	<b>376,599</b>
Retail exposures – other SMEs	PD range	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
		g	h	i	j	k	l
	0.00 to < 0.15	28.25%	-	15	6.93%	-	-
	0.00 to < 0.10	30.00%	-	-	3.37%	-	-
	0.10 to < 0.15	28.25%	-	15	6.93%	-	-
	0.15 to < 0.25	26.88%	-	4	7.28%	-	-
	0.25 to < 0.50	26.84%	-	177	11.74%	1	-
	0.50 to < 0.75	29.28%	-	90	19.27%	1	-
	0.75 to < 2.50	28.90%	-	564	25.32%	9	(5)
	0.75 to < 1.75	27.24%	-	383	22.53%	6	(3)
	1.75 to < 2.5	34.19%	-	182	34.22%	4	(2)
	2.50 to < 10.00	32.43%	-	660	36.26%	28	(21)
	2.5 to < 5	32.24%	-	369	34.76%	12	(8)
	5 to < 10	32.70%	-	291	38.35%	16	(13)
	10.00 to < 100.00	37.75%	-	214	60.08%	31	(29)
	10 to < 20	36.31%	-	126	52.89%	12	(13)
	20 to < 30	38.79%	-	40	69.93%	5	(6)
	30.00 to < 100.00	42.41%	-	48	79.03%	14	(9)
	100.00 (Default)	56.87%	-	242	50.18%	274	(326)
	<b>Subtotal (exposure class)</b>	<b>31.69%</b>	<b>-</b>	<b>1,965</b>	<b>27.58%</b>	<b>345</b>	<b>(381)</b>

**continued: Template EU CR6 – IRB approach: Credit risk exposures by exposure class and PD range (in millions)**

A-IRB	PD range	On-balance-sheet exposures	Off-balance-sheet exposures pre-CCF	Exposure weighted average CCF	Exposures post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors
		a	b	c	d	e	f
	0.00 to < 0.15	538	147	14.95%	561	0.12%	45,355
	0.00 to < 0.10	-	-	-	-	-	-
	0.10 to < 0.15	538	147	14.95%	561	0.12%	45,355
	0.15 to < 0.25	525	82	23.88%	546	0.16%	38,698
	0.25 to < 0.50	886	127	26.76%	921	0.27%	73,556
	0.50 to < 0.75	932	93	26.00%	958	0.57%	68,688
	0.75 to < 2.50	1,511	135	31.30%	1,557	1.75%	118,192
	0.75 to < 1.75	843	83	32.85%	873	1.19%	66,875
	1.75 to < 2.5	668	51	28.78%	684	2.47%	51,317
	2.50 to < 10.00	1,109	56	28.59%	1,130	4.73%	87,487
	2.5 to < 5	671	33	28.72%	681	3.66%	47,319
	5 to < 10	438	23	28.38%	449	6.37%	40,168
	10.00 to < 100.00	184	10	30.43%	187	26.16%	45,177
	10 to < 20	104	9	29.87%	107	12.07%	16,074
	20 to < 30	14	1	28.56%	14	24.33%	3,076
	30.00 to < 100.00	66	1	41.05%	66	49.46%	26,027
	100.00 (Default)	182	21	3.47%	183	100.00%	19,126
	<b>Sub-total</b>	<b>5,866</b>	<b>669</b>	<b>24.11%</b>	<b>6,044</b>	<b>2.38%</b>	<b>496,279</b>
Retail exposures – other non-SMEs	PD range	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
		g	h	i	j	k	l
	0.00 to < 0.15	28.77%	-	45	8.02%	-	-
	0.00 to < 0.10	0.00%	-	-	0.00%	-	-
	0.10 to < 0.15	28.77%	-	45	8.02%	-	-
	0.15 to < 0.25	29.21%	-	56	10.34%	-	-
	0.25 to < 0.50	29.33%	-	133	14.47%	1	-
	0.50 to < 0.75	29.00%	-	216	22.53%	2	-
	0.75 to < 2.50	28.80%	-	536	34.45%	8	(4)
	0.75 to < 1.75	28.66%	-	271	31.07%	3	(2)
	1.75 to < 2.5	28.97%	-	265	38.76%	5	(3)
	2.50 to < 10.00	29.86%	-	491	43.48%	16	(8)
	2.5 to < 5	29.99%	-	289	42.50%	8	(3)
	5 to < 10	29.67%	-	202	44.98%	8	(5)
	10.00 to < 100.00	31.64%	-	126	67.17%	16	(13)
	10 to < 20	31.64%	-	61	56.88%	4	(6)
	20 to < 30	31.11%	-	11	74.69%	1	(1)
	30.00 to < 100.00	31.77%	-	54	82.29%	10	(6)
	100.00 (Default)	40.74%	-	37	20.30%	67	(98)
	<b>Subtotal (exposure class)</b>	<b>29.59%</b>	<b>-</b>	<b>1,641</b>	<b>27.16%</b>	<b>110</b>	<b>(123)</b>

## continued: Template EU CR6 – IRB approach: Credit risk exposures by exposure class and PD range (in millions)

A-IRB	On-balance-sheet exposures	Off-balance-sheet exposures pre-CCF	Exposure weighted average CCF	Exposures post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors
	a	b	c	d	e	f
<b>Total portfolio</b>	<b>57,104</b>	<b>20,100</b>	<b>11.69%</b>	<b>59,699</b>		<b>1,702,061</b>

A-IRB	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
	g	h	i	j	k	l
<b>Total portfolio</b>		<b>2.04</b>	<b>18,620</b>	<b>31.19%</b>	<b>1,074</b>	<b>(1,319)</b>

## continued: Template EU CR6 – IRB approach: Credit risk exposures by exposure class and PD range (in millions)

F-IRB	PD range	On-balance-sheet exposures	Off-balance-sheet exposures pre-CCF	Exposure weighted average CCF	Exposures post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors
		a	b	c	d	e	f
	0.00 to < 0.15	1,801	3,749	11.92%	2,248	0.05%	226
	0.00 to < 0.10	1,801	3,743	11.93%	2,248	0.05%	203
	0.10 to < 0.15	-	6	1.14%	-	0.15%	23
	0.15 to < 0.25	2,610	3,212	9.61%	2,919	0.17%	330
	0.25 to < 0.50	2,237	1,892	10.98%	2,445	0.48%	326
	0.50 to < 0.75	54	62	5.08%	57	0.74%	105
	0.75 to < 2.50	1,267	998	12.86%	1,395	1.63%	393
	0.75 to < 1.75	826	593	12.86%	902	1.20%	263
	1.75 to < 2.5	441	405	12.86%	493	2.42%	130
	2.50 to < 10.00	428	351	18.87%	494	4.79%	200
	2.5 to < 5	346	263	22.66%	406	4.15%	113
	5 to < 10	82	88	7.62%	89	7.75%	87
	10.00 to < 100.00	121	38	16.42%	127	27.79%	434
	10 to < 20	72	19	26.60%	77	15.22%	32
	20 to < 30	-	-	9.06%	-	26.13%	7
	30.00 to < 100.00	49	18	6.04%	50	47.16%	395
	100.00 (Default)	2	1	5.02%	2	100.00%	10
	<b>Sub-total</b>	<b>8,521</b>	<b>10,304</b>	<b>11.33%</b>	<b>9,688</b>	<b>1.03%</b>	<b>2,024</b>
Exposures to corporates – general	PD range	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
		g	h	i	j	k	l
	0.00 to < 0.15	39.93%	1.85	319	14.20%	1	-
	0.00 to < 0.10	39.93%	1.85	319	14.20%	1	-
	0.10 to < 0.15	33.85%	2.05	-	22.36%	-	-
	0.15 to < 0.25	39.55%	1.86	871	29.84%	2	(1)
	0.25 to < 0.50	39.33%	1.76	1,271	51.99%	6	(3)
	0.50 to < 0.75	38.99%	2.35	39	67.58%	-	-
	0.75 to < 2.50	37.56%	2.67	1,234	88.49%	9	(24)
	0.75 to < 1.75	36.31%	2.48	684	75.82%	4	(2)
	1.75 to < 2.5	39.83%	3.02	550	111.69%	5	(22)
	2.50 to < 10.00	39.45%	3.01	659	133.45%	9	(13)
	2.5 to < 5	39.43%	3.35	534	131.68%	7	(11)
	5 to < 10	39.56%	1.43	125	141.56%	3	(2)
	10.00 to < 100.00	40.00%	2.42	252	198.57%	14	(16)
	10 to < 20	40.00%	3.26	157	204.01%	5	(11)
	20 to < 30	40.00%	0.79	-	159.70%	-	-
	30.00 to < 100.00	40.00%	1.13	95	190.37%	9	(5)
	100.00 (Default)	40.00%	2.94	-	0.00%	1	(2)
	<b>Subtotal (exposure class)</b>	<b>39.29%</b>	<b>2.02</b>	<b>4,646</b>	<b>47.96%</b>	<b>42</b>	<b>(58)</b>

**continued: Template EU CR6 – IRB approach: Credit risk exposures by exposure class and PD range (in millions)**

F-IRB	On-balance-sheet exposures	Off-balance-sheet exposures pre-CCF	Exposure weighted average CCF	Exposures post CCF and post CRM	Exposure weighted average PD (%)	Number of obligors
	a	b	c	d	e	f
<b>Total portfolio</b>	<b>8,521</b>	<b>10,304</b>	<b>11.33%</b>	<b>9,688</b>		<b>2,024</b>

F-IRB	Exposure weighted average LGD (%)	Exposure weighted average maturity (years)	Risk weighted exposure amount after supporting factors	Density of risk weighted exposure amount	Expected loss amount	Value adjustments and provisions
	g	h	i	j	k	l
<b>Total portfolio</b>		<b>2.02</b>	<b>4,646</b>	<b>47.96%</b>	<b>42</b>	<b>(58)</b>

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

The part of the table relating to Exposures to corporates – specialised lending, exposures to institutions and exposures to Central governments and central banks is not reported, as these exposures are not treated under the AIRB approach.

The exposures to credit risk with capital absorption calculated according to the (A-IRB and F-IRB) internal models methodologies amounted to Euro 69.39 billion and showed an approximately Euro 0.47 billion increase in EAD in the first half of 2025 and a corresponding increase in RWAs of around Euro 1.12 billion. Besides portfolio dynamics, the change is mainly attributable to the introduction of the CRR3 in the first quarter of 2025, broken down into RWAs with Corporate (Euro +0.3 billion) and Retail counterparties (Euro +0.8 billion).

Overall (PD) average risk has remained essentially stable at 1.90% in June 2025, while average LGD value (24.81%) has increased compared to the previous half-year period (20.47%).

### Template EU CR7 – IRB approach – Effect on the RWEAs of credit derivatives used as CRM techniques (in millions)

		Pre-credit derivatives risk weighted exposure amount	Actual risk weighted exposure amount
		a	b
1	Central governments and central banks – F-IRB	-	-
EU 1a	Regional government and local authorities– F-IRB	-	-
EU 1b	Public sector entities – F-IRB	-	-
2	Central governments and central banks – A-IRB	-	-
EU 2a	Regional government and local authorities– A-IRB	-	-
EU 2b	Public sector entities – A-IRB	-	-
3	Entities – F-IRB	-	-
5	Corporates – F-IRB	4,646	4,646
EU 5a	Corporates - General	4,646	4,646
EU 5b	Corporates - Specialised lending	-	-
EU 5c	Corporates - Purchased receivables	-	-
6	Corporates – A-IRB	10,954	10,954
EU 6a	Corporates - General	10,766	10,766
EU 6b	Corporates - Specialised lending	188	188
EU 6c	Corporates - Purchased receivables	-	-
EU 8a	Retail – A-IRB	7,854	7,854
9	Retail – Qualifying revolving (QRRE)	196	196
10	Retail – Secured by residential immovable property	3,208	3,208
EU10a	Retail - Purchased receivables	-	-
EU10b	Retail - Other retail exposures	4,450	4,450
17	<b>Exposures under F-IRB</b>	<b>4,646</b>	<b>4,646</b>
18	<b>Exposures under A-IRB</b>	<b>18,808</b>	<b>18,808</b>
19	<b>Total Exposures</b>	<b>23,455</b>	<b>23,455</b>

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

## Template EU CR7-A – IRB approach – Disclosure of the extent of the use of CRM techniques (in millions)

A-IRB		Credit risk mitigation techniques					
		Total exposures	Funded Credit Protection (FCP)				
			Part of exposures covered by Financial Collaterals (%)	Part of exposures covered by Other eligible collaterals (%)	Part of exposures covered by Immovable property Collaterals (%)	Part of exposures covered by Receivables (%)	Part of exposures covered by Other physical collateral (%)
1	Central governments and central banks	-	-	-	-	-	-
2	Regional government and local authorities	-	-	-	-	-	-
3	Public sector entities	-	-	-	-	-	-
5	Corporates	16,485	1.96%	16.46%	16.46%	-	-
5,1	Corporates - General	16,234	1.99%	16.72%	16.72%	-	-
5,2	Corporates - Specialised lending	251	-	-	-	-	-
5,3	Corporates - Purchased Receivables	-	-	-	-	-	-
6	Retail	43,465	0.74%	70.12%	70.12%	-	-
6,1	Retail - Qualifying revolving	1,080	-	-	-	-	-
6,2	Retail - secured by residential immovable property	25,429	0.04%	97.79%	97.79%	-	-
6,3	Retail - Purchased Receivables	-	-	-	-	-	-
6,4	Retail - Other retail exposures	16,957	1.84%	33.08%	33.08%	-	-
<b>7</b>	<b>Total</b>	<b>59,950</b>	<b>1.08%</b>	<b>55.36%</b>	<b>55.36%</b>	-	-

## continued: Template EU CR7-A – IRB approach: Disclosure of the extent of the use of CRM techniques (in millions)

A-IRB		Credit risk mitigation techniques				Credit risk Mitigation methods in the calculation of RWEAs			
		Funded Credit Protection (FCP)				Unfunded credit Protection (UFCP)		RWEA without substitution effects (reduction effects only)	RWEA with substitution effects (both reduction and substitution effects)
		Part of exposures covered by Other funded credit protection (%)	Part of exposures covered by Cash on deposit (%)	Part of exposures covered by Life insurance policies (%)	Part of exposures covered by Instruments held by a third party (%)	Part of exposures covered by Guarantees (%)	Part of exposures covered by Credit Derivatives (%)		
1	Central governments and central banks	-	-	-	-	-	-	-	-
2	Regional government and local authorities	-	-	-	-	-	-	-	-
3	Public sector entities	-	-	-	-	-	-	-	-
5	Corporates	-	-	-	-	4.66%	-	10,944	10,954
5,1	Corporates - General	-	-	-	-	4.73%	-	10,755	10,766
5,2	Corporates - Specialised lending	-	-	-	-	-	-	188	188
5,3	Corporates - Purchased Receivables	-	-	-	-	-	-	-	-
6	Retail	-	-	-	-	5.07%	-	7,865	7,854
6,1	Retail - Qualifying revolving	-	-	-	-	-	-	196	196
6,2	Retail - Secured by residential immovable property	-	-	-	-	0.71%	-	3,207	3,208
6,3	Retail - Purchased Receivables	-	-	-	-	-	-	-	-
6,4	Retail - Other retail exposures	-	-	-	-	11.94%	-	4,462	4,450
<b>7</b>	<b>Total</b>	-	-	-	-	<b>4.96%</b>	-	<b>18,808</b>	<b>18,808</b>

**continued: Template EU CR7-A – IRB approach: Disclosure of the extent of the use of CRM techniques (in millions)**

F-IRB		Credit risk mitigation techniques				
		Total exposures	Funded Credit Protection (FCP)			
			Part of exposures covered by Financial Collaterals (%)	Part of exposures covered by Other eligible collaterals (%)	Part of exposures covered by Immovable property Collaterals (%)	Part of exposures covered by Receivables (%)
a	b	c	d	e	f	
1	Central governments and central banks	-	-	-	-	-
2	Regional government and local authorities	-	-	-	-	-
3	Public sector entities	-	-	-	-	-
4	Institutions	-	-	-	-	-
5	Corporates	9,688	1.12%	1.87%	1.87%	-
5.1	Corporates - General	9,688	1.12%	1.87%	1.87%	-
5.2	Corporates - Specialised lending	-	-	-	-	-
5.3	Corporates- Purchased Receivables	-	-	-	-	-
<b>6</b>	<b>Total</b>	<b>9,688</b>	<b>1.12%</b>	<b>1.87%</b>	<b>1.87%</b>	<b>-</b>

**continued: Template EU CR7-A – IRB approach: Disclosure of the extent of the use of CRM techniques (in millions)**

F-IRB		Credit risk mitigation techniques				Credit risk Mitigation methods in the calculation of RWEAs			
		Funded Credit Protection (FCP)				Unfunded credit Protection (UFCP)		RWEA without substitution effects (reduction effects only)	RWEA with substitution effects (both reduction and substitution effects)
		Part of exposures covered by other funded credit protection (%)	Part of exposures covered by Cash on deposit (%)	Part of exposures covered by Life insurance policies (%)	Part of exposures covered by Instruments held by a third party (%)	Part of exposures covered by guarantees (%)	Part of exposures covered by credit derivatives (%)		
g	h	i	j	k	l	m	n		
1	Central governments and central banks	-	-	-	-	-	-	-	
2	Regional government and local authorities	-	-	-	-	-	-	-	
3	Public sector entities	-	-	-	-	-	-	-	
4	Institutions	-	-	-	-	-	-	-	
5	Corporates	-	-	-	-	1.19%	-	4,646	
5.1	Corporates - General	-	-	-	-	1.19%	-	4,646	
5.2	Corporates - Specialised lending	-	-	-	-	-	-	-	
5.3	Corporates- Purchased Receivables	-	-	-	-	-	-	-	
<b>6</b>	<b>Total</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>-</b>	<b>1.19%</b>	<b>-</b>	<b>4,646</b>	

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

The table shows the application of Credit Risk Mitigation techniques under the internal models (A-IRB and F-IRB). 61.4% of the total exposure treated under the A-IRB approach (approximately Euro 60 billion) is covered by guarantees, most of which immovable property (55.4%).

More specifically, Retail exposures (approximately Euro 43.5 billion) are 70.1% covered by real estate guarantees while Corporate exposures (approximately Euro 16.5 billion) are 16.5% covered by real estate guarantees.

The use of personal guarantees as a credit risk mitigation tool shows a total 5% coverage ratio, broken down into Retail (5.1%) and Corporate (4.7%) portfolios respectively.

As part of the exposures processed with the F-IRB method (approximately Euro 9.7 billion), exposures covered by collateral are 3% equally broken down into financial and real estate collateral. The use of personal guarantees as a credit risk mitigation tool covers 1.2% of exposures.

The substitution effect results in the secured exposure shifting from the exposed counterparty's original portfolio to the guarantor's portfolio.

In order to calculate the weighted exposures for credit risk using the internal rating-based method, the Bank recognised the mitigating effect of the eligible personal guarantees in two approaches: the LGD mitigation approach envisages to account for the guarantee effect by mitigating the LGD internal estimate, and the substitution approach whereby the debtor's PD is replaced with the PD of the guarantor providing the guarantee.

Therefore, the amounts set out under column k ("Part of exposures covered by personal guarantees (%)") indicate guarantees to which both approaches are applied.

### Template EU CR8 – RWEA flow statement of credit risk exposures under the IRB approach (in millions)

	Quarter closing as at 30.06.2025
	Risk weighted exposure amount
	a
<b>1 Risk weighted exposure amount as at the end of the previous reporting period</b>	<b>26,431</b>
2 Asset size (+/-)	(3,442)
3 Asset quality (+/-)	496
4 Model updates (+/-)	-
5 Methodology and policy (+/-)	-
6 Acquisitions and disposals (+/-)	(11)
7 Foreign exchange movements (+/-)	(19)
8 Other (+/-)	-
<b>9 Risk weighted exposure amount as at the end of the reporting period</b>	<b>23,455</b>

In the second quarter of 2025, risk-weighted exposures in the context of the application of internal rating-based approaches (A-IRB and F-IRB) amounted to Euro 23.45 billion, attributable for Euro 15.60 billion to exposures to Corporate counterparties and for Euro 7.85 billion to exposures to Retail counterparties.

The quarterly change of Euro -2.98 billion is attributable to the following main dynamics:

- Euro -3.44 billion primarily due to the migration of exposures in the "Other assets" portfolio treated under the AIRB approach to the standardised approach.
- Euro +0.50 billion due to changes in the portfolio risk profile;
- Euro -0.01 billion, due to disposals of non-performing loans;
- Euro -0.02 billion due to Foreign exchange rate movements.

## Template EU CR10: Specialised lending and equity exposures under the simple risk-weighted approach (in millions)

### Template EU CR10.1

Specialised lending: Project finance (Slotting approach)							
Regulatory categories	Remaining maturity	On-balance-sheet exposures	Off-balance-sheet exposures	Risk weight	Exposure value	Risk weighted exposure amount	Expected loss amount
		a	b	c	d	e	f
Category 1	Less than 2.5 years	-	-	50%	-	-	-
	Equal to or more than 2.5 years	-	-	70%	-	-	-
Category 2	Less than 2.5 years	-	-	70%	-	-	-
	Equal to or more than 2.5 years	11	57	90%	23	15	-
Category 3	Less than 2.5 years	1	7	115%	4	3	-
	Equal to or more than 2.5 years	82	30	115%	93	71	3
Category 4	Less than 2.5 years	-	-	250%	-	-	-
	Equal to or more than 2.5 years	-	-	250%	-	-	-
Category 5	Less than 2.5 years	-	-	-	-	-	-
	Equal to or more than 2.5 years	-	-	-	-	-	-
<b>Total</b>	<b>Less than 2.5 years</b>	<b>1</b>	<b>7</b>		<b>4</b>	<b>3</b>	<b>-</b>
	<b>Equal to or more than 2.5 years</b>	<b>93</b>	<b>87</b>		<b>116</b>	<b>86</b>	<b>3</b>

### Template EU CR10.2

Specialised lending: Income-producing real estate and high volatility commercial real estate (Slotting approach)							
Regulatory categories	Remaining maturity	On-balance-sheet exposures	Off-balance-sheet exposures	Risk weight	Exposure value	Riskweighted exposure amount	Expected loss amount
		a	b	c	d	e	f
Category 1	Less than 2.5 years	-	-	50%	-	-	-
	Equal to or more than 2.5 years	-	-	70%	-	-	-
Category 2	Less than 2.5 years	28	13	70%	34	20	-
	Equal to or more than 2.5 years	59	8	90%	62	47	-
Category 3	Less than 2.5 years	-	-	115%	-	-	-
	Equal to or more than 2.5 years	18	3	115%	20	21	1
Category 4	Less than 2.5 years	-	-	250%	-	-	-
	Equal to or more than 2.5 years	-	-	250%	-	-	-
Category 5	Less than 2.5 years	-	-	-	-	-	-
	Equal to or more than 2.5 years	-	-	-	-	-	-
<b>Total</b>	<b>Less than 2.5 years</b>	<b>28</b>	<b>13</b>		<b>34</b>	<b>20</b>	<b>-</b>
	<b>Equal to or more than 2.5 years</b>	<b>77</b>	<b>11</b>		<b>82</b>	<b>68</b>	<b>1</b>

### Template EU CR10.3

Specialised lending: Object finance (Slotting approach)							
Regulatory categories	Remaining maturity	On-balance-sheet exposures	Off-balance-sheet exposures	Risk weight	Exposure value	Risk weighted exposure amount	Expected loss amount
		a	b	c	d	e	f
Category 1	Less than 2.5 years	-	-	50%	-	-	-
	Equal to or more than 2.5 years	-	-	70%	-	-	-
Category 2	Less than 2.5 years	6	-	70%	6	3	-
	Equal to or more than 2.5 years	10	-	90%	10	7	-
Category 3	Less than 2.5 years	-	-	115%	-	-	-
	Equal to or more than 2.5 years	-	-	115%	-	-	-
Category 4	Less than 2.5 years	-	-	250%	-	-	-
	Equal to or more than 2.5 years	-	-	250%	-	-	-
Category 5	Less than 2.5 years	-	-	-	-	-	-
	Equal to or more than 2.5 years	-	-	-	-	-	-
<b>Total</b>	<b>Less than 2.5 years</b>	<b>6</b>	<b>-</b>		<b>6</b>	<b>3</b>	<b>-</b>
	<b>Equal to or more than 2.5 years</b>	<b>10</b>	<b>-</b>		<b>10</b>	<b>7</b>	<b>-</b>

### Template EU CR10.5

Exposures in equity instruments pursuant to article 133, paragraphs 3 to 6, and article 495a, paragraph 3 of the CRR.			
Equity	On-balance-sheet exposures	Off-balance-sheet exposures	Risk-weighted exposure amount
	a	b	c
<b>Total</b>	<b>937</b>	<b>-</b>	<b>1,430</b>

Please note that, in relation to template EU CR10, only the templates applicable as a function of the type of loan/exposure were produced; the templates not present in this section are therefore to be considered not applicable as the case is not present.

# 10. EXPOSURES TO COUNTERPARTY CREDIT RISK

## Template EU CCR1 – Analysis of CCR exposure by approach (in millions)

		a	b	c	d	e	f	g	h
		Replacement cost (RC)	Potential future exposure (PFE)	Effective EPE (EEPE)	Alpha used for computing regulatory exposure value	Exposure value pre-CRM	Exposure value post-CRM	Exposure value	RWEA
EU-1	EU - Original Exposure Method (for derivatives)	-	-	-	1.4	-	-	-	-
EU-2	EU - Simplified SA-CCR (for derivatives)	-	-	-	1.4	-	-	-	-
1	SA-CCR (for derivatives)	193	238	-	1.4	603	527	527	438
2	IMM (for derivatives and SFTs)	-	-	-	-	-	-	-	-
2a	<i>of which securities financing transactions netting sets</i>	-	-	-	-	-	-	-	-
2b	<i>of which derivatives and long settlement transactions netting sets</i>	-	-	-	-	-	-	-	-
2c	<i>of which from contractual cross-product netting sets</i>	-	-	-	-	-	-	-	-
3	Financial collateral simple method (for SFTs)	-	-	-	-	-	-	-	-
4	Financial collateral comprehensive method (for SFTs)	-	-	-	-	2,537	88	88	20
5	VaR for SFTs	-	-	-	-	-	-	-	-
<b>6</b>	<b>Total</b>					<b>3,139</b>	<b>614</b>	<b>614</b>	<b>457</b>

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

### Template EU CCR3 – Standardised approach: CCR exposures by regulatory exposure class and risk weights (in millions)

Exposure class	Risk weight					
	a	b	c	d	e	f
	0%	2%	4%	10%	20%	50%
1 Central governments or central banks	-	-	-	-	-	-
2 Regional government or local authorities	-	-	-	-	-	-
3 Public sector entities	-	-	-	-	-	-
4 Multilateral development banks	-	-	-	-	-	-
5 International organisations	-	-	-	-	-	-
6 Institutions	-	513	-	-	126	1
7 Corporates	-	-	-	-	1	35
8 Retail	-	-	-	-	-	-
9 Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-
10 Other items	-	-	-	-	-	-
<b>11 Total exposure value</b>	-	<b>513</b>	-	-	<b>127</b>	<b>36</b>

### continued: Template EU CCR3 – Standardised approach: CCR exposures by regulatory exposure class and risk weights (in millions)

Exposure class	Risk weight					
	g	h	i	j	k	l
	70%	75%	100%	150%	Other	Total exposure value
1 Central governments or central banks	-	-	-	-	-	-
2 Regional government or local authorities	-	-	-	-	-	-
3 Public sector entities	-	-	-	-	-	-
4 Multilateral development banks	-	-	-	-	-	-
5 International organisations	-	-	-	-	-	-
6 Institutions	-	-	-	1	20	661
7 Corporates	-	96	311	14	7	463
8 Retail	-	1	-	-	-	1
9 Institutions and corporates with a short-term credit assessment	-	-	-	-	-	-
10 Other items	-	-	7	1	-	8
<b>11 Total exposure value</b>	-	<b>97</b>	<b>318</b>	<b>16</b>	<b>27</b>	<b>1,134</b>

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

Template EU CCR4 “IRB approach – CCR exposures by exposure class and PD scale” is not reported because only the standardised approach is used for counterparty risk.

**Template EU CCR5 – Composition of collateral for CCR exposures (in millions)**

Collateral type		a		b		c		d		e		f		g		h	
		Collateral used in derivative transactions								Collateral used in SFTs							
		Fair value of collateral received				Fair value of posted collateral				Fair value of collateral received				Fair value of posted collateral			
		Segregated		Unsegregated		Segregated		Unsegregated		Segregated		Unsegregated		Segregated		Unsegregated	
1	Cash – domestic currency	-	935	-	-	-	248	-	-	-	-	-	-	-	-	-	-
2	Cash – other currencies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
3	Domestic sovereign debt	-	-	-	-	-	-	-	-	-	517	-	-	-	-	-	5,826
4	Other sovereign debt	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	571
5	Government agency debt	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
6	Corporate bonds	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	674
7	Equity securities	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
8	Other collateral	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1,243
<b>9</b>	<b>Total</b>	-	<b>935</b>	-	-	-	<b>248</b>	-	-	-	<b>517</b>	-	-	-	-	-	<b>8,315</b>

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

The change compared to December 2024 was mainly due to a slight increase in the variation margin in the collateralisation of the derivative contracts and a considerable increase in securities recognised as part of repurchase agreements.

The EU CCR6 Template “Credit derivatives exposures” is not produced, as there are no credit derivatives exposures. Template EU CCR7 “RWEA flow statements of CCR exposures under the IMM” is not published as no internal models are applied to CCR exposures.

**Template EU CCR8 – Exposures to CCPs (in millions)**

		a		b	
		Exposure value		RWEA	
<b>1</b>	<b>Exposures to QCCPs (total)</b>			<b>17</b>	
2	Exposures for trades at QCCPs (excluding initial margin and default fund contributions); of which:	513		10	
3	i) OTC derivatives	333		7	
4	ii) Exchange-traded derivatives	-		-	
5	iii) SFTs	180		4	
6	iv) Netting sets where cross-product netting has been approved	-		-	
7	Segregated initial margin	-			
8	Non-segregated initial margin	-		-	
9	Prefunded default fund contributions	1		7	
10	Unfunded default fund contributions	-		-	
<b>11</b>	<b>Exposures to non-QCCPs (total)</b>			<b>-</b>	
12	Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions); of which:	-		-	
13	i) OTC derivatives	-		-	
14	ii) Exchange-traded derivatives	-		-	
15	iii) SFTs	-		-	
16	iv) Netting sets where cross-product netting has been approved	-		-	
17	Segregated initial margin	-			
18	Non-segregated initial margin	-		-	
19	Prefunded default fund contributions	-		-	
20	Unfunded default fund contributions	-		-	

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

# 11. SECURITISATION EXPOSURES

## Template EU SEC1 – Securitisation exposures in the non-trading book (in millions)

		a	b	c	d	e	f	g	
		Institution acts as originator							Sub-total
		Traditional			Synthetic				
		STS		Non-STS		of which SRT			
	of which SRT		of which SRT						
<b>1</b>	<b>Total exposures</b>	-	-	<b>23</b>	<b>23</b>	-	-	<b>23</b>	
<b>2</b>	<b>Retail (total)</b>	-	-	<b>23</b>	<b>23</b>	-	-	<b>23</b>	
3	Residential mortgage	-	-	3	3	-	-	3	
4	Credit card	-	-	-	-	-	-	-	
5	Other retail exposures	-	-	20	20	-	-	20	
6	Re-securitisation	-	-	-	-	-	-	-	
<b>7</b>	<b>Wholesale (total)</b>	-	-	-	-	-	-	-	
8	Loans to corporates	-	-	-	-	-	-	-	
9	Commercial mortgages	-	-	-	-	-	-	-	
10	Lease and receivables	-	-	-	-	-	-	-	
11	Other wholesale	-	-	-	-	-	-	-	
12	Re-securitisation	-	-	-	-	-	-	-	

## continued: Template EU SEC1: Securitisation exposures in the non-trading book (in millions)

		h	i	j	k	l	m	n	o	
		Institution acts as sponsor					Institution acts as investor			
		Traditional		Synthetic	Sub-total	Traditional		Synthetic	Sub-total	
		STS	Non-STS		STS	Non-STS				
<b>1</b>	<b>Total exposures</b>	-	-	-	-	-	<b>22</b>	-	<b>22</b>	
<b>2</b>	<b>Retail (total)</b>	-	-	-	-	-	<b>22</b>	-	<b>22</b>	
3	Residential mortgage	-	-	-	-	-	-	-	-	
4	Credit card	-	-	-	-	-	-	-	-	
5	Other retail exposures	-	-	-	-	-	22	-	22	
6	Re-securitisation	-	-	-	-	-	-	-	-	
<b>7</b>	<b>Wholesale (total)</b>	-	-	-	-	-	-	-	-	
8	Loans to corporates	-	-	-	-	-	-	-	-	
9	Commercial mortgages	-	-	-	-	-	-	-	-	
10	Lease and receivables	-	-	-	-	-	-	-	-	
11	Other wholesale	-	-	-	-	-	-	-	-	
12	Re-securitisation	-	-	-	-	-	-	-	-	

As part of traditional securitisations, the BPER Banca Group has not planned any Asset Backed Commercial Paper (ABCP) programmes.

Template EU-SEC2 “Securitisation exposures in the trading book is not published as the Group has no securitisation exposures in the trading book.

**Template EU SEC3 – Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acts as originator or as sponsor (in millions)**

	a	b	c	d	e	f	g	h	i
	Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)			
	≤20 % RW	>20% to 50% RW	>50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions
<b>1 Total exposures</b>	-	-	17	3	3	-	1	20	3
<b>2 Traditional transactions</b>	-	-	17	3	3	-	1	20	3
3 Securitisation	-	-	17	3	3	-	1	20	3
4 Retail	-	-	17	3	3	-	1	20	3
5 <i>of which STS</i>	-	-	-	-	-	-	-	-	-
6 Wholesale	-	-	-	-	-	-	-	-	-
7 <i>of which STS</i>	-	-	-	-	-	-	-	-	-
8 Re-securitisation	-	-	-	-	-	-	-	-	-
<b>9 Synthetic transactions</b>	-	-	-	-	-	-	-	-	-
10 Securitisation	-	-	-	-	-	-	-	-	-
11 Retail underlying	-	-	-	-	-	-	-	-	-
12 Wholesale	-	-	-	-	-	-	-	-	-
13 Re-securitisation	-	-	-	-	-	-	-	-	-

**continued: Template EU SEC3 – Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acts as originator or as sponsor (in millions)**

	j	k	l	m	n	o	EU-p	EU-q
	RWEA (by regulatory approach)				Capital charge after cap			
	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions
<b>1 Total exposures</b>	-	1	30	31	-	-	2	2
<b>2 Traditional transactions</b>	-	1	30	31	-	-	2	2
3 Securitisation	-	1	30	31	-	-	2	2
4 Retail	-	1	30	31	-	-	2	2
5 <i>of which STS</i>	-	-	-	-	-	-	-	-
6 Wholesale	-	-	-	-	-	-	-	-
7 <i>of which STS</i>	-	-	-	-	-	-	-	-
8 Re-securitisation	-	-	-	-	-	-	-	-
<b>9 Synthetic transactions</b>	-	-	-	-	-	-	-	-
10 Securitisation	-	-	-	-	-	-	-	-
11 Retail underlying	-	-	-	-	-	-	-	-
12 Wholesale	-	-	-	-	-	-	-	-
13 Re-securitisation	-	-	-	-	-	-	-	-

In the table, the weighting buckets are calculated at the tranche level of the securitisation transaction.

The total exposure referring to the securitisations deducted from the Own Funds is reported under the “1250% RW/deductions” column.

**Template EU SEC4 – Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acts as investor (in millions)**

		a	b	c	d	e	f	g	h	i	
		Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)				
		≤20 % RW	>20% to 50% RW	>50% to 100% RW	>100% to < 1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	
<b>1</b>	<b>Total exposures</b>	-	-	-	<b>19</b>	<b>2</b>	-	-	<b>21</b>	-	
<b>2</b>	<b>Traditional securitisation</b>	-	-	-	<b>19</b>	<b>2</b>	-	-	<b>21</b>	-	
3	Securitisation	-	-	-	19	2	-	-	21	-	
4	Retail underlying	-	-	-	19	2	-	-	21	-	
5	of which STS	-	-	-	-	-	-	-	-	-	
6	Wholesale	-	-	-	-	-	-	-	-	-	
7	of which STS	-	-	-	-	-	-	-	-	-	
8	Re-securitisation	-	-	-	-	-	-	-	-	-	
<b>9</b>	<b>Synthetic securitisation</b>	-	-	-	-	-	-	-	-	-	
10	Securitisation	-	-	-	-	-	-	-	-	-	
11	Retail underlying	-	-	-	-	-	-	-	-	-	
12	Wholesale	-	-	-	-	-	-	-	-	-	
13	Re-securitisation	-	-	-	-	-	-	-	-	-	

**continued: Template EU SEC4 – Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acts as investor (in millions)**

		j	k	l	m	n	o	EU-p	EU-q
		RWEA (by regulatory approach)				Capital charge after cap			
		SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions
<b>1</b>	<b>Total exposures</b>	-	-	<b>167</b>	-	-	-	<b>2</b>	-
<b>2</b>	<b>Traditional securitisation</b>	-	-	<b>167</b>	-	-	-	<b>2</b>	-
3	Securitisation	-	-	167	-	-	-	2	-
4	Retail underlying	-	-	167	-	-	-	2	-
5	of which STS	-	-	-	-	-	-	-	-
6	Wholesale	-	-	-	-	-	-	-	-
7	of which STS	-	-	-	-	-	-	-	-
8	Re-securitisation	-	-	-	-	-	-	-	-
<b>9</b>	<b>Synthetic securitisation</b>	-	-	-	-	-	-	-	-
10	Securitisation	-	-	-	-	-	-	-	-
11	Retail underlying	-	-	-	-	-	-	-	-
12	Wholesale	-	-	-	-	-	-	-	-
13	Re-securitisation	-	-	-	-	-	-	-	-

In the table, the weighting buckets are calculated at the tranche level of the securitisation transaction.

The total exposure referring to the securitisations deducted from the Own Funds is reported under the "1250% RW/deductions" column.

**Template EU SEC5 – Exposures securitised by the institution – Exposures in default and specific credit risk adjustments (in millions)**

	a	b	c
	Exposures securitised by the institution - Institution acts as originator or as sponsor		
	Total outstanding nominal amount	of which exposures in default	Total amount of specific credit risk adjustments made during the period
<b>1 Total exposures</b>	<b>5,482</b>	<b>5,336</b>	-
<b>2 Retail (total)</b>	<b>5,042</b>	<b>4,896</b>	-
3 Residential mortgage	977	830	-
4 Credit card	-	-	-
5 Other retail exposures	4,065	4,065	-
6 Re-securitisation	-	-	-
<b>7 Wholesale (total)</b>	<b>440</b>	<b>440</b>	-
8 Loans to corporates	-	-	-
9 Commercial mortgages	440	440	-
10 Lease and receivables	-	-	-
11 Other wholesale	-	-	-
12 Re-securitisation	-	-	-

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

## 12. MARKET RISK

### Template EU MR1 – Market risk under the standardised approach (in millions)

		a
		RWEA
<b>Outright products</b>		
1	Interest rate risk (general and specific)	573
2	Equity risk (general and specific)	61
3	Foreign exchange risk	-
4	Commodity risk	-
<b>Options</b>		
5	Simplified approach	-
6	Delta plus approach	62
7	Scenario approach	-
8	Securitisation (specific risk)	-
<b>9</b>	<b>Total</b>	<b>696</b>

Please note that table EU MRB “qualitative disclosure requirements for institutions using the Internal Models Approach for market risk” and templates EU MR2-A “market risk under the Internal Models Approach (IMA)”, EU MR2-B “RWA flow statements of market risk exposures under the IMA”, EU MR3 “IMA values for trading portfolios” and EU MR4 “Comparison of VaR estimates with gains/losses” are not shown as no internal models are used for market risk.

# 13. EXPOSURES TO INTEREST RATE RISK ON POSITIONS NOT HELD IN THE TRADING BOOK

As required by Implementing Regulation (EU) no. 3172/2024 of 29 November 2024, the information referred to in Template EU IRRBB1 with reference to quantitative information on interest rate risks of non-trading book activities is provided below.

The template below illustrates the changes in the economic value of equity calculated under the six supervisory shock scenarios defined by the EBA (Parallel shock up, Parallel down, Steepener, Flattener, Short rates up and Short rates down) and displays the changes in net interest income as calculated under the two prudential shock scenarios (Parallel up and Parallel down).

## Template EU IRRBB1 – Interest rate risks of non-trading book activities (in millions)

Supervisory shock scenarios	a		b		c		d	
	Changes of the economic value of equity				Changes of the net interest income			
	30.06.2025		31.12.2024		30.06.2025		31.12.2024	
1 Parallel up	(1,164)	(922)			68			72
2 Parallel down	236	180			(304)			(242)
3 Steepener	(246)	(240)						
4 Flattener	(21)	-						
5 Short rates up	(267)	(175)						
6 Short rates down	122	94						

As at 30 June 2025, the banking book of the BPER Banca Group continues to be composed mainly of activities in Euro, which is the only relevant currency reported for the purposes of disclosures requested by template EU IRRBB1.

The composition by maturity dates of assets and liabilities ensures that when there is an increase in rates (parallel up), the Group is positively exposed in the context of changes in the net interest income and negatively in the context of economic value. The opposite is observed in case of an interest rate decrease scenario (Parallel Down).

The change in the risk measures compared to the previous monitoring period is mainly due to a higher increase in the duration of Assets and a concurrent slight decrease in the duration of the Liabilities.

## 14. ESG RISK

This chapter provides the qualitative and quantitative information required by art. 449a of the CRR according to the information templates contained in Implementing Regulation (EU) 2024/3172 of the Commission of 29 November 2024 laying down implementing technical standards for the application of Regulation (EU) no. 575/2013 of the European Parliament and of the Council with regard to public disclosures by institutions of the information referred to in Part Eight, Titles II and III, of that Regulation, and repealing Commission Implementing Regulation (EU) 2021/637. Instructions for populating the disclosure formats are specified in Section 21 – ‘Disclosure of prudential disclosures on ESG risks’ in Annex I to the above Regulation. In particular, the three qualitative tables envisaged in the aforementioned Regulation together with the quantitative templates applicable as at 30 June 2025 are shown hereunder.

Based on the regulatory provisions cited above, the Pillar 3 document requires entities to publish, on a six-monthly basis from 31 December 2022, three qualitative sections (hereinafter “Tables”) and - full requirement - a total of ten quantitative disclosure templates (hereinafter “Templates”), of which four dedicated to climate change transition risk, one dedicated to climate change physical risk and five with quantitative information on the actions that the institutions are taking to mitigate the risks related to climate change, including information on taxonomy-aligned actions (GAR and BTAR) and on any other mitigation actions. The qualitative disclosure describes the integration of environmental, social and governance (ESG) risks in the strategic and governance decisions, in business processes and in risk management. The Strategy, Governance and Risk management themes are therefore specified for said risk types (E, S and G); where necessary, any references to the paragraphs of this document or to other documents that already comprehensively describe the required contents are also reported.

For the reasons reported in the chapter “Introduction” of this document, as of the reference date 30 June 2025, the publication of ESG Templates EU 6 to EU 10 and column c of ESG Templates 1 and 4 will be omitted.

With reference to Templates 9 “BTAR: “Mitigating actions” and, in particular, to Templates 9.1 “Mitigating actions: assets for calculation of BTAR”, 9.2 “ BTAR %” and 9.3 “Summary table - BTAR %”, it should be noted that these templates are not presented as they are subject to voluntary disclosure, in addition to being subject to the EBA no-action letter.

### **Table 1: Qualitative information on environmental risk**

The following table shows the information required under Article 449a and Article 435 (1 and 2) of the CRR.

	Business strategy and processes
a)	<b>Institution’s business strategy to integrate environmental factors and risks, taking into account the impact of environmental factors and risks on institution’s business environment, business model, strategy and financial planning.</b>

In order to implement an effective climate/environmental strategy capable on the one hand of managing risks and on the other of multiplying opportunities, the BPER Banca Group has identified a number of cornerstones in its approach, all aimed at redirecting capital flows towards sustainable investments in order to achieve sustainable and inclusive growth:

- integration of ESG criteria into the bank’s credit assessment process;
- supporting the “Just Transition” of companies and households, improving the range of ESG products and services offered to customers, increasing the offer of ESG investments and with the issue of Green Bonds;
- direct emissions reduction target through the energy efficiency activities contained in the Energy Plan and the reduction of financed emissions in line with the commitments made following endorsement of the NZBA;
- actions to foster ESG skills enhancement through employee engagement and targeted employee training activities.

The 2024-2027 Business Plan<sup>18</sup> “B:Dynamic|Full Value 2027”, which has been operational since the end of 2024 and has gone into full swing as early as the first half of 2025, is based on three main pillars: unlocking full customer value; capturing latent economies of scale; and leveraging the strength of the Group’s Balance Sheet. The effective and smooth execution of implemented projects is ensured through three main enabling factors, namely:

- technology, security and artificial intelligence;
- ESG and sustainability commitment;
- organisation and people.

With specific reference to the commitment to sustainability issues, in parallel with the modernisation of the Group, the integration of ESG factors into business processes will enable BPER Banca to continue its role as a leader in the sector.

The projects with an ESG impact integrated in the aforementioned Business Plan are monitored quarterly and submitted to the Sustainability Committee.

The previous Strategic Plan also fully included the Action Plan for managing climate and environmental risks, approved by the Parent Company’s Board of Directors on 20 May 2021 and sent to the European Central Bank in response to the process of assessment of the positioning on climate and environmental risk management in which the ECB involved all supervised banks.

Starting in early 2022, the BPER Banca Group was involved in two exercises mandated by the Supervisory Authority to assess the Group’s overall compliance with climate and environmental risk Guidelines, including the Thematic Review (completed during the month of December 2023) and the Climate Risk Stress Test, seizing opportunities to further strengthen risk governance practices.

In 2024, activities have been finalised to adapt to the principles contained in the ECB Guidelines on Climate and Environmental Risks, also as a result of the outcomes of the ECB Thematic Review. Among other things, this allowed further strengthening of the C&E risk factor management framework in addition to their implementation in the corporate strategy. Measures implemented in 2024 were submitted to the Board of Directors’ Meeting of 18 December 2024 and documents thereof were forwarded to the ECB on 23 December 2024, after obtaining the opinion of the Board of Directors. The issue has been evaluated and discussed during the first half of 2025 as part of the ongoing dialogue with the ECB.

Recognising all the possible risks to which the Group is or could be exposed starts from the analysis of prudential supervisory regulations, the best market practices, the macro-economic context and the assessments made by the Supervisory Bodies on the subject of risk oversight and management. The process of identifying relevant risks is the starting point and junction of all the Group’s main strategic processes, and is carried out through a structured process involving the many corporate structures. The process of identifying corporate risks gives particular attention to the identification of ESG risk factors which, through certain transmission channels, reflect their effects on the main risks: the process also requires to check the materiality of these factors in the business lines and over various time horizons.

In 2022, as described above, the BPER Banca Group, via its Parent Company BPER Banca, also joined the Net-Zero Banking Alliance (NZBA), the 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 loan and investment portfolios with the achievement of the net-zero emissions target by 2050.

Following its membership, BPER Banca set decarbonisation targets for its portfolios on six of the ten high carbon footprint sectors identified by the NZBA, in line with the Bank’s ambitions to support the sustainable transition and the timelines defined by the Alliance: Oil and gas, Power generation, Iron and Steel, Aluminium, Commercial Real Estate and Agriculture.

For the remaining sectors identified by the Alliance and not subject to publication, the following reasons should be noted:

- Cement: due to the limited significance in terms of exposure and due to the structural interventions required for decarbonising the sector, which are beyond the Bank’s direct control;
- Transportation: for the limited significance in terms of exposures and for the limited applicability of the target setting methodologies for counterparties that are actually included in the Group’s portfolio;
- Residential immovable property: given the high exposure and in line with other peers, the Group decided, for the time being, to continue monitoring its portfolio, but not to communicate a target that would not be achieved in the absence of efficient public policies.

<sup>18</sup> It should be noted that, on 30 May 2024, the Bank’s Board of Directors resolved upon the (i) ahead-of-time closure of the 2022-2025 Business Plan as at 31 December 2024 in light of the earlier-than-planned achievement of the main economic and financial targets attained by the Bank, and (ii) preparation of a new Business Plan to be submitted to the Board of Directors for approval and presented to the market in October 2024.

Defining objectives has entailed an important step forward in BPER Banca's commitment to align its business with the decarbonisation ambitions set out in the Paris Agreement of 2015 and constitutes a further evolution of its activities in favour of sustainability and mitigating climate changes. Compared to the NZBA decarbonisation targets, the Bank has incorporated their pursuit of the targets across its entire business, from the evolution of its credit policies and processes to the structuring of lending solutions to help businesses achieve their sustainable transition pathways.

Besides the definition of de-carbonisation targets for each carbon-intensive sector, the NZBA Guidelines call for specific disclosure obligations in order to provide details of the monitoring methods adopted as well as the strategies put in place to achieve said targets.

More specifically, BPER Banca undertakes to report absolute emissions and emission intensity annually, within the next 12 months after target publication. This reporting process will enable BPER Banca to provide shareholders, investors and other stakeholders with a complete overview of the composition of the loan portfolio, with particular reference to corporate counterparties belonging to high emission intensity sectors.

In this context, in August 2024 the Bank published its first "Decarbonisation Plan" for the first two priority sectors mentioned above, i.e. Oil and Gas and Power Generation, which aims to inform key stakeholders on the progress made on its decarbonisation path. The Bank continued the analysis of its loan portfolios, publishing additional targets for the Iron & Steel, Aluminium and Commercial Real Estate sectors in December 2024, and publishing its targets for Agriculture in May 2025. All the objectives pertaining to the decarbonisation plan have been approved by BPER Banca's BoD.

The "Decarbonisation Plan" defines specific strategies aimed at improving the emission performance of the issuers/projects to which it is exposed and the related impacts on business and risk governance. In fact, loan activities are a key factor in supporting the decarbonisation strategy.

Specifically, the "Decarbonisation Plan" for the loan portfolio is based on the following pillars:

- definition of the Net-Zero sector targets and pursuit thereof through the Bank's business and processes; BPER Banca also undertakes to progressively expand the scope of the target-setting analysis to additional exposures and/or asset classes in the portfolio and to constantly update the Net-Zero trajectory on the basis of the most recent data and methodologies available;
- monitoring the portfolio's progress compared to the defined sectoral targets and identifying corrective measures in the event of any deviations;
- management and improvement of data quality and reliability: the Bank aims to find increasingly complete and accurate data through initiatives dedicated to enriching and improving the information used in its carbon accounting activities. With this in mind, the strengthening of information sources and systems is a key factor in the definition of appropriate decarbonisation strategies, consistent with both BPER Banca's commercial and business sustainability as well as the sectoral reference pathways; the Bank therefore restructured its ESG data architecture in 2024, working on the ESG Data Model project;
- identification and management of climate and environmental risk through the integration of ESG factors into all relevant stages of the loan granting and monitoring process in order to improve governance of the various transition risks of portfolio clients and support the development of more sustainable business models;
- implementation of the transition of customers in the portfolio towards the Net-Zero objective through the implementation of strategies that may take different forms depending on the decarbonisation efforts required by the sector, the type of counterparties in the portfolio and the data and information available to the Bank.

For more information on the endorsement of the NZBA, the Decarbonisation Plan and the 2022-2030 Energy Plan, please see the section "Transition plan for climate change mitigation (E1-1)" in the Consolidated Sustainability Statement.

Following the publication of EBA's Final Guidelines on the Management of ESG risks in January 2025, BPER Banca started a dedicated initiative to draft a Transition Plan which will be prepared and published by December 2025, under the above Guidelines and existing EU frameworks, including the CSRD, EU Taxonomy Regulation, Pillar 3, and voluntary commitments with the NZBA.

The project named "P&C Climate Risk", that ended in mid-September 2023, has enabled the Group to plan the enhancement of its processes linked to strategic planning to identify a number of potential "climate-related" KPIs to be included in the main Planning and Control Management processes (for example the Budget process, the Business Plan process and the Funding Plan). Within the first project workshop, a short list of KPIs was selected, that can be classified under three main categories:

- risk management (i.e. exposure to physical risk - counterparties/collateral; Exposure to transition risk - company);
- portfolio (e.g. ESG Portfolio with high/low ESG rating; Collateral with a certified high/low rating of its Energy Performance Certificate (EPC));
- product and services (e.g. Volumes of "green" bond issuances, volumes of "green" loans).

At the same time, the regulations for the Annual Budget, Business Plan and Funding Plan were updated to include the incorporation of climate-related KPIs and related considerations into the strategy, allowing the ESG perspective to be fully integrated into the corporate strategy, and the Sustainability Plan to be almost fully integrated into the Strategic Plan.

The project also included two portfolio alignment exercises:

- the first exercise, which took place in March 2023, based on NGSF scenarios, identified 3 sectors among those expected to have a greater greenhouse gas emission reduction rate on their path to Net-Zero by 2050: the Oil & Gas Sector, the Iron and Steel Sector and the Real Estate Sector;
- in July 2023, an additional analysis was performed that integrated the goals defined by the NZBA projects on the two sectors that are required to define their Net-Zero goals stated on 2 August 2023: Power Generation and Oil & Gas. Taking into account an intermediate macro-climate scenario, which presumes a less “severe” transition than that envisaged by the NZBA scenario but which, nevertheless, calls for an acceleration of the activities compared to the Current Policy scenario, the evolution of greenhouse gases by the counterparties within the context of the “target setting” appears to be aligned with the declared NZBA goals.

Activities continued in 2024 to integrate the functional data for KPI calculation into the Management Control database within the Evoco Project. Subsequently, the implementation phase of climate-related KPIs in management reporting began, which also includes the opening of Group performance data by business lines (BPER Banca Segment Reporting). The KPIs have become part of internal reporting permanently with the report with reference date 31 March 2025.

The KPIs that will be monitored relate to measures such as:

- Financed emissions (FE) - for Corporate customers;
- Carbon Intensity (CI) - for Corporate customers;
- Exposure concentrations secured by properties with EPCs considered high and low energy efficiency;
- Green Financing - separately for Corporate and Private customers, i.e. the amount of “green” financing in the loan portfolio (% of portfolio or absolute levels) used to finance investments for technological adaptations/energy saving or other “green” initiatives (climate change mitigation) with different degrees of openness (e.g. target sector NZBA).

Subsequently, within the scope of the transformative stream of the new planning platform, the actions needed to introduce the KPIs, also in the target application process, will be implemented: monitoring of the performance of the indicators compared to the planned targets will therefore enable identification of any misalignment and the formalisation of corrective actions like the classic redirection activities of the budgeting process.

In December 2024, to support the forward-looking assessment of the business model's resilience to climate-related risk, an analysis of the economic and strategic impact, broken down by time horizon (short, medium and long term), was carried out taking into account the climate transition scenarios, the exposure to transition and physical risks of counterparties in the portfolio as well as the decarbonisation targets of the BPER Banca Group's (Net Zero) portfolio, already communicated in 2023. The exercise is based on the following elements:

- climate transition scenarios (NGFS version 4 macro-climatic scenarios, grafted onto BPER's macroeconomic and financial view); the scenarios considered are Net Zero 2050, belonging to the “Orderly” family of scenarios and the “Current Policies” scenario, belonging to the “Hot house world” family;
- multiple time horizons, including short (up to 3 years), medium (up to 7 years) and long-term (up to 2050) analyses;
- synergy with the 2025 budget process, by using the same database with cut-off date on 30 June 2024. In particular, the portfolio of performing loans to customers of BPER Banca, Banco di Sardegna, Bibanca, Banca Cesare Ponti, BPER Leasing and BPER Factor was taken into consideration;
- classification of the Group's volumes into macro-clusters according to the type of counterparty and in line with the business lines defined in BPER Banca's Segment Reporting, in order to assess the impacts on significant business lines. In particular, the loan portfolio was segmented by:
  - business unit;
  - customer segments;
- quantification of the impact of climate risk factors on counterparties within the portfolio (financial needs and risk appetite) using the identified metrics. In particular, the evolution of (gross and net) volumes, risk parameters for the calculation of expected credit loss, contribution and commission income was assessed.

Under the 2025 “ESG Strategy” project, the “P&C building site” involves:

- the analyses of the economic and strategic impact, broken down by time horizon (short, medium and long term), taking into account the climate transition scenarios, the exposure to transition and physical risks of counterparties in the portfolio as well as the decarbonisation targets of the BPER Banca Group's (Net Zero) portfolio, already communicated in 2023 and in 2024. The results of decarbonisation policies impact analyses consistent with the application of portfolio alignment targets (GHG emission reduction), under the NZBA membership, will provide one of the benchmarks to define the strategic levers that the Bank will activate or plan in order to balance its achievement of the set goals with the commercial and corporate sustainability. These implementation strategies will be included in the Transition Plan being prepared by the Bank in accordance with EBA Guidelines;

- completion of a KPI framework to be included in the main Planning and Control Management processes (for example the Budget process, the Business Plan process and the Funding Plan) by integrating the climate-related KPIs already defined in 2024 with a panel of environmental-risk indicators;
- within the scope of the transformative streams of the new planning platform, the design of portfolio alignment approaches to de-carbonisation objectives through the activation of a specific component.

During the first half of 2025, having shared the approach for the impact analysis of climate transition plans and decarbonisation policies, and having defined an activity plan thereof, climate simulation engines and portfolio alignment (Climate Risk Engine and Transition Plan Engine) were parameterised. These were subsequently run to create useful inputs to implement databases for the portfolio alignment to be executed in the planning platform. In the second half of the year, activities will continue with the deployment in the BPER environment of the portfolio alignment module within the new planning platform, simulation runs, and results analysis.

Furthermore, the identification of a nature-related KPI short list was started, which will continue in the second half of the year.

### Enhancing the Green Offer

The range of green products and services is a central element to the strategy set out under the Industrial Plan and is identified as an enabling factor to achieve the sustainability targets aimed for by the Group over the next three years, and with a broader vision, in the medium and long term with special reference to the loan and wealth management activities that characterise the banking Group's business. In particular, among the KPIs related to products and services, two have a specific ESG sustainability bearing and in particular on the environment:

- ceiling on the provision of ESG credit;
- sustainable Asset Under Management (AuM) growth.

To give new impetus to its sustainability lending strategy within its business plan, the BPER Banca Group has set a ceiling on green lending, identifying challenging targets that at the same time reflect the Group's clear commitment to mitigating the phenomenon of climate change, through the gradual decarbonisation of its portfolio. The main business activities relating to green funding involve the green loans/aligned with the European Taxonomy, project financing, different products for green investment financing to small and medium-sized enterprises, sustainable-linked loans and green loans supporting Corporate Investment Banking customers.

For further details, please refer to the paragraphs "Products and services with environmental purposes - retail banking" and the paragraph "Products and services with environmental purposes - corporate banking", "Products and services with environmental purposes - project financing", "Actions on ESG investments in the management of the proprietary portfolio", the 2024 Consolidated Sustainability Statement of the BPER Banca Group included in Part 2 of the Director's management report of the Group for the Consolidated Financial Report of the BPER Banca Group as at 31 December 2024 (hereinafter also referred to as "Consolidated Sustainability Statement").

In the first half of 2024, the BPER Banca Group issued two Green Bonds for an overall amount of Euro 1 billion. Both issuances were placed in accordance with the Group's Green, Social and Sustainability (GSS) Bond Framework, targeting institutional investors. On 13 February 2024, the first issuance was completed with an allocated amount of Euro 500 million, 6-year maturity and a call after year 5. On 15 May 2024, the second issuance was completed with an allocated amount of Euro 500 million, 7-year maturity and a call after year 6. The final allocation was primarily in favour of investment funds, banks and private banking.

In the Wealth Management segment, the Banks of the BPER Banca Group adopt a structured approach to the integration of sustainability risks into decision-making processes on investments, both for portfolio management services and for financial advisory services. The selection of financial products takes into account the information provided by manufacturers, if available, and is based on the application of exclusion criteria and on the use of an ESG score provided by independent third-party data providers, integrated with internal qualitative analyses. This approach enables the identification and mitigation of environmental, social and governance (ESG) risks that could have adverse impacts on the value of the investments.

The sustainability preferences expressed by the customers are gathered through the MiFID questionnaire, updated in December 2024 with new questions aimed at assessing the interest in environmentally sustainable, sustainable investments and investments who take into consideration adverse effects on sustainability factors (the PAI or Principal Adverse Impacts). This update allows an increased consistency between the proposed investments and the sustainability targets declared by customers.

The Banks of the BPER Banca Group, in their capacity as Participants in the financial markets as they provide portfolio management investment service, consider the Principal Adverse Impacts ("PAI") on sustainability factors. The "PAI Declaration" was published on 30 June 2025, with reference to the period going from 1 January to 31 December 2024. The comparison with the previous year shows changes mainly attributable to the evolution of managed assets and the transfer of the "Private Banking" business unit from BPER Banca to Banca Cesare Ponti at the beginning of 2024. BPER Banca recorded an improvement of

absolute and relative indicators, thanks to the reallocation to instruments with more sustainable ESG profiles. Banca Cesare Ponti shows an increase in indicators, which cannot be compared with the previous year due to an expansion in the scope of application. Banco di Sardegna showed a gradual improvement in most indicators, with a marginal increase associated with the increase in managed assets.

The Group Banks take into consideration every mandatory PAI indicator and two additional indicators set forth by Delegated Regulation (EU) 2022/1288, subject to data availability and quality. Monitoring focuses particularly on the following PAIs, identified as “top priority”:

- PAI 2 - Carbon footprint;
- PAI 3 - GHG intensity (greenhouse gas intensity of investee companies);
- PAI 5 - share of non-renewable energy consumption and production;
- PAI 10 - Violations of the UNGC principles and OECD Guidelines for Multinational Enterprises;
- PAI 15 - GHG intensity (Sovereign issuers and International organisations).

As of 1 January 2025, the Group has decided to replace PAI 5 (Share of consumption and production of non-renewable energies), which concerns environmental issues that are already covered by other priority indicators, with PAI 14 (Exposure to controversial weapons). This update was also carried out in line with national regulations (Law no. 220/2021), with the exclusion policies provided for by the Internal Regulation concerning the PAI consideration process in investment decisions at the entity level.

The Group Banks, as financial advisors pursuant to the SFDR Regulation, also incorporate PAIs in financial advisory services. Training sessions dedicated to branch employees are held on an ongoing basis, in line with MiFID requirements, to ensure an adequate awareness on ESG topics and support efficient and responsible advisory services.

The “B:Dynamic|Full value 2027” Business Plan confirms the Group’s commitment to sustainability with ambitious objective in the environment, social and governance field. In particular, in Wealth Management, an objective was set to achieve a 45% share of ESG assets on the total managed assets (funds, portfolio management and pension funds) by 2027.

### **BPÉR Data Platform**

Since 2022, BPÉR Banca has enriched the BPÉR Data Platform with the ESG Data Island, i.e. the unique centralised ESG database managed according to a holistic and transversal approach, usable by all the Group’s functions, including credit granting and monitoring activities, risk management activities pertaining to Risk Management, the preparation of Supervisory Reporting (Pillar III) and CSRD.

In more detail, the availability of data through the BPÉR Data Platform guarantees:

- effective and efficient data protection;
- consistency of the information assets used for different purposes so far identified in the strategic and regulatory fields;
- the scalability required to cover new information needs.

The ESG Data Island is populated with counterparty-level information, e.g. ESG scores, GHG emissions, as well as credit line-level data, e.g. data pertaining to real estate collateral, including the EPC and information needed to assess physical risk, and green or Taxonomic alignment characteristics of individual exposures. All the data collected is subjected to the safeguards of the Data Governance framework.

BPÉR Banca is constantly engaged in analysing and verifying possible information gaps in order to set in motion appropriate remediation actions, and in 2024 the further project “ESG Data Model” was initiated, with the objective of fine tuning the data improvement process even further.

In 2024, BPÉR Banca defined objectives and set-ups for the aforementioned project, i.e. collection and modelling of ESG data in use or required for regulatory and management purposes, as well as the definition of a data governance and management process (for further information please refer to the section “Transition plan for climate change mitigation (E1-1)), with the project due to be completed by the end of the year. In the first half of 2025, it defined the set up for the relate implementation project, i.e. data model, related architecture and dedicated ESG dashboard, which will be implemented starting from the second half of the year. Indeed, the management of ESG data is an enabling factor for the progressive development of bank processes with the integration of ESG factors.

Please refer to the paragraph “BPÉR Data Platform” of the Consolidated Sustainability Statement for further information.

### **Engaging the Value Chain**

The procurement cycle for Group Companies, in accordance with the “Regulations for the purchasing process and payables cycle”, governing the roles and responsibilities of the various functions involved, is overseen by the Procurement Service Centre. The mission of the Function is to ensure that internal customers benefit from the availability of products and services that best satisfy their requirements, selecting suppliers that guarantee the best balance between price and quality of service, as well as those able to satisfy the company’s expectations in regard to social and environmental responsibility. The risks relative to the supply chain are carefully governed through preliminary analysis and document requests that

enable each supplier to be assessed as extensively as possible. The reputational risks in this area are mapped together with the designated office and monitored periodically.

Since 2023, the Procurement Centre unit has carried out a project aimed at revising the tools used during the various stages of the procurement process, for which a dedicated platform has been implemented. In this context, new supplier and supply assessment criteria have been introduced which also take into account ESG elements. In particular, these criteria are applied in the following application forms:

- Tender forms: Minimum Environmental Criteria (MECs) have been introduced for each goods sector in order to take them into account, along with other elements, in supply tenders for the procurement of goods and services;
- Vendor Management form: the new BPER supply register approval process involves the compilation of a questionnaire with a section dedicated to ESG elements, where data and certifications are provided that contribute to the overall evaluation of the supplier;
- Contract Management form: the process of creating, formalising, executing and managing the contracts with a view to maximising the operational and financial performance of a company by means of a correct and transparent formalisation of relations with the supplier.

Please refer to paragraph “4.1.3 Management of relationships with suppliers, including payment practices” in the Consolidated Sustainability Statement for further details.

### Value chain analysis in the 2024 Consolidated Sustainability Statement

The above-mentioned document includes information on material impacts, risks and opportunities related to the BPER Banca Group through its direct and indirect business relationships in the upstream and downstream value chain, based on the results of the double materiality analysis process, in accordance with specific value chain obligations.

The Group’s value chain encompasses all the activities, resources and relationships related to the business model and the external context in which it operates. In order to identify its business relations, the BPER Banca Group has considered not only its direct contractual relations, but also its indirect business relations beyond the first level, and its participation in joint ventures or investments. Starting from the activities of the value chain and referring to the Group’s most important processes, its main actors are:

- shareholders, relevant on the basis of the communications made pursuant to Article 120 of the Consolidated Law on Finance;
- subscribers of issued capital instruments;
- subscribers of issued bonds;
- customers with both direct and indirect funding instruments;
- suppliers (main, strategic);
- product companies;
- customers for financing operations;
- workforce.

In order to determine its value chain, the Group analysed, in particular, data on its direct and indirect funding, as well as on its suppliers. The Group collected value chain data useful for analysing the reference context for the preparation of the double materiality analysis, as well as for collecting quantitative data related to Scope 3 emissions.

Please refer to the paragraphs “Gross greenhouse gas effect emissions of 1, 2 and 3 scopes and total emissions (E1-6)” in the Consolidated Sustainability Report.

In the first half of 2025, work was started for a value chain analysis in the 2025 Consolidated Sustainability Statement.

### Reducing Direct Impacts

As Parent Company, BPER Banca established a “2022-2030 Energy Plan”, published in 2022 and updated in 2024 at the launch of the new 2024-2027 Business Plan “B:Dynamic|Full Value 2027”.

With the definition of the “2022-2030 Energy Plan”, the Bank has set as its goal the reduction of Scope 1 and 2 emissions in line with the demands to limit the global average temperature increase in 2050 to within 1.5°C compared to pre-industrial levels and the best available market practices for climate change mitigation. Specifically, the goal is to reduce direct Scope 1 emissions by -35% by 2027 and halve them by 2030 compared to 2021 levels, as well as to use 100% electricity from renewable sources. In this context, as at 31 December 2024, the BPER Banca Group had purchased 100% energy from renewable sources, with the issue of Guarantees of Origin (GO).

During the course of 2024 the BPER Banca Group has consolidated the gradual implementation of the energy efficiency measures foreseen by the 2022-2030 Energy Plan. The effectiveness of the work is expressed in percentage terms in each project reported below and will be significant over the course of the upcoming years.

In addition to the initiatives of the Energy Plan, in 2024 a PPA (Power Purchase Agreement) contract was signed with a national player for the supply of energy directly produced by a photovoltaic plant built in the country, which will guarantee the coverage of about 10% of BPER Banca's energy needs.

As at 31 December 2024, construction sites contributing to the achievement of the overall -21% CO<sub>2</sub>e emissions reduction had been started, monitored and completed. The remaining part of the 2% emission reduction, useful for achieving the planned -23% reduction, which could not be achieved due to the early closure of the 2022-2025 Business Plan on 31 December 2024, was offset through the DKV Myclimate Card initiative.

As previously stated, the new Business Plan was published in October 2024, which resulted in the early termination of the 2022-2025 Energy Plan, and in the new 2025-2027 Energy Plan, the two targets of -35% and -50.2% reduction in direct greenhouse gas emissions (Scope 1) by 2027 and 2030, respectively, were confirmed, along with the goal of increasing the number of renewable energy plants.

The overall transition plan of the BPER Banca Group, as required under Legislative Decree 125/2024, is currently being finalised. The BPER Banca Group's climate commitments are currently set within the "Decarbonisation Plan", with reference to Net-Zero targets on the loan portfolio and within the "2022-2030 Energy Plan". Among the planned initiatives, targets for the Bank's proprietary investments will be set in the second half of 2025.

This plan will be prepared taking into account ongoing regulatory developments, including the EBA's "Guidelines on the management of environmental, social and governance (ESG) risks", which require institutions, as of 11 January 2026, to develop specific plans to address risks arising from the transition by making forward-looking ESG risk considerations in their risk management strategies and processes, also considering the frameworks already present in the European Union, such as the CSRD, the EU Taxonomy Regulation, Pillar 3 and voluntary frameworks with NZBA, published by December 2025.

With the intention of pursuing its transition path towards a low-carbon and sustainable economy and, in line with the Energy Plan 2022-2030, the BPER Banca Group has implemented an Integrated Environment and Energy Management System that complies with the two standards UNI EN ISO 14001:2015 and UNI EN ISO 50001:2018, respectively, on a perimeter of 20 representative properties.

During 2024, the BPER Banca Group approved the "Policy governing the management of environmental and energy issues", which identifies the environmental commitments aimed at reducing the direct and indirect impacts of the BPER Banca Group, especially with regard to resource savings and attention to climate change. The Policy therefore defines the commitments with reference to BPER Banca Group Companies' own operations, with the exception of non-credit financial corporations.

Please refer to the paragraphs "2022-2030 Energy Plan", "C&E Thematic Review", "The new Industrial Plan 2024-2027" and "B. Dynamic|Full Value 2027" in the Consolidated Sustainability Statement.

### Reviewing risk management processes

Regarding the inclusion of climate and environmental factors in risk management processes, during 2024, in line with plans and communications to the Supervisory Authority, the incorporation of ESG issues continued, including the strengthening of the materiality analysis of these risk factors within the context of the risk identification process, the evolution of the Risk Appetite Framework (RAF) and of the ICAAP by identifying specific Key Risk Indicators and the introduction of special analyses, the updating of risk management processes and the integration of risk reporting.

When integrating the aforementioned areas, consideration was also given to the connections and relationships with the various business processes impacted and the commitments made by the Group in this regard (e.g., Net Zero Banking Alliance - NZBA). All of this confirms the strategic importance that the BPER Banca Group attaches to sustainability issues, the management of which translates into consistent and concrete commitments both at governance level and in the day-to-day operations of all of the Company's functions.

Consistent with the Group's business model, the strategies pursued and its risk appetite framework, climate and environmental risk management was restated also in the 2024-2027 Business Plan "B:Dynamic|Full Value 2027". In fact, the BPER Group has defined a risk-taking and management strategy with the aim of ensuring, under business-as-usual and stress conditions, a risk profile that is sustainable and consistent with its business model and the market context. Therefore, the strategy also considers activities aimed at achieving sustainability goals, with the understanding that the implications of ESG-related risks on individuals and corporate performance require careful and responsible corporate management. These factors are integrated while taking into account market requirements, regulatory changes, the expectations of the Supervisor and the various stakeholders in order to identify those short- and medium- to long-term management actions that can mitigate the risks arising from the pursuit of the defined sustainability objectives.

With a view to continuously complying with the Supervisory Authorities' requirements, activities are underway to assess possible areas for improvement in line with the latest regulatory provisions issued by the EBA on the management of ESG factors and scenario analyses.

For further details, please refer to the paragraph "Description of the processes to identify and assess material climate-related impacts, risks and opportunities (E1 – IRO1)" of the Consolidated Sustainability Statement.

## Business strategy and processes

**b) Objectives, targets and limits to assess and address environmental risk in short-, medium-, and long-term, and performance assessment against these objectives, targets and limits, including forward-looking information about the design of business strategy and processes.**

In order to implement an effective climate/environmental strategy capable on the one hand of managing risks and on the other of multiplying opportunities, the BPER Banca Group has identified a number of cornerstones in its approach, all aimed at redirecting capital flows towards sustainable investments in order to achieve sustainable and inclusive growth.

The actions and objectives related to environmental issues in the existing Business Plan include:

- integration of ESG criteria into the bank's credit assessment process;
- support for the "Just Transition" of companies and families by improving the offer to customers also through the definition of a ceiling of over Euro 7 billion for ESG Corporate and Retail products; the increase in the proposition of ESG investments (45% of ESG AuM) and the issue of Green Bonds for at least Euro 1 billion;
- direct emissions reduction target of -35% to 2027 (with 2021 baseline) through the energy efficiency activities contained in the Energy Plan and the reduction of financed emissions in line with the commitments made following endorsement of the NZBA;
- actions to foster ESG skills enhancement through employee engagement and training activities (at least 60% of employees trained on ESG issues per year).

### Net Zero Banking Alliance

In March 2022, the BPER Banca Group joined the Net-Zero Banking Alliance (NZBA), with the goal of eliminating emissions by 2050. Reaching the final objective will involve various five-year intermediate steps starting in 2030, with reference to both the loan portfolio and the portfolio of investment in financial assets.

Following its membership, BPER Banca set decarbonisation targets for its portfolios on six of the ten high carbon footprint sectors identified by the NZBA, in line with the Bank's ambitions to support the sustainable transition and the timelines defined by the Alliance, listed below:

August 2023

- "Power generation": 36% reduction in weighted emission intensity of counterparties in the portfolio, from a baseline of 256 kilograms of CO<sub>2</sub>-equivalent per megawatt hour (256 kg CO<sub>2</sub>e/MWh) in 2022 to an average value of 165 kilograms of CO<sub>2</sub>-equivalent per megawatt hour (165 kg CO<sub>2</sub>e/MWh) in 2030;
- "Oil and gas": 29% reduction in BPER Banca's financed emissions by 2030, starting from a baseline of 464 thousand tons of CO<sub>2</sub>-equivalent (464 thousand tCO<sub>2</sub>e) in 2022.

December 2024

- Iron and steel: 27% reduction in emission intensity at portfolio exposure level, from a base of 275 tonnes of CO<sub>2</sub> equivalent per exposure in the sector in millions of Euro (275 tCO<sub>2</sub>e/€ million) by 2023 to an average value of 201 tonnes of CO<sub>2</sub> equivalent per exposure in the sector in millions of Euro (201 tCO<sub>2</sub>e/€ million) by 2030;
- Aluminium: 24% reduction in emission intensity at portfolio exposures level, from a base of 460 tonnes of CO<sub>2</sub> equivalent per exposure in the sector in millions of Euro (460 tCO<sub>2</sub>e/€ million) by 2023 to an average value of 350 tonnes of CO<sub>2</sub> equivalent per exposure in the sector in millions of Euro (350 tCO<sub>2</sub>e/€ million) by 2030;
- Commercial real estate: 47% reduction in emission intensity at the level of financed property, from a base of 37 kilograms of CO<sub>2</sub> equivalent per square metre (37 kgCO<sub>2</sub>e/m<sup>2</sup>) by 2023 to an average value of 19 kilograms of CO<sub>2</sub> equivalent per square metre (19 kg CO<sub>2</sub>e/m<sup>2</sup>) by 2030.

May 2025

- Agriculture: 63% reduction in emission intensity at portfolio level, from a base of 66.3 tonnes of CO<sub>2</sub> equivalent per exposure in the sector in millions of Euro (66.3 tCO<sub>2</sub>e/€ million) by 2024 to an average value of 24.5 tonnes of CO<sub>2</sub> equivalent per exposure in the sector in millions of Euro (24.5 tCO<sub>2</sub>e/€ million) by 2030.

With regard to the Coal sector, BPER Banca will phase-out its exposure, highlighted as immaterial since its membership in the Alliance and on which, in any case, the Bank has envisaged restrictive policies, as governed by the "ESG-linked Loan Origination Policy" since 2023.

For the remaining sectors identified by the Alliance and not subject to publication, the following reasons should be noted:

- Cement: due to the limited significance in terms of exposure and due to the structural interventions required for decarbonising the sector, which are beyond the Bank's direct control;
- Transportation: for the limited significance in terms of exposures and for the limited applicability of the target setting methodologies for counterparties that are actually included in the Group's portfolio;

- Residential immovable property: given the high exposure and in line with other peers, the Group decided, for the time being, to continue monitoring its portfolio, but not to communicate a target that would not be achieved in the absence of efficient public policies.

The targets were defined by the BPER Banca Group through a process for the quantification of its portfolio emissions (also known as ‘financed emissions’). The mechanism for the assignment of emissions to customers is based on the amount of loans disbursed with the Bank’s exposures being specifically analysed and aligned with the decarbonisation trajectories outlined by the Net Zero scenarios recommended by the NZBA.

The calculation of the targets as at 2030 refers directly to the Net Zero 2050 scenario defined by the International Energy Agency (IEA) and in line with the requirements of the Alliance.

Please refer to the paragraph “Participation in the Net-Zero Banking Alliance” in the Consolidated Sustainability Statement for further information.

## Business strategy and processes

### c) Current investment activities and (future) investment targets towards environmental objectives and EU Taxonomy-aligned activities.

The BPER Banca Group, for over three years has incorporated ESG elements also into the investment policies of its proprietary portfolio and monitors its trend. The BPER Banca Group changed its management methods, by giving greater weight to the factors that favour sustainable growth, attentive to society and the environment, by approving a specific “Policy on ESG investments in the Management of the Group’s Proprietary Portfolio” in December 2022. Therefore, resources for the bond issuances placed by companies with the best ESG practices will continue to increase and will be given priority upon investment decision-making. The adopted criteria require that priority be given to issuers with an ESG rating of at least BB (according to the MSCI scale), all other conditions being equal. For further details, please refer to the Company’s website <https://group.bper.it/en/sustainability/policies-and-code-of-ethics>. The focus continues to be on enhancing corporate social responsibility and improving financial and reputational risk management. Therefore, the BPER Banca Group pledges to contribute, firstly, to a sustainable economic development by giving priority, in its investment choices and in the management of its financial portfolio, to businesses that adopt virtuous practices focused on the use of environmentally friendly production methods, on the guarantee of inclusive working conditions that are respectful of human rights and on the implementation of the best corporate governance standards. Inappropriate business conduct can generate costs and risks not only for the individual businesses, but for the whole economic system, negatively impacting financial stability and economic growth, sometimes even in the short-term. Conversely, as confirmed by extensive literature and empirical studies, businesses that are attentive to ESG factors are usually less exposed to operational, legal and reputational risks and are more oriented towards innovation and efficiency in allocating their resources; for this reason, they are considered to be more interesting by investors and benefit from a lower capital cost. When choosing investments, the BPER Banca Group also pays particular attention to the issues of States, Government Agencies and Supranational Entities classified as “green”. As of the second half of 2025, following approval the Board of Directors of the Parent Company, the Finance Committee will evaluate and propose management activities for the Group’s financial instruments portfolio also with reference to the amount of the required portfolio with an ESG Score.

As at 30 June 2025, the Group held an overall financial portfolio of Euro 31.4 billion, of which approx. 7.6% (9% as at 31 December 2024, 9% as at 30 June 2024 and 8.4% as at 31 December 2023) with ESG (Environmental, Social and Governance) characteristics. More specifically, the “Portfolio with an ESG score” includes Social Bonds, Green Bonds, Sustainability Bonds, Sustainability-linked Bonds, equity funds of Etica Sgr and equity investments weighted for an “ESG score”.

With particular reference to “green” investments as at 30 June 2025, these amounted to approximately Euro 1.2 billion, or about 3.8% of the total portfolio.

BPER Banca and the Group’s companies rely on external data providers to identify an ESG rating for each individual investment and to have a specific analysis for environmental, social and governance issues (e.g. ESG score from leading information providers).

Please refer to the paragraph “ESG Investment Actions for the Management of the Group’s Proprietary Portfolio” of the Consolidated Sustainability Statement for further information.

## Business strategy and processes

**d) Policies and procedures relating to direct and indirect engagement with new or existing counterparties on their strategies to mitigate and reduce environmental risks.**

The BPER Banca Group develops and adopts an approach aimed at identifying and assessing potential climate and environmental, reputational, operational, and other ESG risks arising from financing in companies operating in controversial sectors, involved in serious events that have led or may lead to negative impacts on counterparty valuation, with particular attention to the impact on their creditworthiness; at the same time, it intends to take the opportunity to direct and support the transition path. The main policies and procedural additions are set out below, which, in the banking area, have been applied by the BPER Banca Group since 30 June 2025.

**ESG-linked Loan Origination Policy**

In June 2024, the BPER Banca Group updated its ESG-linked Loan Origination Policy.

The update of the Policy allowed an explanation to be given, including with respect to the customers, on the reference to the Net Zero Banking Alliance for the sectors in which the Group reported its targets to reduce funded emissions, and the growing attention to the impacts linked to ESG factors in line with what is defined by the Principles for Responsible Banking. The principles applicable to the infrastructure, agriculture, forestry and fishing, real estate and manufacturing sectors were introduced, as was the amendment to the evaluation criteria for the “Power Generation” and “Oil and Gas” sectors, which had already been regulated in the previous version, thus ensuring broad coverage of the corporate loan portfolio and the portfolio secured by real estate assets. During 2024, ESG elements were also added to the definition of the counterparty strategy in all sectors provided for under the ESG-linked Loan Origination Policy: Coal, Electricity, Mining, Oil and Gas, Defence, Transport, Manufacturing, Infrastructure and Agriculture, Real Estate and Gambling (see details in Table 1, letter m).

**Integration of ESG factors into credit policies**

Since 2023, the overall loan policy framework has been subject to a review that led to a change in the previous instructions at sectoral/geographic level towards a micro-founded credit strategy at the counterparty level. The indications of the strategy may tend to be expansive or restrictive, according to a notching model that considers various credit-relevant elements (e.g. sectoral positioning, profitability and capitalisation of the customer company, profitability of the relationship, etc.). The notching model has also been integrated with ESG elements (first and foremost in relation to the identification of climate risk exposure, in line with the Group’s Risk Appetite Framework) using a modular approach with growing intensity, so as to be able to be governed while applying more or less intensity in accordance with the Group’s strategic objectives, market and regulatory developments, and the type of data available.

In particular, the integration of the assessment of physical and transition risk metrics requires the possible adjustment of the credit strategy, taking into consideration forward-looking elements of particular vulnerability of the counterparties according to environmental policies or regulations and decarbonisation targets set forth in the European context.

In this sense, in the first half of 2025:

- the strategy assigned to counterparties operating almost exclusively in the coal sector, and that have so far not developed strategies to change their business models, is confirmed for gradual disengagement, including in compliance with the objective declared by the Group for a phase-out by 2030 (for OECD countries); it should also be noted that the BPER Banca Group’s overall exposure to this sector is insignificant;
- for counterparties belonging to the Oil and Gas sectors, a selective strategy is activated based on the counterparty’s emission profile, making it possible to limit the exposures to less virtuous counterparties at the portfolio level;
- for counterparties belonging to the Production of electricity sector, the introduction of strategic guidelines on shifting to companies aware of their emission profile led to a significant drop in the physical intensity of the credit portfolio. The result achieved is lower than the target trajectory due to improvement of the performance of the companies in the portfolio that are progressively gearing their technological mixes towards more sustainable sources in line with the push to decarbonise the sector. The quality of emission profile data of the counterparties in the portfolio also improved, allowing the specific publicly available information of the counterparty to be exploited, including the energy mix produced by the operators in the sector, thereby reducing dependency on estimates based exclusively on sectoral data. It was therefore deemed unnecessary to apply actions to the strategies as they were considered to be fully in line with expectations;
- for counterparties belonging to the Iron, Steel and Aluminium sectors, for which the NZBA targets for the reduction of financed emissions were communicated in December 2024, the preparatory analyses on the overall portfolio positioning did not determine the need to intervene on the notching mechanism, also in light of the decarbonisation trajectories and targets already declared by the BPER Banca Group’s main customers, which are in line with the declared targets.

In addition to the leverage applicable by acting on the notching mechanism at the counterparty level, specific actions to support the commitment made in favour of companies’ decarbonisation are conveyed in the applications adopted during the granting of credit, with the aim of pursuing, in the relationship with customers belonging to the sectors regulated by the ESG Credit Policy, the best practices applicable. These include:

- acquisition of decarbonisation plans or official commitments to defining targets for the reduction of their own GHG emissions and reliance on fossil fuels;
- the acquisition of specific ESG covenants, formalising shared commitments to improve counterparty KPIs;
- the placement of green or sustainable-linked products to support the transition or reduction of climate change and the improvement of the ESG KPIs of the companies to whom funding is given.

The single-name strategies are also defined on the basis of ESG elements especially for emission-intensive sectors and on which the Group has already disclosed its reduction targets to all origination functions and has fully integrated them in the applications supporting the network, where they are visible together with the summary indications of the “ESG-linked Loan Origination Policy”. Recommendations also regarding the acquisition of findings with respect to the level of insurance cover of the customer companies against extreme events, not exclusively regarding weather (for example earthquakes, floods, landslides, etc.) are transmitted through the loan applications based on the estimated levels of exposure to relevant risks. In that sense, the distribution agreements and synergies with the insurance partners allow physical risk reduction strategies to be better transmitted.

### Corporate customer engagement and data collection

The BPER Banca Group has activated various initiatives to engage Corporate customers since 2022, in order to help spread awareness of sustainability issues. In fact, the BPER Banca Group recognises the strategic and priority role of the banking system also with regard to the dissemination of useful information to start virtuous paths among SMEs and confirms its commitment to assisting its customers in the transition process with this initiative.

In order to acquire the most relevant ESG data in the assessment of its corporate customers, the BPER Banca Group began cooperating with a leading infoprovider to administer ESG questionnaires to its customers through a market tool that allows the company itself to obtain immediate feedback, expressed by an ESG score, on its positioning and which can also be shared with other players. Targeted ESG data collection campaigns have been carried out since 2023, directly engaging customer companies in order to engage in fruitful dialogue on the needs of individual businesses as a result of the assessment. This is also aimed at gradually reducing the use of sectoral proxies in the assessment of companies, both for the definition of the BPER Banca Group’s own decarbonisation trajectory and in the risk management and credit granting processes, also in accordance with the requirements of the Banking Supervisory Authorities.

The Group has also participated in the work of the MEF table “Sustainability Dialogue between SMEs and Banks”, aimed at simplifying the dialogue between banks and businesses and reducing the impact of ESG disclosure, especially with regard to counterparties not subject to sustainability reporting requirements.

With regard to the above, recently introduced simplifications to the relevant regulation, which relieved SMEs of regulatory disclosure obligations, reinforce the importance to continue with counterparty engagement.

### Target Net Zero: a tool to support the calculation of emissions and the definition of decarbonisation plans for SMEs

The BPER Banca Group, in order to specifically support SMEs, also developed an innovative service in partnership with a leading consultancy group in order to offer its customers, free of charge, a calculation of the scope 1 and 2 GHG emissions using the GHG Protocol (“Calculation” mode). A customised decarbonisation trajectory can also be identified, along with the development of an investment plan to reduce emissions in accordance with the SBTi principles (“Reduce” mode), potentially aided by financial support from the BPER Banca Group.

Both features may be activated by BPER Banca customers by accessing the internet banking dedicated website or the BPER Group corporate website.

### Integration of ESG analyses into the credit granting process

In 2024 information on corporate customers was incorporated with a section dedicated to ESG profiles, in order to allow the manager to analyse the main characteristics of the counterparty’s sustainability profile, both according to its sector of belonging and on the basis of precise information, also collected through ESG questionnaires.

In addition to the applicability of the ESG Credit Policy according to the client company’s sector of operation, specific physical and transition risk scores are highlighted, consistent with the metrics assumed at the overall portfolio level in the Risk Appetite Framework. In addition, a summary view of any critical areas is offered by means of a counterparty ESG score, which expresses the counterparty’s ranking in all assessment KPIs in the environmental, social and governance areas defined by the EBA with a traffic light indicator, also according to its sector of belonging.

For the most significant counterparties, the reports annotated by specialised analysts on the Separate or Consolidated Financial Report of customers are also accompanied by the analysis of the Sustainability Statement (formerly NFS) of customer companies, if any.

Consistent with the above principles, the credit-granting applications have been integrated to provide evidence of “ESG best practices”, which are aimed at rewarding the placement of green, Taxonomy-aligned or sustainable-linked loans, or at incentivising the redevelopment of the customer’s real estate assets.

In particular, in the case of mortgage financing, the purpose of the financing is checked, rewarding the upgrading of existing buildings, especially if they belong to the worst energy classes (F or G). As of December 2024, the ESG best practices have been integrated into all Group banks and companies that are aligned in terms of IT.

### Real estate collateral assessment and reassessment process

The collateral assessment and reassessment process has also been reinforced taking into account the potential effects resulting from exposure to physical and/or transition risk. In this sense, a specific mandate was given to providers to acquire detailed information, in addition to the collection of the Energy Performance Certificate, regarding, for example, any elements of exposure or mitigation of physical hazards that emerged during the inspection, the situation of the building and whether it has undergone recent renovations, in particular if focused on energy efficiency.

As for the acquisition of the EPC on real estate collateral, it has been fully integrated into the process whenever there is contact with the customer - at the time of filing the loan request, with delivery of the report to the relationship manager; when carrying out the appraisal, with delivery to the appraiser; when renewing the customer's exposure.

The information acquired and necessary for an appropriate evaluation of collateral is procedurally integrated into the application used also during the preliminary phase to collect information on property to be pledged as collateral.

In addition, appraisals of residential properties are conducted according to a "Taxonomic" process, which makes it possible to acquire, thanks to the appraiser's inspection, all the elements necessary to identify with certainty at an early stage whether the property, depending on its purpose, corresponds to the Taxonomic requirements and can therefore contribute to the Group's Green Asset Ratio. Moreover, since January 2024, information on the financed property with particular reference to the taxonomic valuation elements is acquired within information systems, in addition to being assessed by the appointed experts.

### Detecting the Taxonomic alignment of exposures

The BPER Banca Group has specific processes in place to detect the Taxonomic alignment of exposures.

In addition to the process outlined above with regard to real estate credit, the loan origination and monitoring processes have been integrated with the evolution of applications that are already in use and the introduction of a new application for the detailed assessment of EU Taxonomy requirements for credit exposures in view of a gradual expansion by product and segment starting from green products with an environmental objectives and from "Corporate & Investment Banking" exposures.

Please refer to the paragraph "Detecting the taxonomic alignment of exposures" of the Consolidated Sustainability Statement for further information.

### Involvement of the Supply Chain

In order to strengthen the responsible approach in the supply chain, in cooperation with the ABC Consortium, from 2019 to 2021 the BPER Banca Group implemented a supplier engagement project in order to assign a Sustainability Rating to the Group's top 200 suppliers. The pilot project included an evaluation system carried out through a documentary audit, after which the individual supplier received an ESG rating free of charge.

After the pilot engagement phase (2019-2021 Business Plan) was completed, the entire procurement process was revised to include ESG issues, with the aim of selecting both suppliers and purchased products. The Green Procurement project included in the 2022-2024 Business Plan, concerning the integration of ESG criteria in the procurement and supplier management processes, was developed starting from the need to realign corporate purchasing and consumption.

In this context, new supplier and supply assessment criteria have been introduced which also take into account ESG elements. In particular, these criteria are applied in the following application forms:

- Tender forms: Minimum Environmental Criteria (MECs) have been introduced for each goods sector in order to take them into account, along with other elements, in supply tenders for the procurement of goods and services;
- Vendor Management form: the new BPER supply register approval process involves the compilation of a questionnaire with a section dedicated to ESG elements, where data and certifications are provided that contribute to the overall evaluation of the supplier;
- Contract Management form: the process of creating, formalising, executing and managing the contracts with a view to maximising the operational and financial performance of a company by means of a correct and transparent formalisation of relations with the supplier.

This project is designed to identify and collaborate with suppliers who share the same values as the Group, in order to generate a significant impact both for the business and for the achievement of sustainability goals throughout the value chain.

The ESG criteria and elements in the various phases of the purchasing process were incorporated in 2023, consolidating them further in 2024, especially with regard to the supplier accreditation and evaluation stages, and for the management of tenders and contracts.

The project that has been implemented aimed at, inter alia, identifying and collaborating with suppliers who share the same values as the Group, in order to generate a significant impact both for the business and for the achievement of sustainability goals throughout the value chain.

For more information, please see para. 4.1.3 "Management of Relationships with Suppliers, Including Payment Practices" of the Consolidated Sustainability Statement.

**e) Responsibilities of the management body for setting the risk framework, supervising and managing the implementation of the objectives, strategy and policies in the context of environmental risk management covering relevant transmission channels.**

The BPER Banca Group's Board Governance over climate issues is assigned to three corporate bodies: the Board of Directors (BoD), the Board Sustainability Committee and the Control and Risk Committee. The BoD defines Group guidelines and strategies relating to sustainability and climate-related issues. The BoD is responsible for approving the Consolidated Sustainability Statement, the Business Plan, the Risk Appetite Framework and the risk governance policies, incorporating ESG and climate elements over time.

Each of the Group's areas of operations appears, on the whole, to be adequately covered with specific professional skills to ensure effective and knowledgeable management.

All members of the corporate bodies meet the requirements of professionalism and competence set out by the applicable legislation. In particular, the Board members and Statutory Auditors have, on the whole, acquired adequate experience in listed and unlisted companies operating in the credit, financial or insurance sector.

The BoD and the Board of Statutory Auditors therefore possess a combination of knowledge, skills and experience that enables the members to understand the main business areas, the characteristics of the areas where the Bank and the Group operate and the risks to which the Bank and the Group are exposed, including those related to business management.

The members of the Group's Board of Directors draw on their expertise in sustainability, acquired through the experience they have gained during their professional careers and through participation in special training sessions.

In this regard, it should be noted that with the aim of strengthening the skills of the members of the BoD and the Board of Statutory Auditors on ESG matters, a training session was held in 2024 on risk management, and focused in particular on the management of climate and environmental risks.

In addition, following the establishment of the Board of Directors appointed by the Shareholders' Meeting of 19 April 2024, a training plan was prepared.

Lasting approximately one year, the programme consists of three modules: (i) governance, supervision and controls and succession plans; (ii) risk management (identification, assessment, monitoring, control and mitigation of the BPER Group's main types of risks); (iii) Supervised Entity business models, strategic planning, accounting and financial statements, Risk Appetite Framework, ICAAP (Internal Capital Adequacy Assessment Process) and ILAAP (Internal Liquidity Adequacy Assessment Process). Participation in the training programme is open to all Directors and Statutory Auditors in order to improve their skills on the topics mentioned above, thus fostering an increasingly in-depth and direct discussion in the meetings of the Corporate Bodies.

As part of this plan, the topics of integrating ESG factors into the credit risk assessment process and supervisory expectations on climate and environmental risks were discussed in depth, among others. In addition, a training session was dedicated to the contents of the CSRD, especially the presentation of the new ESRS principles and their impact on sustainability reporting.

Pursuant to the Rules of Operation, meetings of the Board of Directors are convened on an ordinary basis, as a rule, once a month. The Board of Directors addressed the Environment and Climate Change issue in 13 meetings out of 19 in 2024, and in 7 meetings out of 9 in the first half of 2025.

The Board Sustainability Committee supports the activities of the BoD in the field of sustainability, with an impact on all the processes, structures and corporate controls through which the Bank ensures the pursuit of sustainable development, with particular reference to environmental, social and governance issues. More specifically, the Committee reviews and assesses:

- the contents of the "Group's ESG Policy" as well as its ability to ensure, through constant dialogue with all stakeholders, the achievement of sustainable development objectives;
- ESG-related regulatory documents, final reports and disclosures - including the Consolidated Sustainability Statement;
- 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.

The Sustainability Committee also has a strategic role with regard to ESG and climate issues, and is responsible for assessing the Bank's positioning within sustainability metrics, indices and market benchmarks, and initiatives and programmes aimed at spreading a culture of sustainability and awareness of the need to pursue sustainable development throughout the Bank's organisational structures. The body meets to discuss sustainability and climate issues at least quarterly; in 2024 it addressed Environment and Climate Change in all 10 of its meetings and, in the first half of 2025, in 5 out of a total of 5 meetings.

The Internal Board Control and Risk Committee supports the Board of Directors in assessing the ESG elements emphasised in the internal control system, Risk Appetite Framework and strategies for capital and liquidity management, as well as for all relevant risks of the Bank and the BPER Banca Group. More specifically, in 2024 the Committee held 11 meetings on the topic of environment and climate change out of a total of 17 meetings; in the first half of 2025, it held 8 meetings on this topic out of a total of 9.

Please refer to paragraph 1.1.2. "Governance" of the Consolidated Sustainability Statement for further information.

In that context, the risk identification process for the risks to which the bank could be exposed within the scope of the processes that underlie the Risk Appetite Framework on which the materiality analysis of the ESG risk factors is based is highly important, and which, on the basis of the transmission channels set out under letters l) and r), show their effects on the main company risks (credit, market, strategic, liquidity, operational and reputational).

With particular reference to liability risk within the scope of the operational risk management process, the BPER Banca Group:

- identifies the operational loss events (gathered through the Loss Data Collection process) connected to climatic and environmental risk factors or relating to disputes in the area of climate/environment, through specific event types;
- during the Operational Risk Assessment process, it evaluates the possible losses deriving from potential legal responsibilities through specific risk scenarios dedicated to climatic and environmental risk factors.

## Governance

### f) Management body's integration of short-, medium- and long-term effects of environmental factors and risks, organisational structure both within business lines and internal control functions.

The BPER Banca Group has structured 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. In that regard, the approval of the "ESG Policy" in November 2022 was significant, which further strengthened governance of ESG issues for the pursuit of sustainable success.

On 14 October 2021, the Board of Directors established the Board-internal Sustainability Committee, which was assigned a support role in the Board's sustainability activities and, therefore, in tackling Climate Change, with reverberations on all processes, structures and company controls through which the Bank guarantees the pursuit of sustainable development, with particular reference to environmental, social and governance themes, in compliance with Principle I of the Code of Corporate Governance and the principles drawn up by the competent international bodies.

The main ESG roles and responsibilities applied in the various bodies are as follows:

- **Board-Internal Sustainability Committee:** performs 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. In particular the Committee:
  - reviews and assesses, at least once a year, the content of the Group's ESG 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 and disclosures - including the Consolidated Sustainability Statement prepared by the ESG Strategy Unit;
  - 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, throughout the Bank's organisational structure, 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;
  - reports at least annually to the Board of Directors on the overall activities carried out.
- **Board-Internal Control and Risk Committee:** The Board-Internal Control and Risk Committee supports the BoD in assessing ESG elements as part of broader assessments of corporate strategy and of risk appetite Framework (with particular reference to identification, measurement/assessment, risk reporting and monitoring processes). The Control and Risks Committee meets to discuss sustainability and climate issues on a regular basis, and *inter alia*, examines the following: the results of the risk identification process which also contain the analyses regarding the materiality of the ESG factors expressed considering short-, medium- and long-term time horizons, in addition to the openings for the internal business management lines relating to the core business (for example retail banking, corporate banking, private and wealth management), the Finance and the Corporate Centre; the single risk management policies and the quarterly reporting of the risks that include a focus on the ESG risk factors. Please refer to letters n and r of this table for further information.

The BPER Banca Group added sustainability topics to the prevailing 2024-2027 Business Plan. The projects with an ESG impact integrated in the Business Plan are monitored quarterly and submitted to the Sustainability Committee.

In addition to the above-mentioned Committees, a further Management Committee was established by the previous BoD in 2020, which was renamed the **ESG Management Committee** in 2022. This Committee facilitates the coordination of Corporate and Group Departments with regard to sustainability issues and supports the CEO in the management of ESG and sustainability issues at both Parent Company and Group level. In addition, the Committee monitors the BPER Banca Group's positioning in terms of sustainability and the 17 UN goals (SDGs) and promotes and manages the ESG strategy and sustainability issues, in line with what is defined in the Business Plan that incorporates sustainability issues, with the support of the ESG Strategy Service.

As at 30 June 2025, the ESG Strategy Unit has 17 resources selected for their specific expertise in sustainability and climate matters. The Unit, as mentioned above, supports the ESG Management Committee in the operational management of sustainability and climate issues in accordance with the provisions of the Business Plan and the Sustainability Plan. Furthermore, it acts across-the-board at Group level on sustainability and climate issues, directly managing strategic planning and supporting the relevant corporate structures in achieving sustainable development goals.

Details of the core activities carried out by the ESG Strategy Unit are reported below:

- sustainability reporting:
  - preparation of sustainability reporting (CSRD) integrated with the climate-related information previously contained in the TCFD Report;
  - preparation of the PRB Report;
  - management of ESG ratings;
- strategic and sustainability planning;
  - benchmarking in order to identify market trends and establish a proposal for the main ESG goals to be included in the Business Plan as well as participation in the Project definition stage for the aspects within its remit;
  - support in defining the ESG budget objectives;
  - definition, monitoring and reporting of the ESG KPIs for the remuneration policies;
- ESG monitoring:
  - regulatory monitoring and macroanalysis of impacts by discussing the new ESG goals with the functions;
  - monitoring of Business Plan and non-Business Plan projects and ESG KPIs, with verification of the progress made;
  - monitoring and control of the management of direct and indirect environmental impact;
  - management of the Portfolio Alignment activities to monitor the emission alignment of the portfolio to de-carbonisation objectives;
- management of ESG data:
  - mapping of ESG information requirements;
  - coordination of data acquisition/purchase processes;
  - coordination of the ESG data management process;
  - regulatory monitoring and macro-analysis of the impacts of information requirements;
- management of environmental sustainability projects;
  - management of processes linked to stated de-carbonisation objectives;
  - management of relevant sustainability projects and identification of strategic ESG targets;
- coordination of discussions with supervisory bodies and stakeholders:
  - managing relations with the ECB on climate and environmental risk issues and coordinating cross-sectoral ESG exercises initiated by supervisory bodies (e.g., ECB Climate and Environmental Risk questionnaires);
  - management of relations and communications with international bodies regarding compliance with sustainability frameworks and ESG ratings;
  - monitoring consistency of ESG information disseminated outside the company, even through retrieval of relevant ESG data and information for clear, transparent and consistent communication of Group policies and actions;
  - management of reputational impacts related to sustainability issues;
- support for Committees and other corporate functions:
  - Internal Sustainability Board Committee on the promotion and management of the strategy on sustainability and climate issues;
  - ESG Management Committee in the operational management of sustainability issues in accordance with the plan objectives;
  - coordination of ESG Managers and company functions on ESG issues;
  - all Group structures on ESG issues also through the identification and delivery of training and consultancy services on sustainability issues and reporting;
- Energy & Mobility Management:
  - proposal and supervision of measures to contain energy consumption, with a view to sustainability, within the various company activities even through specific projects and the launch of green initiatives (Energy Management);
  - management of the Energy Plan, definition, coordination, implementation and monitoring of the objectives;
  - Mobility Management activities with the identification of initiatives to reduce environmental impacts due to business mobility and employees' home-to-work mobility;

The new ESG policy contains the key figures of the ESG Managers, identified in the structures that are active on ESG issues and who represent their pivotal figures, with the following functions:

- 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 are coordinated by the ESG Strategy Unit and meet at ESG round-table work groups, assisting the same Unit in implementing ESG projects. There are about 35 ESG Managers, also present in the Legal Entities Sardaleasing, Bibanca, Banco di Sardegna, Finitalia and BPER Factor. In addition to the ESG Managers, other additional cross-the-board support functions within the Bank have been identified with specific knowledge on ESG issues, such as, by way of example: the Risk and ESG Integration Office, the Regulation and ESG Credit Adequacy Office, the Financial and Sustainability Reporting Supervision Unit, the Protection and ESG Modelling Office, the Audit Risk Governance, ESG and Property Office.

In particular, the Financial & Sustainability Reporting Supervision Unit - in the role of Manager responsible for preparing the company's financial reports - ensures the preparation of an adequate sustainability reporting process and the related assessment of its adequacy and effective application; it ensures the assessment of the drafting and disclosure rules applied to the Consolidated Sustainability Statement, as well as the related compliance with the new reporting standards (ESRS). For more details on controls over Consolidated Sustainability Statement, see the disclosure requirement "Risk management and internal controls over sustainability statement" (GOV-5).

The Chief Financial Officer oversees the implementation of sustainable strategies with the support of the ESG Strategy Office. The latter, which is responsible for the preparation of the Sustainability Reporting and the coordination of ESG activities, provides the various bodies involved, including the Sustainability Committee and the ESG Management Committee, with analyses and assessments.

Please refer to paragraph 1.1.2. "Governance" of the Consolidated Sustainability Statement for further information.

## Governance

### **g) Integration of measures to manage environmental factors and risks in internal governance arrangements, including the role of committees, the allocation of tasks and responsibilities, and the feedback loop from risk management to the management body covering relevant transmission channels.**

The roles and responsibilities of the Board and internal board committees responsible for climate-related issues were described previously.

As previously stated, in addition to the Sustainability Committee, another Committee was established by the previous Board of Directors in the last months of 2020, which was renamed the ESG Management Committee in 2022. The new Rules on operations were updated in 2024. This Committee consists of: the CEO (permanent guest), the Chief Financial Officer (CFO), its chair, and all the Chiefs of the Parent Company, as well as the Manager responsible for preparing the company's financial reports, the Head of Management and Planning & Control, the Head of Organisation Department and the Head of the ESG Strategy Office. The latter, together with the CFO, coordinates the activities and meetings of the Committee, which normally meets quarterly.

The ESG Management Committee addressed the Environment and Climate Change topic in all 5 meetings of 2024 and in its only meeting in the first half of 2025. In particular, besides an update on the progress of the projects concerning ESG impact, discussions focused on the integration of ESG factors in the processes underpinning the loan, risk management, strategic planning and investment services.

Thus, to date, the evolution of BPER Banca's governance in ESG terms concerns the Group's entire corporate organisation, starting from the body with strategic supervisory functions, which relies on the support of the Sustainability Committee established internally, and continuing with the ESG Managerial Committee and the ESG Strategy Service that, reporting directly to the CFO, provides support across the board to all the bank's functions in managing ESG issues.

The BPER Banca Group's governance was strongly reinforced in 2022 with the Board of Directors' approval of the "ESG Policy", which clearly and precisely identifies the Group's commitments on sustainability and climate change issues, as well as its management roles and responsibilities. The Policy aims to foster the spread of a culture of sustainability within the Group and to guide the governance, processes, structures and corporate functions, in order to ensure the pursuit of sustainable growth with particular reference to ESG issues and a focus on combating climate change. The Policy has been defined based on the BPER Banca Group's sustainability ambitions and in line with the principles outlined in the Corporate Governance Code of Borsa Italiana, in the documentation of competent international bodies, as well as in the directives issued by the supervisory authorities and regulatory bodies of the European banking sector, first and foremost including the EBA and the ECB. The Policy identifies ESG Managers as key figures, defined in the structures that are active on ESG issues and who represent their pivotal figures, with the following functions:

- 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.

There are roughly 35 ESG Managers, coordinated by the ESG Strategy Unit, who meet at ESG round-table work groups, assisting the same function in implementing ESG projects. ESG Managers are present in the Legal Entities of BPER Banca, Optima, Sardaleasing, Bibanca, Banco di Sardegna, Finitalia and BPER Factor.

Finally, for risk management issues, the Risk Committee was established as a management committee which supports the Chief Executive Officer in the activities connected with the definition and implementation of the Risk Appetite Framework, the risk governance policies and the capital adequacy process of the Group and its Companies.

These activities also include, *inter alia*, the definition of the Group Risk Map, in addition to the analyses relating to the ESG risk factors that are reported in the periodic risk reporting aimed at the Corporate Bodies in which any exceeding of the risk limits is reported in accordance with the prevailing escalation processes.

With special reference to the risk identification process whose results were reported in the risk map, the fine-tuning continued with respect to how to identify and assess the ESG factors which now constitute a specific, focused analysis in identifying what risk factors, through defined transmission channels, can be considered to have a material impact on the main company risks in the various time horizons and also considering the management business lines of the Group. For further details on transmission channels, please refer to letters l) and r) of this table.

## Governance

### h) Lines of reporting and frequency of reporting relating to environmental risk.

In order to make the Board and Joint Bodies aware of the exposure to C&E risk factors and in order to enable them to make informed decisions on sustainability issues, the BPER Banca Group, in line with the Risk Appetite Framework, strengthened quarterly reporting on risks with indicators and analyses relating to climate risk factors.

In particular, the Group periodically monitors the RAF metrics, in order to control on a timely basis any breaches of the tolerance thresholds and/or risk limit set in the individual risk governance Policies and, if appropriate, direct the necessary communications to the Corporate Bodies and subsequent remedies. These metrics are selected in line with the choices made within the ICAAP, ILAAP and Recovery Plan and share consistent escalation processes.

The Group continued to gradually implement the Supervisory requirements within its quarterly risk reporting in 2024, also with regard to C&E risk factors.

With regard to credit risk, the results of the analyses relating to climate and environmental risk factors are presented in order to depict the level of exposure of the corporate and mortgage loan portfolio to physical and transition risk factors assessed as high. As of 2025, evidence is also given of the environmental risk analyses, by providing the monitoring of the NRR indicator aimed at assessing the incidence of the exposure of counterparties that have a "Very High" NRR risk, compared to all the counterparties in scope (businesses).

Furthermore, with specific reference to mortgage loans, information is provided about exposure to seismic risk and the energy efficiency class of the property pledged as collateral. In particular, in 2024 the aforementioned information dedicated to climate and environmental risk factors were incorporated into:

- the distribution and evolution of exposures subject to nature-related risk factors for the corporate portfolio;
- the distribution by business line of physical, transition and nature and biodiversity (NRR) risk factors for the corporate portfolio and the mortgage portfolio.

The credit section of the quarterly risk reporting was supplemented in the first half of 2025 with the analysis on the exposure to climate risks in the short, medium and long term with reference to the NFC (Non-Financial Corporation) and Real Estate perimeter. This analysis will be updated annually.

Forward-looking analyses of climate factors relating to the corporate and sovereign sector (due to the nature of the risk, the opening by business line is limited to Finance) are expected for market risk.

For operational risk, operational loss data related to the occurrence of ESG factors is reported, as well as the results of monitoring the indicators foreseen in the Policy for governing this risk.

For reputational risk, where present, evidence is given of the occurrence of that type of risk events related to ESG factors.

It is shown how the C&E factors are also evaluated within the scope of the ICAAP process.

This approach guarantees organic monitoring of the company's evolution, enabling the Group to proactively manage any critical situations that may entail possible remedial actions.

It is shown how the issues relating to climate and environmental risk factors are processed at governance level, and within the scope of the Board of Directors and the related Internal Board Committees, including in the Management Committees (e.g. the Risk Committee and the ESG Management Committee).

## Governance

### i) Alignment of the remuneration policy with institution's environmental risk-related objectives.

The Group's remuneration policy is aligned with the short- and long-term strategic objectives aimed at creating value for shareholders, employees, customers and all Group stakeholders. The remuneration policy was defined with the aim of ensuring, as always, the correlation and consistency between remuneration, the results achieved, the development guidelines, the sustainability of the initiatives undertaken and sound and prudent risk management, as well as compliance with regulatory requirements.

In particular, the remuneration policies also support the achievement of objectives linked to environmental sustainability by including specific KPIs in both the short and long-term incentive plans which, as far as possible, reflect the commitments undertaken to mitigate climate risks.

The new 2024-2027 Business Plan is consistent with the Group's modernisation path and continues the integration of ESG factors into business processes, with the aim of remaining a leader in the management of ESG issues in order to create shared value for all stakeholders and to be a credible partner for customers in their energy and environmental transition path.

The performance and reward policies continue to be aligned with the Group's ESG strategies and with the pursuit of short and long-term results, also taking into account the working conditions of all employees.

Systems are designed to incentivise the achievement of short and long-term goals in a sustainable manner, through:

- a Long-Term Incentive Plan ("2025-2027 LTI Plan"), based on BPER shares and linked to the Business Plan targets, to support the alignment of the interests of the recipients with those of shareholders and all stakeholders, incorporating in its targets not only profitability, operational efficiency, credit quality objectives and shareholder return but also sustainability objectives (with a weight of 20%). These are set out in three fundamental guidelines: Sustainable Finance, ESG Investments (Assets under Management), Diversity and inclusion;
- the adoption of an annual remuneration system, known as MBO (Management By Objectives) aimed at incentivising the achievement of objectives in the short term, in line with the strategic guidelines.

The LTI Plan targets are associated with profitability, operating efficiency, capitalisation and sustainability (ESG), in addition to a Total Shareholder Return target. More specifically, economic and financial objectives are integrated with sustainability objectives, set out in three fundamental guidelines: In particular, the ESG target (weight 20%) is composed of:

1. Sustainable Finance (1/3) – ESG Loans;
2. ESG AuM (1/3) - % of ESG products out of total Assets under Management;
3. Diversity and Inclusion (1/3) – % of women in leadership positions;

The first two objectives therefore concern environmental risks.

The short-term incentive plan (MBO) described in the "2025 Report on the Remuneration Policy and Compensation paid" confirms the weight assigned to the ESG components among the targets (their weight is 15%). The Strategic Scorecard assigned to the Chief Executive Officer (CEO) on which the so called "Material Risk Takers" (hereinafter also MRTs<sup>19</sup>) are based, includes ESG objectives defined according to a compound metric comprising six targets deemed strategic in the short-term as an enabling factor to achieve the ESG targets that can be traced back to Business Plan projects<sup>20</sup>:

1. % weight increase of ESG products: growth in the percentage weight of sustainable Assets under Management in relation to total Assets under Management;
2. Green Loan Amount: loans specifically dedicated to sustainability (ESG);
3. Net Zero Banking Alliance: definition of business strategies for the sectors of Aluminium, Iron and Steel, Commercial Real Estate;
4. Energy Plan: direct emission reduction (calculated on the basis of the efficiency, assessed during the conceptual phase, of the Energy Plan activities implemented in the year of the analysis and starting from the achievements as at 31 December 2024).
5. Progress in diversity, equity and inclusion: percentage of women holding positions of responsibility in the organisation;
6. ESG rating<sup>21</sup>: maintaining the current evaluation<sup>22</sup> (level identified by the Business Plan) of Moody's Analytics, CSA (Corporate Sustainability Assessment) S&P, CDP, Sustainalytics (Morningstar), Standard Ethics ratings.

19 The "MRTs" are resources that can have a substantial impact on the risk profile of the entity on the basis of the criteria foreseen by current legislation. For further information: "2025 Report on Remuneration Policy and Compensation Paid" (section I) paragraph 7.3.

20 Further details on the ceilings and payout curves of these objectives can be found in the "2025 Report on Remuneration Policy and Compensation Paid".

21 With the data available time to time and with the same evaluation methodology. It should be noted that, as of 2025, BPER Banca will not receive any ratings by Moody's Analytics since that rating was discontinued in December 2024 and the Bank was made aware of this only in May 2025. Therefore, that score cannot be taken into consideration in the 2025 MBO strategic scorecard. The remaining ratings ensure the continuity of the KPI efficiency.

22 Maintaining ratings within the ranges defined by the Board of Directors.

For ESG objectives, the achievement of each individual objective is on/off, based on precise, measurable quantitative targets. The minimum, target and maximum thresholds are represented, respectively, by the achievement of 4, 5 or 6 objectives. Therefore, the payout curve is 50%-100%-130%.

The short-term incentive system (2025 MBO) calls for the allocation of ESG incentives to essentially all relevant personnel (MRTs) with different methods depending on whether they are C-Level Managers or less with a weighting of between 10% and 15% possibly in combination with specific ESG objectives attributable to their areas of responsibility of with the objectives of the “managerial assessment”. A drip down effect is also foreseen for some of the Staff and Semi-central figures that are not part of the most relevant personnel with a weighting generally speaking of between 10% and 20%. Among the ESG objectives, especially the KPIs linked to the products placed by the Bank (i.e. ESG loans, “green” residential mortgages, sustainably managed assets) for the commercial departments and objectives such as the Net-Zero Banking Alliance. The assignment of ESG objectives also concerns the corporate structure, it ranges from the so-called Top managers, and then feeds down to the heads of department, and occasionally even to the office heads when they are directly engaged in achieving a specific objective.

## Risk management

### J) Integration of short, medium- and long-term effects of environmental factors and risks in the risk framework.

In 2024, the BPER Banca Group continued to implement its activities aimed at adopting the principles contained in the ECB Guidelines on Climate and Environmental Risks, also as a result of the outcomes of the ECB Thematic Review. Among other things, this allowed further strengthening of the C&E risk factor management framework in addition to their implementation in the corporate strategy. More specifically, the activities that have concerned various processes of the Risk Management Framework, across all areas, include (i) the risk identification process, (ii) the Risk Appetite Framework, (iii) the single risk management process and related reporting, (iv) the capital adequacy assessment process (ICAAP), (v) the internal liquidity adequacy assessment process (ILAAP) and (vi) the risk forecasting and stress testing programme.

An overall overview that makes it possible to define the various goals, frequencies and time horizons that characterise the main processes is provided below.

Process	Objective	Frequency	Time horizon
<b>Identification of risks</b>	Definition and updating of the Group's Risk Map, a document designed to identify the risks that the Group is or could be exposed to, currently and in the future, which may have significant impacts on the Group's economic, financial and equity balance, hindering the achievement of its strategic objectives. The Group Risk Map is relevant for the entire Risk Management Framework, as it sets the stage for the implementation and pursuit of all the main risk governance processes such as the RAF, the ICAAP, the ILAAP and the single risk governance policies.	At least on a yearly basis	1 year. The ESG risk factor impact analysis on existing risks is carried out over three-time horizons (short, medium and long).
<b>Risk Appetite Framework</b>	Definition of the Group's risk appetite in line with the risks identified within the Group's Risk Map.	At least on a yearly basis	1 year. 3 years (for some indicators)
<b>Single risk management process</b>	Measuring, monitoring and reporting on the individual risks that the Group turns out to be exposed to in line with the Group's Risk Map. The single risk processes are formalised within specific governance Policies and are approved by the Board of Directors.	Ongoing	Not applicable
<b>ICAAP</b>	Assessment of the Group's equity adequacy.	Ongoing	3 years for the application of the short-term scenarios  30 years for the application of the long-term scenarios
<b>ILAAP</b>	Assessment of the adequacy of the governance system and the Group's liquidity risk management.	Ongoing	3 years
<b>Risk forecasting and stress testing</b>	Supporting decision-making and business processes and evaluating specific areas of vulnerability in the exposure to individual risks:	Variable depending on the purpose of the exercise	Variable depending on the purpose of the exercise (daily, monthly, half-yearly, annually or every three years)

## Risk management

**k) Definitions, methodologies and international standards on which the environmental risk management framework is based.**

The climate and environmental risk to which the BPER Banca Group makes reference is based on international standards and, with particular reference to risk management, the physical and transition risk definitions contained in the Guide on climate and environmental risks published by the European Central Bank (November 2020) are important.

The BPER Banca Group has signed up to various international initiatives and programmes that provide the framework which inspires the Group's operations and outlines its policies for the creation of shared long-term value.

In said context, the Group signed up to the TCFD framework in 2021 in order to highlight, in line with the international standards and rules, the path undertaken to define an effective governance model, a resilient business strategy, state-of-the-art climate risk management processes and short-, medium- and long-term objectives consistent with the Group's commitments. To date, the Task Force has been disbanded, but the contents are being managed and will be reported in accordance with the ESRS standards of the 2024 Consolidated Sustainability Statement.

Moreover, the BPER Banca Group has been part of several international frameworks such as the UN Global Compact since 2017 and the Principles for Responsible Banking since 2020, while Group company ARCA Fondi Sgr is a signatory of the UN Principles for Responsible Investment. The "ESG Policy" identifies the SDGs (Sustainable Development Goals) described by the 2030 Agenda of the United Nations on which the Bank operates in a proactive manner to promote the international principles and objectives promoted by the Paris Agreement. Supplementing these, among the initiatives promoted by the United Nations, in 2022, the BPER Banca Group, recognising the importance of ESG issues and managing the resulting risks, signed up to the Net-Zero Banking Alliance (NZBA), with the goal of aligning its loans and investments portfolio with achievement of the "net zero" objective by 2050, gradually integrating the relevant climate and environmental risks in the risk management framework. Participation in this initiative allows the Group to improve its management of ESG issues in order to become more efficient, competitive and be a credible and reliable partner of its clients in creating a more sustainable, equitable and inclusive society.

## Risk management

**l) Processes to identify, measure and monitor activities and exposures (and collateral where applicable) sensitive to environmental risks, covering relevant transmission channels.**

The BPER Banca Group manages the ESG risk factors within the scope of its Risk Appetite Framework which was integrated over time on the basis of principles linked to the priorities and relevance of these factors for BPER Banca.

With special reference to the risk identification process whose results were reported in the risk map, the fine-tuning continued with respect to how to identify and assess the ESG factors which now constitute a specific, focused analysis in identifying what risk factors, through defined transmission channels, can be considered to have a material impact on the main company risks in the various time horizons and also considering the management business lines of the Group. The materiality results may give rise to the preparation of specific controls and processes.

This analysis was carried out based on qualitative/quantitative elements and took into account the risk factors "physical climate", "transition climate", "environmental" (NRR - nature related risk) and, where possible, also the "social" and "governance" components.

The analysis considered the effects on the following risks: Credit, Market, Operational, Reputational, Strategic, Liquidity. A summary of the main risk categories to which the Group is exposed that influence ESG risk factors and the identified transmission channels is provided below.

## Main risk categories to which the Group is exposed that are impacted by ESG risk factors:

Macro categories	Definition
<b>Credit risk</b>	The possibility that an unexpected change in the creditworthiness of a counterparty, to which an exposure exists, will generate a corresponding unexpected change in the value of the credit position
<b>Market risk</b>	Risk of losses caused by unfavourable developments in market elements
<b>Operational risk</b>	Risk of losses due to inadequate or dysfunctional procedures, human resources or internal systems, or to exogenous events, including the legal risk
<b>Reputational risk</b>	Current or prospective risk of a decline in earnings or capital arising from a negative perception of the Group's image on the part of customers, employees, counterparties, bank shareholders, investors or Supervisory Authorities
<b>Liquidity risk</b>	Risk of default on payment commitments (expected and unexpected)
<b>Strategic risk</b>	Risk that changes in the competitive environment and economic conditions of the company's business or choices of competitive/strategic positioning in the market will not produce the expected results

## Summary of ESG factor transmission channels:

Risk	Drivers/transmission channels
<b>Credit</b>	<p>National and European policies, which provide incentives and rules to build a low-carbon industrial system, thus characterised by greater energy efficiency in production processes and supply chains, could cause great damage to companies:</p> <ul style="list-style-type: none"> <li>- direct effects such as taxes based on the level of greenhouse gas emissions (payment of a Carbon Tax) or energy input cost shocks;</li> <li>- indirect effects due to consumer behaviour, the competitive environment to which the supply chain is exposed and the effects of the macroeconomic contest on the capital market.</li> </ul> <p>Such policies would also lead companies in high-emission sectors to bear higher investments and consequent financial burdens. The impact on companies' margins and leverage may therefore lead to a possible worsening of the counterparties' risk profile in terms of increased probability of default or recovery capabilities (especially for unsecured exposures). The transition could also define a re-composition of sectoral lending with indirect effects on the Group's risk profile.</p> <p>The risk arises from a potential increase in the likelihood of occurrence and severity of extreme weather events (e.g. floods, heat waves, droughts, landslides, fires, etc.), especially in the medium and long term, with a higher magnitude if transitional policies are not undertaken. These phenomena may affect both companies and individuals by generating:</p> <ul style="list-style-type: none"> <li>- in the first case, damage to assets, increased costs and/or interruption of operations, resulting in loss of profit;</li> <li>- in the second case, damage to property resulting in a reduction in the value of collateral or unexpected costs for counterparties.</li> </ul> <p>These phenomena may lead to increases in the probability of default for both types of counterparties and/or reductions in recovery rates on commercial and residential collateral, with a consequent impact on LGD.</p> <p>Environmental risks, understood as impacts (changes in nature caused by commercial or industrial activity that may lead to potential impacts on social and economic functions) and dependencies (aspects of ecosystem services that an organisation, or other actors, depend on to operate, e.g. availability of water and other natural resources), which may lead to critical issues (scarcity of production factors) or limitations (e.g. introduction of pollution tax or extension of protected natural areas) in production that generate increased financial risk for certain sectors and/or individual operators financed by the Group. Failure to identify and manage this transmission channel could increase the risk profile of the Group's credit portfolio.</p>
<b>Market</b>	<p>The macro-economic contexts featuring strong transition policies towards a green economy and the possible consequences of a reputational nature could entail a sudden redefinition of the price of equity, debt and derivative securities, with particular focus on products linked to brown activities and/or sectors with a resulting negative impact on the Group's banking and trading book portfolio.</p> <p>Serious events related to physical risk at national and EU level could lead to changes in market expectations and higher expected volatility.</p> <p>In the specific context of the Group, transition policies and adverse weather events could have a negative impact on the securities issued by financial, corporate and government counterparties present in the bank's portfolio which could lead to an increased equity and credit spread risk.</p>
<b>Liquidity</b>	<p>Possible impact on the liquidity and funding profile if, following adverse environmental or climate events or to cover costs resulting from the climate transition, the Group's customers ended up needing liquidity by accessing the credit lines granted.</p> <p>Redefinition of the price of portfolio securities which could reduce the value of the liquid assets and thus negatively influence the Group's cash reserves.</p>

(continued)

Risk	Drivers/transmission channels
<b>Operational</b>	Possible claims for damages following the sale of financial instruments that do not comply with the declared levels of sustainability and/or are not in line with the characteristics envisaged by the reference regulations (Reg. EU 2020/852, Reg. EU 2019/2088, etc.) or do not comply with the disclosure transparency requirements in terms of the adequacy of the information provided to the customer (known as “Greenwashing”).
	Extreme climate and environmental events capable of causing material damage to buildings, branches, data processing centres could result in potentially negative impacts with possible repercussions on the Group’s operations.
	Potential operational losses deriving from the use of unfair market practices that may harm customers and/or counterparties, and from events that may damage relationships with external stakeholders (i.e. fraud, inappropriate product placement).
	Possible operational losses related to events attributable to injuries and/or occupational diseases occurred during operating activities due to non-compliance with the relevant regulations in the field of employee benefits.
	Possible operational losses and loss of earnings resulting from business interruption and replacement costs of suppliers critical to the Bank.
	Possible operational losses attributable to lawsuits filed by employees for matters concerning remuneration, indemnities and employment relationship.
	Possible impact of sanctions for non-compliance with legislation on remuneration policies and practices.
<b>Reputational</b>	Possible repercussions of negative perceptions due to partnerships with companies with low sustainability standards.
	Reputational damage resulting from a critical weather event that impairs the institution’s normal operation.
	Reputational damage caused by choosing to lend money to companies connected with pollution activities.
	Possible decisions, statements or commercial relations contrary to supportive climate and environmental policies, or negative company issues and bad governance practices.
	Negative perception of a rating downgrade due to non-compliance with sustainability standards.
	Negative perception of possible legal disputes with staff for incidents of discrimination (e.g. gender, ethnicity, religion), possible legal disputes with customers and suppliers, sanctions by the Supervisory Authority.
<b>Strategic/ business</b>	In the presence of strong transition policies and the increase in the frequency and intensity of acute and chronic physical events in certain geographical areas, a failure to promptly react and adjust to contextual changes could jeopardize the viability and sustainability of the business model.
	Environmental risks, understood as impacts (changes in nature caused by commercial or industrial activity that may lead to potential impacts on social and economic functions) and dependencies (aspects of ecosystem services that an organisation, or other actors, depend on to operate, e.g. availability of water and other natural resources), may lead to critical issues (scarcity of production factors) or limitations (e.g. introduction of pollution tax or extension of protected natural areas) in production that generate increased financial risk for certain sectors and/or individual operators financed by the Bank. Failure to identify and manage such a transmission channel could increase the volatility of the Bank’s revenues.

With regard to monitoring and related reporting, the Group periodically monitors the overall RAF metrics, in order to control on a timely basis any overruns of the tolerance thresholds identified and/or assigned risk limits included within the individual Risk Governance Policies and, if appropriate, address the necessary communications to the Corporate Bodies and subsequent remedial actions. These metrics also include elements that refer to the ESG sphere.

Within the scope of the quarterly reporting of risks, in addition to the C&E indicator monitoring results, there are specific in-depth examinations related to credit risk (with analyses of physical, transitional and environmental risk, with a specific focus also on the single file review areas) and market risk (with forward looking analyses on the corporate and sovereign portfolios applying different ESG scenarios), while ESG elements are in any case considered within the overall results relating to the operational and reputational risks. As of 2025, with regard to credit risk, evidence is also given of the environmental risk analyses, by providing the monitoring of the NRR indicator aimed at assessing the share of exposures of counterparties with “Very High” NRR risk, compared to all the counterparties in scope (businesses). These findings ensure that periodic information is given to the Corporate Bodies and the top and senior management on the risks connected to those types of factors.

Please refer to the contents of letter n) of this Table for more information on risk governance and management. Furthermore, with specific reference to mortgage loans, information is provided about exposure to seismic risk and the energy efficiency class of the property pledged as collateral.

Finally, the section on climate and environmental risks mentioned above has been supplemented since 2024 with:





- the distribution and evolution of exposures subject to nature-related risks for the corporate portfolio;
- the distribution by business line of physical, transition and nature and biodiversity (NRR) risk factors for the corporate portfolio and the mortgage portfolio.

The credit section of the quarterly risk reporting was supplemented in the first half of 2025 with the analysis on the exposure to climate risks in the short, medium and long term with reference to the NFC (Non-Financial Corporation) and Real Estate perimeter. This analysis will be updated annually.







### m) Activities, commitments and exposures contributing to mitigate environmental risks.



In June 2024, the BPER Banca Group updated its ESG-linked Loan Origination Policy.

In the update, the principles of exclusion from eligibility for financing of specific transactions/counterparties particularly exposed to transition risk were further strengthened, simultaneously addressing positive screening principles to counterparties/projects aligned with the Taxonomy, or with decarbonisation plans in line with European targets, and that therefore contribute towards reducing the transition risk. Please refer to the following summary table of the principles applied:

Sector	ATECO	Icon	Summary
Coal	5; 8.92; 19 (excluding 19.2)		<p><b>Prohibition of financing of:</b></p> <ul style="list-style-type: none"> <li>- companies operating in the sector;</li> <li>- projects for the construction or expansion of new coal mines;</li> <li>- projects for the purchase of businesses operating in the coal mining sector ;</li> <li>- projects for the transformation of hard coal into coke oven products;</li> <li>- projects related to activities associated with coal marketing/trading.</li> </ul> <p><b>Selective assessment with compulsory due diligence for:</b></p> <ul style="list-style-type: none"> <li>- credit lines aimed at or associated with the conversion/remediation of mining sites</li> </ul>
Electricity	35.1		<p><b>Positive Screening</b> for counterparties with:</p> <ul style="list-style-type: none"> <li>- transition plan targeting at least 55% of power generation from renewable energy sources by 2030;</li> <li>- at least 50% of their Turnover, Capex or Opex aligned with the EU Taxonomy.</li> </ul> <p><b>Selective assessment</b> in the absence of a plan or with thresholds below 55% of power generation from renewable energy sources by 2030:</p> <ul style="list-style-type: none"> <li>- new finance: only if aligned with the EU Taxonomy;</li> <li>- no increase for general purpose facilities;</li> <li>- acquisition of covenants linked to the achievement of the 55% target of power generation from renewable energy sources or 30% GHG emission intensity reduction by 2030.</li> </ul> <p><b>Prohibition of financing of:</b></p> <ul style="list-style-type: none"> <li>- counterparties with &gt;20% of power generated from coal and oil and lacking an alignment/ transition plan aimed at obtaining at least 55% of power generation from renewable energy sources by 2030;</li> <li>- projects for the construction or expansion of Coal Fired Power Plants.</li> </ul>
Mining	7; 8 (excluding 8.92); 9.9		<p><b>Positive screening</b> in the event of:</p> <ul style="list-style-type: none"> <li>- compliance with the requirements covered by the industry's international best practices;</li> <li>- projects aimed at the promotion of technological innovation in the mining sector and pursuing circular economy, to strengthen the resilience and sustainability of the supply of critical and/or strategic raw materials.</li> </ul> <p><b>Assessment with compulsory due diligence for:</b></p> <ul style="list-style-type: none"> <li>- transactions for the construction or expansion, conversion or remediation of mining sites.</li> </ul> <p><b>Prohibition of financing for projects or mining industries that:</b></p> <ul style="list-style-type: none"> <li>- extract asbestos;</li> <li>- extract and trade rough diamonds from war zones or that have not been certified under the Kimberley Process certification scheme.</li> </ul>
Oil & Gas	6.1; 6.2; 9 (excluding 9.9); 19.2; 35.2; 46.71; 47.3; 49.5		<p><b>Selective assessment</b> for counterparties that:</p> <ul style="list-style-type: none"> <li>- have adopted official transition and/or exit plans by 2040;- have officially declared or undertaken commitments for transition and/or exit by 2040.</li> </ul> <p>Or alternatively:</p> <ul style="list-style-type: none"> <li>- general purpose facilities cannot be increased</li> <li>- loans can only be granted if backed by covenants associated with a 30% reduction in GHG emission intensity.</li> </ul> <p><b>Prohibition of financing of:</b></p> <ul style="list-style-type: none"> <li>- projects aimed at the development, construction and expansion of the following unconventional oil and gas extraction and exploration activities, including Tar Sands or Oil Sands and Onshore/ Offshore Oil and Offshore Gas in the Arctic Region and the Area known as the "Amazon Sacred Headwaters";</li> <li>- operations aimed at the exploration and extraction of new Oil &amp; Gas fields;</li> <li>- new customers operating in the Oil &amp; Gas sector, with plans for the exploration and extraction of new fields.</li> </ul>

(continued)

Sector	ATECO	Icon	Summary
<b>Defence (Weapons)</b>	25.4; 30.30.02; 30.4;		<p><b>Negative screening:</b> pursuant to Italian Law 220/2021, it is strictly forbidden to finance companies directly or indirectly involved in the construction, production, development, assembly, repair, preservation, use, storage, stockpiling, retention, promotion, sale, distribution, import, export, transfer or transportation of anti-personnel mines, cluster munitions and submunitions of any nature or composition, and any part thereof; as well as any technological research or activity that involves the manufacture, sale and transfer, on any basis, export, import and holding of cluster munitions and submunitions, of any nature or composition, or any part thereof.</p> <p>Furthermore, reference should be made to the Group Policy governing relations between the BPER Banca Group Companies and defence operators, weapons manufacturers and dealers”.</p>
<b>Maritime transport - Shipping</b>	30.1; 33.15; 38.31; 50; 52.22; 52.24.2		<p><b>Positive screening for projects of:</b> - hydrogen vessels or alternative fuel infrastructure; - electrification of ferries; - construction of power supply devices for ships at the quayside in ports; - installation of electrical control panels and transformers; - modifications to the operating software; - infrastructure projects to increase the use of alternative fuels - electrification of ports.</p> <p><b>Prohibition of financing of:</b> - counterparties who do not comply with the Paris Memorandum of Understanding on Port State Control; - vessels flying the flag of countries on the Black List of the Paris MoU on Port State Control in force at any given time; - projects for ship dismantling, if carried out in compliance with the Hong Kong International Convention for the Safe and Environmentally Sound Recycling of Ships and the European legislation on ship dismantling; - operations related to oil tankers of over 200,000 tonnes deadweight.</p> <p>Furthermore, possible financing limitations will be assessed in light of: - carbon intensity indicators and/or international ratings (e.g. Carbon Intensity Indicator (CII) Rating of the vessel); - specific purpose of the loan (e.g. operations on crude oil tankers - or oil product tankers).</p>
<b>Land transport</b>	49.3; 49.4; 52.24.4; 52.29; 53; 77.1		<p><b>Positive screening for projects aimed at:</b> - supporting the increase in car fleets and/or - purchasing cars, motorbikes or vehicles with GHG emissions below the emission thresholds in force at any given time as technical screening criteria for the substantive contribution made to the objectives of the EU Taxonomy.</p> <p><b>Assessment</b> based on the following elements: - high levels of GHG emissions; - low energy efficiency; - composition of the company's vehicle fleet; - failure to respect labour rights and working conditions.</p>
<b>Infrastructure</b>	42.1; 42.2; 42.9; 52.21		<p><b>In-depth assessment</b> for projects: - associated with the development of new infrastructure; - for the management or maintenance, recovery, reconstruction, requalification, modernisation or substitution of obsolete or damaged infrastructure; In any case in compliance with the best practices and applicable regulations.</p>
<b>Gambling</b>	92 (Excluding 92.00.01)		<p><b>Prohibition of financing of:</b> - purchase, construction, development and expansion of gambling halls; - purchase and production of machines that promote gambling (e.g. slot machines); - development, dissemination, printed or digital publication and marketing for the promotion of gambling; - new customers who encourage and/or promote gambling.</p>
<b>Manufacturing</b>	10; 11; 12; 13; 14; 15; 16; 17; 20; 21; 22; 23; 24; 25; 26; 27; 28; 29; 30 (excluding 30.1; 30.30.02 and 30.4); 32; 33.16; 33.17		<p><b>Positive screening for counterparties who:</b> - have at least 50% of Turnover, Capex or Opex aligned with the EU Taxonomy; - are subject to reporting requirements and have undertaken official commitments; - are not subject to reporting requirements with access to green / sustainable projects and/or services.</p> <p><b>Positive screening for projects:</b> - aligned with the EU Taxonomy; - for the electrification of end-use consumption or energy efficiency improvement; - that support switching from fossil fuels to renewable fuels, such as hydrogen from non-fossil sources, bioenergies and synthetic fuels; - designed for the reduction / reuse of water or packaging; - related to the capture and storage of carbon dioxide; - that support circular economy; - that are ancillary to national or supranational initiatives supporting transition (e.g. NRRP, EIB, EIF); - capital light financing or third-party funds for green initiatives.</p>

Sector	ATECO	Icon	Summary
Agriculture, forestry and fishing	01; 02; 03		<p><b>Positive screening for counterparties who:</b></p> <ul style="list-style-type: none"> <li>- adhere to industry standards, European or international certifications;</li> <li>- have Individual Insurance Plans in place;</li> <li>- are in partnership with associations or pursue high social interest projects.</li> </ul> <p><b>Positive screening for projects:</b></p> <ul style="list-style-type: none"> <li>- aligned with the EU Taxonomy and/or dedicated green products;</li> <li>- consistent with the Eco-schemes of the Common Agricultural Policy (CAP);</li> <li>- dedicated to the adaptation to climate change and emission reduction also financed through green or sustainable products.</li> </ul> <p><b>Negative screening</b> for counterparties who have been definitively convicted for:</p> <ul style="list-style-type: none"> <li>- 'caporalato' (illegal recruitment) under current national or international legislation;</li> <li>- undeclared work;</li> <li>- labour exploitation in agriculture;</li> <li>- wage realignment in the agricultural sector.</li> </ul>
Real Estate	41; 43; 68		<p><b>Positive screening for counterparties who:</b></p> <ul style="list-style-type: none"> <li>- have at least 50% of their Turnover, Capex or Opex aligned with the EU Taxonomy;</li> <li>- adhere to industry standards, European or international certifications.</li> </ul> <p><b>Positive screening for projects:</b></p> <ul style="list-style-type: none"> <li>- aligned with the EU Taxonomy and/or dedicated green products;</li> <li>- dedicated to adaptation to climate change (mitigation of physical risk).</li> </ul> <p>Assessment of possible financing limitations for properties in energy class "F" or "G" that are not subject to energy upgrading and/or energy efficiency measures, especially if particularly relevant physical risk elements emerge.</p>

The single-name credit strategies of counterparties who belong to sectors governed by the policy are implemented in accordance with ESG criteria, especially for the sectors with high emission intensity, reported to all the origination functions and fully integrated into the applications supporting the network, in which they are visible, along with the summarised instructions of the ESG-linked Loan Origination Policy as set out above.

The definition of the single-name loan strategies was integrated in accordance with the single-name characteristics, and the property collateral valuation processes were strengthened, addressing the findings related to the "ESG Best Practices" in the credit applications. The Best Practices reward exposures that, having environmental targets or aligned with the European Taxonomy in accordance with Regulation (EU) no. 852/2020, contribute towards redirecting the portfolio towards lower exposure to environmental risks (see Table 1 "Qualitative information on environmental risk", letter d).

Joining the Net Zero Banking Alliance also, along with the related process to identify the specific decarbonisation objectives of the portfolio for the most significant sectors, the preparation of a plan of action to reach the objectives and the entire periodic process of monitoring the distance from the targets will contribute towards a natural reduction of the transition risks.

With regard to the activities of the Risk Management Function in the risk identification process whose results were reported in the risk map, in 2024 the fine-tuning continued with respect to how to identify and assess the ESG factors which now constitute a specific, focused analysis in identifying what risk factors, through defined transmission channels, can be considered to have a material impact on the main company risks in the various time horizons and also considering the management business lines of the Group. For further details on the main risk categories to which the Group is exposed, that are affected by ESG risk factors, and evidence of the related transmission channels, please refer to letter l) of this table.

**Risk management**

**n) Implementation of tools for identification, measurement and management of environmental risks.**

The management of C&E risk factors has been progressively integrated into the BPER Banca Group's Risk Appetite Framework through the policies and processes for governing the main corporate risks, approved by the Board of Directors.

**Risk Appetite Framework**

To ensure that the corporate activity is driven by criteria of sound and prudent management, the Risk Appetite Framework (RAF) is used to monitor the risk profile that the Group intends to assume in the implementation of its business strategies. The RAF is a coordinated set of methodologies, processes, policies, controls and systems that make it possible to establish, communicate and monitor the Group's risk appetite.

The Group adopts mechanisms aimed at allowing effective integration of the risk appetite with management activities. In particular, the Group consistently reconciles its RAF, business model, strategic plan, Capital, Funding and NPE Plan, ICAAP, ILAAP and budget, identifying suitable coordination mechanisms.

RAF management includes the following activities:

- identification of the risks to be evaluated that may have significant impacts on the economic, financial and equity equilibrium of the Group (Group Risk Map);
- identification of the elements through which the Group expresses its risk appetite level to achieve its strategic objectives (areas of analysis, metrics, thresholds and risks for which it is considered appropriate to define qualitative guidelines for monitoring);
- definition of threshold calibration and quantification rules;
- formalisation of RAF decisions taken as part of the Risk Appetite Statement (RAS);
- verification of trends in the actual risk values (Risk Profile) of the RAF metrics with respect to the established risk appetite and thresholds;
- definition and activation of differentiated assessment and escalation procedures based on the type of threshold being exceeded;
- preparation of periodic reporting for the Corporate Bodies of the Parent Company and Group companies, providing a quarterly summary of the development of the actual risk profile in relation to defined thresholds.

With reference to ESG issues within the RAF, the presence of specific indicators progressively introduced in the governance policies of individual risks is confirmed; in addition, the presence of an indicator relating to the downgrading of the ESG rating is highlighted in the Risk Appetite Statement.

### Risk Governance Policies and Processes

The Group further strengthened its processes for governing the risks impacted by ESG risk factors in 2024, in line with the 2024 Consolidated Sustainability Statement.

With particular reference to credit risk, the three indicators to assess the incidence of exposures to companies with high transition risk, to companies with high physical risk, and the share of mortgages with real estate as collateral with high physical risk have been confirmed during monitoring.

To strengthen the monitoring framework, in 2025 a new monitoring indicator has been introduced, with the aim of assessing the incidence of the exposure of counterparties with “Very High” NRR risk as against all the counterparties in scope (businesses). These indicators are third level metrics of the Risk Appetite Framework.

The ESG factors are also integrated into the second level credit control analysis methods both in terms of analyses regarding the Single File Review and the Collateral File Review. The results of the analyses carried out are included in the regular reporting on control activities of management reporting.

The climate components are also considered within the scope of the IFRS 9 models.

In the market risk area, the ESG risk factor management system of the proprietary portfolio was strengthened through a primary set of indicators that can help manage the above-mentioned portfolio on which specific operational limits were set. Specific ESG rating operational limits are also included in the “Policy for the governance of market risk”.

With regard to operational risk, specific key risk indicators relating to climate and environmental risk factors have been defined, including forward-looking indicators that will supplement the already existing indicator of monitoring the number of ESG events reported in the period, collected in the Loss Data Collection process. Certain critical situations were also investigated - not present to date - in relation to the NRR (nature related risk) scores.

For reputational risk, the “Reputational scenario catalogue” was updated and additional monitoring indicators connected to ESG risk factors were identified.

As regards strategic risk, the methodological framework underlying the annual assessment of this risk was supplemented with qualitative questions also aimed at verifying the implementation of the strategy for the C&E components over the various time horizons, in line with the ECB’s “Guide on climate-related and environmental risks - November 2020” and the Guidelines on the management of ESG risks.

It should be noted that the BPER Banca Group, over the course of the coming years, will continue to assess additional areas where actions can be undertaken to develop the risk governance framework further, with a view to pinpointing with greater accuracy the specific aspects connected to this kind of risk as well as any regulatory developments.

All ESG risk factors have been addressed consistently with the relevant corporate risk management framework through the processes of:

- identification of ESG risk factors and assessment of their materiality;
- measurement, assessment and mitigation;
- monitoring and reporting.

### Identification of ESG risk factors and assessment of their materiality

The BPER Banca Group, in line with the prudential supervisory regulations, carries out an accurate identification process of the risks to which it is or could be exposed on an at least annual basis, taking into account its operations and reference markets. This process results in the periodic updating of the “Group Risk Map”, which illustrates the relative position of the individual Group companies with respect to Pillar I and Pillar II risks, both current and prospective.

In this context, the process of updating the long list of all the potential risks affected, starts out by identifying and analysing the systemic and idiosyncratic risk factors based on the reference context, including the indications provided by the Regulator in the context of the “SSM Supervisory Priorities”; these risks are compared with the BPER Banca Group situation to establish which ones are actually applicable and thus define the Risk Taxonomy.

The risks included in the Risk Taxonomy are then subjected to a materiality analysis which can take into account regulatory obligations, the intrinsic nature of the risk within the business model or the likelihood of exceeding qualitative and quantitative materiality thresholds.

The risks that are deemed material identify the Inventory Risk (the Group’s material risks).

In this context, refinements continued on how to identify and assess the materiality of ESG factors in the overall risk identification process, which is now a specific analysis focused on identifying which risk factors, through defined transmission channels, can be deemed to have a material impact on the main business risks. Materiality implies the definition and implementation of specific management and control measures for these factors, consistent with the Group’s Risk Appetite Framework.

The methodology for analysing the materiality of each ESG factor considered:

- the short (<3 years), medium (5/6 years - 2030) and long-term (>10 years - 2050) time horizons for risk-related factors with an impact on capital and the short (<12 months) and medium/long (>12 months) time horizons for liquidity-related factors;
- the bank’s main business lines;

The materiality analysis carried out based on qualitative/quantitative elements considered the risk factors “physical climate”, “transition climate”, “environmental” (NRR - nature related risk) and, where possible, also the “social” and “governance” components.

The analysis considered the effects on the following risks: Credit, Market, Operational, Reputational, Strategic, Liquidity. A summary of the main risk categories to which the Group is exposed that are impacted by ESG risk factors is provided below.

### Main risk categories to which the Group is exposed that are impacted by ESG risk factors:

Macro categories	Definition
<b>Credit risk</b>	The possibility that an unexpected change in the creditworthiness of a counterparty, to which an exposure exists, will generate a corresponding unexpected change in the value of the credit position
<b>Market risk</b>	Risk of losses caused by unfavourable developments in market elements
<b>Operational risk</b>	Risk of losses due to inadequate or dysfunctional procedures, human resources or internal systems, or to exogenous events, including the legal risk
<b>Reputational risk</b>	Current or prospective risk of a decline in earnings or capital arising from a negative perception of the Group’s image on the part of customers, employees, counterparties, bank shareholders, investors or Supervisory Authorities
<b>Liquidity risk</b>	Risk of default on payment commitments (expected and unexpected)
<b>Strategic risk</b>	Risk that changes in the competitive environment and economic conditions of the company’s business or choices of competitive/strategic positioning in the market will not produce the expected results

A summary of the results of the materiality assessments is provided below, highlighting the risks where the impact of ESG risk factors is deemed material over the different time horizons and the openness by business line.

Main-Risk	ESG Factors	Materiality by time horizon		
		BT (3y) 2027	MT (5/6Y) 2030	LT (>10Y) 2050
<b>Credit</b>	Climate – Physical	X	X	✓
	Climate – Transition	✓	✓	X
	Environmental	X	X	X
<b>Market</b>	Climate – Physical	X	X	X
	Climate – Transition	X	X	X
	Environmental	X	X	X
	Social	X	X	X
	Governance	X	X	X
<b>Operational</b>	Climate – Physical	X	X	✓
	Climate – Transition	X	X	✓
	Environmental	X	X	X
<b>Reputational</b>	Climate – Physical	X	X	X
	Climate – Transition	X	X	X
	Environmental	X	X	X
	Social	✓	✓	✓
	Governance	✓	✓	✓
<b>Strategic &amp; Business</b>	Climate – Physical	X	X	✓
	Climate – Transition	X	✓	✓
	Environmental	X	X	X
		<b>BT &lt; 12 m</b>	<b>MT &gt; 12 m</b>	<b>LT &gt; 12 m</b>
<b>Liquidity</b>	Climate – Physical	X	X	X
	Climate – Transition	X	✓	✓
	Environmental	X	✓	✓

### Measurement, assessment and mitigation

The measurement and/or assessment of risks and the definition of interventions to mitigate them is the next stage of analysis for those risks (and risk factors) found material. These activities are conducted with through quantitative analyses through, for example, the definition and monitoring of specific indicators, and through qualitative evaluation techniques.

This evidence is also considered in the capital adequacy and liquidity processes (ICAAP and ILAAP).

By using risk forecasting and stress testing quantitative techniques the Group can also assess its own vulnerability to extreme yet plausible events and the potential negative effects of significant changes in one or more risk factors, taken individually or of joint movements of a set of risk factors under the assumption of adverse scenarios.

The integration of ESG risk factors into the Risk Management framework carried out in 2024 allowed the development of metrics to measure these factors, continuing with the identification of specific Key Risk Indicators as well as the preparation of dedicated qualitative analyses.

### Monitoring and reporting

The monitoring and reporting phases constitute the framework that supports the management of key governance processes, consistent with the Risk Appetite Framework and the business model underlying the Business Plan.

The Group periodically monitors the RAF metrics, in order to control on a timely basis any breaches of the tolerance thresholds and/or risk limit set in the individual risk governance Policies and, if appropriate, direct the necessary communications to the Corporate Bodies and subsequent remedies. These metrics are selected in line with the choices made within the ICAAP, ILAAP and Recovery Plan and share consistent calibration methodologies and escalation processes.

The Group continued to gradually implement the Supervisory requirements within its quarterly risk reporting in 2024, also with regard to ESG risk factors.

With regard to credit risk, the results of the analyses relating to climate and environmental risk factors are presented in order to depict the level of exposure of the corporate and mortgage loan portfolio to physical and transition risk factors assessed as high. Furthermore, with specific reference to mortgage loans, information is provided about exposure to seismic risk and the energy efficiency class of the property pledged as collateral.

Since 2024, the section on climate and environmental risks mentioned above has been supplemented with:

- the distribution and evolution of exposures subject to nature-related risks for the corporate portfolio;
- the distribution by business line of physical, transition and nature and biodiversity (NRR) risk factors for the corporate portfolio and the mortgage portfolio.

Since the monitoring of the first quarter 2025, the section was also implemented with the results of the monitoring of the NRR indicator aimed at assessing the incidence of the exposure of the counterparties with “Very High” NRR risk as against all the companies in scope (businesses).

The representation of the exposure to climate risks in the short, medium and long term with reference to the NFC (Non-Financial Corporation) and Real Estate perimeter will also be gradually incorporated. This analysis will be updated annually.

For market risk, there is a specific section on forward-looking analyses of climate factors relating to the corporate and sovereign sector (due to the nature of the risk, the opening by business line is limited to Finance).

For operational risk, there is a specific section on the evidence of operational loss data related to the occurrence of ESG factors, as well as the results of monitoring the indicators foreseen in the Policy for governing this risk.

For reputational risk, where present, evidence is given of the occurrence of reputational risk events related to ESG factors.

This approach guarantees organic monitoring of the company’s evolution, enabling the Group to proactively manage any critical situations that may entail possible remedial actions.

In 2024, with a view to adequately identify and manage ESG risks, the BPER Banca Group has extended the monitoring parameter by integrating risks resulting from climate change, meaning risks that refer to the Group’s potential exposure to counterparties that may contribute or be influenced by climate change, with environmental risks not linked to climate, such as those resulting from impacts on biodiversity, on the deterioration of natural capital and of the ecosystems, i.e. the Nature-Related Risks (NRR).

After the first mapping in 2023, in the context of the 2024 Risk Materiality Assessment, the Bank carried out an extensive analysis of the natural risk on over Euro 80 billion in financial exposure towards companies (involving over 210,000 companies).

In accordance with the materiality assessment carried out as above, the impacts of NRR risks were assessed on the credit portfolio as at 30 June 2024 considering both the on-balance sheet and the off-balance sheet exposures.

Safeguarding biodiversity and land and sea ecosystems, as well as the growing attention paid to the circular economy and the protection of natural resources, are issues of increasing relevance, to protect well-being and health, but also for the prosperity of economy systems, often heavily dependent on natural resources and ecosystemic services.

The measurement and monitoring of environmental risks other than Climate Change, such as those linked to biodiversity, the impoverishing of natural factors and pollution, therefore take on increasing relevance for the market and legislation, even where the financial sector is concerned.

The ECB believes that credit institutions should frame climate and environmental risks in the folds of an overall and far-sighted strategic approach that might help to understand how climate change and environmental degradation give rise to structural changes that influence economic activities with repercussions on the financial system. The Bank, among other things, within its own “Climate and nature plan for 2024-2025”, emphasised that it will delve deeper into the impact that risks linked to nature may have on the economy, to get a better understanding of the possible implications for the monetary policy and the financial system<sup>23</sup>.

In light of these elements, during 2023, the BPER Banca Group began an initial pilot analysis aimed at:

- mapping the share of its exposures towards counterparties operating in sectors which, based on the main international reference frameworks (Taskforce on Nature-related Financial Disclosures - TNFD), it is believed may generate relevant dependencies and impacts linked to nature;
- understanding the current impact and risks linked to environmental issues, other than Climate Change, and thus useful to support the Group in outlining its own strategic approach to the management of these issues.

The analysis also concerned various aspects, i.e. the impacts directly generated by the Group and those connected to the business, in terms of products/services offered and the exposure of the loan and disinvestment portfolio, in order to produce an “as-is” mapping that could be used to activate discussions with the various business functions and owner controls, with whom both individual and plenary discussion groups have been organised.

With reference to possible direct impacts on natural issues, the assessment highlighted a number of best practices introduced by the BPER Banca Group which emphasise the commitment to protecting the environment and natural resources, as indicated in the ESG Policy.

<sup>23</sup> ECB, “Climate and nature plan for 2024-2025”:

[https://www.ecb.europa.eu/ecb/climate/our-climate-and-nature-plan/shared/pdf/ecb.climate\\_nature\\_plan\\_2024-2025.el.pdf](https://www.ecb.europa.eu/ecb/climate/our-climate-and-nature-plan/shared/pdf/ecb.climate_nature_plan_2024-2025.el.pdf)

Some examples are provided below.

With the Green Procurement project included in the 2022-2024 Business Plan, concerning the incorporation of ESG criteria in the procurement and supplier management processes, the BPER Banca Group aims to carefully select its purchases according to Italian and European Minimum Environmental Criteria.

The BPER Banca Group is also engaged in acquiring the certifications that testify to the environmental sustainability of its main real estate.

LEED certification will specifically be pursued for the Ancona offices in Via Stamira completed in December 2024, which attests the level of a building's sustainability with reference to its entire life cycle.

Similar activities have been started for the buildings for office and museum use located in Naples in Via Petronio, Rome in Via Bissolati and Ferrara in Corso Giovecca, for which extraordinary maintenance works are underway that will last throughout 2025 and are therefore expected to be certified in 2026. Lastly, a three-year redevelopment project is underway for the Modena Headquarters; when completed (estimated 2027), it will obtain LEED certification.

Moreover, with the aim of improving its environmental/energy performance, in 2024 BPER Banca initiated and concluded a process that led to the attainment of two certifications meeting the UNI EN ISO 14001:2015 (Environmental Management System) and UNI EN ISO 50001:2018 (Energy Management System) standards on an initial significant sample of 20 properties.

With reference to the business, there was a constant growth in the value of products and services with environmental purposes in both retail banking and commercial and corporate banking. Within the specific context of the analyses performed, particular significance can be attributed to the Group's loans in support of the circular economy and the protection of natural resources, as well as the gradual increase of offers of funds that promote environmental characteristics (e.g. funds that invest in companies aligned with the principles of the circular economy), as is the case of the Arca Blue Leader Fund which engages in sustainable investments pursuant to Article 9 of Regulation (EU) 2019/2088, that focus on the sustainable use and protection of water and marine resources.

The most significant engagement has concerned the loan and investment portfolio on which a series of in-depth assessments have been performed.

### Assessment of environmental relevance: results

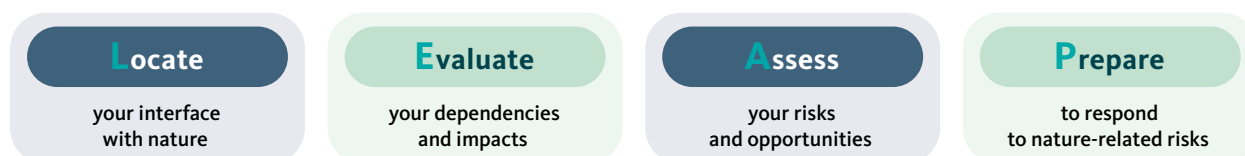
As part of its commitment to constantly improve the identification and management of ESG risks, the BPER Banca Group has extended the monitoring perimeter of these risks by integrating risks resulting from climate change with non climate-related risks, as those resulting from impacts on biodiversity, on the deterioration of natural capital and of ecosystems.

The risk assessment approach was further expanded in 2024 in the context of the Materiality Assessment. During this analysis, nature related risks were included in a study on a broad range of counterparties.

The methodology is centred around the Bank's non-financial customer companies and takes into account the main risk drivers linked to environmental factors, in terms of:

- impacts on nature: changes to nature caused by commercial or industrial activities that may have potential impacts on social and/or economic functions (positive or negative, direct, indirect or cumulative);
- dependencies on nature: aspects of ecosystemic services on which an organisation, or other actors, depend on to operate (for example, the availability of water and other natural resources etc.).

The methodology adopted by the Group follows practices and guidelines provided by the Taskforce on Nature-related Financial Disclosures (TNFD) and, in the case in point, is based on the "LEAP" process (Locate, Evaluate, Assess, Prepare) indicated by the association, which in particular assesses the vulnerability of the loan portfolio to environmental risks.



### Locate

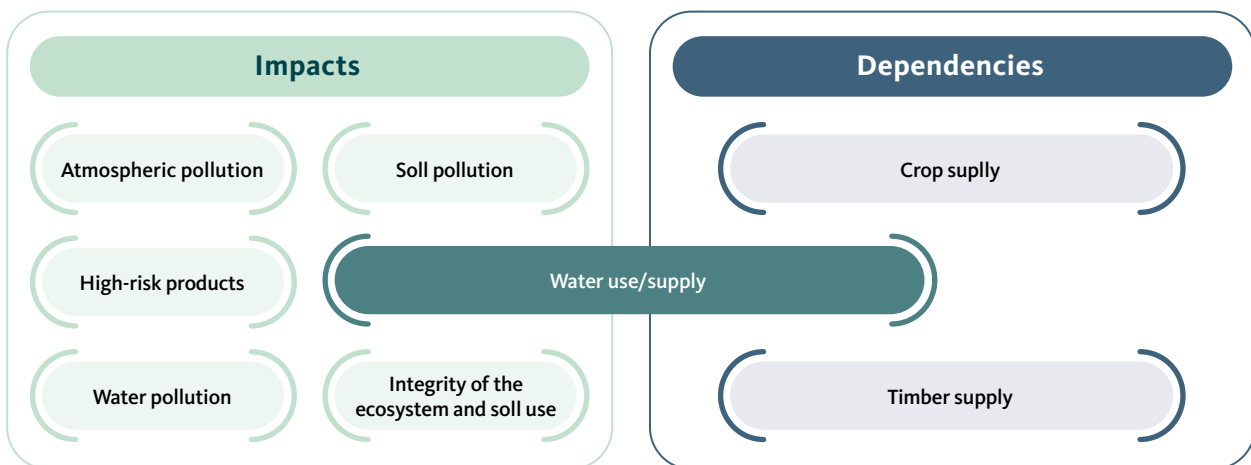
During the localisation phase, the central offices and the local production units of customer companies are located, in order to analyse the interactions between the industries and the surrounding nature (direct operations). The company's operational sites are located in space on maps that show the vulnerability of ecosystemic services and the impacts on biodiversity of the various geographic areas.

### Evaluate

For each counterparty within the sample, specific impact/dependency scores for the sector are applied using the materiality at sector level (top-down approach). The most relevant impacts and dependencies (for direct operations) are assessed by applying a bottom-up approach which takes into consideration the state of the natural resources particular to that position as well as the materiality of the specific dependence or impact for the sector. Additionally, possible dependencies and impacts resulting from the value chain are assessed using input-output matrices that take into account environmental issues. Various sectoral and territorial scores are estimated and normalised for each company in order to allow comparisons between sectors and geographical areas.

More specifically:

- impacts: 6 indicators are considered (at both a sectoral and territorial level);
- dependencies: 3 indicators are considered (supply services and direct physical inputs).



A variety of strategies have been adopted to create individual indicators, and especially:

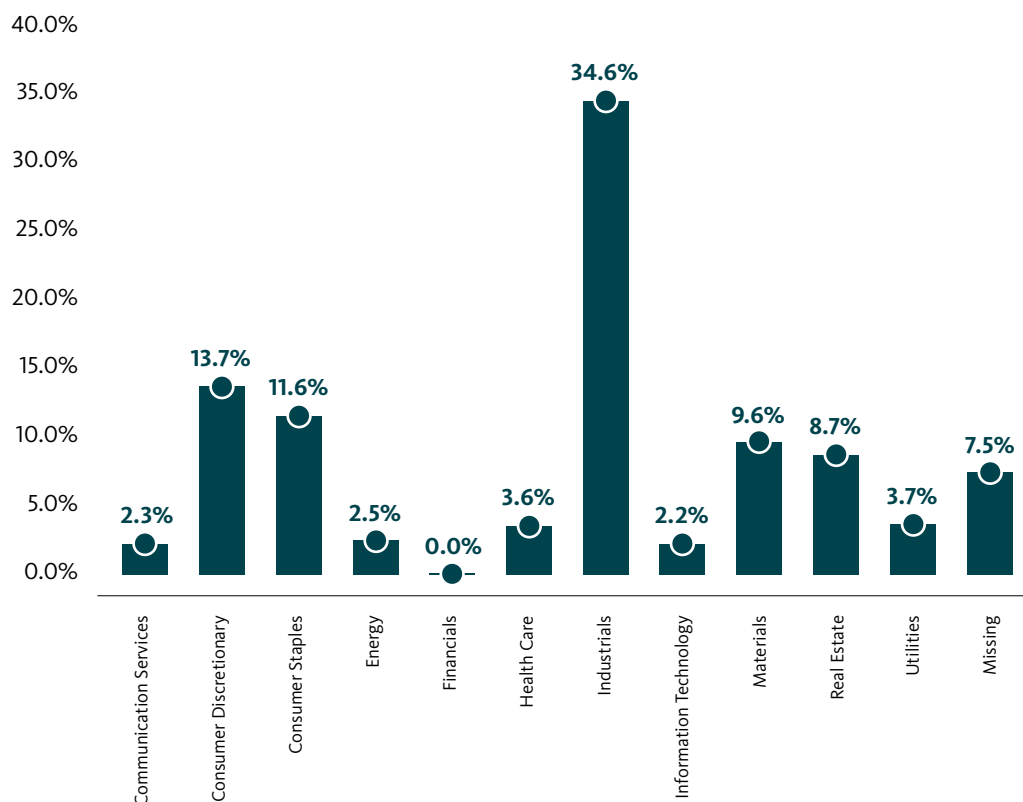
- Sectoral materiality: sectoral scores for impact and dependency on nature are estimated using input-output matrices. The data provide a differentiated overview for the country and enable the effects on the “value chain” to be estimated for each country and for each sector for each of the indicators analysed;
- Territorial materiality: for each nature-linked risk, a map has been identified that represents the state of the ecosystem or of the natural resource being analysed. These maps have been used to establish the special risk levels associated with each impact/dependency indicator. The maps are used by considering the indicator as connected to the sectoral nature and relevance of the impact dependency (in other words whenever the sectoral score is considered “not relevant”, the associated map is not activated).

## Assess

The assessment of the exposure of the loan portfolio to environmental risk is then quantified by combining the sectoral and territorial vulnerability scores.

The total volume of financial exposure covered by the analysis is around Euro 80 billion, distributed mainly among industrials (35%), consumers (25%), materials (10%) and real estate (9%).

## EXPOSURE DISTRIBUTION



In terms of aggregate portfolio, 6.6% (Euro 5.1 billion) of the total financial exposure is material to environmental risks: i.e. falling under the very high risk category. The remaining portion of the portfolio (Euro 71.5 billion) falls under the “Very Low”, “Low”, “Medium” or “High” risk categories, and is therefore not material.

Scores	Exposure (€)	Distribution (%)
<b>Not material</b>	71,551,166,475	93.4%
<b>Material</b>	5,084,652,105	6.6%
<b>Total</b>	<b>76,635,818,580</b>	<b>100.0%</b>

To obtain an overview of the level of dependency or impact of the GICS sectors and of the single nature-linked indicators, the heatmap at the bottom shows the score, calculated as a weighted average of the sectoral and territorial scores for each GICS sector.

The green colour indicates a low or very low score, blue indicates an intermediate score, while red indicates a high score.

The results show that the Energy, Consumer Staples and Materials sectors, for some indicators, carry high risk scores. The GICS sectors are made up of a number of industrial sub-sectors in which the level of intensity may vary quite considerably. The highest values of the risk indicators are linked to Air Pollution, High Risk Commodity and Water Stress/Provisioning.

14. ESG risk

The score shown is a weighted average of the risk indicators (both territorial and sectoral) based on the relative exposure of each aggregated sector.

	Communication Services	Consumer Discretionary	Consumer Staples	Energy	Financials	Health Care	Industrials	Information Technology	Materials	Real Estate	Utilities
Air Pollution	2	3	3	4	3	3	2	2	3	2	3
Soil Pollution	1	1	2	1	1	1	1	1	1	1	1
High Risk Commodity	1	1	1	4	1	1	1	1	2	1	2
Water Pollution	1	1	2	1	1	1	1	1	1	1	1
Water Stress	3	3	4	4	2	3	3	3	4	2	3
Water Provisioning	3	3	4	4	2	3	3	3	4	2	3
Crop Provisioning	1	2	3	1	1	2	1	1	1	1	1
Timber Provisioning	1	1	2	2	1	1	1	1	1	1	1

1 - Very low

2 - Low

3 - Medium

4 - High

5 - Very high

The table below indicates the percentage distribution of the financial exposure relating to nature-related risks in the various sectors. Yet again, those most affected are the Energy and Consumer Staples followed by the Materials and Utilities sector. On the other hand, Communication Services, Financials, Information Technology and Real Estate are not material.

GICS Sector	Not material	Material
Communication Services	100.0%	0.0%
Consumer Discretionary	96.4%	3.6%
Consumer Staples	73.5%	26.5%
Energy	35.6%	64.4%
Financials	100.0%	0.0%
Health Care	95.3%	4.7%
Industrials	99.5%	0.5%
Information Technology	100.0%	0.0%
Materials	91.4%	8.6%
Real Estate	100.0%	0.0%
Utilities	92.1%	7.9%

## Risk management

### o) Results and outcome of risk assessment using implemented tools and estimated impact of environmental risks on the capital and liquidity risk profile.

The phase of management and mitigation of C&E risks is prior to the Group capital and liquidity adequacy assessment, from a current and forward-looking perspective. In particular, said assessments also take account of C&E risk factors and are included in the ICAAP and ILAAP processes. Both processes are fundamental parts of the risk management framework, which originate from the identification, measurement and management of risks and the associated reporting, and are heavily integrated in the corporate governance processes related to strategic planning and the Risk Appetite Framework, as well as in the overall internal control system, also taking into account the evolution of the internal and external conditions in which the Group operates.

In particular, the methodologies used ensure consistency between the various risk governance processes; said activities presuppose adequate corporate governance mechanisms, an organisational structure with well-defined lines of responsibility, and effective internal control systems.

The results of the impact assessments carried out to date as part of the Materiality Assessment showed that the BPER Banca Group, from an asset perspective, is not exposed to a material extent to physical climate risks in the short and medium term, while over the long term, the exposure to said risk factor could worsen for credit and operational risks. As regards transition risk, materiality was found on the credit risk only in the short term, and mainly on operational and strategic risks in the long term. However, no materiality was found with regard to environmental factors (NRR).

On the other hand, the impact assessments showed materiality for transition and environmental climate risk factors in the medium and long term.

Main-Risk	ESG Factors	Materiality by time horizon		
		BT (3y) 2027	MT (5/6Y) 2030	LT (>10Y) 2050
Credit	Climate – Physical	X	X	✓
	Climate – Transition	✓	✓	X
	Environmental	X	X	X
Market	Climate – Physical	X	X	X
	Climate – Transition	X	X	X
	Environmental	X	X	X
	Social	X	X	X
	Governance	X	X	X
Operational	Climate – Physical	X	X	✓
	Climate – Transition	X	X	✓
	Environmental	X	X	X
Reputational	Climate – Physical	X	X	X
	Climate – Transition	X	X	X
	Environmental	X	X	X
	Social	✓	✓	✓
	Governance	✓	✓	✓
Strategic & Business	Climate – Physical	X	X	✓
	Climate – Transition	X	✓	✓
	Environmental	X	X	X
		BT < 12 m	MT > 12 m	LT > 12 m
Liquidity	Climate – Physical	X	X	X
	Climate – Transition	X	✓	✓
	Environmental	X	✓	✓

In line with the activities provided for under the Net Zero Banking Alliance, the Group will continuously monitor those risks that will extend progressively to all the sectors included in the Alliance in order to reduce the potential risk.

### ICAAP

In line with the 2024 ICAAP, 2025 ICAAP was also characterised by specific risk forecasting and climate and environmental stress testing analyses whose scope includes risk categories for which climate and environmental factors were deemed relevant as part of the Group Risk Map.

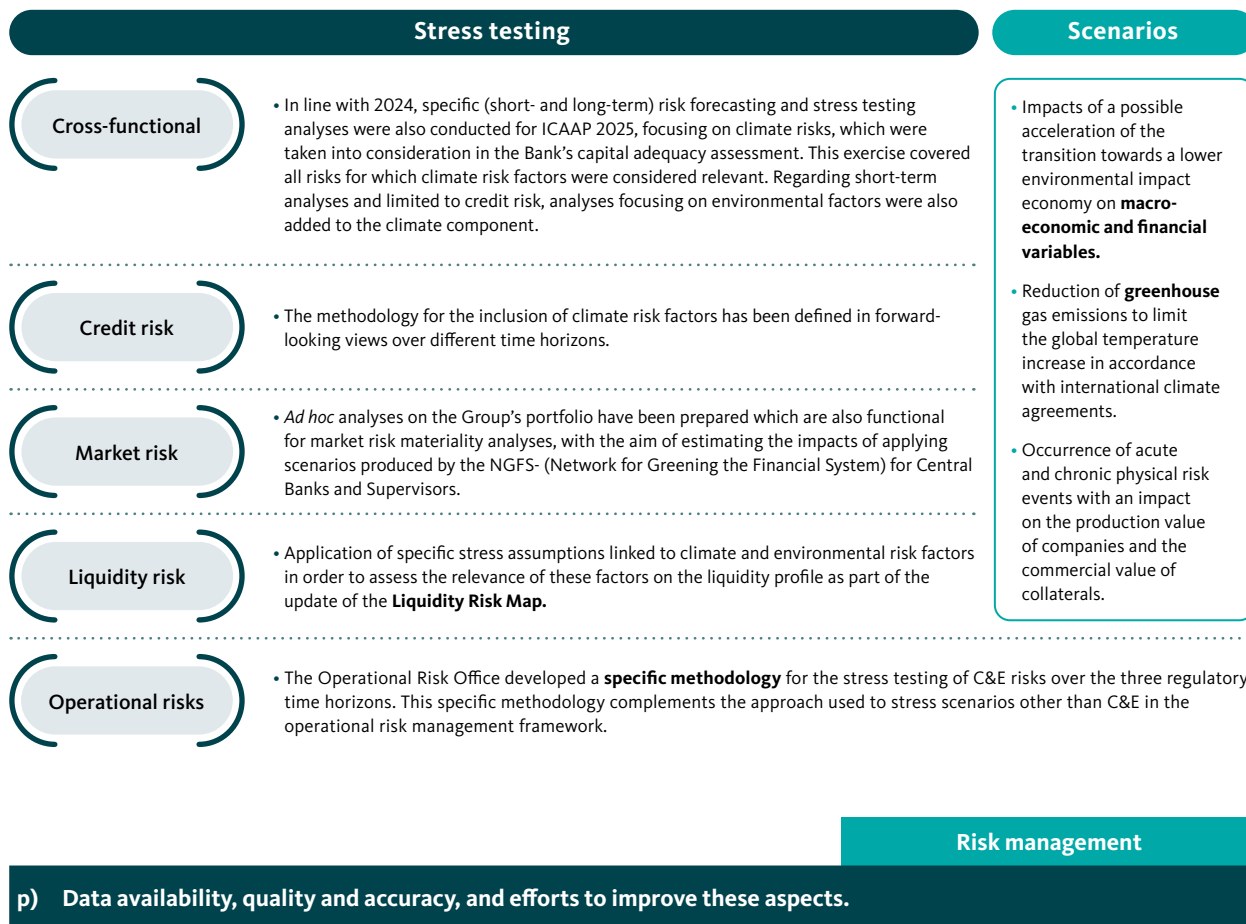
## Risk forecasting and stress testing

The objective of the Group's Internal Risk Forecasting and Stress Testing Programme is to map the characteristics of the risk forecasting and stress testing exercises carried out internally and used within the main risk governance processes, verifying the relative degree of effectiveness through a specific self-assessment process and identifying possible areas for improvement.

Where climate risk is concerned, the update of the Programme in 2024, in addition to monitoring the progress of the integration of these factors within the simulation activities performed by management as part of its Risk Management processes, it has also incorporated and mapped all the developments completed during the course of 2024.

An overview of the integration of ESG risk factors within the internal risk forecasting and stress testing framework, in line with the Group's Risk Map and the Risk Appetite Framework is provided below.

Overview of the integration of ESG risk factors within the internal risk forecasting and stress testing framework:



In 2022, the BPER Banca Group kicked off its first data project to support the company's path towards implementing ESG-related issues. The project was mainly organised along four lines:

- supporting the preparation of the Consolidated Sustainability Statement in terms of assessing the eligibility of assets, quantifying the carbon footprint of the loan portfolio and scenario analysis;
- defining Bank-wide nomenclature consistent with the European taxonomy for the classification of counterparties, assets and project purposes;
- assessing the data for the identification and provision of information necessary to meet regulatory (EBA/ECB) and non-regulatory requirements;
- designing and initialising the ESG database for use by all the Bank's structures.

Activities focused on gradually enriching the data of the BPER Data Platform and their use by the various functions of the bank continued in 2023. It should be noted that especially during the course of 2023 an OCR (Optical Character Recognition) was developed to reach the Energy Performance Certificates (EPCs) which enables the automatic detection of data related to energy performance contained in the certificate analysed by the Group's IT systems.

Please refer to the paragraph "Assessment and revaluation of real estate collateral" of the Consolidated Sustainability Statement for further information.

BPER Banca is constantly engaged in analysing and verifying possible information gaps in order to set in motion appropriate remediation actions, and in 2024 the further project “ESG Data Model” was initiated, with the objective of fine tuning the data improvement process even further.

In 2024, BPER Banca defined objectives and set-ups for the aforementioned project, i.e. the census and modelling of ESG data in use or required for regulatory and management purposes, as well as the definition of a data governance and management process (for further information please refer to the section “Transition plan for climate change mitigation (E1-1)), completing its preparation by the end of the year. In the first half of 2025, it defined the set up for the related implementation project, i.e. data model, related architecture and dedicated ESG dashboard, which will be implemented starting from the second half of the year. More specifically, the actions planned as part of the new “B:Dynamic|Full Value 2027” Business Plan are aimed at the efficiency and effectiveness of the credit processes responsible for assessing counterparties and transactions from an ESG perspective, with the goal of contributing to the creation of value also through the reduction of internal and external costs.

The most relevant actions include:

- the integration, consistent with the materiality analyses conducted by the Group, of additional ESG risk elements in the definition of credit strategies;
- the ESG evolution of credit applications, also consistent with the overall process efficiency objectives set out in the Business Plan as well as with the relevant Supervisory Guidelines;
- the adjustment, on an annual basis, of the “ESG-linked Loan Origination Policy”.

For the functions involved in the processes of credit origination and resolution, specific ESG training courses have also been set up, which will involve more than 1,000 colleagues working in the BPER Banca Group’s corporate centres and credit functions over the two-year period 2024-2025.

Please refer to the paragraph “BPER Data Platform” of the Consolidated Sustainability Statement for further information.

## Risk management

### q) Description of limits to environmental risks (as drivers of prudential risks) that are set, which, if exceeded, lead to further investigation and exclusion.

To ensure that the corporate activity is driven by criteria of sound and prudent management, the BPER Banca Group identifies the Risk Appetite Framework (RAF) to monitor the risk profile that the Group intends to assume in the implementation of its business strategies. The RAF is a coordinated set of methodologies, processes, policies, controls and systems that make it possible to establish, communicate and monitor the Group’s risk appetite.

RAF metrics are continuously monitored both at a consolidated level and at the level of individual risk-taking units to promptly manage any breaches of the defined actual risk profile thresholds. If necessary, escalation mechanisms are activated to assess appropriate corrective actions.

With reference to ESG risk factors in particular, the activity carried out by the BPER Banca Group in 2024 and in 2025 allowed the development of metrics to measure these factors, with the identification of specific KRIs and the preparation of dedicated qualitative analyses.

More specifically, with particular reference to **credit risk**, in 2025 the Group has updated its Risk Governance Policy, strengthening and increasing the range of the Key Risk Indicators (KRI): in addition to the three indicators to assess the share of exposures to companies with high transition risk, to companies with high physical risk, and the share of mortgages with real estate as collateral with high physical risk, a new indicator has been introduced to assess the share of exposure to counterparties with “Very High” NRR risk compared to all the counterparties in scope (businesses).

These indicators are third level metrics of the Risk Appetite Framework.

At the same time, the second-level credit control structure consolidated climate factors into its control model: the framework was implemented in both the Single File Review and Collateral File Review analysis methodologies. The results of the analyses carried out are included in the regular reporting on control activities of management reporting. Confirmation was given to the risk indicators used to assess the incidence of exposures to companies with high transition risk and high physical risk and the portion of mortgage loans guaranteed by real estate with high physical risk.

Within the context of **operational risk**, integration continues in the overall risk management framework in order to monitor C&E, social and governance risk factors. To this end, a set of key risk indicators relating to climate and environmental risk factors was defined, including forward-looking indicators that will supplement the already existing indicator of monitoring the number of ESG events reported in the period, collected in the Loss Data Collection process.

The NRR (Nature Related Risk) scores of critical suppliers were also considered in order to investigate possible problems issues, which do not seem to be present at the moment.

As far as **reputational risk** is concerned, strengthening of the overall risk management framework continued in order to oversee C&E, social and governance risk factors in relation to the direct or indirect exposure of the Group or its counterparties. This activity essentially entails the updating of the “Reputational scenario catalogue” and the identification of additional monitoring indicators connected to ESG risk factors.

The BPER Banca Group also drew up an “ESG-linked Loan Origination Policy” which explains the principles adopted by the Group when assessing the creditworthiness of customers in accordance with the general controls adopted by the BPER Banca Group to monitor credit risk and therefore also the risks related to the ESG factors. Therefore, said document includes, inter alia, the general exclusion criteria in terms of eligibility for financing at counterparty and/or project level, consistent with the “ESG Policy”, the criteria for identifying “sensitive” sectors in terms of ESG, and the strategies to support the transition process and the increasing alignment of counterparties with the principles of the EU Taxonomy.

Please refer to Table 1 “Qualitative information on environmental risk”, letter m, for more details on the transactions on which specific due diligence is required, i.e. exclusion from eligibility for financing.

## Risk management

### r) Description of the links (transmission channels) between environmental risks and credit risk, liquidity and funding risk, market risk, operational risk and reputational risk in the risk management framework.

The development of the Risk Map described above (Table 1 “Qualitative information on environmental risk”, letter n) and the related findings on the materiality of the risk represented an important reinforcement of the risk identification process for 2024. In that context, fine-tuning continued regarding also the definition of specific transmission channels through which the ESG risk factors can impact the main corporate risks.

The transmission channels identified are reported hereunder:

Risk	Drivers/transmission channels
<b>Credit</b>	<p>National and European policies, which provide incentives and rules to build a low-carbon industrial system, thus characterised by greater energy efficiency in production processes and supply chains, could cause great damage to companies:</p> <ul style="list-style-type: none"> <li>- direct effects such as taxes based on the level of greenhouse gas emissions (payment of a Carbon Tax) or energy input cost shocks;</li> <li>- indirect effects due to consumer behaviour, the competitive environment to which the supply chain is exposed and the effects of the macroeconomic contest on the capital market.</li> </ul> <p>Such policies would also lead companies in high-emission sectors to bear higher investments and consequent financial burdens.</p> <p>The impact on companies’ margins and leverage may therefore lead to a possible worsening of the counterparties’ risk profile in terms of increased probability of default or recovery capabilities (especially for unsecured exposures). The transition could also define a re-composition of sectoral lending with indirect effects on the Group’s risk profile.</p> <hr/> <p>The risk arises from a potential increase in the likelihood of occurrence and severity of extreme weather events (e.g. floods, heat waves, droughts, landslides, fires, etc.), especially in the medium and long term, with a higher magnitude if transitional policies are not undertaken. These phenomena may affect both companies and individuals by generating:</p> <ul style="list-style-type: none"> <li>- in the first case, damage to assets, increased costs and/or interruption of operations, resulting in loss of profit;</li> <li>- in the second case, damage to property resulting in a reduction in the value of collateral or unexpected costs for counterparties.</li> </ul> <p>These phenomena may lead to increases in the probability of default for both types of counterparties and/or reductions in recovery rates on commercial and residential collateral, with a consequent impact on LGD.</p> <hr/> <p>Environmental risks, understood as impacts (changes in nature caused by commercial or industrial activity that may lead to potential impacts on social and economic functions) and dependencies (aspects of ecosystem services that an organisation, or other actors, depend on to operate, e.g. availability of water and other natural resources), which may lead to critical issues (scarcity of production factors) or limitations (e.g. introduction of pollution tax or extension of protected natural areas) in production that generate increased financial risk for certain sectors and/or individual operators financed by the Group. Failure to identify and manage this transmission channel could increase the risk profile of the Group’s credit portfolio.</p>
<b>Market</b>	<p>The macro-economic contexts featuring strong transition policies towards a green economy and the possible consequences of a reputational nature could entail a sudden redefinition of the price of equity, debt and derivative securities, with particular focus on products linked to brown activities and/or sectors with a resulting negative impact on the Group’s banking and trading book portfolio.</p> <hr/> <p>Serious events related to physical risk at national and EU level could lead to changes in market expectations and higher expected volatility.</p> <hr/> <p>In the specific context of the Group, transition policies and adverse weather events could have a negative impact on the securities issued by financial, corporate and government counterparties present in the bank’s portfolio which could lead to an increased equity and credit spread risk.</p>

(continued)

Risk	Drivers/transmission channels
<b>Liquidity</b>	<p>Possible impact on the liquidity and funding profile if, following adverse environmental or climate events or to cover costs resulting from the climate transition, the Group's customers ended up needing liquidity by accessing the credit lines granted.</p> <p>Redefinition of the price of portfolio securities which could reduce the value of the liquid assets and thus negatively influence the Group's cash reserves.</p>
<b>Operational</b>	<p>Possible claims for damages following the sale of financial instruments that do not comply with the declared levels of sustainability and/or are not in line with the characteristics envisaged by the reference regulations (Reg. EU 2020/852, Reg. EU 2019/2088, etc.) or do not comply with the disclosure transparency requirements in terms of the adequacy of the information provided to the customer (known as "Greenwashing").</p> <p>Extreme climate and environmental events capable of causing material damage to buildings, branches, data processing centres could result in potentially negative impacts with possible repercussions on the Group's operations.</p> <p>Potential operational losses deriving from the use of unfair market practices that may harm customers and/or counterparties, and from events that may damage relationships with external stakeholders (i.e. fraud, inappropriate product placement).</p> <p>Possible operational losses related to events attributable to injuries and/or occupational diseases occurred during operating activities due to non-compliance with the relevant regulations in the field of employee benefits.</p> <p>Possible operational losses and loss of earnings resulting from business interruption and replacement costs of suppliers critical to the Bank.</p> <p>Possible operational losses attributable to lawsuits filed by employees for matters concerning remuneration, indemnities and employment relationship.</p> <p>Possible impact of sanctions for non-compliance with legislation on remuneration policies and practices.</p> <p>Possible operational losses due to financial claims related to financing and/or other financial relationships with companies that do not comply with emerging regulations on emissions or environmental standards.</p>
<b>Reputational</b>	<p>Possible repercussions of negative perceptions due to partnerships with companies with low sustainability standards.</p> <p>Reputational damage resulting from a critical weather event that impairs the institution's normal operation.</p> <p>Reputational damage caused by choosing to lend money to companies connected with pollution activities.</p> <p>Possible decisions, statements or commercial relations contrary to supportive climate and environmental policies, or negative company issues and bad governance practices.</p> <p>Negative perception of a rating downgrade due to non-compliance with sustainability standards.</p> <p>Negative perception of possible legal disputes with staff for incidents of discrimination (e.g. gender, ethnicity, religion), possible legal disputes with customers and suppliers, sanctions by the Supervisory Authority.</p>
<b>Strategic/business</b>	<p>In the presence of strong transition policies and the increase in the frequency and intensity of acute and chronic physical events in certain geographical areas, a failure to promptly react and adjust to contextual changes could jeopardize the viability and sustainability of the business model.</p> <p>Environmental risks, understood as impacts (changes in nature caused by commercial or industrial activity that may lead to potential impacts on social and economic functions) and dependencies (aspects of ecosystem services that an organisation, or other actors, depend on to operate, e.g. availability of water and other natural resources), may lead to critical issues (scarcity of production factors) or limitations (e.g. introduction of pollution tax or extension of protected natural areas) in production that generate increased financial risk for certain sectors and/or individual operators financed by the Bank. Failure to identify and manage such a transmission channel could increase the volatility of the Bank's revenues.</p>

**Table 2: Qualitative information on social risk**

The following table shows the information required under Article 449a and Article 435 (1 and 2) of the CRR.

**Business strategy and processes**

**a) Adjustment of the institution's business strategy to integrate social factors and risks, taking into account the impact of social risk on the institution's business environment, business model, strategy and financial planning.**

The BPER Banca Group has structured 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. The sustainability perspective has been fully integrated in the new 2024-2027 Business Plan "B:Dynamic|Full Value 2027".

The new Business Plan, which has been operational since the end of 2024 and entered into full swing as early as the first half of 2025, is based on three main pillars: unlocking the full value of our customers; capturing our latent economies of scale; and leveraging the strength of our Balance Sheet. The effective and smooth execution of these topics is ensured through three main enabling factors, namely:

- technology, security and artificial intelligence;
- ESG and sustainability commitment;
- organisation and people.

With specific reference to the commitment to sustainability issues, in parallel with the modernisation of the Group, the integration of ESG factors into business processes will enable BPER Banca to continue its role as a leader in the sector.

With regard to social issues, the 2024-2027 Business Plan "B:Dynamic|Full Value 2027" has identified concrete actions and objectives to be pursued along various lines, putting the focus on social risk, in particular:

- strong community orientation for community and territorial support and financial inclusion projects;
- attracting and developing talents and enhancing diversity;
- actions to foster ESG skills enhancement through employee engagement and training activities and work-life rebalance;
- supporting "Just Transition" with a specific ESG ceiling which also includes loans with social purposes (BPER Bene Comune activities, loans dedicated to businesses) and an increase in the placement of ESG investments to customers.

The projects with an ESG impact integrated in the Business Plan are monitored quarterly and submitted to the Sustainability Committee.

In the first half of 2025, BPER Banca further consolidated its commitment to promoting a work environment that is inclusive, equal and respectful of diversity and of the value of people as a strategic element for the innovation and sustainable growth of the Group.

An important step in this direction was taken on 12 June 2025, with the Board of Directors of the Parent Company approving the new Group Policy on Diversity, Equity and Inclusion (DEI). This document strengthens the guiding principles and concrete actions to ensure equal opportunities at all organisational levels, with particular attention to gender equality, inclusion of disabled people and support for gender affirmation processes. The document was disseminated to the Group Companies with a dedicated Directive.

The key additions include the establishment of the Disability Manager in the Parent Company, in charge of coordinating the cross-cutting initiatives for inclusion and being the internal and external point of reference for topics concerning disability.

Planned activities have been carried out in line with the objectives outlined in the Business Plan. Initiatives also continue, in association with the 2023-2025 Three-year Operational Plan for the Enhancement of Gender Diversity, which was deemed compliant with the UNI/PDR 125/2022 Reference Practice and in line with Target 5 of the 2030 UN Agenda. This plan aims at defining a structured path to support gender equality.

To bear witness to the concrete commitment to the topic, in 2024 BPER Banca gained two important certifications: the IDEM Gender Equality and the UNI/PDR 125/2022, which favoured the adoption of a Gender Equality Management System with dedicated organisational units. The webinars "*Oltre il rosa – Economia e autonomia secondo Azzurra Rinaldi*" have also continued, as did other cultural initiatives aimed at enhancing the value of female talent.

To oversee the initiatives envisaged in the Gender Plan, a cross-functional control room and governance mechanisms for reporting on results have been set up involving internal Board Committees, the BoD and, as of 2024, the Steering Committee established in line with the requirements of UNI PDR 125/2022.

For the sixth consecutive year, in 2025 BPER Banca was included among the "Top Employers" in Italy, bearing witness to its excellence in the management of human resources and in the promotion of organisational well-being.

The Group continued to play an active role in the Italian landscape by participating in initiatives such as "D&I in Finance" promoted by ABI, where it presented the programme "The Power of Neurodiversity", dedicated to enhancing the value of neurodivergence.

In 2021, BPER Banca signed the Principles for Responsible Banking (PRB) launched in 2019 by UNEP's Financial Initiative with the aim of supporting interventions to foster sustainability in the financial sector.

Adherence to the PRB represents a significant milestone with respect to the Group's broader national and international commitments.

The third PRB Report was published in June 2025, drawn up in accordance with the "Responsible Banking Progress Statement" published by the UNEP FI.

BPER Banca's ESG strategy is consistent with the reference national and international regulatory frameworks, such as the NRRP (National Recovery and Resilience Plan), the Paris Agreement and the Sustainable Development Goals established by the United Nations.

This corporate strategy is in line with the sustainability commitments contained in the BPER Banca Group's "ESG Policy". The BPER Banca Group adopts the sustainable development concept in its broadest meaning, which includes environmental, social and economic considerations in the Group's operating and banking activities.

The BPER Banca Group, as part of its compliance with the above-mentioned Principles for Responsible Banking, has carried out an analysis to identify Italy's priorities and needs, with the support of the UNEP FI Context Tool, in order to identify the country's impact areas, which, together with the portfolio analysis, are the starting point for setting targets.

Moreover, the analysis has taken into account the Italian current challenges and priorities reported in the National Recovery and Resilience Plan (NRRP), that is part of the Next Generation EU (NGEU) programme, defined by the European Union in response to the pandemic crisis. The NRRP identifies the following 6 missions:

- digitalisation, innovation, competitiveness, culture and tourism;
- the green revolution and ecological transition;
- infrastructures for sustainable mobility;
- education and research;
- inclusion and cohesion;
- healthcare.

At the end of the impact analysis process, according to definition of the PRB framework, two significant impact areas have been identified: climate change mitigation and financial inclusion.

The BPER Banca Group has defined targets for both of these areas.

### Climate change mitigation

Please refer to the NZBA targets described in Table 1: Qualitative information on environmental risk.

### Financial inclusion

The BPER Banca Group has been working on this issue for years. As proof of the growing commitment of the Group towards financial inclusion, various products with significant positive social impacts have been available for some time now. In line with the UNEP guideline "Financial Inclusion and Financial Health Target Setting" and in order to structure an appropriate performance evaluation process in relation to financial inclusion, BPER Banca developed the product analysis for target retail customers.

Moreover, an important part of the Group's products with positive social impacts are financial inclusion programmes aimed at those who are not fully integrated into the economic and productive fabric or who have been marginalised from it for various reasons, often including young people and senior citizens. Financial, credit and savings services aimed at economic strengthening (e.g. microcredit, specific loans for disabled customers, etc.) were designed and implemented for these categories.

In this regard, the Bank created BPER Bene Comune in 2023, an organisational unit capable of offering specific skills, relations and services to Public Administration and Third Sector entities. Through its proximity proposals and logic, BPER Bene Comune supports the non-profit and public sector in meeting the primary needs of the territories and the community. To this end, BPER Bene Comune defined its service offering and structure in 2024, while consolidating important relationships with entities working for the development of a more inclusive economy. The commitment to the financial inclusion of citizens and their customers as a fundamental contribution of banks to the development of the country also seems to be confirmed by authoritative studies.

Also with reference to the content of the NRRP, financial inclusion can be considered an essential component for the achievement of several of its objectives: financial empowerment contributes to a more financially aware and inclusive generation, thus supporting the long-term vision for sustainable economic growth and a fairer society.

For the definition of the financial inclusion targets, the Group therefore completed measurement of its performance, taking into consideration the framework of the 2030 UN Agenda in order to determine what target to contribute to most. Upon completion of the analysis, the relevant indicators and targets were selected to guide alignment with the chosen objective.

For further details, please refer to the PRB Report.

The BPER Banca Group attaches strategic importance to social issues, the management of which translates into consistent and concrete commitments both at governance level and in the day-to-day operations of all of the Corporate Functions.

The BPER Banca Group takes ESG criteria into consideration in its credit granting activities, adopting an approach aimed at identifying and assessing potential ESG risks (climate and environmental, reputational, operational, etc.) arising from financing in companies operating in controversial sectors, involved in serious events that have led or may lead to negative impacts on the assessment of counterparties, with particular attention to the impacts on creditworthiness analysis.

In addition, BPER Banca pays attention to ESG factors also in its investment activities and, in 2022, adopted an appropriate Policy in that regard.

In the aforementioned context, BPER Banca also focussed on investments incorporating a “Social” footprint, hence supporting female empowerment and job prospects for young people.

In addition, we must also not forget the careful management of controversial sectors like the defence sector, gambling and buying/selling of gold.

Please refer to paragraph 3.4.3 “Customer Social Inclusion” of the Consolidated Sustainability Statement for further information.

In the Wealth Management segment, the Banks of the BPER Banca Group adopt a structured approach to the integration of sustainability risks into decision-making processes on investments, both for portfolio management services and for financial advisory services. The selection of financial products takes into account the information provided by manufacturers, if available, and is based on the application of exclusion criteria and on the use of an ESG score provided by independent third-party data providers, integrated with internal qualitative analyses. This approach enables the identification and mitigation of environmental, social and governance (ESG) risks that could have adverse impacts on the value of the investments.

The sustainability preferences expressed by the customers are gathered through the MiFID questionnaire, updated in December 2024 with new questions aimed at assessing the interest in environmentally sustainable, sustainable investments and investments who take into consideration adverse effects on sustainability factors (the PAI or Principal Adverse Impacts). This update allows an increased consistency between the proposed investments and the sustainability targets declared by customers.

The Banks of the BPER Banca Group, in their capacity as Participants in the financial markets as they provide portfolio management investment service, take into consideration the main negative effects of investment decisions on sustainability factors.

The “PAI Declaration” was published on 30 June 2025, with reference to the period going from 1 January to 31 December 2024. The comparison with the previous year shows changes mainly attributable to the evolution of managed assets and the transfer of the “Private Banking” business unit from BPER Banca to Banca Cesare Ponti at the beginning of 2024. BPER Banca recorded an improvement of absolute and relative indicators, thanks to the reallocation to instruments with more sustainable ESG profiles. Banca Cesare Ponti shows an increase in indicators, which cannot be compared with the previous year due to an expansion in the scope of application. Banco di Sardegna showed a gradual improvement in most indicators, with a marginal increase associated with the increase in managed assets.

The Group Banks take into consideration every mandatory PAI indicator and two additional indicators set forth by Delegated Regulation (EU) 2022/1288, subject to data availability and quality. Monitoring focuses particularly on the following PAIs, identified as “top priority”:

- PAI 2 - Carbon footprint;
- PAI 3 - GHG intensity (greenhouse gas intensity of investee companies);
- PAI 5 - share of non-renewable energy consumption and production;
- PAI 10 - Violations of the UNGC principles and OECD Guidelines for Multinational Enterprises;
- PAI 15 - GHG intensity (Sovereign issuers and International organisations).

As of 1 January 2025, the Group has decided to replace PAI 5 (Share of consumption and production of non-renewable energies), which concerns environmental issues that are already covered by other priority indicators, with PAI 14 (Exposure to controversial weapons). This update was also carried out in line with national regulations (Law no. 220/2021), with the exclusion policies provided for by the Internal Regulation concerning the PAI consideration process in investment decisions at the entity level.

The Group Banks, as financial advisors pursuant to the SFDR Regulation, also incorporate PAIs in financial advisory services. Training sessions dedicated to branch employees are held on an ongoing basis, in line with MiFID requirements, to ensure an adequate awareness on ESG topics and to support efficient and responsible advisory services.

The “B:Dynamic|Full value 2027” Business Plan confirms the Group’s commitment to sustainability with ambitious objective in the environment, social and governance field. In particular, in Wealth Management, an objective was set to achieve a 45% share of ESG assets on the total managed assets (funds, portfolio management and pension funds) by 2027.

## Business strategy and processes

**b) Objectives, targets and limits to assess and address social risk in short-term, medium-term and long-term, and performance assessment against these objectives, targets and limits, including forward-looking information in the design of business strategy and processes.**

With regard to social issues, the 2024-2027 Business Plan “B:Dynamic|Full Value 2027” has identified concrete actions and objectives to be pursued along various lines, putting the focus on social risk, in particular:

- strong community orientation with the allocation of around Euro 20 million for community and territorial support and financial inclusion projects;
- attracting and developing talent and valuing diversity (e.g. through gender equality projects and targets, including increasing the number of women in senior positions to at least 30%);
- actions to foster ESG skills enhancement through employee engagement and training activities (at least 60% of employees trained on ESG issues per year) and work-life rebalance;
- ~30% of FTEs covered by the up-skilling programme (dedicated to people and enhancing top talent);
- support for the “Just Transition” of companies and families by improving the offer to customers also through the definition of a ceiling of over Euro 7 billion for ESG Corporate and Retail products; the increase in the proposition of ESG investments (45% of ESG AuM).

In addition to the Business Plan targets, in line with the assessment described in letter a) of Table 2, the outcomes of the Smart Targets defined in the 2024 Responsible Banking Progress Statement are reported below. The Group defined specific targets with regard to financial inclusion:

- measurement of the number of retail customers using digital systems over the total of active retail customers: starting from a base of 57% on 31 December 2023, the target set in 2023 was 64% by 31 December 2025.  
At the end of 2024, thanks to the actions aimed at achieving the digital evolution path, it was possible to reach the 64% digitalisation target of private customers, as published in the PRB (Principles for Responsible Banking) Report 2023, ahead of schedule. In consideration of this outcome, the new target, to be achieved by 2027 and reported in the 2024 Responsible Banking Progress Statement, was set at 78%. It should be noted that in the commercial targets set for the network, the over-75 customer segment was purposely not included given the lower digital propensity of these customers. The digitalisation KPI of private customers is calculated in percentage form by including the customers who have a contract that allows them access to digital channels in the numerator and the entire active customer base in the denominator, according to CRM (Customer Relationship Management) rules. The target is monitored on a daily basis by dynamically considering the actual active customer base and the digital contracts actually in place, and is re-evaluated annually to observe the dynamics of digitalisation and any deviations, positive or negative, from the expected pace;
- reaching people through financial education initiatives: the goal established in 2023 of reaching 400 thousand people through financial education initiatives ended in 2024, a year in advance in accordance with the ahead-of-time closure of the previous Business Plan, showing a positive trend as it had reached over 330 thousand people over the three-year period. In this regard, in compliance with the new 2024-2027 Business Plan and, as suggested by the UNEP team, a new financial inclusion target was set and reported in the 2024 Responsible Banking Progress Statement, after recalibration to the customer target: approximately Euro 273 million worth of social-impact loan originations over the 2024-2027 Business Plan period. This amount, to be issued through the BPER Bene Comune Organisational Unit, is divided into three different areas: Third Sector (a total of Euro 216 million), Financial Inclusion (a total of Euro 11.6 million) and Public Administration (a total of Euro 45 million). For the area of Financial Inclusion, the disbursement includes, for example, the following loans: Anti-Usury Foundation Loans, Social Microcredit, University Loans of Honour, and other loans dedicated to the inclusion of students and people with disabilities.

The BPER Banca Group has developed a series of products and services with social objectives. In particular, the BPER Banca Group aims to improve inclusion and accessibility. In order to ensure easier use of the services by people with physical or cognitive disabilities, the Group banks are able to offer visually impaired and blind customers specific tools to carry out financial transactions, bank transfers, mobile phone top-ups and more.

In addition, in order to guarantee social inclusion, in line with the provisions of the Decree Law Sostegni Bis no. 73, the BPER Banca Group has expanded its offer with mortgage lines dedicated to customers under 36 years of age for the purchase of their first home with a Consap guarantee. A communication campaign and a dedicated section on the [www.bper.it](http://www.bper.it) website were used to properly inform customers.

Lastly, to ensure the financial inclusion needs are met for all customers who have difficulties in accessing traditional credit, the BPER Banca Group Banks have stipulated an important agreement with *Ente Nazionale per il Microcredito* (National Microcredit Agency) to provide interested customers with the auxiliary services required by law.

The agreement stipulated guarantees the management and correct delivery of the auxiliary services listed below:

- support in defining the development strategy of the financed project and in analysing solutions to improve the performance of the activity;

- training in business administration techniques, in terms of accounting, financial and personnel management;
- training on the use of the most advanced technologies to increase the business productivity;
- support in defining price and sales strategies, through market studies;
- help to resolve legal, fiscal and administrative issues, and information on the relevant services available on the market;
- support for the identification and diagnosis of any critical aspects of implementation of the financed project.

Through the collaboration with local, national and EU bodies and institutions (e.g. trade associations and confidi - credit guarantee consortia), the Group Banks offer business customers specific solutions in order to facilitate financial inclusion and economic strengthening, thanks to the opportunities provided by the National Recovery and Resilience Plan and the 'Next Generation EU' programme.

The positive social impact products offered by the Bank to businesses include Loans guaranteed by the Central Guarantee Fund for SMEs, female entrepreneurs, Start Ups – Innovative Start Ups, Loans to businesses guaranteed by EIF InvestEU, and Loans with EIB funds. Sabatini Loan, SACE Garanzia Futuro, Loans guaranteed by the EIB, Financing with ESG characteristics in the Real Estate sector, Sustainability Linked loans with economic benefits for end customers.

By contrast, in order to support female empowerment and the job prospects of young people, BPER Banca has chosen to focus on '*Fondo Impresa Femminile*', with the objective of supporting female entrepreneurs and making it easier to implement the related new projects, "Smart&Start", for the implementation of projects concerning technological innovation and increasing the economic value of the results of public and private research of start-ups, and '*Oltre Nuove Imprese a Tasso Zero*', ("Beyond New Zero-rate Enterprises"), to support the creation and development of new enterprises composed predominantly or entirely of young people or women.

The BPER Banca Group also offers a wide range of products and services for minors and young people (up to 12 years old and from 13 to 17 years old) and customer insurance policies, through a specific application integrated into its issuing system, through which it systematically assesses the insurance needs and requirements of its customers with the aim of offering solutions consistent with their profile.

Other products offered by the BPER Banca Group to its customers include social products for disabled people (*'prestito senza barriere'* (loan without barriers)) and loans for young university students including '*Futuro Garantito*' and '*Prestito d'Onore Università Cattolica di Milano*'.

Initiatives for the third sector are also active: as previously mentioned, with *BPER Bene Comune* [BPER for the common good], BPER Banca has renewed its commercial proposal for Third Sector organisations with specific services and products to support their activities and contribute to the progressive sustainable development of the community.

These include:

- a wide range of current accounts dedicated to different types of non-profit organisations with two profiles available, Small and Large, according to the organisation's transactional volume in terms of monthly fee and number of transactions included;
- management of the daily operations of collections and payments through online banking channels;
- forms of subsidised and secured loans;
- important partnerships to meet the need for protection of volunteer work, a key driver of civil society, via dedicated insurance policies;
- solutions for the management of termination indemnities through the supplementary pension fund;
- a specific proposition for volunteers, employees and members of non-profit organisations.
- current accounts for the Third Sector:
  - "Third Sector Current Account" for Third Sector Entities listed in the National Single Register of the Third Sector ("Registro Unico Nazionale del Terzo Settore - RUNTS");
  - "Current account for Religious Institutions", reserved for religious institutions such as parishes, dioceses, CARITAS groups, confraternities, diocesan foundations, associations of different religious faiths, etc.;
  - "Current account for Social enterprises", dedicated to non-profit organisations registered as companies, listed or not listed in the RUNTS Register, such as social cooperatives, social enterprises, mutual aid societies. This current account is also targeted at Benefit corporations and B-corps, in light of their commitment in social impact reporting;
  - "Non-Profit Current Account" for non-profit entities other than companies and not listed in the RUNTS register (various associations, recognised or not, Foundations, NGOs, amateur sports clubs, Pro Loco associations, trade unions, political parties, etc.).

In order to facilitate the application of gender-neutral remuneration policies, as envisaged by the regulations in force on the matter, to be able to assess their effectiveness and to monitor their application in a timely manner, the Group has, since 2022, established a granular pay analysis model (known as Gender Analysis or Equal pay gap) that integrates the provisions of banking

and European supervisory regulations, taking into due consideration the developments of the Pay Transparency Directive and industry best practices. This approach, disclosed annually in the Report on Remuneration Policies, whereby the same role or roles are deemed comparable, makes it possible to identify possible misalignments between organisational positions of equal value, considering market conditions. This, in turn, allows for the most appropriate corrective action needed to ensure full compliance with the remuneration policies adopted.

#### Business strategy and processes

### c) Policies and procedures relating to direct and indirect engagement with new or existing counterparties on their strategies to mitigate and reduce socially harmful activities.

The BPER Banca Group has mapped its stakeholders, periodically monitoring and updating the map, also with a view to defining the most appropriate modes of interaction. The map of stakeholders includes the following categories: customers, employees, financial market, shareholders, suppliers, footprint areas and community, environment and Public Administration.

The Group defines its strategies around the needs and expectations of the various stakeholders; to this end, it implements a structured stakeholder engagement process with the aim of intercepting their needs, understanding their expectations with regard to the Group's operations and anticipating any risks so as to transform them into opportunities. This process is based on a stakeholder analysis and segmentation activity that makes it possible to group multiple and differentiated interests (economic, social, environmental). Therefore, various listening paths have been set up over the years which, thanks to a variety of tools and channels of dialogue with the various stakeholders, have been able to summarise different demands. The information gathered through these listening channels is used to improve management strategies, refine processes and strengthen relations with all stakeholders.

At the same time, the BPER Banca Group analyses the interests and opinions of the main internal and external stakeholders, including through the engagement process aimed at identifying material sustainability matters, as part of the double materiality analysis carried out annually. The engagement of stakeholders such as shareholders, customers and financial market participants takes place in accordance with the priorities resulting from the stakeholder prioritisation exercise carried out periodically. The evidence of the stakeholder engagement activity and the consequent results are presented, in the context of illustrating the results of the double materiality analysis, to the Board of Directors for approval, to the Board of Statutory Auditors for information, and to the Sustainability Committee and Control and Risk Committee for an opinion.

In 2024 the Organisational Unit BPER Bene Comune - dedicated to the Third Sector, Social Economy and Public Administration - implemented the project "Listening: BPER Bene Comune in Dialogue with the Third Sector", with the aim of understanding its needs and identifying the areas in which the BPER Banca Group could qualify its support in terms of direct intervention (e.g. credit, guarantee funds, risk coverage, etc.) and in terms of "indirect" support (e.g. partnerships with the PA and other entities in the territories, consultancy and training, etc.) in order to ensure its development and growth, thereby benefiting people and the community. The steps of the listening plan carried out throughout Italy involved 221 Third Sector actors.

Following up on the findings resulting from the listening path, in 2025 the Bank planned a series of actions and initiatives that can be concrete solutions to the main needs arisen. In particular, the meetings organised with the local Service Centres for Volunteers (CSV) aimed not only at informing the Third Sector subjects involved and other non-profit entities active on the reference area of the outcomes of the national listening activities, but also at carrying out financial training activities.

To favour the evolution of the relationship between Third Sector and Public Administration and to create innovative expertise, BPER Civic Hub was launched, a digital space that addressed topics of cooperative experimentation between social public and private areas.

Further specific proposals for both the Third Sector and Public Administration are currently being prepared.

With regard to its customers, the BPER Banca Group established several policies aimed at developing expertise and promoting sustainable practices. First of these, the Group ESG Policy defines role and responsibilities to manage customers relations and to identify new customer needs from an ESG perspective.

Furthermore, the Group has dedicated a section of its website to discussion with stakeholders from a sustainability perspective. Indeed, there are specific sections and pages for the various categories of key stakeholders of the Bank: employees, customers, shareholders, suppliers, the environment and the community. In this context, it is essential to listen to the needs and expectations of the customers.

Since 2019, the BPER Banca Group has implemented a new customer listening system, which provides for continuous monitoring system of the entire customer base: the metric chosen is the Net Promoter Score (NPS), an indicator that measures the difference between the percentage of "promoters" (customers who would recommend the bank) and the percentage of "detractors".

The main contact channel is e-mail, in order to collect feedback from the greatest number of customers possible with the least effort in terms of costs and time.

The "Voice of Customer" project also seeks to capture customers' reaction soon after certain specific activities have taken place. As of today, the active ones regard the subscription of six products (current accounts, payment cards, insurance policies, mortgages, loans and instalment products) and the interaction with five Bank channels (Branch, ATM, Self-Service cash desk, Smart Web and Online Branch).

Every year, customer satisfaction surveys are also administered to Corporate customers and Private Banking customers. The branded community “La Piazza” has also been online since 2017, with the aim of having an active listening solution to give voice to the suggestions and ideas of its customers and thus build an increasingly customer-centric relationship. “La Piazza” has more than 5 thousand “active” customers, mainly Family customers and a smaller number of Personal customers. The users are encouraged to take part in the community and provide feedback on various kinds of initiatives: tests of the use and appreciation of new products and services, more effective marketing campaigns or the identification of contact opportunities between the bank and the customer and the study of the best possible management. Through this system and other channels of engagement, BPER Banca manages its customer relations from an ESG perspective.

The ESG problems we are currently facing are unprecedented and require action from all parties involved, in all types of organisations. For this reason, the BPER Banca Group has undertaken engagement activities with its suppliers since 2019. From 2019 to 2021, in order to bolster its responsible approach in the supply chain, the BPER Banca Group implemented an engagement project that included an evaluation system realised through a documentary audit, after which the individual supplier received an ESG rating free of charge. After the pilot engagement phase (2019-2021 Business Plan) was completed, the entire procurement process was revised to include ESG issues, with the aim of selecting both suppliers and purchased products. The Green Procurement project, included in the 2022-2024 Business Plan, therefore aims to integrate ESG criteria into the procurement and supplier management processes.

In this context, new supplier and supply assessment criteria have been introduced which also take into account ESG elements. In particular, these criteria are applied in the following application forms:

- Tender forms: Minimum Environmental Criteria (MECs) have been introduced for each goods sector in order to take them into account, along with other elements, in supply tenders for the procurement of goods and services;
- Vendor Management form: the new BPER supply register approval process involves the compilation of a questionnaire with a section dedicated to ESG elements, where data and certifications are provided that contribute to the overall evaluation of the supplier;
- Contract Management form: the process of creating, formalising, executing and managing the contracts with a view to maximising the operational and financial performance of a company by means of a correct and transparent formalisation of relations with the supplier.

The BPER Banca Group is committed to the enhancement of its presence in the territories through partnership initiatives, sponsorships and donations; the activities supported favour those areas attributable to the Group’s system of values such as welfare, development of cultural realities and support for the younger generations.

The attention paid to the social and environmental context of the local areas has promoted its significant partnerships with organisations and associations among which: Global Compact Network Italia, Impronta Etica, Sodalitas Foundation, Foundation for Financial Education and Savings (FEduF), Forum for Sustainable Finance, Sustainability Makers, Association for CSR Valore D, ABI working groups on sustainability, inclusion and combating climate change.

The BPER Banca Group’s commitment towards territorial social development in 2024 led to the disbursement of charity contributions in favour of many social, cultural and environmental initiatives.

The Group companies identify the activities to be supported and the contributions to disburse in compliance with the “Group Regulation on the process of institutional promotion and donations”, which are allocated based on the various needs voiced by the area of reference.

The 2024-2027 Business Plan provides for resources of Euro 20 million to support local communities.

Please refer to paragraph “3.3 Affected Communities (S3)” of the Consolidated Sustainability Statement for further information. The Group thinks that it is essential to train adults and young people on financial education and sustainability issues, and for this reason for years we have been engaged in projects and initiatives to provide tangible assistance in this area. The aim is to increase the number of people with specific skills in finance and economics, helping them to make informed choices about spending, investing and savings with a view to promoting a sustainable development of society.

Please refer to paragraphs “Financial Education and Other Educational Projects” and “Actions/Initiatives on Violence against Women” in the Consolidated Sustainability Statement for further information.

As part of the ethical management of controversial sectors, the activities implemented by the BPER Banca Group to reduce negative impacts and enhance initiatives with a positive social impact are described below.

### **Fight against compulsive gambling**

Starting in 2013, the BPER Banca Group, in consideration of its Corporate Social Responsibility towards the communities served, has implemented initiatives to inform, prevent and implement measures against the practice of compulsive gambling (CG), aiming at:

- protecting the social welfare of their customers and their families, preventing addiction from leading to the potential loss of employment and source of income;
- combating organisations that promote illegal gambling or those that illicitly intervene to financially support compulsive gamblers by involving them in usury;

- informing young people on the most correct ways to manage their money with the aim of seeing a generation grow up more aware and less exposed to the risk of addiction.

The main actions related to combating compulsive gambling include:

- the branches have been instructed to carefully assess the operations of each customer, promptly communicating to the branch head any situations that may be attributable to the compulsive conduct in question;
- information campaigns for the Group's employees and customers have been implemented, describing the reports on a number of banking transactions that could reveal an addiction to gambling, and useful instructions and tips on how branches can approach a gambling addicted customer in order to take action to protect both the customer and their family;
- the use of credit cards and prepaid business BPER Cards for payment transactions at businesses (for example: betting shops) or on internet websites have been classified as pertaining to the "gambling" goods category (except consumer prepaid cards and black credit cards). Special attention is paid to minors: the PAYUP TEEN prepaid cards have usage blocks for certain categories of expenditure that could be considered risky, such as gaming and betting, (but also including telephone and postal sales, door-to-door sales, alcohol and tobacco, drugs and political organisations.) If a minor has a prepaid card that is not PAYUP TEEN, they are in any case subject to checks and, in the event of use in gambling, the payment card is blocked and notifications are sent to parents/guardians. The marketing and promotion to customers of "Scratch & Win" tickets is also avoided;
- for a few years now a "Compulsive Gamblers and Banking Services" handbook has been produced with the aim of supporting the family members of compulsive gamblers, suggesting some simple monitoring and intervention actions related to the use of banking services;
- in collaboration with Avviso Pubblico, an "Online Gaming Handbook" has been produced, with a view to disseminating information and knowledge tools on the main critical aspects linked to the widespread offer of gambling (both legal and illicit) online, to make people aware of the dangers and pitfalls as well as point readers towards acquiring in-depth knowledge by providing an extensive documentation;
- in cooperation with Avviso Pubblico, the new edition of the project "*La trappola dell'azzardo*" (The gambling trap) was made in 2024, which included the organisation of a series of dissemination meetings in four Italian cities: Bari, Verona, Milan and Florence. The purpose of these initiatives was to develop a greater awareness on the issue of compulsive gambling and the risks associated with its addiction, as well as the potential impacts on the financial position, social relations and health of subjects involved, with particular attention paid to the new generations. The events represented moments for focused training and awareness-raising with both students and teachers, as well as citizens and local institutions, as part of an entire day dedicated to the issues of the lawfulness and correct information related to gambling;
- in 2024, the Webinar "Compulsive Gambling: Recognise, Intervene, Prevent" was held for the corporate population and aimed at raising awareness among employees about this disease. Carried out in cooperation with ATS Bergamo, the training course highlighted the suspicious signs/behaviours of the disease and the methodologies for "approaching" the client, a suspected gambling addict, are indicated in order to direct them to the appropriate assistance services;
- in the first half of 2025, BPER Banca continued its commitment to raising awareness on the risks of problem gambling through the roadshow "*Fate il nostro gioco*", that met with secondary school student in Rome and Turin. This lecture show, hosted by the scientific communicators of Taxi1729, guides students in discovering the real dynamics of gambling, including mathematical rules, false beliefs and awareness of the real odds of winning.

Please refer to the paragraphs "Fight against compulsive gambling" and "Processes to remediate negative impacts and channels for affected communities to raise concerns (S3-3)" in the Consolidated Sustainability Statement.

## Weapons policy

The relationship between banks and companies involved in the production of and trade in arms has long been the subject of attention by the Italian civil society, particularly by associations whose aim is to prevent Italy and its companies from becoming involved in the production, purchase and sale of so-called controversial weapons, especially where the counterparties are located in countries that are subject to international sanctions.

For these reasons, and in line with the guiding principles of the Code of Ethics, the Group adopted, starting in 2012, the first guidelines and then a specific "Policy governing the relations of the BPER Group Banks and Companies with defence operators, weapons manufacturers and dealers", which was updated in 2025. With this Policy, the Group has adopted a self-governance framework that regulates, more stringently than required by current legislation, its presence in this sector.

In defining the Guidelines, the Group sought the correct balance among certain general values, such as:

- promotion of human rights and peace;
- respect for peoples' and nations' right to defence and security;
- respect for freedom of enterprise and economic initiative (including of arms manufacturers) within the framework of the rules of the law.

In full compliance with regulatory dispositions, the Group's Banks and Financial Companies may therefore appear in the Annual Reports drafted by the Chairman of the Board pursuant to Law No. 185/90, which, it should be recalled, exclusively regulates the export, import and transit of armaments.

However, the Policy regulates a broader field of application that includes the BPER Banca and its subsidiaries' direct investments, its management of deposits and investments, its collection services with limitations based on the final country.

Lastly, it should be noted that BPER Banca has adopted appropriate procedural safeguards to avoid the risk of financing landmine producers, as required by Italian Law 220 of 9 December 2021, and has updated the related Policy.

### Transactions in Physical Gold

Investment gold trade (Orosicuro service) and financing with gold inventory as the underlying asset for gold processing companies that are among the services that the Bank offers to its customers. BPER Banca only markets gold ingots produced by suppliers and refineries that have international certifications attesting compliance with due diligence practices with their suppliers and registered on the London Good Delivery list, internationally recognised as the market standard.

This ensures that the metal sold is Conflict Free and complies with the regulations and codes of conduct prepared by the main associations in the sector (LBMA, RJC) and international bodies (OECD); it also ensures that the suppliers have the tools to control and evaluate the gold purchasing chains, in order to combat possible forms of crime both of a geopolitical-financial nature (anti-money laundering, corruption, terrorist financing) and related to the abuse of human rights, genocide, the exploitation of child labour or crimes against the environment.

### Protection of human rights

The UN Guiding Principles on Business and Human Rights endorsed in 2011 are the global reference standard on safeguarding human rights in the context of business activities, and specify the appropriate conduct of governments and businesses in order to prevent and address the impact of business activities on human rights. While the duty of the state is to protect human rights, companies have a duty to respect them and must strengthen access to appropriate and effective remedies for victims of abuse. The principles state that through their activities, companies can generate different human rights impacts: positive, such as offering innovative services that improve people's quality of life; or negative, such as the exploitation of workers or the forced displacement of people or entire communities. In addition, companies may be indirectly involved in violations committed by other companies or states.

The BPER Banca Group monitors the subject of Human Rights in the Code of Ethics and the Organisational Model 231/01, which is binding for the members of the Corporate Bodies, Top Management, employees, including executives, as well as all those who, even if not part of BPER Banca, operate directly or indirectly on the Company's behalf.

The Group undertakes to promote and respect the universally recognised human rights as set out in the Universal Declaration of Human Rights, through the adoption of an "ESG Policy".

In relation to human rights, recognising their crucial importance, the Group is committed to promoting core labour principles in line with the aforementioned United Nations Guiding Principles, the International Labour Organisation (ILO) Conventions and the OECD Guidelines for Multinational Enterprises.

During the 2023 financial year, BPER Banca, continuing on with the activities undertaken in the previous year, has proceeded to update the assessment related to human rights.

The assessment was carried out by identifying the fundamental principles of protection of human rights connected to the BPER Banca Group's activities and through the analysis of potential human rights violations connected to the Group's value chain by both mapping the corporate controls in place and involving the Group's corporate functions in order to assess the associated risk level. During the course of 2023, the BPER Banca Group's framework placed greater attention on the strategy adopted by BPER Banca on the one hand, in the management of areas where violations of human rights might take place and on the other, on the Bank's human rights initiatives. To this end, informative elements such as policies, internal codes, monitoring activities, regulations and partnerships were considered and examined.

No further assessment was made regarding human rights since that issue was added to the materiality analysis; in 2024, evaluations were made on whether human rights violations could be implied for each impact identified, but no problems were found or incidents against human rights.

Please refer to the paragraphs "1.1.4 Impact, risk and opportunity management", "Relevant human rights policy commitments related to own workforce (S1-1)" in the Consolidated Sustainability Statement for further information.

### ESG-linked Loan Origination Policy

The Group sets out its approach in the areas of health and safety of workers in the companies that receive funding under the "ESG-linked Loan Origination Policy".

In particular, in application of the principles to comply with the minimum clauses safeguarding human rights, it prohibits the granting of new or further funding to counterparties or all companies that belong to the scope of consolidation of counterparties, where it emerges, both in the initial credit evaluation stage, and during the periodic reviews, evidence of legal proceedings made by the competent authorities, in any jurisdiction, where there has been a conviction relating to the violation of human rights, or laws in the area of health and safety, both with reference to workers and the local communities; of fundamental labour rights and rules in the area of child labour and forced labour, and other elements relating to the sphere of corporate governance for which reference should be made to Table 3 "Qualitative information on governance risk", letter c.

Violations of minimum safeguard clauses are monitored by accessing specific databases that allow for the detection of such evidence on the counterparties on which the convictions are found. In these cases, specific evidence will be attached to the counterparty's master record to permit immediate identification: a reinforced credit process will also be activated if there are exposures present.

It should be noted that to date, no violations have been detected on the main international databases concerning customers of the BPER Banca Group.

The BPER Banca Group will also provide for specific in-depth investigations and potential further limitations when funding sectors that are more exposed to potential social risks (Table 2 “Qualitative information on social risk”, letter j).

### Corporate customer engagement and data collection

The BPER Banca Group has also activated various initiatives to engage Corporate customers since 2022, in order to help spread awareness of sustainability issues. See Table 1 “Qualitative information on environmental risk”, letter d, for more information on the topic.

The Group works with providers in relation to counterparties subject to Sustainability Reporting, which highlight possible violations of the UN Guiding Principles on Business and Human Rights and the main International Labour Organisation (ILO) conventions.

Likewise, the BPER Banca Group changed its method of managing its financial investments, by giving greater weight to the factors that favour sustainable growth, attentive to society and the environment, by approving a specific “Policy on ESG investments in the Management of the Group’s Proprietary Portfolio” in December 2022. Therefore, the resources allocated to investments in companies with the best social, environmental and governance practices are closely monitored.

For greater details please visit the website <https://group.bper.it/en/sustainability/policies-and-code-of-ethics>.

Therefore, the BPER Banca Group pledges to contribute, firstly, to a sustainable economic development by giving priority, in its investment choices, by giving them greater weight, and in the management of its financial portfolio, to businesses that adopt virtuous practices focused on the use of environmentally friendly production methods, on the guarantee of inclusive working conditions that are respectful of human rights and on the implementation of the best corporate governance standards.

#### Governance

- d) Responsibilities of the management body for setting the risk framework, supervising and managing the implementation of the objectives, strategy and policies in the context of social risk management covering counterparties’ approaches to:**
- (i) Community and social activities**
  - (ii) Employee relationships and labour standards**
  - (iii) Customer protection and product responsibility**
  - (iv) Human Rights.**

The BPER Banca Group’s Board Governance over social issues is assigned to three corporate bodies: the Board of Directors (BoD), the Board Sustainability Committee and the Control and Risk Committee. The BoD defines Group guidelines and strategies relating to sustainability and climate-related issues. The BoD is responsible for approving the Consolidated Sustainability Statement, the PRB Report, the Business Plan, the Risk Appetite Framework and the risk governance policies, incorporating ESG and climate elements over time.

Each of the Group’s areas of operations appears, on the whole, to be adequately covered with specific professional skills to ensure effective and knowledgeable management.

All members of the corporate bodies meet the requirements of professionalism and competence set out by the applicable legislation. In particular, the Board members and Statutory Auditors have, on the whole, acquired adequate experience in listed and unlisted companies operating in the credit, financial or insurance sector.

The BoD and the Board of Statutory Auditors therefore possess a combination of knowledge, skills and experience that enables the members to understand the main business areas, the characteristics of the areas where the Bank and the Group operate and the risks to which the Bank and the Group are exposed, including those related to business management.

The members of the Group’s Board of Directors draw on their expertise in sustainability, acquired through the experience they have gained during their professional careers and through participation in special training sessions.

In this regard, it should be noted that with the aim of strengthening the skills of the members of the BoD and the Board of Statutory Auditors on ESG matters, a training session was held in 2024 on risk management, and focused in particular on the management of climate and environmental risks.

In addition, following the establishment of the Board of Directors appointed by the Shareholders’ Meeting of 19 April 2024, a training plan was prepared.

Lasting approximately one year, the programme consists of three modules: (i) governance, supervision and controls and succession plans; (ii) risk management (identification, assessment, monitoring, control and mitigation of the BPER Banca Group’s main types of risks); (iii) Supervised Entity business models, strategic planning, accounting and financial statements, Risk Appetite Framework, ICAAP (Internal Capital Adequacy Assessment Process) and ILAAP (Internal Liquidity Adequacy Assessment Process). Participation in the training programme is open to all Directors and Statutory Auditors in order to improve their skills on the topics mentioned above, thus fostering an increasingly in-depth and direct discussion in the meetings of the Corporate Bodies.

As part of this plan, the topics of integrating ESG factors into the credit risk assessment process and supervisory expectations on climate and environmental risks were discussed in depth, among others. In addition, a training session was dedicated to the contents of the CSRD, especially the presentation of the new ERS principles and their impact on sustainability reporting.

Pursuant to the Rules of operation, the Board of Directors is called to meet on an ordinary basis, as a rule, once a month (for further information please refer to the Report on Corporate Governance and Ownership Structure published on the corporate website <https://group.bper.it/en/governance/documents>).

For further details on specific social risks associated with each field such as community, labour regulations, consumers and human rights, please refer to the paragraphs “Interests and views of stakeholders (SBM-2)” and “Impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)” of the Consolidated Sustainability Statement. For further details on human right protection, please refer to letter c) of Table 2 - Qualitative information on social risk of this Chapter.

The Board Sustainability Committee supports the activities of the BoD in the field of sustainability, with an impact on all the processes, structures and corporate controls through which the Bank ensures the pursuit of sustainable development, with particular reference to environmental, social and governance issues. More specifically, the Committee reviews and assesses:

- the contents of the “Group’s ESG Policy” as well as its ability to ensure, through constant dialogue with all stakeholders, the achievement of sustainable development objectives;
- ESG-related regulatory documents, final reports and disclosures - including the Sustainability Statement;
- 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.

The Sustainability Committee also has a strategic role with regard to ESG and climate issues, and is responsible for assessing the Bank’s positioning within sustainability metrics, indices and market benchmarks, and initiatives and programmes aimed at spreading a culture of sustainability and awareness of the need to pursue sustainable development throughout the Bank’s organisational structures. The body meets to discuss sustainability and climate issues at least quarterly.

The Internal Board Control and Risk Committee supports the Board of Directors in assessing the ESG elements emphasised in the internal control system, risk objectives (“risk appetite”), tolerance thresholds (“risk tolerance”) and strategies for capital and liquidity management, as well as for all relevant risks of the Bank and the BPER Banca Group. In addition, the Control and Risk Committee periodically assesses 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. The committee meets at least once every two months.

As part of the overall product governance framework, BPER Banca has set up the Product Governance and Pricing Committee, which is the board that oversees the consistency, also with the ESG strategies that the Group intends to pursue, of the overall distribution strategy, as well as of the Group’s commercial offer development guidelines formulated on the basis of the annual Product Plan. The Committee also ensures, on the basis of periodically analysed reports, the constant monitoring of the entire commercial offer, including products/services classified as ESG, in order to formulate any guidelines and/or requests for revision of the offer.

#### Governance

- e) **Integration of measures to manage social factors and risks in internal governance arrangements, including the role of committees, the allocation of tasks and responsibilities, and the feedback loop from risk management to the management body.**

The sustainability/ESG strategic lines and policies are approved by the Board of Directors, with the support of the Control and Risk Committee and the Sustainability Committee, taking account of the objectives of the solid and sustainable creation and distribution of value for all stakeholders. More information on the Committees in place can be found in Table 1 - Qualitative information on environmental risk letter f) of this chapter.

#### Governance

- f) **Lines of reporting and frequency of reporting relating to social risk.**

The BPER Banca Group’s Board Governance over ESG issues is assigned to three corporate bodies: the Board of Directors (BoD), the Board-internal Sustainability Committee and the Control and Risk Committee. The BoD defines Group guidelines and strategies relating to sustainability issues. The BoD is responsible for approving the Consolidated Sustainability Statement, the Business Plan, the Risk Appetite Framework and the risk governance policies, incorporating ESG and climate elements over time. Pursuant to the Rules of Operation, meetings of the Board of Directors are convened on an ordinary basis, as a rule, once a month. During the first half of 2025, the BoD addressed social issues in 7 out of 9 meetings.

The Board Sustainability Committee supports the activities of the BoD in the field of sustainability, with an impact on all the processes, structures and corporate controls through which the Bank ensures the pursuit of sustainable development, with particular reference to environmental, social and governance issues. More specifically, the Committee reviews and assesses:

- the contents of the “Group’s ESG Policy” as well as its ability to ensure, through constant dialogue with all stakeholders, the achievement of sustainable development objectives;
- ESG-related regulatory documents, final reports and disclosures - including the Consolidated Sustainability Statement and the PRB Report;
- 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.

The Sustainability Committee also has a strategic role with regard to ESG and climate issues, and is responsible for assessing the Bank’s positioning within sustainability metrics, indices and market benchmarks, and initiatives and programmes aimed at spreading a culture of sustainability and awareness of the need to pursue sustainable development throughout the Bank’s organisational structures. The projects with an ESG impact integrated in the Business Plan, described in point a), are monitored quarterly and submitted to the Sustainability Committee. During the first half of 2025, the Sustainability Committee addressed social issues in 5 out of 5 meetings.

The Internal Board Control and Risk Committee supports the Board of Directors in assessing the ESG elements emphasised in the internal control system, risk objectives (“risk appetite”), tolerance thresholds (“risk tolerance”) and strategies for capital and liquidity management, as well as for all relevant risks of the Bank and the BPER Banca Group. In addition, the Control and Risk Committee periodically assesses 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. During the first half of 2025, the Control and Risk Committee addressed social issues in 8 out of 9 meetings.

In order to make the Board and Joint Bodies aware of the exposure to ESG risks and, therefore, to take fully-informed decisions regarding sustainability issues, the BPER Banca Group, in line with the Risk Appetite Framework, is strengthening activities aimed at integrating quarterly reporting in the respective Policies.

In particular, evidence is provided of the occurrence of a reputational risk event connected to social phenomena in the section on reputational risks, where present; these factors are also included in the scenarios used for the periodic reputational risk assessment. This approach also applies to operational risks: in events of loss connected to social factors, evidence is provided in the reports, and these elements can also be found within the scope of certain scenarios used in the risk assessment of the operational risks.

## Governance

### g) Alignment of the remuneration policy in line with institution’s social risk-related objectives.

The Group’s remuneration policy is aligned with the short- and long-term strategic objectives aimed at creating value for shareholders, employees, customers and all Group stakeholders. The remuneration policy was defined with the aim of ensuring, as always, the correlation and consistency between remuneration, the results achieved, the development guidelines, the sustainability of the initiatives undertaken and sound and prudent risk management, as well as compliance with regulatory requirements.

In particular, the remuneration policies support the achievement of objectives linked to social sustainability by including specific KPIs in both the short and long-term incentive plans which, as far as possible, reflect the commitments undertaken to mitigate social risks.

The new 2024-2027 Business Plan is consistent with the Group’s modernisation path and continues the integration of ESG factors into business processes, with the aim of maintaining a strong focus on the management of ESG issues in order to continue creating shared value for all stakeholders. The performance and reward policies continue to be aligned with the Group’s ESG strategies and with the pursuit of short and long-term results, also taking into account the working conditions of all employees.

Systems are designed to incentivise the achievement of short and long-term goals in a sustainable manner, through:

- the Long-Term Incentive Plan “2025-2027 LTI Plan” (based on BPER shares), based on BPER share and linked to the Business Plan targets, to support the alignment of the interests of the managerial figures with those of shareholders and all stakeholders, incorporating in its targets not only profitability, operational efficiency, credit quality objectives and shareholder return but also sustainability objectives (with a weight of 20%). These are set out in three fundamental guidelines: Sustainable Finance, ESG Investments (Assets under Management), Diversity and inclusion;
- the adoption of an annual remuneration system, known as MBO (Management By Objectives) aimed at incentivising the achievement of objectives consistent with the strategic guidelines.

The LTI Plan targets are associated with targets of profitability, operational efficiency, capitalisation and sustainability (ESG), in addition to a Total Shareholder Return target. More specifically, economic and financial objectives are integrated with sustainability objectives, set out in three fundamental guidelines each weighing 20%, comprising:

1. Sustainable Finance (1/3) – ESG Loans;
2. ESG AuM (1/3) - % of ESG products out of total Assets under Management;
3. Diversity and Inclusion (1/3) – % of women in leadership positions.

The final objective is related to social issues.

The short-term incentive plan (MBO) described in the “2025 Report on the Remuneration Policy and Compensation paid” confirms the weight assigned to ESG components among the targets (their weight is 15%).

The Strategic Scorecard assigned to the Chief Executive Officer (CEO) on which the so called “Material Risk Takers” (hereinafter also MRTs<sup>24</sup>), includes ESG objectives defined according to a compound metric comprising six targets deemed strategic in the short-term as an enabling factor to achieve the ESG targets that can be traced back to Business Plan projects:

1. % weight increase of ESG products: growth in the percentage weight of sustainable Assets under Management in relation to total Assets under Management;
2. Green Loan Amount: loans specifically dedicated to sustainability (ESG);
3. Net Zero Banking Alliance: definition of business strategies for the sectors of Aluminium, Iron and Steel, Commercial Real Estate;
4. Energy Plan: direct emission reduction (calculated on the basis of the efficiency, assessed during the conceptual phase, of the Energy Plan activities implemented in the year of the analysis and starting from the achievements as at 31 December 2024);
5. Progress in diversity, equity and inclusion: percentage of women holding positions of responsibility in the organisation;
6. ESG rating<sup>25</sup>: maintaining the current evaluation<sup>26</sup> (level identified by the Business Plan) of Moody’s Analytics, CSA (Corporate Sustainability Assessment) S&P, CDP, Sustainalytics (Morningstar), Standard Ethics ratings.

For ESG objectives, the achievement of each individual objective is on/off, based on precise, measurable quantitative targets. The minimum, target and maximum thresholds are represented, respectively, by the achievement of 4, 5 or 6 objectives. Therefore, the payout curve is 50%-100%-130%.

The short-term incentive system (2025 MBO) calls for the allocation of ESG incentives to essentially all relevant personnel (MRT) with different methods depending on whether they are C-Level Managers or less with a weighting of between 10% and 15% possibly in combination with specific ESG objectives attributable to their areas of responsibility of with the objectives of the “managerial assessment”.

In particular, Objective 5 has a positive impact on the social environment.

## Risk management

### h) Definitions, methodologies and international standards on which the social risk management framework is based.

The BPER Banca Group defines social risk factors on the basis of international standards and, more specifically, reference is made to the provisions contained in the “EBA Report on Management and Supervision of ESG Risks for Credit Institutions and Investment Firms” guidelines (EBA/REP/2021/18).

With regard to the description of the methodology and the tools used by the Group to identify and manage social risks, please refer to letter i) of this table.

With regard to the approach adopted by the Group in relation to social risks linked to companies that are recipients of loans, please refer to letter l) of this table.

24 The “MRTs” are resources that can have a substantial impact on the risk profile of the entity on the basis of the criteria foreseen by current legislation. For further information: “2025 Report on Remuneration Policy and Compensation Paid” (section I) paragraph 7.3.

25 With the data available time to time and with the same evaluation methodology.

26 Maintaining ratings within the ranges defined by the Board of Directors.

## Risk management

**i) Processes to identify, measure and monitor activities and exposures (and collateral where applicable) sensitive to social risk, covering relevant transmission channels.**

As described in Table 1 “Qualitative information on environmental risk”, letter l), the Group manages the ESG factors within the scope of its Risk Appetite Framework progressively integrated on the basis of the priorities and materiality of the ESG factors.

With regard to the risk identification process (Risk Map), specific criteria were identified to identify the impacts of the ESG factors on the existing risk categories; in this context, fine-tuning continued with respect to how to assess the materiality of the ESG factors which now constitute a specific, focused analysis in identifying what risk factors, through defined transmission channels, can be considered to have a material impact on the main company risks (compared to the previous year, no specific ESG sub risks connected to the main risks were identified).

With special reference to social risk factors, the following activities are taking place within the overall risk management framework in the areas of risk identification, measurement/assessment, monitoring and reporting.

Special transmission channels relating to social factors were identified with regard to the operational risks (and periodically updated) which may result in operating losses for the Group: in that case, the Operational Risk Map” is updated, including through new classification attributes, also including the development of the ESG factors.

Operating losses connected to ESG events, gathered through the Loss Data Collection process, are reported in the quarterly reports, both from the standpoint of the frequency associated with the events reported in the period, and from the standpoint of the severity relating to the accumulated losses accounted for in the quarter in question. The social risk factors are also considered in the definition of certain scenarios used in the risk self assessment.

With regard to reputational risk, the environmental, social and governance risk factors are already considered in the management framework in terms of direct or indirect exposure of the Group and its counterparties.

In that sense, the “Catalogue of reputational scenarios” is regularly updated, the element at the basis of the reputational risk assessment analyses, which also considers the social risk factors. These are also considered within the scope of reputational key risk indicators and in the reputational data collection where events of this type may occur. The findings from these analyses are reported in the risk reports.

Furthermore, as concerns credit risk management, in sampling counterparties and collateral to be submitted to Single and Collateral File Review, the BPER Banca Group incorporated the second level credit control framework by adopting selection criteria based on drivers dedicated to the identification of climate-related and environmental (E), social (S) and governance (G) risk factors. The results of the analyses carried out, focused on the integration of the assessments relating to the climate and environmental risk factors within the scope of managing credit risk, were included in the periodic report on the control activities in the management reports.

## Risk management

**j) Activities, commitments and assets contributing to mitigate social risks.**

Corporate culture is a fundamental element for the BPER Banca Group, which is committed to ensuring the integrity of those who work within it. It is essential to identify, assess, prevent and manage behaviour that is not in line with the Group’s values, in order to ensure the quality of credit, the protection of all stakeholders and the strengthening of fiduciary relations with them. To that end, the Group has defined in-house rules, management systems and instruments that can help reinforce a work environment based on transparency, responsibility and trust, and guarantee the protection of whistleblowers. Please refer to section 4 Governance Information of the Consolidated Sustainability Statement for further information.

The ESG-linked Loan Origination Policy requires that the BPER Banca Group does not provide financial products or services to counterparties for which violations with a final conviction related to human rights, health and safety regulations have been judicially ascertained in relation to both workers and local communities; fundamental labour rights and child and forced labour regulations; in addition to other elements concerning corporate Governance for which reference is made to Table 3 ‘Qualitative information on governance risk’, letter j.

In its ESG-linked Loan Origination Policy, the Group additionally sets out specific provisions depending on the sector in which the counterparties operate, in particular for the mining, shipping and agricultural sectors. In this sense, it includes:

- due diligence to verify compliance with labour rights and conditions in accordance with the main International Labour Organisation (ILO) conventions in the case of project financing to counterparties operating in the mining and shipping industries;
- exclusion from financing ships flying the flag of countries on the Black List of the Paris Memorandum of Understanding on Port State Control in force at the time.

For the agricultural sector, the BPER Banca Group also applies exclusion criteria to counterparties who have been definitively convicted of illegal hiring under current national or international legislation on undeclared work, the exploitation of labour in agriculture and wage realignment.

### Integration of ESG analyses into the credit granting process

In 2024 information on corporate customers was incorporated with a section dedicated to ESG profiles, in order to allow the manager to analyse the main characteristics of the counterparty's sustainability profile, both according to its sector of belonging and on the basis of precise information, also collected through ESG questionnaires.

In addition to applicability of the ESG policy in accordance with the operating sector of the customer company, specific risk scores are shown for every social risk factor set out by the EBA. In addition, a summary view of any critical areas is offered by means of a counterparty ESG score, which expresses the counterparty's ranking with a traffic light indicator in all assessment KPIs, which, for the social component, take into consideration the following elements:

- level of employee remuneration and job insecurity;
- rates of workplace accidents and number of days lost to accidents;
- presence of occupational health and safety certifications (ISO 45001);
- presence of state aid for employee training and/or occupational safety;
- presence of Code of Ethics and Supplier Codes of Conduct;
- the presence of whistle-blowing mechanisms.

For the most significant counterparties, the reports annotated by specialised analysts on the Separate or Consolidated Financial Report of customers are also accompanied by the analysis of the Sustainability Statement (formerly NFS) of customer companies, if any.

For counterparties with a negative traffic light score, at sector or single name level, financing through Sustainable Linked Loan with KPIs specifically related to the criticality area, e.g. KPIs related to the rate of workplace accidents or the acquisition of ISO 45001 occupational health and safety certification, is considered a risk mitigation element.

Any additional investigations are included in accordance with principles of proportionality, avoiding excessive reporting burdens that exceed those set out in the Law on Client Companies; therefore, the specific areas of credit operations in which due diligence is required with regard to consistency with applicable ILO standards, for example financing the reclamation or reconversion of mining sites or the exclusion from financing, in relation to shipping, ships flying the flag of countries on the black list of the Paris Memorandum of Understanding on Port State Control, have been regulated in the "ESG-linked Loan Origination Policy".

### Integration of the social risk factor into the risk management framework

Through the evaluation activities of Reputational Data Collection, Reputational Risk Self-Assessment and the monitoring of specific KRIs, the reputational risk management framework enables the Group to identify and, if necessary, mitigate any critical issues in the Social domain.

#### Risk management

##### k) Implementation of tools for identification and management of social risks.

The social risk factors are processed in accordance with the provisions of the risk appetite framework of the BPER Banca Group with regard to those risks for which, current frameworks allow for their implications to be assessed.

The materiality assessments of such factors are made as part of the risks identification process and are incorporated in the "Group Risk Map", which illustrates the relative position of the individual companies with respect to Pillar I and Pillar II risks, both current and prospective.

Subsequently, the outcomes of said analysis are gradually included in the main processes of the risk management framework in place (e.g. ICAAP, RAF), which form an integral part of corporate management, helping to determine the strategies and current operations of the Group.

With specific reference to the operational and reputational risk management frameworks, the Group has defined the microeconomic and macroeconomic transmission channels, whereby Social risk factors (e.g. relations with employees and customers, social inclusion, etc.) can translate into operating losses and reputational risks; this specification has made it possible to update the mapping of operational and reputational risk scenarios to Social factors, which are being analysed with the aim of assessing the adequacy of controls and identifying any necessary action to prevent and mitigate exposure to the risks identified.

The social risk factors are also monitored and assessed within the scope of loss data collection processes and reputational data collection in the event of the occurrence of operational and reputational events with their causes relating to said ESG factor.

To date, there are no channels available that would allow for the direct finding of any negative social impacts by the customer companies, apart from the most serious cases. Lists containing associated names - mainly on the basis of news appearing on national information sources - and various types of crimes such as crimes against property, against persons, corruption, bankruptcy or selling drugs would generate negative findings in the database procedures of the Group.

Additional controls pertain to the ordinary monitoring of credit quality and are part of the credit monitoring process. Through the client company's relationship manager, any negative social situations, such as tensions with employees leading, *inter alia*, to work stoppages or disputes with a fiduciary impact can be reported and addressed for enhanced credit management, in addition to being intercepted in the event of press reports.

In the case of adverse information against the company or seizures, including as a result of infringements with impacts on issues that are relevant from a social standpoint, the initiation of procedures regarding the event will trigger the early warning mechanism, or, upon notification by the manager, the addition of a counterparty to a watchlist, with possible consequences, including a lower classification of the counterparty. In addition, in the event of a final conviction, the exposure is managed in order to end the relationship with the convicted party.

### “Social risk” pilot project

With specific reference to the “social risk” factor, in early 2025, the Group carried out a pilot project aimed at making a first assessment of the exposure of the Bank to said risk factor.

The project concentrated on implementation of a scenario analysis, aimed at identifying how demographic trends, including migrations, could influence the business of the BPER Banca Group. Having identified a baseline scenario and an adverse scenario dedicated to the demographic profile, time spans were defined that were considered to be relevant to understand the phenomena, and specific risk transmission channels to the Group were identified. The pilot project concentrated on the loan portfolio to customers, analysing profit margin and risk drivers for both the companies and mortgage loans.

### Time horizons

The demographic dynamics were evaluated by considering a time horizon that started from the present year (t0 of the analyses corresponding to the end of 2024) to 2035, defined as long term, while the year 2030 was considered to be medium-term. Phenomena occurring over shorter time horizons were not considered as relevant, as the short-term demographic tendency is already included in scenarios used for planning purposes and in stress testing, and its variance is very limited in the short term.

### Models and Scenarios

The demographic scenario (baseline/adverse) is linked to the macroeconomic scenario using the Overlapping Generations Model - “OLG”, which evaluates how demographic transitions affect economic variables through four main elements:

- a reduction in labour supply: the population and its variations directly influence the size and composition of the workforce; a more accentuated slowdown in the workforce compared to the total population reduces capital demand by companies.
- the increase in life expectancy: individuals, aware of a longer life, will save more to ensure future consumption, thereby exercising downward pressure on interest rates.
- “dissaving” by the older population: as provided for under the life cycle theory, increasing numbers of pensioners reduce aggregate savings, increasing the shortage of capital and pushing interest rates upwards.
- congestion in the pension systems: in split pension systems (like the Italian system), a potential increase in the work rate to finance pensions will reduce the capital available for productive investments, resulting in an increase in real interest rates.

The OLG model was applied by following two different demographic assumptions: first the median demographic forecast of the ISTAT (national statistics institute) population was considered (2023-2080) (baseline scenario). Subsequently, a new simulation of the OLG model was made, considering the hypotheses, still using ISTAT figures as source, contained in the demographic forecast relating to the lower confidence range of 90% (adverse scenario).

In the “baseline” scenario, the reduction trends in the demographic component is already clear, with a forecast of a net balance of the population, compared to the t0 of the simulation, of -2% over the long term, reaching -8% for the active portion (i.e. the population falling within the 15-64 age group). In the adverse scenario, the net demographic balance amounts to -3% by 2035, with the active population falling by 9%.

The migratory balance shows positive figures, although down by 2035, with a national average of slightly more than 4 inhabitants per thousand falling to about 3 in the baseline scenario and 2 in the adverse scenario. However, considering the data by regions, the Centre-North maintains positive numbers (Emilia-Romagna and Liguria first at around 6 inhabitants per thousand in the baseline scenario) while the South has negative balances; Campania, Puglia, Basilicata, Calabria, Sicily and Sardinia lose an average of 0.3 inhabitants per thousand in the baseline scenario by 2035, rising to over 1 per thousand in the adverse scenario. The net effect in Southern Italy takes account of lower incoming migration compared to the Northern regions, in addition to an outgoing migration from the Southern regions to the Northern regions.

In the period 2025-2035 with annual average GDP growth in the baseline scenario of 0.5%, one scenario characterised by a lower population (both total and active) would result in more modest economic growth (0.4%); the cumulative loss over the entire horizon forecast would be about -1.2 percentage points.

### Transmission channels

The diverse demographic scenario will therefore lead to the definition of a diverse macroeconomic scenario where, according to the drivers described above, lower household spending and lower investments will lead to lower GDP growth. Direct and indirect impacts of the demographic trends, the ageing population and the migration phenomena regard businesses and households.

### Corporates

Businesses will be impacted by the demographic trends mainly through lower labour supply, which, assuming an unchanged context (labour market participation rate, pension age, technology, etc.), will translate into higher salaries. These trends will therefore result in higher costs for businesses which will negatively influence balance sheets, worsening the financial position and therefore potentially increasing the riskiness of the counterparties, all other conditions being equal. The impact of demographic trends on salaries will not be symmetric at national level, but will vary in accordance with the workforce composition by age bracket, in turn differentiated by sector of activity and the company's footprint area. The assessment of the impacts therefore considered the prospective reductions (in the medium and long term) in the labour supply by age bracket and region underlying the scenarios considered (baseline and adverse, source ISTAT); the effects of these reductions will then play out in different ways in the various sectors due to the diverse composition in terms of age bracket of the workforce and the relative salaries (source INPS (Social Security)).

The application of said salary flexibility coefficient template to the estimated labour supply, and calculated in accordance with the expected salary dynamics projected at national level by the macroeconomic model, allowed a grid of impact spreads on salaries to be created, broken down by sector (80+), region and year, then applied to the companies in the BPER Banca portfolio in accordance with the size.

The weight of the labour factor on operating costs of companies also had an impact on the simulation, captured through the economic value of the balance sheet items relating to personnel expenses (with the % shock on salaries being equal, the extra-cost magnitude changes with the change of the initial level of the labour costs on the balance sheet by individual company).

The demographic scenario also impacts companies indirectly, having, in accordance with the macroeconomic context associated with them (with baseline and adverse being different), effects on the balance sheet items like turnover, profit margins, financial charges, etc.

### Households

The impact of demographic trends on Households was analysed by focusing on the loans backed by residential properties. There is a double impact linked to demographic drivers:

- on the one hand, an ageing population and the emigration of young people from specific areas lead to a long-term reduction in the need for loans, and, potentially, a reduction in the Bank's profit margins;
- on the other hand, there will be, especially at local level, an excess of availability of properties on the market, leading to a reduction in value in property, including the properties given in guarantee to the Bank by private individuals.

### Results of the scenario analysis

#### Corporates

The analysis was carried out by simulating, over the medium and long term for the baseline and adverse scenarios, the impact of the demographic trends on the balance sheets of enterprises that have business relations with the BPER Banca Group, estimated on the basis of the above-mentioned transmission channels, broken down by operating segment and geographic location (region) of the company. The portfolio assessed in the analysis includes about 110 thousand companies.

The risk indicator used for the businesses was the Risk Index, which combines the financial KPIs NFP/EBITDA and DSCR and showing a strong relationship with the impairment rates of the Bank of Italy, can be used as an estimate of the Probability of Default trends of the company.

Since the demographic reduction trends are significant even in the baseline scenario (-8% for the active population), this is what is reflected in most of the negative impacts on the companies. However, the median riskiness of the portfolio has a relatively low variability, rising from a Risk Index value of 0.99 at t0 to 1.00 in 2035, with a Gross Operating Profit (EBITDA as a percentage of the value of the production) reducing to a little more than one percentage point over the long period analysed (from a median value of 7.7% in t0) and debt levels which, as a percentage of production, increase by 4 percentage points. The impacts are

strongly differentiated by sector due to the importance of the labour factor in the activity in addition to the original economic-financial situations and the cyclical sectoral trends underlying the scenario.

The sectors with the greatest increase in risk in the baseline scenario are transport (Risk Index from 0.98 to 1.05 over the long term in the adverse scenario), and agriculture, which starts from a much higher Risk Index than the average at t0 (1.10) increasing over the long term to 1.16.

The negative demographic impacts in the adverse scenario lead to a further deterioration of the baseline picture, albeit of limited size in accordance with the drop differential hypothesised in the active population (-9% instead of -8% in the baseline scenario). The extra cost associated with salaries is reflected in slightly more contained profit margins which increase the median Risk Index of the portfolio to 1.01 in 2035 (+0.4 percentage points of risk compared to the baseline scenario). There are greater impacts in the most labour-intensive sectors such as transport (especially terrestrial transport and transport services), construction and certain manufacturing sectors (such as metal working and construction products).

The diverse sectoral specialisations in the territories is reflected in a different map of the increase in risk at regional level: Southern Italy, not including Campania, is the most impacted geographic area, with a peak in Sardinia (a Risk Index figure of +8% in the adverse scenario).

### Household mortgage loans

Demographic and migration trends were assessed considering the population regional distribution and the various age brackets, identifying what trends to expect in these clusters under a macroeconomic approach.

The stock of mortgage loans in place to purchase homes in the alternative scenario by 2035 would increase by 15%, with an average growth of 1.3%; the growth would be 2 p.p. higher in the baseline scenario, with an average growth of 1.5%.

In order to provide a key to understanding the trends, it should be noted that the average growth over the past 10 years in Italy amounted to 1.7% per year, increasing to 4% considering the last 20 years.

Compared to the baseline scenario and the adverse scenario in the medium term, demand for mortgage loans would increase by about 1%. The regional distribution is essentially similar. On the other hand, the opening by age bracket is relevant, where the adverse scenario regarding requests for loans will worsen, most especially in the bracket up to 34 years: -1.7%. In the long term, the comparison between the adverse scenario and the baseline scenario shows an average reduction for Italy of -2%, becoming -3% for the age bracket up to 34 years.

As regards property values, a comparison between the adverse scenario and the baseline scenario shows an average reduction of 2% over the medium term and 5% over the long term. The regional distribution shows a higher impact of the adverse scenario over the baseline scenario in the Molise and Liguria regions.

### Further considerations on the context analysis

Confirming what was described as part of the “Social Risk” pilot project, a summary of the first outcomes of a technical panel of ABI, chaired by the CEO of BPER Banca, Gianni Franco Papa, on one of the 8 challenges that will guide ABI’s work in the near future, i.e. “Demographic changes and imbalances”, is reported. Demographic changes are a phenomenon of great interest to the banking world.

The Italian population is sharply decreasing, with a drop of 1.35 million people between 2024 and 2025 (from 60.3 million to just below 59 million). The mid-way scenario by ISTAT foresees a reduction of further 439 thousand residents by 2030 and a faster decrease up to 54.8 million in 2050. In addition to the demographic reduction, the population is gradually getting older: in 2080, the average age would go from 46.4 to 50.9. Therefore, the population in working age (15-67) would drastically decrease from 67.3% to 57.4% of the total population, while the “over 67” component would increase from 20.3% to 31.2%.

The population reduction is not a negative change, from an economic point of view. The issue is that the expected reduction of the population in Italy is associated with a gradually ageing population, which could be challenging from a macroeconomic point of view, at least for three reasons: i) economic growth; ii) welfare system; iii) business birth rate and generational turnover.

In time, pensions will risk becoming less adequate to ensure a decent standard of living. In 2023, pension expenses reached Euro 319 million, equal to 15% of the GDP, and according to estimations it will increase to slightly over 17% by 2040, to the gradually reduce to 14% approximately around 2070. This trend reflects two main factors: on the one hand, the impact of the retirement of the baby boomer generations, and on the other hand the transition from the retribution system to the contribution system, which would entail a decrease in the overall number of pensioners and a decrease in the impact of this expense on the GDP.

In this context, supplementary pension funds become increasingly important, reaching Euro 224.4 billion worth of resources in 2023, drastically increasing from Euro 83 billion in 2010. Participation is not homogenous: it is higher in Northern Italy, such as in Trentino-Alto Adige (over 60%), and much lower in the South, with Campania at 27%. The distribution by age and gender also shows imbalances, with a strong concentration of over 50 (almost 48%) and a majority of males (62%).

At the same, the ageing population will also cause a sharp increase in the demand for healthcare, since expenses per capita tend to increase with age. In 2023, healthcare expenditure amounted to Euro 131 billion (6.2% of GDP) and it is estimated to reach 7.2% by 2070. However, just as demand is growing, the availability of informal care provided by family members will decline due to falling birth rates, smaller average household size and increased female employment.

In this scenario, greater pressure on private healthcare spending is to be expected, which has already reached Euro 46 billion in 2023, covering over 35% of total healthcare spending in Italy. Of these, only 11% were traded by funds and health insurance companies, while the remainder were paid for by households directly.

It is therefore essential to encourage the development of complementary healthcare in order to reduce the risk that a growing proportion of the population puts off healthcare for financial reasons.

Furthermore, it should be emphasised that demographic developments can also have an impact on the number of businesses. There are approximately 4 million active companies in the industry and service sectors in Italy, a figure that has been steadily declining since 2008, although a reversal of this trend has been observed since the Covid pandemic (perhaps thanks in part to public support). The demographic decline currently being recorded does not necessarily lead to a decrease in the number of businesses, but it does have consequences such as a reduction in the target market, a decrease in labour demand, and changes in the consumption behaviour of an ageing population. Furthermore, a generational turnover issue arises.

The banking sector is challenged to manage changes in the demographic structure of the population by delivering innovative, inclusive, and personalised financial solutions to complement traditional banking services.

## Risk management

### I) Description of setting limits to social risk and cases to trigger escalation and exclusion in the case of breaching these limits.

The monitoring and reporting processes represent a set of activities aimed at the analysis and periodical reporting of the evolution of the exposure profile to operational and reputational risks, including social factors, with a view to identifying and describing the changes observed in the dynamics of the risk in question in terms of number and impacts, as well as the interventions to contain or enhance the degree of surveillance on the risk levels observed. As part of periodic reporting on operational and reputational risks, the results of indicator assessment and monitoring are accounted for, with specific indicators concerning social aspects, the aim being to inform the relevant corporate functions about any breaches of the thresholds set for the implementation of the actions required to contain and reduce risk levels.

#### ESG-linked Loan Origination Policy

The Group sets out its approach in the area of social risks potentially linked to recipient companies of the loans under the “ESG-linked Loan Origination Policy”.

In particular, in application of the principles to comply with the minimum clauses safeguarding human rights, it prohibits the granting of new or further funding to counterparties or all companies that belong to the scope of consolidation of counterparties, where it emerges, both in the initial credit evaluation stage, and during the periodic reviews, evidence of legal proceedings made by the competent authorities, in any jurisdiction, where there has been a conviction relating to the violation of human rights, or laws in the area of health and safety, both with reference to workers and the local communities; of fundamental labour rights and rules in the area of child labour and forced labour, and other elements relating to the sphere of corporate governance for which reference should be made to Table 3 “Qualitative information on governance risk”, letter c.

Violations of minimum safeguard clauses are monitored, only for counterparties that are listed and issue listed securities, by accessing specific databases that allow for the detection of such evidence on the counterparties on which the convictions are found. In these cases, specific evidence will be attached to the counterparty’s master record to permit immediate identification: a reinforced credit process will also be activated if there are exposures present.

It should be noted that to date, no violations have been detected on the main international databases concerning customers of the BPER Banca Group.

In its ESG-linked Loan Origination Policy, the Group additionally sets out specific provisions depending on the sector in which the counterparties operate, in particular for the mining, shipping and agricultural sectors. In this sense, it includes:

- due diligence to verify compliance with labour rights and conditions in accordance with the main International Labour Organisation (ILO) conventions in the case of project financing to counterparties operating in the mining and shipping industries;
- exclusion from financing ships flying the flag of countries on the Black List of the Paris Memorandum of Understanding on Port State Control in force at the time.

For the agricultural sector, the BPER Banca Group also applies exclusion criteria to counterparties who have been definitively convicted of illegal hiring under current national or international legislation on undeclared work, the exploitation of labour in agriculture and wage realignment.

The Group works with providers in relation to counterparties subject to Sustainability Statement, which highlight possible violations of the UN Guiding Principles on Business and Human Rights and the main ILO conventions. In the case of counterparties that are not subject to Sustainability Statement and whose main business activity is in one or more of the sectors covered by the Policy, the

Group also collects timely information through specific counterparty and/or due diligence questionnaires and project assessments, to enable the application of such principles, subject to the principles of proportionality and relevance of the exposure.

Additional controls pertain to the ordinary monitoring of credit quality and are part of the credit monitoring process. Through the client company's relationship manager, any negative social situations, such as tensions with employees leading, *inter alia*, to work stoppages or disputes with a fiduciary impact can be reported and addressed for enhanced credit management. Press news related to events that breach prevailing laws are also blocked, turning on specific alerts.

In the case of adverse information against the company or seizures, including as a result of infringements with impacts on issues that are relevant from a social standpoint, the initiation of procedures regarding the event will trigger the early warning mechanism, with possible consequences, including a lower classification of the counterparty. In addition, in the event of a final conviction, the exposure is managed in order to end the relationship with the convicted party.

Funding will not be given to new customers operating to a significant extent (>30% of turnover) in the gambling sector, due to the relevant negative social impacts that could occur.

### **Policy governing the relations of the BPER Banca Group Banks and Companies with defence operators, weapons manufacturers and dealers**

The "Policy governing the relations of the BPER Group Banks and Companies with defence operators, weapons manufacturers and dealers" regulates relations between BPER Group Companies with defence operators and companies involved in the production of and trade in armament materials and military supplies; in particular, the Policy is aimed at balancing the interests of defence operators and companies involved in the production of and trade in armament materials with those of civil society, regulating the type of relationships that entities operating in the defence and armaments sector may have with the Group, in accordance with the Parent Company's Code of Ethics, reducing any exposure to reputational risk. Any exception to the Policy in the Group Companies, including any waivers on individual collection and payment transactions, shall be submitted in advance by the ESG Strategy Unit, to the Parent Company's CFO.

Although BPER Banca and its subsidiaries are not permitted to be direct shareholders in companies that trade in or manufacture conventional weapons, sporting, hunting and collectible weapons, common firearms and non-automatic short firearms nor, in general, in weapon storage companies and commercial brokerage, any waivers on these direct shareholdings shall be authorised by the Chief Executive Officer. Any granted waivers shall be reported quarterly to the Chief Financial Officer and the Supervisory Body pursuant to Legislative Decree no. 231/01.

## Risk management

### **m) Description of the link (transmission channels) between social risks with credit risk, liquidity and funding risk, market risk, operational risk and reputational risk in the risk management framework.**

Within the scope of developing the risk identification process, the BPER Banca Group considers the potential impact of social factors for market, operational and reputational risk. The results of the materiality analysis are reported in Table 1 "Qualitative information on environmental risk", letter o).

With special reference to the transmission channels identified to transfer the effects from the social risk factors to the main company risks, the following examples are given:

#### *Market Risk*

- The macro-economic contexts featuring strong transition policies towards a green economy and the possible consequences of a reputational nature could entail a sudden redefinition of the price of equity, debt and derivative securities, with particular focus on products linked to brown activities and/or sectors with a resulting negative impact on the Group's banking and trading book portfolio.

#### *Operational risk*

- Possible claims for damages following the sale of financial instruments that do not comply with the declared levels of sustainability and/or are not in line with the characteristics envisaged by the reference regulations (Reg. EU 2020/852, Reg. EU 2019/2088, etc.) or do not comply with the disclosure transparency requirements in terms of the adequacy of the information provided to the customer (known as "Greenwashing");
- potential operational losses deriving from the use of unfair market practices that may harm customers and/or counterparties, and from events that may damage relationships with external stakeholders (i.e. fraud, inappropriate product placement);
- possible operational losses related to events attributable to injuries or occupational diseases occurred during operating activities due to non-compliance with the relevant regulations in the field of employee benefits;

- possible operational losses attributable to lawsuits filed by employees for matters concerning remuneration, indemnities and employment relationship;
- possible impact of sanctions for non-compliance with legislation on remuneration policies and practices.

#### Reputational risk

- Possible repercussions of negative perceptions due to partnerships with companies with low sustainability standards;
- possible decisions, statements or commercial relations contrary to supportive climate and environmental policies, or negative company issues and bad governance practices;
- negative perception of a rating downgrade due to non-compliance with sustainability standards;
- negative perception of possible legal disputes with staff for incidents of discrimination (e.g. gender, ethnicity, religion), possible legal disputes with customers and suppliers, sanctions by the Supervisory Authority.

As regards credit risk, the BPER Banca Group has also defined in its “ESG-linked Loan Origination Policy”, its own approach to social risk factors in loan origination. Please refer to the contents of letter I) of this Table for more information.

### Table 3: Qualitative information on governance risk

The following table shows the information required under Article 449a of the CRR, in addition to Article 435 (1) and (2) CRR.

	Governance
a)	<b>Institution’s integration in their governance arrangements of the governance performance of the counterparty, including committees of the highest governance body, committees responsible for decision-making on economic, environmental, and social topics.</b>

The BPER Banca Group has structured 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. In that regard, the approval of the “ESG Policy” in November 2022 was significant, which further strengthened governance of ESG issues for the pursuit of sustainable success.

On 14 October 2021, the Board of Directors established the Board-internal Sustainability Committee, which was assigned a support role in the Board’s sustainability activities, with reverberations on all processes, structures and company controls through which the Bank guarantees the pursuit of sustainable development, with particular reference to environmental, social and governance themes, in compliance with Principle I of the Code of Corporate Governance and the principles drawn up by the competent international bodies.

The main ESG roles and responsibilities applied in the various bodies are as follows:

**Board-internal Sustainability Committee:** supports the Board of Directors’ activities in the field of ESG and sustainability, with an impact on all the processes, structures and corporate controls through which the Bank ensures the pursuit of sustainable development, with particular reference to environmental, social and governance issues. In particular the Committee:

- reviews and assesses, at least once a year, the content of the Group’s ESG 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 and disclosures - including the Consolidated Sustainability Statement, prepared by the ESG Strategy Unit and the PRB Report;
- 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, throughout the Bank’s organisational structure, 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;
- reports at least annually to the Board of Directors on the overall activities carried out.

**Board Control and Risk Committee:** The Board Control and Risk Committee supports the BoD in assessing the ESG elements emphasised in the internal control system, identifying risks (“Group Risk Map”), risk objectives (“Risk Appetite”), tolerance thresholds (“Risk Tolerance”) and strategies for capital and liquidity management, as well as on all relevant risks of the Bank and the BPER Banca Group. In addition, the Control and Risk Committee periodically assesses 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. The body meets to discuss sustainability and climate issues on a regular basis and among its various activities assesses the individual risk management policies and the quarterly reporting on risks which includes discussions specifically focusing on ESG risks.

Within the scope of the prevailing 2024-2027 Business Plan, the BPER Banca Group added the sustainability issues; the projects with ESG impacts added to the Business Plan are monitored on a quarterly basis and submitted to the Sustainability Committee.

In addition to the above-mentioned Committees, a further Management Committee was established by the previous BoD in 2020, which was renamed the **ESG Management Committee** in 2022. This Committee, whose Regulation was updated in 2024, consists of the CEO (permanent guest), the Chief Financial Officer (CFO), who acts as chair, all the Chiefs of the Parent Company, the Manager responsible for preparing the company’s financial reports, the Head of Management and Planning & Control, the Head of Organisation Department and the Head of the ESG Strategy Office. The latter, together with the CFO, coordinates the activities and meetings of the Committee. The ESG Management Committee facilitates the coordination of Corporate and Group Departments with regard to sustainability issues and supports the CEO in the management of ESG and sustainability issues at both Parent Company and Group level. In addition, the Committee monitors the BPER Banca Group’s positioning in terms of sustainability and the 17 UN goals (SDGs) and promotes and manages the ESG strategy and sustainability issues, in line with what is defined in the Business Plan that incorporates sustainability issues, with the support of the ESG Strategy Service. The aforementioned Committee meets on a quarterly basis and, besides an update on the progress of the projects concerning ESG impact, in 2024 and in 2025, discussions focused on the integration of ESG factors in the processes underpinning the loan, risk management, strategic planning and investment services, HR.

The ESG Strategy Unit supports the ESG Management Committee in the operational management of sustainability and climate issues in accordance with the provisions of the Business Plan, which integrates Sustainability issues. Furthermore, it acts across-the-board at Group level on sustainability and climate issues, directly managing strategic planning and supporting the relevant corporate structures in achieving sustainable development goals.

Details of the core activities carried out by the ESG Strategy Unit are reported below:

- sustainability reporting:
  - preparation of sustainability reporting (CSRD) integrated with the climate-related information previously contained in the TCFD Report;
  - preparation of the PRB Report;
  - management of ESG ratings;
- strategic and sustainability planning;
  - benchmarking in order to identify market trends and establish a proposal for the main ESG goals to be included in the Business Plan as well as participation in the Project definition stage for the aspects within its remit;
  - support in defining the ESG budget objectives;
  - definition, monitoring and reporting of the ESG KPIs for the remuneration policies;
- ESG monitoring;
  - regulatory monitoring and macro-analysis of impacts by discussing the new ESG goals with the functions;
  - monitoring of Business Plan and non-Business Plan projects and ESG KPIs, with verification of the progress made;
  - monitoring and control of the management of direct and indirect environmental impact;
  - management of the Portfolio Alignment activities to monitor the emission alignment of the portfolio to de-carbonisation objectives;
- management of ESG data:
  - mapping of ESG information requirements;
  - coordination of data acquisition/purchase processes;
  - coordination of the ESG data management process;
  - regulatory monitoring and macro-analysis of the impacts of information requirements;
- management of environmental sustainability projects;
  - management of processes linked to stated de-carbonisation objectives;
  - management of relevant sustainability projects and identification of strategic ESG targets;
- coordination of discussions with supervisory bodies and stakeholders:
  - managing relations with the ECB on climate and environmental risk issues and coordinating cross-sectoral ESG exercises initiated by supervisory bodies (e.g., ECB Climate and Environmental Risk questionnaires);
  - management of relations and communications with international bodies regarding compliance with sustainability frameworks and ESG ratings;

#### 14. ESG risk

- monitoring consistency of ESG information disseminated outside the company, even through retrieval of relevant ESG data and information for clear, transparent and consistent communication of Group policies and actions;
- management of reputational impacts related to sustainability issues;
- support for Committees and other corporate functions:
  - Internal Sustainability Board Committee on the promotion and management of the strategy on sustainability and climate issues;
  - ESG Management Committee in the operational management of sustainability issues in accordance with the plan objectives;
  - coordination of ESG Managers and company functions on ESG issues;
  - all Group structures on ESG issues also through the identification and delivery of training and consultancy services on sustainability issues and reporting;
- Energy & Mobility Management:
  - proposal and supervision of measures to contain energy consumption, with a view to sustainability, within the various company activities even through specific projects and the launch of green initiatives (Energy Management);
  - management of the Energy Plan, definition, coordination, implementation and monitoring of the objectives;
  - Mobility Management activities with the identification of initiatives to reduce environmental impacts due to business mobility and employees' home-to-work mobility.

The new ESG policy contains the key figures of the ESG Managers, defined in the structures that are active on ESG issues and who represent their pivotal figures, with the following functions:

- 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 are coordinated by the ESG Strategy Unit and meet at ESG round-table work groups, assisting the same function in implementing ESG projects. There are about 35 ESG Managers, also present in the Legal Entities Sardaleasing, Bibanca, Banco di Sardegna, Finitalia and BPER Factor. In addition to the ESG Managers, other additional across-the-board support functions within the Bank have been identified with specific knowledge on ESG issues, such as, by way of example: the Risk & ESG Integration Office, the Regulation & ESG Credit Adequacy Office, the Financial & Sustainability Reporting Supervision Unit, the Protection & ESG Modelling Office, the Audit Risk Governance, ESG & Property Office.

In 2023, BPER activated an initial exercise to supplement the analysis of “corporate governance” factors with specific counterparty ESG scores in the credit origination approvals for the most significant counterparties/exposures. The ESG score is obtained from a specialist external information provider and includes elements such as the adoption of best practices in disclosure and transparency (e.g. voluntary adoption of audited Financial Reports, and/or the Board of Statutory Auditors) and in the management of external stakeholders (e.g. disclosure of ESG and sustainability issues on the corporate website) and internal stakeholders (e.g. remuneration levels and inclusion of women and young people among employees) in the assessment of the governance component. These elements corroborate the traditional analyses carried out during the assessment of creditworthiness concerning the correctness of the counterparty in terms of the regularity of tax payments and contributions, the presence of the legality rating, the presence of negative information such as protested cheques/bills or prejudicial information regarding company representatives and, in general, the fitness and propriety of the company structure and company representatives.

In the Wealth Management segment, the Banks of the BPER Banca Group adopt a structured approach to the integration of sustainability risks into decision-making processes on investments, both for portfolio management services and for financial advisory services. The selection of financial products takes into account the information provided by manufacturers, if available, and is based on the application of exclusion criteria and on the use of an ESG score provided by independent third-party data providers, integrated with internal qualitative analyses. This approach enables the identification and mitigation of environmental, social and governance (ESG) risks that could have adverse impacts on the value of the investments.

The sustainability preferences expressed by the customers are gathered through the MiFID questionnaire, updated in December 2024 with new questions aimed at assessing the interest in environmentally sustainable, sustainable investments and investments who take into consideration adverse effects on sustainability factors (the PAI or Principal Adverse Impacts). This update allows an increased consistency between the proposed investments and the sustainability targets declared by customers.

The Banks of the BPER Banca Group, in their capacity as Participants in the financial markets as they provide portfolio management investment service, take into consideration the Principal Adverse Impacts (“PAI”) on investment decisions on sustainability factors. The “PAI Declaration” was published on 30 June 2025, with reference to the period going from 1 January to 31 December 2024. The comparison with the previous year shows changes mainly attributable to the evolution of managed assets and the transfer of the “Private Banking” business unit from BPER Banca to Banca Cesare Ponti at the beginning of 2024. BPER Banca recorded an improvement of absolute and relative indicators, thanks to the reallocation to instruments with more sustainable ESG profiles. Banca Cesare Ponti shows an increase in indicators, which cannot be compared with the previous year due to an expansion in the scope of application. Banco di Sardegna showed a gradual improvement in most indicators, with a marginal increase associated with the increase in managed assets.

The Group Banks take into consideration every mandatory PAI indicator and two additional indicators set forth by Delegated Regulation (EU) 2022/1288, subject to data availability and quality. Monitoring focuses particularly on the following PAIs, identified as “top priority”:

- PAI 2 - Carbon footprint;
- PAI 3 - GHG intensity (greenhouse gas intensity of investee companies);
- PAI 5 - share of non-renewable energy consumption and production;
- PAI 10 - Violations of the UNGC principles and OECD Guidelines for Multinational Enterprises;
- PAI 15 - GHG intensity (Sovereign issuers and International organisations).

As of 1 January 2025, the Group has decided to replace PAI 5 (Share of consumption and production of non-renewable energies), which concerns environmental issues that are already covered by other priority indicators, with PAI 14 (Exposure to controversial weapons). This update was also carried out in line with national regulations (Law no. 220/2021), with the exclusion policies provided for by the Internal Regulation concerning the PAI consideration process in investment decisions at the entity level.

The Group Banks, as financial advisors pursuant to the SFDR Regulation, also incorporate PAIs in financial advisory services.

Training sessions dedicated to branch employees have held on an ongoing basis, in line with MiFID requirements, to ensure an adequate awareness on ESG topics and to support efficient and responsible advisory services.

The “B:Dynamic|Full value 2027” Business Plan confirms the Group’s commitment to sustainability with ambitious objective in the environment, social and governance field. In particular, in Wealth Management, an objective was set to achieve a 45% share of ESG assets on the total managed assets (funds, portfolio management and pension funds) by 2027.

## Governance

### b) Institution’s accounting of the counterparty’s highest governance body’s role in non-financial reporting.

Over the last few years, the BPER Banca Group has structured 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. In that regard, the approval of the “ESG Policy” by BPER Banca’s Board of Directors on 24 November 2022 was significant, which further strengthened governance of ESG issues for the pursuit of sustainable success.

On 14 October 2021, the Board of Directors established the Board-internal Sustainability Committee, which was assigned a support role in the Board’s sustainability activities and, therefore, in tackling Climate Change, with reverberations on all processes, structures and company controls through which the Bank guarantees the pursuit of sustainable development, with particular reference to environmental, social and governance themes, in compliance with Principle I of the Code of Corporate Governance and the principles drawn up by the competent international bodies.

As at today’s date, the Sustainability Committee consists of the director, Antonio Cabras, who acts as Chair of the Committee, and the directors Maria Elena Cappello and Andrea Mascetti.

The aforementioned Internal Board Committee augments an additional Committee established by the previous Board of Directors in the last months of 2020, which was renamed the ESG Management Committee in 2022, whose Regulations and rules of operation were updated in 2024. This Committee consists of: the CEO (permanent guest), the Chief Financial Officer (CFO), who acts as Chair, and all the Chiefs of the Parent Company, as well as the Manager responsible for preparing the company’s financial reports, the Head of Management and Planning & Control, the Head of Organisation Department and the Head of the ESG Strategy Office. The latter, together with the CFO, coordinates the activities and meetings of the Committee, which meets quarterly.

Thus, to date, the evolution of BPER Banca’s governance in ESG terms concerns the Group’s entire corporate organisation, starting from the body with strategic supervisory functions, which relies on the support of the Sustainability Committee established internally, and continuing with the ESG Managerial Committee and the ESG Strategy Unit that, reporting directly to the CFO, provides support across the board to all the bank’s functions in managing ESG issues.

The new Policy contains the key figures of the ESG Managers, defined in the structures that are active on ESG issues and whose functions are explained in point a) of this Table.

The ESG Strategy Unit is active in the main national and European round-table working groups: the Head of the Unit represents BPER Banca in various working groups on sustainability (ABI, Global Compact, *Impronta Etica*), is a member of the BoD of FEduF (*Fondazione per l'educazione finanziaria e il risparmio* - Foundation for Financial Education and Savings), a member of the Board of the Forum for Sustainable Finance and lastly a member of the EBF Chief Sustainability Officer Roundtable.

A summary of ESG roles and responsibilities based on the current governance structure is shown below:

- Board of Directors: defines Group guidelines and strategies with regard to ESG issues, and approves the Consolidated Sustainability Statement, the PRB Report, Business Plan, Risk Appetite Framework and Risk Governance Policies;
- Chief Executive Officer: implements, within the scope of his/her delegated powers, the strategic guidelines and the Plan and oversees the operational activities, actions to be implemented and monitored related to sustainability, with the support of the ESG Strategy Unit and the ESG Management Committee;
- Sustainability Committee: performs support functions for the Board of Directors' ESG activities, reviews the ESG Policy, the Consolidated Sustainability Statement and the PRB Report, evaluates the Bank's positioning in sustainability benchmarks, monitors relevant initiatives and assesses scenarios and macro-trends;
- ESG Management Committee: facilitates the coordination of Corporate Functions and supports the Chief Executive Officer in the management of ESG issues, monitors the positioning of the BPER Banca Group with respect to sustainability and the 17 UN goals (SDGs) and, lastly, promotes and manages the ESG strategy and sustainability issues;
- Chief Financial Officer (CFO): manages the implementation of the strategic guidelines and the Sustainability Plan approved by the Board of Directors and the sustainability-related operational activities of the ESG Strategy Unit;
- ESG Strategy Unit: has the priority tasks of sustainability reporting, defining the relevant issues and sustainability indicators to be disclosed, contributing to the drafting of the Business Plan with regard to projects impacting ESG issues. The Unit also supports the Sustainability Committee in promoting and managing the strategy on ESG issues and the Management Committee in the operational management of ESG and climate change issues. To do so, the ESG Strategy Unit assesses the ESG impacts of the Group's initiatives, including through stakeholder engagement activities, and manages Energy and Mobility Management activities. The Unit is also responsible for managing the relationship with ESG rating agencies and relations with the ECB with regard to climate and environmental risk issues within its remit (e.g. disclosure, organisational structures, ESG Strategy), coordinating the cross-sectoral ESG exercises initiated by supervisory bodies (e.g. ECB Climate and Environmental Risk questionnaires).

The Consolidated Sustainability Statement drafting activity is governed by an Internal Regulation and its related Operational Instructions.

The attention paid to the management of sustainability/Climate Change issues is confirmed by the appointment of an Energy Manager and a Mobility Manager, both of whom work in the ESG Strategy Unit.

At Group level, it is important to highlight that all the companies included in the consolidated scope have an ESG Contact Person who collaborates with the ESG Strategy Unit in the preparation of the Consolidated Sustainability Statement and in the management of activities on sustainability/Climate Change issues.

The activities needed to draw up the 2025 Consolidated Sustainability Statement were initiated in the first half of 2025.

In 2024 information on corporate customers was incorporated with a section dedicated to ESG profiles, in order to allow the manager to analyse the main characteristics of the counterparty's sustainability profile, both according to its sector of belonging and on the basis of precise information, also collected through ESG questionnaires.

In addition to the applicability of the ESG policy in accordance with the operating sector of the customer company, specific risk scores are shown on the individual EBA factors of governance risk elements (see Table 3 "Qualitative information on governance risk", letter c).

For the most significant counterparties, in addition to the Consolidated Financial Report or Separate Financial Report, a qualitative analysis is made, and a report drawn up, with comments by specialised analysts, of the Sustainability Statement on the companies subject to said obligation. This analysis focuses on data from the official Financial Reports of the counterparty to the extent they have been validated by the corporate top management.

The qualitative analysis also provides a general assessment of how complete the issues that the bank believes could be material have been dealt with. However the number of these counterparties is still quite small.

## Governance

- c) **Institution's integration in governance arrangements of the governance performance of their counterparties including:**
- (i) **Ethical considerations**
  - (ii) **Strategy and risk management**
  - (iii) **Inclusiveness**
  - (iv) **Transparency**
  - (v) **Management of conflict of interest**
  - (vi) **Internal communication on critical concerns.**

The ESG problems we are currently facing are unprecedented and require action from all parties involved, in all types of organisations. For this reason, the BPER Banca Group has undertaken engagement activities with its suppliers since 2019. For sustainable growth in line with the 2030 Agenda and the Sustainable Development Goals, it is crucial to look at the entire value and supply chain.

Working with suppliers who share the same values is of great impact both for the business and for achieving sustainability goals, not only from an environmental point of view, but also from a social, governance and economic one. In order to strengthen the responsible approach in the supply chain, in cooperation with the ABC Consortium, from 2019 to 2021 the BPER Banca Group implemented a supplier engagement project in order to assign a Sustainability Rating to the Group's top 200 suppliers. The pilot project included an evaluation system carried out through a documentary audit, after which the individual supplier received an ESG rating free of charge.

After the pilot engagement phase (2019-2021 Business Plan) of the first 200 suppliers was completed, the entire procurement process was revised from an ESG perspective, with the aim of selecting both suppliers and purchased products. The Green Procurement project included in the 2022-2024 Business Plan, concerning the integration of ESG criteria in the procurement and supplier management processes, was developed starting from the need to rationalise corporate purchasing and consumption. To fulfil this objective, the BPER Banca Group aims to carefully select its purchases according to Italian and European Minimum Environmental Criteria.

### ESG-linked Loan Origination Policy

The Group sets out its approach on environmental, social and governance issues in the credit assessment of the recipient companies of the loans under the "ESG-linked Loan Origination Policy".

More specifically, it clarifies the elements to justify denial of eligibility for financing due to convictions resulting from serious infringements of prevailing laws on human rights, fraud relating to financial and sustainability reporting, money laundering, corruption or terrorist financing. In any case, once any negative findings are made, the credit relationship is reinforced, making the necessary in-depth investigations.

In addition, the principles provided for by law and relevant internal regulations to address money laundering and the financing of terrorism, as well as the prohibition of financing in any form of companies involved in any way in the production or marketing of anti-personnel mines, munitions and cluster submunitions, (together with other elements concerning social and environmental aspects, for which reference is made to Table 1 (c) "Qualitative information on environmental risk" and Table 2 (c) "Qualitative information on social risk") apply across the board to all sectors and types of counterparties.

Violations of minimum safeguard clauses are monitored, only for counterparties that are listed and issue listed securities, by accessing specific databases that allow for the detection of such evidence on the counterparties on which the convictions are found. In these cases, specific evidence will be attached to the counterparty's master record to permit immediate identification: a reinforced credit process will also be activated if there are exposures present.

It should be noted that to date, no violations have been detected on the main international databases concerning customers of the BPER Banca Group.

### Lawfulness Rating

Additionally, in application of Ministerial Decree no. 57/2014 (legality rating of companies), the Group identifies and recognises the responsible companies with legality ratings, rewarding them in the assessment of the governance profile due to their recognised and certified positive characteristics. These counterparties, have received special attention by the Group with regard to transactions connected to the participation in public calls for tender (both within the context of the ROP-ERDF and the NRRP).

### Integration of ESG analyses into the credit granting process

In 2024 information on corporate customers was incorporated with a section dedicated to ESG profiles, in order to allow the manager to analyse the main characteristics of the counterparty's sustainability profile, both according to its sector of belonging and on the basis of precise information, also collected through dedicated questionnaires.

In addition to the applicability of the ESG policy in accordance with the operating sector of the customer company, specific risk scores are shown for every social risk factor set out by the EBA. In addition, a summary view of any critical areas is offered by means of a counterparty ESG score, which expresses the counterparty's ranking in all assessment KPIs in the environmental, social and governance areas defined by the EBA with a traffic light indicator, also according to its sector of belonging.

The scores in the governance area include the following for the corporate counterparties:

- ethical considerations;
- strategies and risk management;
- transparency;
- inclusiveness.

As detailed in Table 1, letter d), the BPER Banca Group began cooperating with a specialised infoprovider for gathering more detailed information through questionnaires on the adoption of a Code of Ethics regulating, among other things, conflicts of interest and internal management mechanisms and channels for communicating any concerns of employees and equivalent personnel or irregularities (whistleblowing).

Additional credit quality controls are part of the credit monitoring process. Through the client company's relationship manager, any negative social situations, such as tensions with employees leading, *inter alia*, to work stoppages or disputes with a fiduciary impact can be reported and addressed for enhanced credit management. Press news related to events that breach prevailing laws are also blocked, turning on specific alerts.

If there is adverse information on the company or its representatives such as protested cheques/bills, foreclosures or seizures, the entering of such an event in the software will trigger the early warning mechanism, while at the notification of the manager it can be added to the watchlist, with possible consequences, including a mark-down of the classification. In addition, in the event of a final conviction, the exposure is managed in order to end the relationship with the convicted party.

## Governance

- d) **Institution's integration in risk management arrangements of the governance performance of their counterparties including:**
- (i) **Ethical considerations**
  - (ii) **Strategy and risk management**
  - (iii) **Inclusiveness**
  - (iv) **Transparency**
  - (v) **Management of conflict of interest**
  - (vi) **Internal communication on critical concerns.**

### Risk management

As part of the operational and reputational risk management frameworks, the BPER Banca Group defines the Governance risk on the basis of international standards and, more specifically, reference is made to the concepts included in the “Eba Report On Management And Supervision Of ESG Risks For Credit Institutions And Investment Firms” (EBA/REP/2021/18) guidelines.

As described in Table 1 “Qualitative information on environmental risk”, letter I), the Group manages ESG factors within the scope of its Risk Appetite Framework progressively integrated on the basis of the priorities and materiality of the ESG factors.

With regard to the risk identification process (Risk Map), specific criteria were identified to identify the impacts of the ESG factors on the existing risk categories; in this context, fine-tuning continued with respect to how to assess the materiality of the ESG factors which now constitute a specific, focused analysis in identifying what risk factors, through defined transmission channels, can be considered to have a material impact on the main corporate risks (compared to the previous year, no specific ESG sub risks connected to the main risks were identified).

With special reference to governance risk factors, the following activities are taking place within the overall risk management framework in the areas of risk identification, measurement/assessment, monitoring and reporting.

Special transmission channels relating to governance factors were identified with regard to the operational risks (and periodically updated) which may result in operating losses for the Group: in that case, the “Operational Risk Map” is updated, including through new classification attributes also including the development of ESG factors.

Operating losses connected to ESG events, gathered through the Loss Data Collection process, are reported in the quarterly report, both from the standpoint of the frequency associated with the events reported in the period, and the standpoint of the severity relating to the accumulated losses accounted for in the quarter in question. The governance risk factors are also considered in the definition of certain scenarios used in the risk self assessment.

With regard to reputational risk, the environmental, social and governance risk factors are already considered in the management framework in terms of direct or indirect exposure of the Group and its counterparties.

In that sense, the “Catalogue of reputational scenarios” is regularly updated, the element at the basis of the reputational risk assessment analyses, which also considers the governance risk factors. These are also considered within the scope of reputational key risk indicators and in the reputational data collection where events of this type may occur. The findings from these analyses are reported in the risk reports.

Furthermore, as concerns credit risk management, in sampling counterparties and collateral to be submitted to Single and Collateral File Review, the BPER Banca Group incorporated the second level credit control framework by adopting selection criteria based on drivers dedicated to the identification of climate-related and environmental (E), social (S) and governance (G) risk factors. The results of the analyses carried out, focused on the integration of the assessments relating to the climate and environmental risk factors within the scope of managing credit risk, were included in the periodic report on the control activities in the management reports.

Furthermore, in the management of credit risk, and in line with the bank's commitment to combating pathological gambling, the ESG-linked Loan Origination Policy formalises a non-expansive approach to customers operating predominantly in the economic sector related to gambling and betting, making explicit a negative factor from an ethical point of view, as well as a harbinger of potential negative effects from both a social and economic perspective. The ESG-linked Loan Origination Policy also includes an explicit commitment not to finance counterparties (or, if already customers, to immediately deepen the relevant analyses and direct them to the remedial actions addressed) that, at the time of initial assessment or periodic review, have been subject to legal proceedings initiated by competent authorities in any jurisdiction for financial or non-financial reporting fraud, money laundering, corruption or terrorist financing. Recognition takes place at least on the basis of Principal Adverse Impact 10 evidence acquired on counterparties subject to sustainability disclosure requirements.

As a general safeguard on credit quality, the client company's relationship manager may at any time report and address any circumstances leading to serious damage at Corporate Governance level for an enhanced credit management. Press news related to events that breach prevailing laws are also blocked, turning on specific alerts; the occurrence of relevant evidences will result either in the early warning mechanism being triggered or the counterparty being classified as watch list, with possible consequences, including a mark-down of the counterparty's classification. In the event of a final conviction, the exposure is managed in order to end the relationship with the convicted party.

As detailed in Table 1, letter d), the BPER Banca Group began cooperating with a specialised infoprovider for gathering more detailed information through questionnaires on the adoption of a Code of Ethics regulating, among other things, conflicts of interest and internal management mechanisms and channels for communicating any concerns of employees and equivalent personnel or irregularities (whistleblowing); however, it cannot monitor whether the corporate centres implement policies to protect people that use these structures and processes from any repercussion.

With regard to supplier management and evaluation with regard to their ESG performance, the description of the Business Plan project described above is given below.

The procurement cycle for Group Companies, in accordance with the "Regulations for the purchasing process and payables cycle", governing the roles and responsibilities of the various functions involved, is overseen by the Procurement Service Centre. The mission of the Function is to ensure that internal customers benefit from the availability of products and services that best satisfy their requirements, selecting suppliers that guarantee the best balance between price and quality of service, as well as those able to satisfy the company's expectations in regard to social and environmental responsibility.

The risks relative to the supply chain are carefully governed through preliminary analysis and document requests that enable each supplier to be assessed as extensively as possible. The reputational risks in this area are mapped together with the designated office and monitored periodically.

Since 2023, the Procurement Centre unit has engaged in a project aimed at revising the tools used during the various stages of the procurement process, for which a dedicated platform has been implemented. In this context, new supplier and supply assessment criteria have been introduced which also take into account ESG elements. In particular, these criteria are applied in the following application forms:

- Tender forms: Minimum Environmental Criteria (MECs) have been introduced for each goods sector in order to take them into account, along with other elements, in supply tenders for the procurement of goods and services;
- Vendor Management form: the new BPER supply register approval process involves the compilation of a questionnaire with a section dedicated to ESG elements, where data and certifications are provided that contribute to the overall evaluation of the supplier;
- Contract Management form: the process of creating, formalising, executing and managing the contracts with a view to maximising the operational and financial performance of a company by means of a correct and transparent formalisation of relations with the supplier.

Please refer to paragraph "4.1.3 Management of relationships with suppliers, including payment practices" in the Consolidated Sustainability Statement for further details.

### Template 1: Banking book - Indicators of potential climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity (in millions)

Sector/Subsector	a	b				c				d	e	f				g	h
		Gross carrying amount										Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions					
		Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with Article 12(1) points (d) to (g) and Article 12 (2) of Regulation (EU) 2020/1818		Of which environmentally sustainable (CCM)		Of which Stage 2 exposures		Of which non-performing exposures				Of which Stage 2 exposures		Of which non-performing exposures			
1	<b>Exposures towards sectors that highly contribute to climate change*</b>	<b>33,096</b>	<b>589</b>						<b>3,670</b>	<b>1,307</b>	<b>(1,021)</b>	<b>(146)</b>	<b>(777)</b>				
2	A - Agriculture, forestry and fishing	1,041	2						156	49	(34)	(7)	(23)				
3	B - Mining and quarrying	129	24						8	1	(1)	-	(1)				
4	B.05 - Mining of coal and lignite	-	-						-	-	-	-	-				
5	B.06 - Extraction of crude petroleum and natural gas	72	18						-	-	-	-	-				
6	B.07 - Mining of metal ores	-	-						-	-	-	-	-				
7	B.08 - Other mining and quarrying	50	-						3	-	-	-	-				
8	B.09 - Mining support service activities	7	6						5	1	(1)	-	(1)				
9	C - Manufacturing	13,221	217						1,396	326	(268)	(42)	(201)				
10	C.10 - Manufacture of food products	2,217	-						222	53	(46)	(5)	(35)				
11	C.11 - Manufacture of beverages	263	-						16	3	(3)	-	(1)				
12	C.12 - Manufacture of tobacco products	29	-						-	-	-	-	-				
13	C.13 - Manufacture of textiles	235	-						37	20	(13)	(1)	(11)				
14	C.14 - Manufacture of wearing apparel	268	-						34	15	(11)	(1)	(8)				
15	C.15 - Manufacture of leather and related products	173	-						21	25	(16)	-	(15)				
16	C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	215	-						24	9	(7)	(1)	(6)				
17	C.17 - Manufacture of paper and paper products	299	-						23	1	(2)	(1)	(1)				
18	C.18 - Printing and reproduction of recorded media	119	-						33	5	(4)	(1)	(3)				

\* In accordance with the Commission Delegated Regulation (EU) 2020/1818 supplementing Regulation (EU) 2016/1011 as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks - Climate Benchmark Standards Regulation - Recital 6: Sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) no. 1893/2006.

**continued: Template 1: Banking book - Indicators of potential climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity (in millions)**

Sector/Subsector	a	b				c				d	e	f				g	h
		Gross carrying amount										Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions					
		Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with Article 12(1) points (d) to (g) and Article 12 (2) of Regulation (EU) 2020/1818		Of which environmentally sustainable (CCM)		Of which Stage 2 exposures		Of which non-performing exposures				Of which Stage 2 exposures		Of which non-performing exposures			
19	C.19 - Manufacture of coke and refined petroleum products	245	206					6	-	-	-	-	-	-	-	-	
20	C.20 - Manufacture of chemicals and chemical products	643	-					100	6	(7)	(3)	(3)	(3)				
21	C.21 - Manufacture of basic pharmaceutical products and pharmaceutical preparations	556	-					16	-	-	-	-	-				
22	C.22 - Manufacture of rubber products	630	-					94	11	(12)	(3)	(9)	(9)				
23	C.23 - Manufacture of other non-metallic mineral products	726	1					59	19	(12)	(1)	(10)	(10)				
24	C.24 - Manufacture of basic metals	863	-					63	12	(9)	(1)	(7)	(7)				
25	C.25 - Manufacture of fabricated metal products, except machinery and equipment	1,597	-					193	50	(44)	(10)	(30)	(30)				
26	C.26 - Manufacture of computer, electronic and optical products	213	-					61	7	(7)	(2)	(4)	(4)				
27	C.27 - Manufacture of electrical equipment	428	4					63	3	(5)	(1)	(2)	(2)				
28	C.28 - Manufacture of machinery and equipment n.e.c.	1,702	-					158	47	(38)	(5)	(30)	(30)				
29	C.29 - Manufacture of motor vehicles, trailers and semi-trailers	529	-					83	9	(8)	(1)	(6)	(6)				
30	C.30 - Manufacture of other transport equipment	476	-					14	7	(7)	(1)	(5)	(5)				
31	C.31 - Manufacture of furniture	229	-					33	9	(7)	(1)	(5)	(5)				
32	C.32 - Other manufacturing	334	-					21	6	(5)	(1)	(3)	(3)				
33	C.33 - Repair and installation of machinery and equipment	233	5					22	7	(6)	(1)	(5)	(5)				
34	D - Electricity, gas, steam and air conditioning supply	1,358	282					105	18	(28)	(5)	(13)	(13)				
35	D35.1 - Electric power generation, transmission and distribution	1,189	234					94	15	(24)	(4)	(11)	(11)				
36	D35.11 - Production of electricity	626	231					62	12	(21)	(4)	(8)	(8)				
37	D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	143	48					11	3	(4)	-	(1)	(1)				

**continued: Template 1: Banking book - Indicators of potential climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity (in millions)**

Sector/Subsector		a	Gross carrying amount				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions	
			b	c	d	e	f	g
			Of which exposures towards companies excluded from EU Paris-aligned Benchmarks in accordance with Article 12(1) points (d) to (g) and Article 12 (2) of Regulation (EU) 2020/1818	Of which environmentally sustainable (CCM)	Of which Stage 2 exposures	Of which non-performing exposures	Of which Stage 2 exposures	Of which non-performing exposures
38	D35.3 - Steam and air conditioning supply	26	-	-	1	(1)	-	-
39	E - Water supply; sewerage, waste management and remediation activities	830	-	55	11	(10)	(2)	(6)
40	F - Construction	2,819	4	319	230	(180)	(13)	(154)
41	F.41 - Construction of buildings	1,631	2	202	187	(145)	(11)	(124)
42	F.42 - Civil engineering	536	-	46	12	(11)	(1)	(9)
43	F.43 - Specialised construction activities	653	1	71	31	(24)	(2)	(21)
44	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	6,908	48	840	273	(203)	(25)	(158)
45	H - Transporting and storage	1,718	7	129	61	(45)	(6)	(35)
46	H.49 - Land transport and transport via pipelines	817	-	62	39	(25)	(2)	(22)
47	H.50 - Water transport	293	-	8	1	(1)	-	-
48	H.51 - Air transport	19	-	1	-	-	-	-
49	H.52 - Warehousing and support activities for transportation	571	7	58	21	(18)	(3)	(13)
50	H.53 - Postal and courier activities	18	-	-	-	-	-	-
51	I - Accommodation and food service activities	1,562	-	189	114	(70)	(9)	(56)
52	L - Real estate activities	3,509	7	473	223	(182)	(36)	(132)
53	<b>Exposures towards sectors other than those that highly contribute to climate change*</b>	<b>8,631</b>	<b>134</b>	<b>830</b>	<b>158</b>	<b>(149)</b>	<b>(46)</b>	<b>(80)</b>
54	K - Financial and insurance activities	8	-	1	-	-	-	-
55	Exposures to other sectors (NACE codes J, M - U)	8,623	134	829	158	(148)	(46)	(80)
<b>56</b>	<b>Total</b>	<b>41,726</b>	<b>723</b>	<b>4,500</b>	<b>1,465</b>	<b>(1,169)</b>	<b>(192)</b>	<b>(858)</b>

\* In accordance with the Commission Delegated Regulation (EU) 2020/1818 supplementing Regulation (EU) 2016/1011 as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks - Climate Benchmark Standards Regulation - Recital 6: Sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) no. 1893/2006.

**continued: Template 1: Banking book - Indicators of potential climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity (in millions)**

Sector/Subsector	i	j	k	l	m	n	o	p
	GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO <sub>2</sub> equivalent)	Of which scope 3 financed emissions	GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting	<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
<b>1 Exposures towards sectors that highly contribute to climate change*</b>	<b>59,205,604</b>	<b>56,885,613</b>	<b>7.95%</b>	<b>25,167</b>	<b>5,607</b>	<b>2,058</b>	<b>264</b>	<b>3</b>
2 A - Agriculture, forestry and fishing	673,390	637,069	1.77%	647	250	140	4	5
3 B - Mining and quarrying	63,868	50,357	15.39%	119	10	-	-	1
4 B.05 - Mining of coal and lignite	-	-	-	-	-	-	-	-
5 B.06 - Extraction of crude petroleum and natural gas	22,754	19,171	24.25%	72	-	-	-	-
6 B.07 - Mining of metal ores	-	-	-	-	-	-	-	3
7 B.08 - Other mining and quarrying	39,931	30,009	4.59%	40	10	-	-	3
8 B.09 - Mining support service activities	1,183	1,177	-	7	-	-	-	3
9 C - Manufacturing	30,528,325	28,908,188	9.88%	11,753	1,265	189	14	2
10 C.10 - Manufacture of food products	3,683,541	3,561,369	6.49%	1,870	310	32	5	2
11 C.11 - Manufacture of beverages	57,969	49,831	20.33%	216	46	-	-	3
12 C.12 - Manufacture of tobacco products	1,747	962	-	13	16	-	-	4
13 C.13 - Manufacture of textiles	724,018	714,686	1.86%	215	20	-	-	2
14 C.14 - Manufacture of wearing apparel	110,535	103,909	18.61%	248	17	3	-	2
15 C.15 - Manufacture of leather and related products	198,022	195,833	5.50%	157	11	5	-	2
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	343,667	328,240	0.17%	162	48	3	1	3
17 C.17 - Manufacture of paper and paper products	887,459	820,533	7.44%	244	52	2	-	3
18 C.18 - Printing and reproduction of recorded media	53,561	47,237	0,31%	104	12	2	-	2

\* In accordance with the Commission Delegated Regulation (EU) 2020/1818 supplementing Regulation (EU) 2016/1011 as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks - Climate Benchmark Standards Regulation - Recital 6: Sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) no. 1893/2006.

**continued: Template 1: Banking book - Indicators of potential climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity (in millions)**

Sector/Subsector		i	j	k	l	m	n	o	p
		<b>GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO<sub>2</sub> equivalent)</b>	<b>Of which scope 3 financed emissions</b>	<b>GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting</b>	<b>&lt;= 5 years</b>	<b>&gt; 5 year &lt;= 10 years</b>	<b>&gt; 10 year &lt;= 20 years</b>	<b>&gt; 20 years</b>	<b>Average weighted maturity</b>
19	C.19 - Manufacture of coke and refined petroleum products	1,960,073	1,622,081	0.51%	241	4	-	-	1
20	C.20 - Manufacture of chemicals and chemical products	871,445	745,534	29.02%	595	45	3	-	2
21	C.21 - Manufacture of basic pharmaceutical products and pharmaceutical preparations	79,371	64,370	40.06%	521	21	13	-	3
22	C.22 - Manufacture of rubber products	1,775,629	1,744,240	2.28%	574	48	8	-	2
23	C.23 - Manufacture of other non-metallic mineral products	2,179,475	1,963,794	3.77%	595	121	9	1	3
24	C.24 - Manufacture of basic metals	4,045,429	3,589,870	16.26%	841	19	3	-	1
25	C.25 - Manufacture of fabricated metal products, except machinery and equipment	1,413,441	1,331,579	1.85%	1,380	178	36	3	2
26	C.26 - Manufacture of computer, electronic and optical products	342,237	336,467	0.92%	200	9	3	-	2
27	C.27 - Manufacture of electrical equipment	2,497,866	2,486,693	4.14%	357	66	5	-	3
28	C.28 - Manufacture of machinery and equipment n.e.c.	6,675,051	6,631,081	10.22%	1,526	138	38	1	2
29	C.29 - Manufacture of motor vehicles, trailers and semi-trailers	396,291	382,747	34.52%	509	17	3	-	2
30	C.30 - Manufacture of other transport equipment	990,897	987,833	1.70%	464	7	5	-	2
31	C.31 - Manufacture of furniture	759,897	753,919	0.03%	202	24	3	-	2
32	C.32 - Other manufacturing	215,271	187,369	4.94%	310	13	11	1	2
33	C.33 - Repair and installation of machinery and equipment	265,433	258,011	0.01%	206	24	3	1	2
34	D - Electricity, gas, steam and air conditioning supply	402,891	333,970	49.20%	960	292	105	-	4
35	D35.1 - Electric power generation, transmission and distribution	261,232	207,066	50.19%	872	244	72	-	4
36	D35.11 - Production of electricity	114,894	75,245	25.00%	314	242	70	-	5
37	D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	118,432	106,977	49.61%	80	30	33	-	5

**continued: Template 1: Banking book - Indicators of potential climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity (in millions)**

Sector/Subsector	i	j	k	l	m	n	o	p
	GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO <sub>2</sub> equivalent)	Of which scope 3 financed emissions	GHG emissions (column i): gross carrying amount percentage of the portfolio derived from company-specific reporting	<= 5 years	> 5 year <= 10 years	> 10 year <= 20 years	> 20 years	Average weighted maturity
38 D35.3 - Steam and air conditioning supply	23,227	19,927	2.00%	9	18	-	-	6
39 E - Water supply; sewerage, waste management and remediation activities	529,574	476,578	29.06%	513	242	75	-	4
40 F - Construction	3,195,801	3,123,232	1.13%	2,014	451	315	39	4
41 F.41 - Construction of buildings	1,925,889	1,893,568	0.02%	1,039	334	235	22	5
42 F.42 - Civil engineering	664,175	650,453	4.15%	438	37	52	9	3
43 F.43 - Specialised construction activities	605,737	579,211	1.42%	537	79	28	8	3
44 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	22,598,589	22,285,127	2.43%	5,900	801	194	13	2
45 H - Transporting and storage	541,334	425,545	6.60%	1,232	365	57	65	4
46 H.49 - Land transport and transport via pipelines	278,843	239,995	3.37%	697	105	11	4	3
47 H.50 - Water transport	62,836	13,237	0.04%	163	124	6	-	4
48 H.51 - Air transport	6,803	3,612	0.00%	4	15	-	-	5
49 H.52 - Warehousing and support activities for transportation	190,764	166,692	15.02%	350	120	40	60	4
50 H.53 - Postal and courier activities	2,088	2,009	0.02%	17	1	-	-	1
51 I - Accommodation and food service activities	373,160	355,098	1.94%	743	543	266	11	6
52 L - Real estate activities	298,672	290,449	0.97%	1,286	1,389	717	117	7
53 <b>Exposures towards sectors other than those that highly contribute to climate change*</b>				<b>7,158</b>	<b>1,067</b>	<b>331</b>	<b>74</b>	<b>3</b>
54 K - Financial and insurance activities				5	-	2	1	7
55 Exposures to other sectors (NACE codes J, M - U)				7,154	1,067	329	73	3
<b>56 Total</b>	<b>59,205,604</b>	<b>56,885,613</b>	<b>6.31%</b>	<b>32,325</b>	<b>6,674</b>	<b>2,389</b>	<b>338</b>	<b>3</b>

\* In accordance with the Commission Delegated Regulation (EU) 2020/1818 supplementing Regulation (EU) 2016/1011 as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks - Climate Benchmark Standards Regulation - Recital 6: Sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) no. 1893/2006.

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

Template 1 aims to represent the exposures to disaggregated non-financial corporations with reference to the sectors of economic activity most exposed to risks connected with climate transition.

The perimeter of generation of the template includes exposures to non-financial corporations present in the Banking Book and classified as loans and advances, debt securities and equity instruments, excluding financial assets held for trading or financial assets held for sale.

The template shows, at NACE (Statistical classification of economic activities in the European Community) level, the gross value of the exposure and the provisions, with details relating to the classification by exposure stage and maturity.

In addition, details are provided relating to the companies excluded from the EU Paris-aligned benchmarks (art. 12, paragraph 1, letters d) to g), and Article 12, paragraph 2 of Regulation (EU) 2020/1818, including in particular:

- d) companies that derive 1% or more of their revenues from exploration, mining, extraction, distribution or refining of hard coal and lignite;
- e) companies that derive 10% or more of their revenues from the exploration, extraction, distribution or refining of oil fuels;
- f) companies that derive 50% or more of their revenues from the exploration, extraction, manufacturing or distribution of gaseous fuels;
- g) companies that derive 50% or more of their revenues from electricity generation with a GHG intensity of more than 100 g CO<sub>2</sub>e/kWh.

The identification of said companies was determined primarily on the basis of information on the nature of the revenues obtained by appropriately hired external suppliers.

The Group evaluates the transition risk, understood as the economic-financial impact incurred during the process of transition to a sustainable economy, on climate scenarios derived from temperature increase forecasts in the coming years. The analyses are developed by taking into account the sector segmentation in terms of the GHG emission reduction targets, by estimating the potential impacts on the individual company.

The calculations performed to identify financed emissions are in line with the requirements of the Partnership for Carbon Accounting Financials (PCAF) methodology, and were based on counterparty emissions i.e.:

- reported emissions (emissions are collected from the borrower or investee company directly);
- physical activity-based emissions (emissions are estimated);
- economic activity-based emissions (emissions are estimated).

Column k, understood as the percentage of the gross book value of the exposures for which it was possible to estimate emissions on the basis of information gathered directly from the counterparty or infoprovider, was calculated by taking into account only the information on financed emissions consistent with the calculations made for the carbon footprint.

It should be noted that, since the reference date of 30 June 2025, column c has not been published following publication of the EBA no-action letter on 6 August 2025.

### Template 2: Banking book - Indicators of potential climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral (in millions)

Counterparty sector	a	b	c	d	e	f	g
	Total gross carrying amount						
	Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral)						
	0; <= 100	> 100; <= 200	> 200; <= 300	> 300; <= 400	> 400; <= 500	> 500	
<b>1 Total EU area</b>	<b>42,914</b>	<b>6,065</b>	<b>15,003</b>	<b>9,841</b>	<b>5,269</b>	<b>3,022</b>	<b>921</b>
2 Of which Loans collateralised by commercial immovable property	6,722	258	611	2,385	1,328	695	208
3 Of which Loans collateralised by residential immovable property	36,015	5,751	14,391	7,456	3,941	2,327	714
4 Of which Collateral obtained by taking possession: residential and commercial immovable properties	176	57	1	-	-	-	-
5 Of which Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) estimated	27,911	2,849	10,442	7,309	4,105	2,582	624
<b>6 Total non-EU area</b>	-	-	-	-	-	-	-
7 Of which Loans collateralised by commercial immovable property	-	-	-	-	-	-	-
8 Of which Loans collateralised by residential immovable property	-	-	-	-	-	-	-
9 Of which Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-
10 Of which Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) estimated	-	-	-	-	-	-	-

**continued: Template 2: Banking book - Indicators of potential climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral (in millions)**

Settore della controparte	h	i	j	k	l	m	n	o	p
	Total gross carrying amount							Without EPC label of collateral	
	Level of energy efficiency (EPC label of collateral)								
	A	B	C	D	E	F	G	Of which level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) estimated	
<b>1 Total EU area</b>	1,940	761	1,146	1,675	2,463	3,018	3,828	28,083	90.06%
2 Of which Loans collateralised by commercial immovable property	82	44	102	119	150	132	285	5,808	78.70%
3 Of which Loans collateralised by residential immovable property	1,833	696	1,041	1,556	2,305	2,886	3,543	22,157	93.52%
4 Of which Collateral obtained by taking possession: residential and commercial immovable properties	25	21	3	-	9	-	-	118	-
5 Of which Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) estimated								25,291	100.00%
<b>6 Total non-EU area</b>	-	-	-	-	-	-	-	-	-
7 Of which Loans collateralised by commercial immovable property	-	-	-	-	-	-	-	-	-
8 Of which Loans collateralised by residential immovable property	-	-	-	-	-	-	-	-	-
9 Of which Collateral obtained by taking possession: residential and commercial immovable properties	-	-	-	-	-	-	-	-	-
10 Of which Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) estimated								-	-

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

The perimeter of Template 2 includes exposures relating to loans secured by commercial and residential real estate and enforced real estate collateral.

The Template disaggregates the exposures in terms of energy performance certificate (EPC) and consumption in kWh/m<sup>2</sup>, and based on the geographical area in which the collateral is located, divided into EU or non-EU areas.

Details are also provided, in the appropriate sections of the template, relating to exposures for which the level of energy consumption in kWh/m<sup>2</sup> is estimated.

For the purpose of providing input to Template 2, the BPER Banca Group made use of the support of external providers to obtain details on the level of energy efficiency in the event in which these were not present in the Group's information systems. Said information was punctually obtained where possible or, alternatively, using the appropriate estimates that take account, among the other variables, of the location, the use and the year of construction of the real estate guarantee.

The information from the provider was also supplemented with data taken directly from the certificates attached to the appraisals or uploaded from the network and read out via OCR.

### Template 3: Banking book - Indicators of potential climate change transition risk: Alignment metrics (in millions)

a	b	c	d	e	f	g
Sector	NACE Sector (a minima)	Portfolio gross carrying amount	Alignment metric	Year of reference	Distance to IEA NZE 2050 in % <sup>***</sup>	Target (year of reference + 3 years)
Power	D35_11	581	0.13238 kg CO <sub>2</sub> e / kwh	2025	-19.77%	0.165 kg CO <sub>2</sub> e / kwh
Fossil fuel combustion	C19_20	244	5,342,870.6097 financed ton CO <sub>2</sub> e	2025	1,527.03%	328,382 financed ton CO <sub>2</sub> e
Fossil fuel combustion	D35_21	10	5,342,870.6097 financed ton CO <sub>2</sub> e	2025	1,527.03%	328,382 financed ton CO <sub>2</sub> e
Fossil fuel combustion	D35_22	46	5,342,870.6097 financed ton CO <sub>2</sub> e	2025	1,527.03%	328,382 financed ton CO <sub>2</sub> e
Fossil fuel combustion	D35_23	36	5,342,870.6097 financed ton CO <sub>2</sub> e	2025	1,527.03%	328,382 financed ton CO <sub>2</sub> e
Fossil fuel combustion	D46_71	240	5,342,870.6097 financed ton CO <sub>2</sub> e	2025	1,527.03%	328,382 financed ton CO <sub>2</sub> e
Fossil fuel combustion	G47_3	48	5,342,870.6097 financed ton CO <sub>2</sub> e	2025	1,527.03%	328,382 financed ton CO <sub>2</sub> e
Fossil fuel combustion	H49_5	40	5,342,870.6097 financed ton CO <sub>2</sub> e	2025	1,527.03%	328,382 financed ton CO <sub>2</sub> e
Fossil fuel combustion	B6_1	72	5,342,870.6097 financed ton CO <sub>2</sub> e	2025	1,527.03%	328,382 financed ton CO <sub>2</sub> e
Fossil fuel combustion	B9_1	7	5,342,870.6097 financed ton CO <sub>2</sub> e	2025	1,527.03%	328,382 financed ton CO <sub>2</sub> e
Iron and steel, coke and metal ore production	C24_42	113	272.9601 ton CO <sub>2</sub> e / mln€	2025	-22.07%	350.25 ton CO <sub>2</sub> e / mln€
Iron and steel, coke and metal ore production	C24_1	289	214.8221 ton CO <sub>2</sub> e / mln€	2025	6.73%	201.27 ton CO <sub>2</sub> e / mln€
Iron and steel, coke and metal ore production	C24_2	105	214.8221 ton CO <sub>2</sub> e / mln€	2025	6.73%	201.27 ton CO <sub>2</sub> e / mln€
Iron and steel, coke and metal ore production	C24_3	43	214.8221 ton CO <sub>2</sub> e / mln€	2025	6.73%	201.27 ton CO <sub>2</sub> e / mln€
Iron and steel, coke and metal ore production	C24_32	5	214.8221 ton CO <sub>2</sub> e / mln€	2025	6.73%	201.27 ton CO <sub>2</sub> e / mln€
Iron and steel, coke and metal ore production	C24_33	27	214.8221 ton CO <sub>2</sub> e / mln€	2025	6.73%	201.27 ton CO <sub>2</sub> e / mln€
Iron and steel, coke and metal ore production	C24_34	15	214.8221 ton CO <sub>2</sub> e / mln€	2025	6.73%	201.27 ton CO <sub>2</sub> e / mln€
Iron and steel, coke and metal ore production	C24_51	17	214.8221 ton CO <sub>2</sub> e / mln€	2025	6.73%	201.27 ton CO <sub>2</sub> e / mln€
Iron and steel, coke and metal ore production	C24_52	8	214.8221 ton CO <sub>2</sub> e / mln€	2025	6.73%	201.27 ton CO <sub>2</sub> e / mln€

<sup>\*\*\*</sup> Point in Time (PiT) distance to 2030 NZE2050 scenario in % (for each metric).

There are no amounts for the automotive, aviation, maritime transport, cement, clinker, and lime production, and chemicals sectors as specific decarbonisation targets have not yet been defined for these sectors.

**continued: Template 3: Banking book - Indicators of potential climate change transition risk: Alignment metrics (in millions)**

a	b	c	d	e	f	g
Sector	NACE Sector (a minima)	Portfolio gross carrying amount	Alignment metric	Year of reference	Distance to IEA NZE 2050 in %***	Target (year of reference + 3 years)
Agriculture	A1_41	75	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	A1_45	7	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	A1_46	6	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	A1_47	28	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	A1_63	1	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	A3_22	5	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_1	119	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_11	27	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_12	27	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_13	144	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_2	24	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_3	39	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_31	8	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_32	1	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_39	102	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_4	51	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_41	60	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_42	1	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_51	195	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_52	12	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_6	2	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_61	95	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_62	5	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_7	36	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_71	4	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_72	27	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_73	116	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_8	-	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_81	6	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_82	46	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_83	46	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_84	5	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_85	59	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_86	-	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	C10_89	5	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€
Agriculture	G46_23	-	61.1955 ton CO <sub>2</sub> e / mln€	2025	149.78%	24.5 ton CO <sub>2</sub> e / mln€

\*\*\* Point in time (PiT) distance to 2030 NZE2050 scenario in % (for each metric).

The Agriculture sector was included in this disclosure as it belongs to the high-emission intensity sectors identified by the Net Zero Banking Alliance, for which a decarbonisation target was defined in 2025.

In line with disclosure requirements under previous Regulation (EU) no. 2453/2022, BPER Banca shall publish the information included in this template starting from 30 June 2024.

After joining the Net Zero Banking Alliance (hereinafter “the Alliance”), on 9 March 2022, the Bank defined, through the publications in August 2023, December 2024 and May 2025, the decarbonisation targets relating to its loan portfolio in six out of the ten sectors identified by the NZBA as having a high carbon footprint: Power Generation, Oil and Gas, Iron and Steel, Aluminium, Commercial Real Estate and Agriculture.

Model 3 shows the information relating to the general-purpose sectors subject to target setting. For more information on the method implemented to define the targets, please refer to the Consolidated Sustainability Statement of the Bank. For the next reporting periods, this disclosure will be added to reflect both the updates of new targets and the calculation of the intermediate targets for the sectors already analysed, in line with the Alliance guidelines.

The NACE codes shown in the table were selected for each sector consistently with the sectoral scope under the NZBA target setting and the gross exposure consistently meets the NZBA target setting scope.

With regard to the calculation of alignment metrics and gap to the reference net-zero scenario for the Power Generation sector, the weighted-emission intensity metrics, calculated as at 30 June 2025 and as at the target year, was considered. The metrics results from exposure aggregation of weighted counterparty metrics by the ratio of the Bank credit exposure and the total amount funded by the Bank in the reference sector.

With reference to the Oil & Gas sector, the Bank has adopted an absolute metric relating to the emissions funded, in line with the metric available in the IEA NZE Global Oil & Gas scenario and best market practices observed among the members. A significant deviation from the target for this sector is to be highlighted, which occurred as early as 31 December 2024 because of the methodological change introduced by the provider in the calculation of GHG Scope 3 emissions; in particular, the estimate was extended to all 15 categories under the Scope 3 framework set out in the GHG protocol (<https://ghgprotocol.org/scope-3-calculation-guidance-2>), resulting in a significant increase in absolute emissions. As at 31 December 2025, targets will be readjusted to include Banca Popolare di Sondrio within the scope. For the Oil and Gas sector, this adjustment will mitigate the aforementioned distortive effect.

The portfolio-wide intensity metric was adopted for the Iron and Steel and Aluminium sectors which, in line with the PCAF (Partnership for Carbon Accounting Financials), represents the impact of financed emissions on a sector's portfolio exposure, thus calculated as Co<sub>2e</sub> emissions per Euro of portfolio value.

Finally, with regard to the 3-year Target from the reference year, the target for the reference sectors was set to 2030 as, within the Target Setting exercise after joining the NZBA, the Bank does not plan to set any additional intermediate targets for a different scope and over a different period.

The data shown, including the gross book value and emission performance of the exposures in the portfolio, were recalculated with reference to the period ended on 30 June 2025.

#### Template 4: Banking book - Indicators of potential climate change transition risk: Exposures to top 20 carbon-intensive firms (in millions)

	a	b	c	d	e
	Gross carrying amount (aggregate)	Gross carrying amount towards the counterparties compared to total gross carrying amount (aggregate) (*)	Of which environmentally sustainable (CCM)	Weighted average maturity	Number of top 20 polluting firms included
1	105	0.078%		-	5

\* For counterparties among the top 20 carbon emitting companies in the world.

The BPER Banca Group identified, in its portfolio, the presence of companies belonging to the corporate groups of companies classified among the Top Polluters in the World.

Companies with the highest level of global emissions, in terms of tonnes of CO<sub>2</sub>/year emitted and entities belonging to one of the companies recognised as the "Top 20 Polluters" are defined as the Top 20 Polluters in the World.

The BPER Banca Group targets specialised external data providers for the acquisition of the list of counterparties identified as the "Top 20 Polluters" in the world, as well as the most up-to-date levels of greenhouse gas emissions (scope 1 and 2) at Group level. The emissions levels used may be exact (obtained from public disclosures) or estimated.

The exposure was measured through the comparison with the list provided by the Climate Accountability Institute, by taking account both carbon and methane emissions.

It should be noted that, since the reference date of 30 June 2025, column c has not been published following publication of the EBA no-action letter on 6 August 2025.

**Template 5: Banking book - Indicators of potential climate change physical risk: Exposures subject to physical risk (in millions)**

a	b	c	d	e	f	g	h	
Italy	Gross carrying amount							
	of which exposures sensitive to impact from climate change physical events							
	Breakdown by maturity bucket				Average weighted maturity	of which exposures sensitive to impact from chronic climate change events		
	<= 5 years	> 5 year <= 10 years	> 10 years <= 20 years	> 20 years				
1	A - Agriculture, forestry and fishing	1,041	178	78	50	-	5	111
2	B - Mining and quarrying	129	7	3	-	-	4	4
3	C - Manufacturing	13,182	1,304	172	32	-	2	334
4	D - Electricity, gas, steam and air conditioning supply	1,358	106	14	2	-	3	9
5	E - Water supply; sewerage, waste management and remediation activities	830	40	39	10	-	6	27
6	F - Construction	2,819	354	128	76	15	5	219
7	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	6,893	975	192	56	1	3	384
8	H - Transporting and storage	1,651	125	50	15	2	4	39
9	L - Real estate activities	3,509	453	551	318	72	6	671
10	Loans collateralised by residential immovable property	35,906	356	712	2,063	1,823	9	586
11	Loans collateralised by commercial immovable property	6,706	586	962	688	61	8	921
12	Repossessed collaterals	176	-	-	-	-	-	-
13	Other relevant sectors	8,443	818	402	181	46	4	722
14	I - Accommodation and food service activities	1,562	230	212	123	2	7	203
15	J - Information and communication	1,104	99	22	2	2	3	92
16	K - Financial and insurance activities	7	-	-	2	-	13	-
17	M - Professional, scientific and technical activities	3,649	266	76	11	23	4	243
18	N - Administrative and support service activities	1,223	87	31	5	9	3	67
19	O - Public administration and defence, compulsory social security	-	-	-	-	-	-	-
20	P - Education	46	9	3	1	-	4	9
21	Q - Human health and social work activities	472	75	31	31	1	6	63
22	R - Arts, Entertainment and Recreation	210	26	14	4	10	8	25
23	S - Other service activities	171	26	12	2	-	4	20
24	T - Activities of households as employers of domestic personnel; undifferentiated goods-and services-producing activities of private households for own use	-	-	-	-	-	-	-
25	U - Activities of extraterritorial organisations and bodies	-	-	-	-	-	-	-

**continued: Template 5: Banking book - Indicators of potential climate change physical risk: Exposures subject to physical risk (in millions)**

a		i	j	k	l	m	n	o
Italy		Gross carrying amount						
		of which exposures sensitive to impact from climate change physical events						
		of which exposures sensitive to impact from acute climate change events	of which exposures sensitive to impact both from chronic and acute climate change events	Of which stage 2 exposure	Of which non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
						Of which Stage 2 exposures	Of which non-performing exposures	
1	A - Agriculture, forestry and fishing	159	37	64	16	(12)	(3)	(8)
2	B - Mining and quarrying	6	-	-	-	-	-	-
3	C - Manufacturing	1,086	88	154	42	(33)	(4)	(26)
4	D - Electricity, gas, steam and air conditioning supply	96	17	14	2	(1)	-	(1)
5	E - Water supply; sewerage, waste management and remediation activities	60	1	6	1	(1)	-	(1)
6	F - Construction	331	23	80	58	(42)	(4)	(34)
7	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	759	81	159	49	(36)	(4)	(28)
8	H - Transporting and storage	111	43	17	11	(6)	(1)	(5)
9	L - Real estate activities	491	232	193	88	(75)	(19)	(51)
10	Loans collateralised by residential immovable property	4,201	167	98	25	(90)	(29)	(55)
11	Loans collateralised by commercial immovable property	1,093	282	229	147	(128)	(25)	(94)
12	Repossessed collaterals	-	-	-	-	-	-	-
13	Other relevant sectors	538	188	174	82	(53)	(7)	(42)
14	I - Accommodation and food service activities	318	46	76	44	(29)	(4)	(22)
15	J - Information and communication	17	17	25	4	(3)	(1)	(2)
16	K - Financial and insurance activities	2	-	-	-	-	-	-
17	M - Professional, scientific and technical activities	81	53	25	10	(6)	-	(5)
18	N - Administrative and support service activities	33	33	16	5	(3)	-	(2)
19	O - Public administration and defence, compulsory social security	-	-	-	-	-	-	-
20	P - Education	3	1	2	1	-	-	-
21	Q - Human health and social work activities	59	16	21	12	(8)	-	(7)
22	R - Arts, Entertainment and Recreation	14	14	5	4	(2)	-	(2)
23	S - Other service activities	11	8	4	2	(1)	-	(1)
24	T - Activities of households as employers of domestic personnel; undifferentiated goods-and services-producing activities of private households for own use	-	-	-	-	-	-	-
25	U - Activities of extraterritorial organisations and bodies	-	-	-	-	-	-	-

**continued: Template 5: Banking book - Indicators of potential climate change physical risk: Exposures subject to physical risk (in millions)**

a	b	c	d	e	f	g	h
Rest of the World	Gross carrying amount						
	of which exposures sensitive to impact from climate change physical events						
	Breakdown by maturity bucket				Average weighted maturity	of which exposures sensitive to impact from chronic climate change events	
	<= 5 years	> 5 year <= 10 years	> 10 years <= 20 years	> 20 years			
1	A - Agriculture, forestry and fishing	-	-	-	-	-	-
2	B - Mining and quarrying	-	-	-	-	-	-
3	C - Manufacturing	39	-	-	-	-	-
4	D - Electricity, gas, steam and air conditioning supply	-	-	-	-	-	-
5	E - Water supply; sewerage, waste management and remediation activities	-	-	-	-	-	-
6	F - Construction	-	-	-	-	-	-
7	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	15	-	-	-	-	-
8	H - Transporting and storage	67	-	-	-	-	-
9	L - Real estate activities	-	-	-	-	4	-
10	Loans collateralised by residential immovable property	109	1	2	10	4	3
11	Loans collateralised by commercial immovable property	16	-	-	-	-	-
12	Reposessed collaterals	-	-	-	-	-	-
13	Other relevant sectors	1,749	-	-	-	-	-
14	I - Accommodation and food service activities	-	-	-	-	-	-
15	J - Information and communication	-	-	-	-	-	-
16	K - Financial and insurance activities	1	-	-	-	-	-
17	M - Professional, scientific and technical activities	8	-	-	-	-	-
18	N - Administrative and support service activities	-	-	-	-	-	-
19	O - Public administration and defence, compulsory social security	-	-	-	-	-	-
20	P - Education	-	-	-	-	-	-
21	Q - Human health and social work activities	-	-	-	-	-	-
22	R - Arts, Entertainment and Recreation	-	-	-	-	-	-
23	S - Other service activities	-	-	-	-	-	-
24	T - Activities of households as employers of domestic personnel; undifferentiated goods-and services-producing activities of private households for own use	-	-	-	-	-	-
25	U - Activities of extraterritorial organisations and bodies	1,741	-	-	-	-	-

**continued: Template 5: Banking book - Indicators of potential climate change physical risk: Exposures subject to physical risk (in millions)**

a	i	j	k	l	m	n	o
<b>Rest of the World</b>	<b>Gross carrying amount</b>						
	<b>of which exposures sensitive to impact from climate change physical events</b>						
	<b>of which exposures sensitive to impact from acute climate change events</b>	<b>of which exposures sensitive to impact both from chronic and acute climate change events</b>	<b>Of which stage 2 exposure</b>	<b>Of which non-performing exposures</b>	<b>Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions</b>		
					<b>Of which Stage 2 exposures</b>	<b>Of which non-performing exposures</b>	
1	A - Agriculture, forestry and fishing	-	-	-	-	-	-
2	B - Mining and quarrying	-	-	-	-	-	-
3	C - Manufacturing	-	-	-	-	-	-
4	D - Electricity, gas, steam and air conditioning supply	-	-	-	-	-	-
5	E - Water supply; sewerage, waste management and remediation activities	-	-	-	-	-	-
6	F - Construction	-	-	-	-	-	-
7	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	-	-	-	-	-	-
8	H - Transporting and storage	-	-	-	-	-	-
9	L - Real estate activities	-	-	-	-	-	-
10	Loans collateralised by residential immovable property	14	-	-	-	(1)	-
11	Loans collateralised by commercial immovable property	-	-	-	-	-	-
12	Repossessed collaterals	-	-	-	-	-	-
13	Other relevant sectors	-	-	-	-	-	-
14	I - Accommodation and food service activities	-	-	-	-	-	-
15	J - Information and communication	-	-	-	-	-	-
16	K - Financial and insurance activities	-	-	-	-	-	-
17	M - Professional, scientific and technical activities	-	-	-	-	-	-
18	N - Administrative and support service activities	-	-	-	-	-	-
19	O - Public administration and defence, compulsory social security	-	-	-	-	-	-
20	P - Education	-	-	-	-	-	-
21	Q - Human health and social work activities	-	-	-	-	-	-
22	R - Arts, Entertainment and Recreation	-	-	-	-	-	-
23	S - Other service activities	-	-	-	-	-	-
24	T - Activities of households as employers of domestic personnel; undifferentiated goods-and services-producing activities of private households for own use	-	-	-	-	-	-
25	U - Activities of extraterritorial organisations and bodies	-	-	-	-	-	-

Due to rounding off, the sum of some separate itemised amounts may differ from their respective aggregate amounts.

This template provides information on the exposures of the banking book, including loans and advances, debt securities and equity instruments not held for trading and held for sale to non-financial corporations, on loans secured by real estate and on real estate collateral recovered, exposed to chronic and acute climate-related hazards, with a distribution by sector of economic activity (NACE classification) and geographical location of the activity of the counterparty or the collateral, for the sectors and geographical areas subject to acute and chronic events related to climate change.

Consistent with Implementing Regulation (EU) no. 3172/2024, the prudential information connected with environmental risks relating to sensitive exposures are published in Template 5, in particular:

- column h includes the gross carrying value of exposures sensitive to the impact of chronic events linked to climate change, including hazards connected with gradual changes in meteorological and climate conditions and that may have an impact on economic production and productivity;
- column i includes the gross carrying value of exposures sensitive to the impact of acute events linked to climate change, including hazards that may cause sudden damages to property, the interruption of the supply chain and depreciation of activities;
- column j shows the gross book value of exposures sensitive to impact both from chronic and acute climate change events.

The BPER Banca Group assesses physical risk, understood as the degree of exposure of a business or a building to natural hazards (floods, earthquakes, landslides, extreme wind, drought, etc.) depending on the area and the effects of climate change expected in the future. The analyses are carried out by assessing the geographical vulnerability of the individual address of the production site/building based on the hazard map linked to a scale of each phenomenon analysed.

## **Certification on disclosure requirements pursuant to Part Eight, para. 3 of art. 431 of Regulation (EU) 575/2013 dated 26 June 2013 and subsequent additions and amendments**

The undersigned

- Gianni Franco Papa, as Chief Executive Officer,
- Giovanni Tincani, as the Manager responsible for preparing the company's financial reports, of BPER Banca S.p.A.,

ATTEST

that, having considered the requirements of para. 3 of art. 431 of Regulation (EU) 575/2013 dated 26 June 2013 and subsequent additions and amendments, the information provided pursuant to the aforementioned Part Eight have been prepared in accordance with the formal policy and processes, systems and internal controls.

Modena, 30 September 2025

Signed by  
Gianni Franco Papa  
Chief Executive Officer

Signed by  
Giovanni Tincani  
The Manager responsible for preparing  
the company's financial reports

## Declaration of the Manager responsible for preparing the company's financial reports

The Manager responsible for preparing the company's financial reports, Giovanni Tincani, certifies, pursuant to para. 2 of art. 154-bis of Decree 58/1998 (Consolidated Financial Law) that the accounting information contained in this document "Public Disclosures as at 30 June 2025 - Pillar 3" agrees with the underlying accounting entries, records and documentation.

Modena, 30 September 2025

Signed by

Giovanni Tincani

The Manager responsible for preparing the  
company's financial reports





