



BPER Banca

2025 CDP Corporate Questionnaire 2025

Word version

Important: this export excludes unanswered questions

This document is an export of your organization's CDP questionnaire response. It contains all data points for questions that are answered or in progress. There may be questions or data points that you have been requested to provide, which are missing from this document because they are currently unanswered. Please note that it is your responsibility to verify that your questionnaire response is complete prior to submission. CDP will not be liable for any failure to do so.

[Read full terms of disclosure](#)

•

Contents

C1. Introduction.....	7
(1.1) In which language are you submitting your response?	7
(1.2) Select the currency used for all financial information disclosed throughout your response.	7
(1.3) Provide an overview and introduction to your organization.	7
(1.4) State the end date of the year for which you are reporting data. For emissions data, indicate whether you will be providing emissions data for past reporting years.....	8
(1.4.1) What is your organization’s annual revenue for the reporting period?	8
(1.5) Provide details on your reporting boundary.	8
(1.6) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?	9
(1.7) Select the countries/areas in which you operate.	11
(1.9) What was the size of your organization based on total assets value at the end of the reporting period?	11
(1.10) Which activities does your organization undertake, and which industry sectors does your organization lend to, invest in, and/or insure?	11
(1.24) Has your organization mapped its value chain?	14
(1.24.1) Have you mapped where in your direct operations or elsewhere in your value chain plastics are produced, commercialized, used, and/or disposed of?	15
C2. Identification, assessment, and management of dependencies, impacts, risks, and opportunities	17
(2.1) How does your organization define short-, medium-, and long-term time horizons in relation to the identification, assessment, and management of your environmental dependencies, impacts, risks, and opportunities?	17
(2.2) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts?	19
(2.2.1) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities?	20
(2.2.2) Provide details of your organization’s process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities.....	20
(2.2.4) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts related to your portfolio activities? ..	24
(2.2.5) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities related to your portfolio activities?	25
(2.2.6) Provide details of your organization’s process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities related to your portfolio activities.	27
(2.2.7) Are the interconnections between environmental dependencies, impacts, risks and/or opportunities assessed?	35
(2.2.8) Does your organization consider environmental information about your clients/investees as part of your due diligence and/or environmental dependencies, impacts, risks and/or opportunities assessment process?	36

(2.2.9) Indicate the environmental information your organization considers about clients/investees as part of your due diligence and/or environmental dependencies, impacts, risks and/or opportunities assessment process, and how this influences decision-making.	36
(2.4) How does your organization define substantive effects on your organization?	39

C3. Disclosure of risks and opportunities 42

(3.1) Have you identified any environmental risks which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?.....	42
(3.1.1) Provide details of the environmental risks identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.	44
(3.1.2) Provide the amount and proportion of your financial metrics from the reporting year that are vulnerable to the substantive effects of environmental risks.	53
(3.6) Have you identified any environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?	54
(3.6.1) Provide details of the environmental opportunities identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.	56
(3.6.2) Provide the amount and proportion of your financial metrics in the reporting year that are aligned with the substantive effects of environmental opportunities.	59

C4. Governance 61

(4.1) Does your organization have a board of directors or an equivalent governing body?	61
(4.1.1) Is there board-level oversight of environmental issues within your organization?	62
(4.1.2) Identify the positions (do not include any names) of the individuals or committees on the board with accountability for environmental issues and provide details of the board’s oversight of environmental issues.	62
(4.2) Does your organization’s board have competency on environmental issues?	71
(4.3) Is there management-level responsibility for environmental issues within your organization?.....	73
(4.3.1) Provide the highest senior management-level positions or committees with responsibility for environmental issues (do not include the names of individuals).	74
(4.5) Do you provide monetary incentives for the management of environmental issues, including the attainment of targets?	80
(4.5.1) Provide further details on the monetary incentives provided for the management of environmental issues (do not include the names of individuals).	82
(4.6) Does your organization have an environmental policy that addresses environmental issues?.....	84
(4.6.1) Provide details of your environmental policies.	85
(4.7) Does the policy framework for the portfolio activities of your organization include environmental requirements that clients/investees need to meet, and/or exclusion policies?.....	87
(4.7.1) Provide details of the policies which include environmental requirements that clients/investees need to meet.	87
(4.7.2) Provide details of your exclusion policies related to industries, activities and/or locations exposed or contributing to environmental risks.	92

(4.8) Does your organization include covenants in financing agreements to reflect and enforce your environmental policies?	95
(4.8.1) Provide details of the covenants included in your organization’s financing agreements to reflect and enforce your environmental policies.	95
(4.9) Does your organization offer its employees a pension scheme that incorporates environmental criteria in its holdings?	97
(4.10) Are you a signatory or member of any environmental collaborative frameworks or initiatives?	98
(4.11) In the reporting year, did your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may (positively or negatively) impact the environment?	99
(4.11.1) On what policies, laws, or regulations that may (positively or negatively) impact the environment has your organization been engaging directly with policy makers in the reporting year?	100
(4.12) Have you published information about your organization’s response to environmental issues for this reporting year in places other than your CDP response?	102
(4.12.1) Provide details on the information published about your organization’s response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.	102

C5. Business strategy..... 107

(5.1) Does your organization use scenario analysis to identify environmental outcomes?	107
(5.1.1) Provide details of the scenarios used in your organization’s scenario analysis.	108
(5.1.2) Provide details of the outcomes of your organization’s scenario analysis.	115
(5.2) Does your organization’s strategy include a climate transition plan?	117
(5.3) Have environmental risks and opportunities affected your strategy and/or financial planning?	119
(5.3.1) Describe where and how environmental risks and opportunities have affected your strategy.	120
(5.3.2) Describe where and how environmental risks and opportunities have affected your financial planning.	121
(5.10) Does your organization use an internal price on environmental externalities?	123
(5.11) Do you engage with your value chain on environmental issues?	123
(5.11.3) Provide details of your environmental engagement strategy with your clients.	125
(5.11.4) Provide details of your environmental engagement strategy with your investees.	128
(5.11.7) Provide further details of your organization’s supplier engagement on environmental issues.	130
(5.11.9) Provide details of any environmental engagement activity with other stakeholders in the value chain.	132
(5.14) Do your external asset managers have to meet environmental requirements as part of your organization’s selection process and engagement?	133
(5.14.1) Provide details of the environmental requirements that external asset managers have to meet as part of your organization’s selection process and engagement.	134
(5.15) Does your organization exercise voting rights as a shareholder on environmental issues?	135

C6. Environmental Performance - Consolidation Approach	136
(6.1) Provide details on your chosen consolidation approach for the calculation of environmental performance data.....	136
C7. Environmental performance - Climate Change.....	138
(7.1) Is this your first year of reporting emissions data to CDP?	138
(7.1.1) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?.....	138
(7.1.2) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?	139
(7.1.3) Have your organization’s base year emissions and past years’ emissions been recalculated as a result of any changes or errors reported in 7.1.1 and/or 7.1.2?....	139
(7.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.	140
(7.3) Describe your organization’s approach to reporting Scope 2 emissions.	140
(7.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure?	141
(7.5) Provide your base year and base year emissions.	141
(7.6) What were your organization’s gross global Scope 1 emissions in metric tons CO2e?	145
(7.7) What were your organization’s gross global Scope 2 emissions in metric tons CO2e?	146
(7.8) Account for your organization’s gross global Scope 3 emissions, disclosing and explaining any exclusions.	147
(7.9) Indicate the verification/assurance status that applies to your reported emissions.	155
(7.9.1) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.	155
(7.9.2) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.	157
(7.9.3) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.	162
(7.10) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?	165
(7.10.1) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.	165
(7.10.2) Are your emissions performance calculations in 7.10 and 7.10.1 based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?	166
(7.23) Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?.....	167
(7.29) What percentage of your total operational spend in the reporting year was on energy?	167
(7.30) Select which energy-related activities your organization has undertaken.	167
(7.30.1) Report your organization’s energy consumption totals (excluding feedstocks) in MWh.....	168

(7.30.16) Provide a breakdown by country/area of your electricity/heat/steam/cooling consumption in the reporting year.	170
(7.45) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.	172
(7.53) Did you have an emissions target that was active in the reporting year?	175
(7.53.1) Provide details of your absolute emissions targets and progress made against those targets.	176
(7.53.4) Provide details of the climate-related targets for your portfolio.	183
(7.54) Did you have any other climate-related targets that were active in the reporting year?	201
(7.54.1) Provide details of your targets to increase or maintain low-carbon energy consumption or production.	201
(7.54.3) Provide details of your net-zero target(s).....	204
(7.55) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.	216
(7.55.1) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.	216
(7.55.2) Provide details on the initiatives implemented in the reporting year in the table below.	216
(7.55.3) What methods do you use to drive investment in emissions reduction activities?	224
(7.79) Has your organization retired any project-based carbon credits within the reporting year?	226
(7.79.1) Provide details of the project-based carbon credits retired by your organization in the reporting year.....	227
C12. Environmental performance - Financial Services.....	230
(12.1) Does your organization measure the impact of your portfolio on the environment?	230
(12.1.1) Provide details of your organization's financed emissions in the reporting year and in the base year.....	233
(12.1.3) Provide details of the other metrics used to track the impact of your portfolio on the environment.	236
(12.2) Are you able to provide a breakdown of your organization's financed emissions and other portfolio carbon footprinting metrics?.....	237
(12.2.1) Break down your organization's financed emissions and other portfolio carbon footprinting metrics by asset class, by industry, and/or by scope.	238
(12.3) State the values of your financing and insurance of fossil fuel assets in the reporting year.	252
(12.4) Does your organization provide finance and/or insurance to companies in the commodity value chain? If so, for each commodity and portfolio, state the values of your financing and/or insurance in the reporting year.	258
(12.5) In the reporting year, did your organization finance and/or insure activities or sectors that are aligned with, or eligible under, a sustainable finance taxonomy? If so, are you able to report the values of that financing and/or underwriting?	261
(12.6) Do any of your existing products and services enable clients to mitigate and/or adapt to the effects of environmental issues?.....	269
(12.6.1) Provide details of your existing products and services that enable clients to mitigate and/or adapt to the effects of environmental issues, including any taxonomy or methodology used to classify the products and services.	269

(12.7) Has your organization set targets for deforestation and conversion-free and/or water-secure lending, investing and/or insuring?..... 273

C13. Further information & sign off 275

(13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?..... 275

(13.1.1) Which data points within your CDP response are verified and/or assured by a third party, and which standards were used?..... 275

(13.3) Provide the following information for the person that has signed off (approved) your CDP response. 276

(13.4) Please indicate your consent for CDP to share contact details with the Pacific Institute to support content for its Water Action Hub website..... 277

C1. Introduction

(1.1) In which language are you submitting your response?

Select from:

English

(1.2) Select the currency used for all financial information disclosed throughout your response.

Select from:

EUR

(1.3) Provide an overview and introduction to your organization.

(1.3.1) Type of financial institution

Select from:

Bank

(1.3.2) Organization type

Select from:

Publicly traded organization

(1.3.3) Description of organization

The BPER Group, established in 1992 by BPER Banca (formerly Banca Popolare dell'Emilia - Romagna), aims to combine the synergies of a large banking group while maintaining the autonomy and local roots of each member bank. It is currently Italy's third-largest listed banking group in terms of global funding and branch network, with 1,558 branches across all Italian regions and one branch in Luxembourg. The BPER Group is active in several major banking and investment service segments, including: Corporate & Investment Banking, Private Banking & Wealth Management, Bancassurance, Leasing, Factoring, Retail Lending. The Group is committed to environmental sustainability and has implemented internal practices and policies to reduce its environmental footprint. In 2024, the Group approved its new Environmental Policy, in line with the ISO 14001 and 50001 environment and energy standards, which aims to further reduce the BPER Group's direct and indirect environmental impacts. This document supersedes the one approved in 2019, which approved the "BPER Group's Environmental Commitments." The approval of this document is a clear reflection of the continuous improvement process implemented by the BPER Group over the years The 2024-2027 B:Dynamic |

Full Value 2027, include goals for improving full integration of ESG criteria in the Bank's credit assessment process, over 7 billion for ESG Corporate and Retail products, target of reducing emissions equal to -35% by 2027 (with a 2021 baseline) through the energy efficiency activities contained in the Energy Plan and the reduction of emissions financed in line with the commitments made following the joining to the NZBA. Additionally, the Group aims to reduce its direct CO2 emissions by 50.2% by 2030, in line with the Paris Agreement, using 2021 as a baseline. BPER Banca joined the Net-Zero Banking Alliance in March 2022 and set intermediate reduction targets by 2030 for its loan portfolio in key sectors with high emission intensity: Power Generation: reduce weighted emission intensity from 0.256 kgCO2e/kWh in 2022 to 0.165 kgCO2e/kWh by 2030, targeting a 36% reduction. Oil & Gas: reduce financed emissions by 29% by 2030, from a baseline of 464,315 tCO2e in 2022 to 328,382 tCO2e, covering Scope 1, 2, and 3 emissions. Iron & Steel: reduce weighted emission intensity from 275 tCO2e/€mln in 2023 to 201 tCO2e/€mln by 2030, targeting a 27% reduction. Aluminium: reduce weighted emission intensity from 460 tCO2e/€mln in 2023 to 350 tCO2e/€mln by 2030, targeting a 24% reduction. Commercial Real Estate: reduce weighted emission intensity from 36.8 kgCO2e/m2 in 2023 to 19 kgCO2e/m2 by 2030, targeting a 47% reduction. These targets were determined through scenario analysis and consideration of factors such as the relevance of financed emissions, data availability, priority sectors within the NZBA, and strategic feasibility. The BPER Group reports its environmental performance annually through the Annual Report and GHG Statement.
 [Fixed row]

(1.4) State the end date of the year for which you are reporting data. For emissions data, indicate whether you will be providing emissions data for past reporting years.

	End date of reporting year	Alignment of this reporting period with your financial reporting period	Indicate if you are providing emissions data for past reporting years
	12/30/2024	Select from: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> No

[Fixed row]

(1.4.1) What is your organization's annual revenue for the reporting period?

7568356000

(1.5) Provide details on your reporting boundary.

	<p>Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?</p>
	<p>Select from: <input checked="" type="checkbox"/> Yes</p>

[Fixed row]

(1.6) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

ISIN code - bond

(1.6.1) Does your organization use this unique identifier?

Select from:

No

ISIN code - equity

(1.6.1) Does your organization use this unique identifier?

Select from:

Yes

(1.6.2) Provide your unique identifier

IT0000066123

CUSIP number

(1.6.1) Does your organization use this unique identifier?

Select from:

No

Ticker symbol

(1.6.1) Does your organization use this unique identifier?

Select from:

No

SEDOL code

(1.6.1) Does your organization use this unique identifier?

Select from:

No

LEI number

(1.6.1) Does your organization use this unique identifier?

Select from:

Yes

(1.6.2) Provide your unique identifier

N7470I7JINV7RUUH6190

D-U-N-S number

(1.6.1) Does your organization use this unique identifier?

Select from:

Yes

(1.6.2) Provide your unique identifier

437489222

Other unique identifier

(1.6.1) Does your organization use this unique identifier?

Select from:

No

[Add row]

(1.7) Select the countries/areas in which you operate.

Select all that apply

Italy

Luxembourg

(1.9) What was the size of your organization based on total assets value at the end of the reporting period?

315614540000

(1.10) Which activities does your organization undertake, and which industry sectors does your organization lend to, invest in, and/or insure?

Banking (Bank)

(1.10.1) Activity undertaken

Select from:

Yes

(1.10.3) Reporting the portfolio value and % of revenue associated with the portfolio

Select from:

- Yes, both the portfolio value and the % of revenue associated with it

(1.10.4) Portfolio value based on total assets

129686995000

(1.10.5) % of revenue

85

(1.10.6) Type of clients

Select all that apply

- Retail clients
- Business and private clients (banking)

(1.10.7) Industry sectors your organization lends to, invests in, and/or insures

Select all that apply

- | | |
|---|--|
| <input checked="" type="checkbox"/> Retail | <input checked="" type="checkbox"/> Manufacturing |
| <input checked="" type="checkbox"/> Services | <input checked="" type="checkbox"/> Infrastructure |
| <input checked="" type="checkbox"/> Materials | <input checked="" type="checkbox"/> Power generation |
| <input checked="" type="checkbox"/> Hospitality | <input checked="" type="checkbox"/> Transportation services |
| <input checked="" type="checkbox"/> Fossil Fuels | <input checked="" type="checkbox"/> Food, beverage & agriculture |
| <input checked="" type="checkbox"/> Biotech, health care & pharma | |

Investing (Asset manager)

(1.10.1) Activity undertaken

Select from:

- Yes

(1.10.3) Reporting the portfolio value and % of revenue associated with the portfolio

Select from:

- Yes, both the portfolio value and the % of revenue associated with it

(1.10.4) Portfolio value based on total assets

185927549000

(1.10.5) % of revenue

15

(1.10.6) Type of clients

Select all that apply

- Retail clients
- Corporate and institutional clients (companies)
- Business and private clients (banking)

(1.10.7) Industry sectors your organization lends to, invests in, and/or insures

Select all that apply

- | | |
|---|--|
| <input checked="" type="checkbox"/> Retail | <input checked="" type="checkbox"/> Fossil Fuels |
| <input checked="" type="checkbox"/> Apparel | <input checked="" type="checkbox"/> Manufacturing |
| <input checked="" type="checkbox"/> Services | <input checked="" type="checkbox"/> Infrastructure |
| <input checked="" type="checkbox"/> Materials | <input checked="" type="checkbox"/> Power generation |
| <input checked="" type="checkbox"/> Hospitality | <input checked="" type="checkbox"/> International bodies |
| <input checked="" type="checkbox"/> Transportation services | |
| <input checked="" type="checkbox"/> Food, beverage & agriculture | |
| <input checked="" type="checkbox"/> Biotech, health care & pharma | |

Investing (Asset owner)

(1.10.1) Activity undertaken

Select from:

No

Insurance underwriting (Insurance company)

(1.10.1) Activity undertaken

Select from:

No

[Fixed row]

(1.24) Has your organization mapped its value chain?

(1.24.1) Value chain mapped

Select from:

Yes, we have mapped or are currently in the process of mapping our value chain

(1.24.2) Value chain stages covered in mapping

Select all that apply

Upstream value chain

Portfolio

(1.24.3) Highest supplier tier mapped

Select from:

Tier 1 suppliers

(1.24.4) Highest supplier tier known but not mapped

Select from:

- All supplier tiers known have been mapped

(1.24.5) Portfolios covered in mapping

Select all that apply

- Banking (Bank)

(1.24.7) Description of mapping process and coverage

Since 2022 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 2022-2025 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. 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. Its mission 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 meet the Company’s expectations in terms of social and environmental responsibility. Supply chain risks are governed through preliminary analysis and document requests, allowing each supplier to be assessed as extensively as possible. Reputational risks are mapped together with the designated office and monitored periodically. From 2023 the Procurement Service Centre engaged in a project to revise the tools used during procurement stages, including the implementation of a dedicated platform (Synesgy). New evaluation criteria for selecting the Group’s suppliers and supplies were introduced, also considering ESG elements, Tender forms: Minimum Environmental Criteria introduced for each goods sector, required for supply tenders; Vendor Management Form: the new BPER vendor register approval process includes a questionnaire with an ESG section, requiring data and certifications that contribute to the supplier’s overall evaluation; Contract Management Form: managing contracts to maximise operational and financial performance through correct and transparent formalisation of supplier relationships. The Group’s value chain encompasses all activities, resources and relationships related to the business model and external context. To identify its business relations, BPER considers both direct contractual relations and indirect relations beyond first level, as well as joint ventures or investments. The Group analysed, in particular, data on direct and indirect funding and suppliers, collecting value chain data useful for analysing the context for the double materiality analysis.

[Fixed row]

(1.24.1) Have you mapped where in your direct operations or elsewhere in your value chain plastics are produced, commercialized, used, and/or disposed of?

(1.24.1.1) Plastics mapping

Select from:

- No, and we do not plan to within the next two years

(1.24.1.5) Primary reason for not mapping plastics in your value chain

Select from:

Judged to be unimportant or not relevant

(1.24.1.6) Explain why your organization has not mapped plastics in your value chain

BPER Banca has not conducted a mapping of the points in the value chain where plastics are produced, marketed, used, or disposed of—neither in its direct operations nor in its upstream or downstream value chain. This approach is consistent with the nature of the Group’s business activities, which are focused on financial services, where the use of plastic materials is not considered a material aspect in terms of strategic management or environmental sustainability. As reflected in the Group’s 2024 consolidated sustainability reporting, prepared in accordance with the ESRS, there are no material impacts identified relating to the use or management of plastics in BPER’s operational processes. Instead, BPER’s ESG strategic priorities are focused on areas more relevant to the banking sector, such as managing climate and environmental risks in the loan portfolio, issuing sustainable finance instruments, improving energy efficiency, and reducing greenhouse gas emissions from its own operations.

[Fixed row]

C2. Identification, assessment, and management of dependencies, impacts, risks, and opportunities

(2.1) How does your organization define short-, medium-, and long-term time horizons in relation to the identification, assessment, and management of your environmental dependencies, impacts, risks, and opportunities?

Short-term

(2.1.1) From (years)

0

(2.1.3) To (years)

3

(2.1.4) How this time horizon is linked to strategic and/or financial planning

With reference to the risk materiality assessment (E1-IRO-1), scenario analysis for physical and transition risk assessment (E1-IRO-1) and resilience analysis (E1-SBM-3), the following time horizons are applied: short-term means a time horizon of zero to three years, consistent with the 2024-2027 Business Plan; medium-term means a time horizon extending to 2030: five to six years for the risk materiality assessment, seven years for the scenario and resilience analyses; long-term means a time horizon up to 2050, aligned with decarbonisation targets: over eight years for the scenario and resilience analyses, over ten for the risk materiality assessment. The choice of these horizons is consistent with the TCFD guidelines, which recommend alignment with financial and investment planning, counterparties' asset lifecycles and climate policies. Accordingly, scenario analysis on physical and transition risks was updated as follows: short-term horizon considers the next three years, consistent with the Bank's Strategic Planning; medium-term considers up to seven years, allowing the BPER Group to adapt strategies to emerging trends, market dynamics and stakeholder expectations; long-term extends to 2050, supporting the assessment of strategies aimed at reducing greenhouse gases and aligning with global sustainability goals.

Medium-term

(2.1.1) From (years)

4

(2.1.3) To (years)

(2.1.4) How this time horizon is linked to strategic and/or financial planning

With reference to the risk materiality assessment (E1-IRO-1), scenario analysis for physical and transition risk assessment (E1-IRO-1) and resilience analysis (E1-SBM-3), the following time horizons are applied: short-term means a time horizon of zero to three years, consistent with the 2024-2027 Business Plan; medium-term means a time horizon extending to 2030: five to six years for the risk materiality assessment, seven years for the scenario and resilience analyses; long-term means a time horizon up to 2050, aligned with decarbonisation targets: over eight years for the scenario and resilience analyses, over ten for the risk materiality assessment. The choice of these horizons is consistent with the TCFD guidelines, which recommend alignment with financial and investment planning, counterparties' asset lifecycles and climate policies. Accordingly, scenario analysis on physical and transition risks was updated as follows: short-term horizon considers the next three years, consistent with the Bank's Strategic Planning; medium-term considers up to seven years, allowing the BPER Group to adapt strategies to emerging trends, market dynamics and stakeholder expectations; long-term extends to 2050, supporting the assessment of strategies aimed at reducing greenhouse gases and aligning with global sustainability goals.

Long-term

(2.1.1) From (years)

8

(2.1.2) Is your long-term time horizon open ended?

Select from:

No

(2.1.3) To (years)

26

(2.1.4) How this time horizon is linked to strategic and/or financial planning

With reference to the risk materiality assessment (E1-IRO-1), scenario analysis for physical and transition risk assessment (E1-IRO-1) and resilience analysis (E1-SBM-3), the following time horizons are applied: short-term means a time horizon of zero to three years, consistent with the 2024-2027 Business Plan; medium-term means a time horizon extending to 2030: five to six years for the risk materiality assessment, seven years for the scenario and resilience analyses; long-term means a time horizon up to 2050, aligned with decarbonisation targets: over eight years for the scenario and resilience analyses, over ten for the risk materiality assessment. The choice of these horizons is consistent with the TCFD guidelines, which recommend alignment with financial and investment planning, counterparties' asset lifecycles and climate policies. Accordingly, scenario analysis on physical and transition risks was updated as follows: short-term horizon considers the next three

years, consistent with the Bank's Strategic Planning; medium-term considers up to seven years, allowing the BPER Group to adapt strategies to emerging trends, market dynamics and stakeholder expectations; long-term extends to 2050, supporting the assessment of strategies aimed at reducing greenhouse gases and aligning with global sustainability goals.

[Fixed row]

(2.2) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts?

(2.2.1) Process in place

Select from:

Yes

(2.2.2) Dependencies and/or impacts evaluated in this process

Select from:

Impacts only

(2.2.4) Primary reason for not evaluating dependencies and/or impacts

Select from:

Not an immediate strategic priority

(2.2.5) Explain why you do not evaluate dependencies and/or impacts and describe any plans to do so in the future

BPER Banca has focused its efforts on the assessment and management of environmental dependencies primarily in its portfolio activities. In particular, the Group has applied the LEAP process developed by the Taskforce on Nature-related Financial Disclosures (TNFD) to map environmental dependencies and impacts at the client and sector levels. This process is currently prioritized in the portfolio area due to its higher material exposure to environmental risks. However, BPER Banca does not exclude the possibility of extending the analysis of environmental dependencies to its own operations in the coming years, in line with the expected evolution of methodologies and regulatory frameworks. The Group is committed to continuously improving its assessment processes and plans to progressively enhance the integration of dependencies within its own operations.

[Fixed row]

(2.2.1) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities?

	Process in place	Risks and/or opportunities evaluated in this process	Is this process informed by the dependencies and/or impacts process?
	Select from: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> Both risks and opportunities	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(2.2.2) Provide details of your organization’s process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities.

Row 1

(2.2.2.1) Environmental issue

Select all that apply

- Climate change

(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

- Impacts
- Risks
- Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

- Direct operations
- Upstream value chain

(2.2.2.4) Coverage

Select from:

- Full

(2.2.2.5) Supplier tiers covered

Select all that apply

- Tier 1 suppliers

(2.2.2.7) Type of assessment

Select from:

- Qualitative and quantitative

(2.2.2.8) Frequency of assessment

Select from:

- Annually

(2.2.2.9) Time horizons covered

Select all that apply

- Short-term
- Medium-term
- Long-term

(2.2.2.10) Integration of risk management process

Select from:

- Integrated into multi-disciplinary organization-wide risk management process

(2.2.2.11) Location-specificity used

Select all that apply

- National

(2.2.2.12) Tools and methods used

Enterprise Risk Management

- Enterprise Risk Management
- Internal company methods

Other

- Desk-based research
- External consultants
- Materiality assessment
- Partner and stakeholder consultation/analysis
- Scenario analysis

(2.2.2.13) Risk types and criteria considered

Acute physical

- Drought
- Landslide
- Wildfires
- Heat waves
- Flood (coastal, fluvial, pluvial, ground water)
- Other acute physical risk, please specify :**Wind Storm**

Chronic physical

- Changing precipitation patterns and types (rain, hail, snow/ice)
- Changing temperature (air, freshwater, marine water)

- Water stress

Policy

- Changes to national legislation

Liability

- Exposure to litigation
- Non-compliance with regulations

(2.2.2.14) Partners and stakeholders considered

Select all that apply

- Customers
- Employees
- Investors
- Suppliers
- Regulators
- Local communities

(2.2.2.15) Has this process changed since the previous reporting year?

Select from:

- Yes

(2.2.2.16) Further details of process

BPER Banca identifies, assesses, and manages environmental dependencies, impacts, risks, and opportunities (IRO) through a double materiality assessment performed in accordance with Legislative Decree No. 125/2024 and EFRAG's Implementation Guidance (IGMA 1). The process was updated in 2024 compared to 2023 to reflect regulatory and methodological changes. The methodology includes three phases: (A) understanding the internal and external context, (B) identifying actual and potential IROs, and (C) assessing and determining the material IROs. The Group performed a detailed mapping of the value chain and engaged internal and external stakeholders, including shareholders, employees, customers, and the financial market. Interviews were conducted to assess and validate impacts. All operational locations and the Group's value chain were assessed. No exclusions were reported. Impacts were evaluated considering severity, probability, magnitude, scope, and irremediability, as required by ESRS. Negative actual impacts were assessed based on severity, while potential negative impacts were assessed based on severity and probability. Positive impacts were evaluated based on magnitude, scope, and probability. A materiality threshold was established using a scale from 1 to 5, with impacts scoring ≥ 3 considered relevant. This led to the identification of 41 material impacts. Risks were assessed by type (credit, operational, reputational,

strategic, market, liquidity), following the Group's Enterprise Risk Management methodology. A unified risk scale (1 to 4) was applied across all risk categories, and a "Medium-High" materiality threshold was set. This process identified 13 material risks. Opportunities were assessed based on inputs from the Group's 2024-2027 Industrial Plan and engagement with internal functions. The materiality of opportunities was determined based on potential financial impact and probability. A "Medium-High" threshold was also applied to opportunities to ensure consistency with the risk assessment methodology. The process considers the organization's dependencies on ecosystem services, human capital, intellectual capital, and relationships with local communities. ESG risks and opportunities are fully integrated into the Group's risk management system, including the Risk Appetite Framework (RAF), ICAAP, ILAAP and quarterly risk reporting to the Board of Directors and the Control and Risk Committee. The sustainability strategy is embedded within the Group's governance system, with periodic updates provided to the Board of Directors and the Control and Risk Committee to ensure awareness of ESG risk exposure and informed decision-making on sustainability issues. Scenario analysis was conducted focusing on sector trends, peer benchmarking, and internal assessments of the Group's products and portfolios. The process is progressively refined to enhance the granularity and accuracy of ESG data, ensuring increasing alignment with supervisory expectations and sustainability reporting standards. The ESG risk management process is consistent with the ECB Guide on climate-related and environmental risks and aligned with supervisory priorities for 2024-2027. The identification and management of ESG risks and opportunities represent a strategic priority for the Group and are fully embedded within its long-term growth and sustainability objectives.

[Add row]

(2.2.4) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts related to your portfolio activities?

Banking (Bank)

(2.2.4.1) Process in place covering this portfolio

Select from:

Yes

(2.2.4.2) Dependencies and/or impacts related to this portfolio evaluated in this process

Select from:

Both dependencies and impacts

Investing (Asset manager)

(2.2.4.1) Process in place covering this portfolio

Select from:

Yes

(2.2.4.2) Dependencies and/or impacts related to this portfolio evaluated in this process

Select from:

Impacts only

(2.2.4.3) Primary reason for not evaluating dependencies and/or impacts related to this portfolio

Select from:

Not an immediate strategic priority

(2.2.4.4) Explain why you do not evaluate dependencies and/or impacts related to this portfolio and describe any plans to evaluate this in the future

*Currently, BPER does not assess dependencies related to asset management activities, as priority has been given to the credit exposures of the banking portfolio.
[Fixed row]*

(2.2.5) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities related to your portfolio activities?

Banking (Bank)

(2.2.5.1) Process in place covering this portfolio

Select from:

Yes

(2.2.5.2) Risks and/or opportunities related to this portfolio are evaluated in this process

Select from:

Both risks and opportunities

(2.2.5.3) Is this process informed by the dependencies and/or impacts process?

Select from:

Yes

Investing (Asset manager)

(2.2.5.1) Process in place covering this portfolio

Select from:

Yes

(2.2.5.2) Risks and/or opportunities related to this portfolio are evaluated in this process

Select from:

Both risks and opportunities

(2.2.5.3) Is this process informed by the dependencies and/or impacts process?

Select from:

No

(2.2.5.6) Explain why you do not have a process for evaluating both risks and opportunities related to this portfolio that is informed by a dependencies and/or impacts process

BPER Banca has developed a structured process for identifying, evaluating, and managing climate risks and opportunities. This process is currently not influenced by analyses of environmental dependencies and impacts. The primary reason for this is that the current focus is mainly on regulatory compliance and managing immediate threats and opportunities in the regulatory and market landscape. However, BPER Banca acknowledges the importance of such analyses for long-term sustainable management. The existing process includes continuous monitoring of environmental regulations and market trends to identify emerging risks and opportunities, such as analyzing government policies and environmental regulations. In the future, BPER Banca will assess the further integration environmental dependencies and impacts into its internal processes. This will involve implementing tools and methodologies to collect and analyze detailed data on environmental interactions and incorporating this information into risk and opportunity management strategies.

[Fixed row]

(2.2.6) Provide details of your organization’s process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities related to your portfolio activities.

Banking (Bank)

(2.2.6.1) Environmental issue

Select all that apply

- Climate change

(2.2.6.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this portfolio

Select all that apply

- Dependencies
- Impacts
- Risks
- Opportunities

(2.2.6.3) % of portfolio covered by the assessment process in relation to total portfolio value

100

(2.2.6.4) Type of assessment

Select from:

- Qualitative and quantitative

(2.2.6.5) Industry sectors covered by the assessment

Select all that apply

- | | |
|--|--|
| <input checked="" type="checkbox"/> Retail | <input checked="" type="checkbox"/> Fossil Fuels |
| <input checked="" type="checkbox"/> Apparel | <input checked="" type="checkbox"/> Manufacturing |
| <input checked="" type="checkbox"/> Services | <input checked="" type="checkbox"/> Infrastructure |

- Materials
- Hospitality
- Food, beverage & agriculture
- Biotech, health care & pharma

- Power generation
- Transportation services

(2.2.6.6) Frequency of assessment

Select from:

- Annually

(2.2.6.7) Time horizons covered

Select all that apply

- Short-term
- Medium-term
- Long-term

(2.2.6.8) Integration of risk management process

Select from:

- Integrated into multi-disciplinary organization-wide risk assessment process

(2.2.6.9) Location-specificity used

Select all that apply

- Site-specific
- National

(2.2.6.10) Tools and methods used

Select all that apply

- Internal tools/methods
- Risk models

- Scenario analysis
- Stress tests
- Other, please specify :LEAP process of TNFD and UNPE FI Portfolio Impact Analysis Tool for Bank

(2.2.6.11) Risk type and criteria considered

Acute physical

- Flood (coastal, fluvial, pluvial, ground water)
- Heat waves
- Landslide
- Wildfires

Chronic physical

- Changing precipitation patterns and types (rain, hail, snow/ice)
- Sea level rise
- Temperature variability
- Water stress

Policy

- Changes to national legislation

Reputation

- Increased partner and stakeholder concern and partner and stakeholder negative feedback
- Investing that could create or contribute to systemic risk for the economy

Technology

- Transition to lower emissions technology and products

Liability

- Exposure to litigation

(2.2.6.12) Partners and stakeholders considered

Select all that apply

- Customers
- Investors
- Regulators
- Suppliers
- Other, please specify :Board of Directors and Top Management

(2.2.6.13) Further details of process

BPER Banca identifies, assesses, and manages environmental dependencies, impacts, risks, and opportunities (IROs) through a structured process integrated into portfolio risk management. The methodology, coordinated by Group Risk Management, is embedded within the Group Risk Map, ICAAP, ILAAP, and Risk Appetite Framework, covering physical and transition climate risks across different time horizons. The assessment follows a double materiality approach, updated in 2024 to align with D.Lgs. 125/2024, EFRAG's IGMA 1, and supervisory expectations. BPER considers how environmental dependencies, such as reliance on water provisioning, and impacts from financed activities affect financial risks, influencing credit parameters like Probability of Default, Loss Given Default, and collateral value, especially in areas exposed to physical risks. The identification and assessment of dependencies and impacts use the LEAP approach (Locate, Evaluate, Assess, Prepare) recommended by TNFD, allowing a systematic screening of portfolio activities to detect material dependencies on ecosystem services and significant environmental impacts. The process begins with understanding systemic, sectoral, and geographical risks, integrating key regulations like the EU Taxonomy, Net-Zero Banking Alliance, ECB supervisory priorities, and EBA ESG Guidelines. Natural resource constraints, such as water or land use, are also assessed. IROs are identified through sector screening and counterparty analysis based on sustainability reports, ESG ratings, public data, questionnaires, and project-level due diligence. The assessment applies qualitative and quantitative criteria supported by double materiality and the LEAP method to evaluate the nature, likelihood, and potential impact of financial and strategic risks. ESG risks and opportunities are integrated into the Group's risk management system, with ESG Key Risk Indicators and portfolio limits monitored quarterly and subject to formal escalation. Scenario analysis applies NGFS "Current Policies" and "Net Zero 2050" pathways over multiple horizons. The process focuses on portfolio activities, excluding operational sites, using data from internal systems, counterparties, public sources, and validated third parties. In 2024, the process was strengthened through improved data quality, expanded portfolio coverage, and enhanced risk aggregation and granularity.

Investing (Asset manager)

(2.2.6.1) Environmental issue

Select all that apply

- Climate change

(2.2.6.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this portfolio

Select all that apply

- Risks
- Opportunities

(2.2.6.3) % of portfolio covered by the assessment process in relation to total portfolio value

100

(2.2.6.4) Type of assessment

Select from:

- Qualitative and quantitative

(2.2.6.5) Industry sectors covered by the assessment

Select all that apply

- | | |
|---|---|
| <input checked="" type="checkbox"/> Retail | <input checked="" type="checkbox"/> Fossil Fuels |
| <input checked="" type="checkbox"/> Apparel | <input checked="" type="checkbox"/> Manufacturing |
| <input checked="" type="checkbox"/> Services | <input checked="" type="checkbox"/> Infrastructure |
| <input checked="" type="checkbox"/> Materials | <input checked="" type="checkbox"/> Power generation |
| <input checked="" type="checkbox"/> Hospitality | <input checked="" type="checkbox"/> Transportation services |
| <input checked="" type="checkbox"/> Food, beverage & agriculture | |
| <input checked="" type="checkbox"/> Biotech, health care & pharma | |

(2.2.6.6) Frequency of assessment

Select from:

- More than once a year

(2.2.6.7) Time horizons covered

Select all that apply

- Short-term

(2.2.6.8) Integration of risk management process

Select from:

- Integrated into multi-disciplinary organization-wide risk assessment process

(2.2.6.9) Location-specificity used

Select all that apply

- Local
- National
- Not location specific

(2.2.6.10) Tools and methods used

Select all that apply

- Internal tools/methods
- Risk models

(2.2.6.11) Risk type and criteria considered

Acute physical

- Flood (coastal, fluvial, pluvial, ground water)
- Heavy precipitation (rain, hail, snow/ice)
- Landslide

Market

- Changing customer behavior
- Inability to attract co-financiers and/or investors due to uncertain risks related to the environment

Reputation

- Increased partner and stakeholder concern and partner and stakeholder negative feedback
- Negative press coverage related to support of projects or activities with negative impacts on the environment (e.g. GHG emissions, deforestation & conversion, water stress)

(2.2.6.12) Partners and stakeholders considered

Select all that apply

- Customers
- Regulators

(2.2.6.13) Further details of process

The Group, for its asset management subsidiaries, performs a regular materiality assessment to identify relevant climate-related and ESG risk drivers and evaluate their significance both at the firm and portfolio level. At the firm level, impacts on market, operational, reputation and strategic risk are assessed, taking into account, for instance, relations with suppliers, the impact of investment performance on the sustainability profile of the firm and the operational losses associated with extreme events that may affect financial performance. At the portfolio level, the asset management subsidiaries consider markets risks arising from physical climate drivers (acute extreme events), liquidity risks associated with significant climate drivers that may affect the client's capacity for saving and investing, as well as potential greenwashing risks that may affect the positioning and reputation of the firm in the sustainable investment market.

Investing (Asset manager)

(2.2.6.1) Environmental issue

Select all that apply

- Climate change

(2.2.6.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this portfolio

Select all that apply

- Impacts

(2.2.6.3) % of portfolio covered by the assessment process in relation to total portfolio value

80

(2.2.6.4) Type of assessment

Select from:

- Quantitative only

(2.2.6.5) Industry sectors covered by the assessment

Select all that apply

- Retail
- Apparel
- Services
- Materials
- Hospitality
- Transportation services
- Food, beverage & agriculture
- Biotech, health care & pharma
- Fossil Fuels
- Manufacturing
- Infrastructure
- Power generation
- International bodies

(2.2.6.6) Frequency of assessment

Select from:

- Annually

(2.2.6.7) Time horizons covered

Select all that apply

- Not defined

(2.2.6.9) Location-specificity used

Select all that apply

- Not location specific

(2.2.6.10) Tools and methods used

Select all that apply

- Other, please specify :Principal adverse impacts

(2.2.6.12) Partners and stakeholders considered

Select all that apply

- Customers

- Employees
- Investors
- Local communities

(2.2.6.13) Further details of process

ARCA Fondi SGR employs an ESG rating model to evaluate the environmental, social, and governance impacts on its managed portfolios, using data provided by the information provider MSCI. The classification ranges from CCC to AAA and considers the "Do Not Significantly Harm" (DNSH) principle, requiring that at least 75% of impacts align with or exceed market standards, such as the MSCI World All Countries Index. The results of these ESG impact assessments are integrated into the company's overall risk management process, with regular reporting to the Risk and Compliance Committee and the Board of Directors. The methodology for collecting impact data involves utilizing MSCI information and integrating it with internal data, including assessments of climate and environmental risks associated with the managed portfolios. This approach ensures that identified impacts are effectively managed, enhancing the sustainability and environmental responsibility of ARCA's operations.

[Add row]

(2.2.7) Are the interconnections between environmental dependencies, impacts, risks and/or opportunities assessed?

(2.2.7.1) Interconnections between environmental dependencies, impacts, risks and/or opportunities assessed

Select from:

- Yes

(2.2.7.2) Description of how interconnections are assessed

BPER Banca assesses the interconnections between environmental dependencies, impacts, risks, and opportunities through an integrated process that applies the double materiality methodology described in 2.2.2. This process, updated in 2024 in line with D.Lgs. 125/2024 and EFRAG's IGMA 1, systematically combines the evaluation of environmental factors with financial risk assessments. The Group adopts a unified framework that integrates sectoral and counterparty-specific analyses into a single process. The assessment is based on internal data, sustainability reports, ESG ratings, ESG questionnaires, and project-level due diligence. The methodology connects environmental dependencies, impacts generated by financed activities, and the corresponding physical and transition risks. Dependencies and impacts are not assessed in isolation but are explicitly linked to the probability of default (PD), loss given default (LGD), and collateral valuations. This integrated approach is fully embedded in the ESG Credit Policy and the Enterprise Risk Management framework. Interconnections are evaluated by considering how environmental factors jointly influence counterparties' credit risk profiles. For example, a company's dependency on water resources increases its exposure to drought risk, which may affect operational continuity and increase credit risk. Simultaneously, transition risks, such as regulatory changes targeting GHG emissions, may create financial pressures on the same company. These interconnected factors are assessed together to provide a comprehensive view of the client's overall risk. The process identifies both synergies and trade-offs. Supporting clients with green transition financing may simultaneously reduce the Group's exposure to transition risks and financed emissions, creating positive alignment. Conversely, financing clients with high transition needs may temporarily increase exposure but

contribute to long-term decarbonization objectives. The integrated assessment allows the Group to balance financial risk, sustainability goals, and regulatory alignment. Interconnections are tracked through ESG-specific Key Risk Indicators (KRIs), sector concentration limits, and the energy efficiency classification of financed assets, monitored quarterly within the Risk Appetite Framework. Scenario analysis plays a key role in assessing interconnections, using NGFS “Current Policies” and “Net Zero 2050” scenarios across multiple time horizons (short, medium, and long term). The scenarios consider sector-specific sensitivity to climate risks and systemic exposures within the portfolio. The Group acknowledges that integrating all interconnections into a fully holistic model remains challenging, mainly due to data availability and the evolving nature of ESG assessment methodologies. BPER Banca is committed to progressively improving its ability to capture and manage these interdependencies through continuous methodological refinement and portfolio monitoring.

[Fixed row]

(2.2.8) Does your organization consider environmental information about your clients/investees as part of your due diligence and/or environmental dependencies, impacts, risks and/or opportunities assessment process?

	We consider environmental information
Banking (Bank)	Select from: <input checked="" type="checkbox"/> Yes
Investing (Asset manager)	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(2.2.9) Indicate the environmental information your organization considers about clients/investees as part of your due diligence and/or environmental dependencies, impacts, risks and/or opportunities assessment process, and how this influences decision-making.

Banking (Bank)

(2.2.9.1) Environmental issues covered

Select all that apply

- Climate change

(2.2.9.2) Type of environmental information considered

Select all that apply

- Emissions data

(2.2.9.3) Process through which information is obtained

Select all that apply

- Directly from the client/investee
- From an intermediary or business partner
- Data provider
- Public data sources

(2.2.9.4) Industry sectors covered by due diligence and/or risk assessment process

Select all that apply

- | | |
|---|---|
| <input checked="" type="checkbox"/> Retail | <input checked="" type="checkbox"/> Fossil Fuels |
| <input checked="" type="checkbox"/> Apparel | <input checked="" type="checkbox"/> Manufacturing |
| <input checked="" type="checkbox"/> Services | <input checked="" type="checkbox"/> Infrastructure |
| <input checked="" type="checkbox"/> Materials | <input checked="" type="checkbox"/> Power generation |
| <input checked="" type="checkbox"/> Hospitality | <input checked="" type="checkbox"/> Transportation services |
| <input checked="" type="checkbox"/> Food, beverage & agriculture | |
| <input checked="" type="checkbox"/> Biotech, health care & pharma | |

(2.2.9.5) % of portfolio covered by the process in relation to total portfolio value

94

(2.2.9.6) Total portfolio value covered by the process

121905775300

Investing (Asset manager)

(2.2.9.1) Environmental issues covered

Select all that apply

- Climate change

(2.2.9.2) Type of environmental information considered

Select all that apply

- Emissions data

(2.2.9.3) Process through which information is obtained

Select all that apply

- From an intermediary or business partner
- Data provider
- Public data sources

(2.2.9.4) Industry sectors covered by due diligence and/or risk assessment process

Select all that apply

- | | |
|---|---|
| <input checked="" type="checkbox"/> Retail | <input checked="" type="checkbox"/> Fossil Fuels |
| <input checked="" type="checkbox"/> Apparel | <input checked="" type="checkbox"/> Manufacturing |
| <input checked="" type="checkbox"/> Services | <input checked="" type="checkbox"/> Infrastructure |
| <input checked="" type="checkbox"/> Materials | <input checked="" type="checkbox"/> Power generation |
| <input checked="" type="checkbox"/> Hospitality | <input checked="" type="checkbox"/> Transportation services |
| <input checked="" type="checkbox"/> Food, beverage & agriculture | |
| <input checked="" type="checkbox"/> Biotech, health care & pharma | |

(2.2.9.5) % of portfolio covered by the process in relation to total portfolio value

(2.2.9.6) Total portfolio value covered by the process

148742039200

[Add row]

(2.4) How does your organization define substantive effects on your organization?

Risks

(2.4.1) Type of definition

Select all that apply

Qualitative

Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

Credit risk

(2.4.3) Change to indicator

Select from:

% increase

(2.4.4) % change to indicator

Select from:

1-10

(2.4.6) Metrics considered in definition

Select all that apply

Time horizon over which the effect occurs

(2.4.7) Application of definition

BPER Banca defines the substantive effect of environmental and climate-related risks through a structured materiality assessment process embedded within its Group Risk Map. This process uses qualitative judgment to evaluate the potential of an ESG risk to materially affect the organization's financial position, strategic objectives, or risk profile, based on its alignment with the Risk Appetite Framework (RAF) and overall business model. ESG factors, particularly climate-related risks, are assessed in terms of their capacity to disrupt capital allocation, alter risk-adjusted returns, or undermine the bank's ability to meet supervisory expectations. These factors are first mapped at a sectoral level using benchmarks, external datasets, and internal assessments, then contextualized for BPER's exposure profile. The analysis distinguishes between direct effects (e.g., increased credit risk due to physical events or carbon transition exposure) and indirect effects (e.g., reputational risk or second-order impacts through supply chains). ESG risks are formally integrated into the Group's risk taxonomy and monitored consistently across risk types and time horizons, and supports decision-making through periodic review by Risk Management and the ESG Strategy Service. It also informs internal escalation protocols and early warning indicators. Among the most relevant risk factors, the Group analysed the impact of climate physical and transition drivers on the increase in probability of default of counterparties for the portfolio of lending to non-financial corporations; the threshold has been set in terms of a proportion of counterparties and loan exposures affected (i.e. the substantial effect indicator).

Opportunities

(2.4.1) Type of definition

Select all that apply

- Qualitative
- Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

- Other, please specify :New disbursement of ESG Loans

(2.4.3) Change to indicator

Select from:

- Absolute increase

(2.4.5) Absolute increase/ decrease figure

7000000000

(2.4.6) Metrics considered in definition

Select all that apply

Time horizon over which the effect occurs

(2.4.7) Application of definition

BPER Banca defines an environmental opportunity as substantive when it is expected to generate a positive, measurable, and strategic effect on key performance indicators such as revenue growth, market share, asset value, reputation, capital allocation, or relationship strength with institutional stakeholders. The definition is applied across specific green and sustainable financial products, including SACE Green Loans, ESG Corporate Lending (di cui Green), and regional incentive-based instruments (e.g., Fondo Regionale Multiscopo). For each product, qualitative and quantitative thresholds are defined. For example, an opportunity is considered substantive when it results in: • a defined % increase in green loan volumes or loan allocation to sustainable purposes; • a reduction in risk-weighted assets (RWA) due to taxonomy-aligned exposures; • an improvement in client relationships and positioning in sustainability-oriented market segments. These thresholds are assessed at least annually, based on market performance, regulatory alignment (e.g., EU Taxonomy), and alignment with sustainability KPIs. The definition is used to guide product development, strategic prioritization, and ESG performance reporting. The application of this definition is monitored by the business functions in coordination with the ESG Strategy Service and the Risk & Compliance Committees, ensuring that environmentally beneficial opportunities are embedded in both financial planning and impact assessment frameworks.

[Add row]

C3. Disclosure of risks and opportunities

(3.1) Have you identified any environmental risks which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.1.1) Environmental risks identified

Select from:

Yes, both within our direct operations or upstream value chain, and within our portfolio

Forests

(3.1.1) Environmental risks identified

Select from:

No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

Not an immediate strategic priority

(3.1.3) Please explain

During the reporting year, BPER Banca did not identify any substantive environmental risks related to forests, water, and plastics. This is because these environmental issues are not currently considered relevant to the bank's core business, and their impact is deemed minimal in relation to BPER's operational activities. However, the organization will continue to monitor these issues and adjust its environmental management strategies as necessary to ensure long-term sustainability.

Water

(3.1.1) Environmental risks identified

Select from:

No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

Not an immediate strategic priority

(3.1.3) Please explain

During the reporting year, BPER Banca did not identify any substantive environmental risks related to forests, water, and plastics. This is because these environmental issues are not currently considered relevant to the bank's core business, and their impact is deemed minimal in relation to BPER's operational activities. However, the organization will continue to monitor these issues and adjust its environmental management strategies as necessary to ensure long-term sustainability.

Plastics

(3.1.1) Environmental risks identified

Select from:

No

(3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

Not an immediate strategic priority

(3.1.3) Please explain

During the reporting year, BPER Banca did not identify any substantive environmental risks related to forests, water, and plastics. This is because these environmental issues are not currently considered relevant to the bank's core business, and their impact is deemed minimal in relation to BPER's operational activities. However, the organization will continue to monitor these issues and adjust its environmental management strategies as necessary to ensure long-term sustainability.

[Fixed row]

(3.1.1) Provide details of the environmental risks identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.1.1.1) Risk identifier

Select from:

Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Acute physical

Heavy precipitation (rain, hail, snow/ice)

(3.1.1.4) Value chain stage where the risk occurs

Select from:

Banking (Bank) portfolio

(3.1.1.5) Risk type mapped to traditional financial services industry risk classification

Select all that apply

Credit risk

(3.1.1.6) Country/area where the risk occurs

Select all that apply

Italy

(3.1.1.9) Organization-specific description of risk

Risk associated with significant damage occurring to real estate assets that collateralise mortgages associated with extreme climate and weather events, which in turn affects loan-to-value for significant lending exposures.

(3.1.1.10) % of portfolio value vulnerable to this risk

Select from:

1-10%

(3.1.1.11) Primary financial effect of the risk

Select from:

Devaluation of collateral and potential for stranded, illiquid assets

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

Long-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

About as likely as not

(3.1.1.14) Magnitude

Select from:

Medium-low

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The anticipated financial effect is associated with exposure to loans collateralized by real estate assets vulnerable to physical risks from extreme weather events. Damages may affect the value of the collaterals, in turn requiring additional capital buffers.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

Yes

(3.1.1.23) Anticipated financial effect figure in the long-term – minimum (currency)

241000000

(3.1.1.24) Anticipated financial effect figure in the long-term – maximum (currency)

242000000

(3.1.1.25) Explanation of financial effect figure

Outstanding amount for mortgage loans that are subject to a significant risk of loss of value of real estate assets posted as collateral due to extreme weather events.

(3.1.1.26) Primary response to risk

Policies and plans

Develop a climate transition plan

(3.1.1.27) Cost of response to risk

1000000

(3.1.1.28) Explanation of cost calculation

BPER Banca and its subsidiaries have undertaken several projects to integrate climate factors into the general risk management framework, including the integration of the internal data model and data collection systems, dedicated scenario analysis and advisory, and developing products and adaptation solutions to integrate the sustainable finance offering to clients.

(3.1.1.29) Description of response

In response to regulatory developments and the demands of supervisory authorities, the Group is committed to integrating climate and environmental risk factors into traditional risk management processes, defining their respective transmission channels. The Bank is adopting strategies to balance the achievement of set goals with the commercial and corporate sustainability of BPER Banca, while also reducing the impact of its lending activities. Specific, KPIs have been defined to measure and monitor the direct and indirect environmental impacts of operations. The "P&C Climate Risk" project, concluded in September 2023, enabled the enhancement of strategic planning processes and the identification of climate related KPIs to be integrated into the main Planning and Control processes (e.g. Budget, Business Plan, Funding Plan). During the initial workshop, a shortlist of KPIs was selected and classified into three categories: Risk Management (e.g. exposure to physical and transitional risk); Portfolio (e.g. portfolio by rating; collateral with high/low Energy performance certificate ratings); Products and services (e.g. volumes of green bond issuances and green loans). Internal regulations for the budget, Business Plan and Funding Plan were updated to incorporate climate related KPIs and considerations into the Group's strategy, enabling full ESG integration and near full alignment of the Sustainability Plan with the strategic plan. In 2024, work continued to integrate functional data for KPI calculation into the Management Control database (Evoco Project). The implementation of climate related KPIs in management reporting began, including performance data analysis by business line. These KPIs will be permanently included in internal reporting starting from the report dated 31 March 2025. They include: Financed Emissions (FE) and Carbon Intensity (CI) for corporate clients; Exposure secured by properties with high/low EPCs; Green financing for Corporate and Retail clients.

Climate change

(3.1.1.1) Risk identifier

Select from:

Risk3

(3.1.1.3) Risk types and primary environmental risk driver

Acute physical

Heavy precipitation (rain, hail, snow/ice)

(3.1.1.4) Value chain stage where the risk occurs

Select from:

Investing (Asset manager) portfolio

(3.1.1.5) Risk type mapped to traditional financial services industry risk classification

Select all that apply

- Liquidity risk

(3.1.1.6) Country/area where the risk occurs

Select all that apply

- Italy

(3.1.1.9) Organization-specific description of risk

Risk associated with the concentration of clients/investors in geographical areas subject to heavy and extreme weather events, which might lead to substantial damages and affect their capacity for saving and investments, which in turn would reduce the investment collection volumes for the firms managed portfolios.

(3.1.1.10) % of portfolio value vulnerable to this risk

Select from:

- 11-20%

(3.1.1.11) Primary financial effect of the risk

Select from:

- Decreased revenues due to reduced demand for products and services

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

- Short-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

- Unlikely

(3.1.1.14) Magnitude

Select from:

Medium-low

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

Extreme weather event may affect the ability and propensity for saving of clients in relevant areas, leading to a reduction in asset management fees associated with a decrease in fund collection.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

No

(3.1.1.26) Primary response to risk

Policies and plans

Develop a climate transition plan

(3.1.1.27) Cost of response to risk

0

(3.1.1.28) Explanation of cost calculation

BPER Banca and its subsidiaries have undertaken several projects to integrate climate factors into the general risk management framework, including the integration of the internal data model and data collection systems, dedicated scenario analysis and advisory, and developing products and adaptation solutions to integrate the sustainable finance offering to clients.

(3.1.1.29) Description of response

In response to regulatory developments and demands, the Group is committed to integrating climate and environmental risk factors within traditional risk management processes. Within its sustainability strategy, the Group has identified opportunities related to climate on a 1-3 year timeframe, aligned with the 2022-2025 BPER evolution Business Plan, aiming to support the transition of its customers. The Group has identified carbon-related assets within its credit and security portfolio and assessed the climate risk exposure of its credit portfolio. The sustainability strategy is embodied in the ESG Infusion Programme, a core part of the new Business

Plan, and focuses on: Enhancing the green offer; Redesigning the data governance model; Engaging the value chain (customers and suppliers); Reducing direct impacts; Reviewing risk management processes. These pillars are supported by ongoing development of scenario analysis methodology and portfolio carbon footprint monitoring. In 2023, the Group defined its first decarbonization targets for key sectors (Power Generation and Oil & Gas) in accordance with the NZBA. The Bank aims to balance its goals with the commercial and corporate sustainability of BPER Banca while reducing loan impacts. The Group has defined KPIs to measure and monitor its environmental impacts. In 2022, the Bank launched a project to evolve strategic planning processes by including ESG drivers through dedicated measures and KPIs (e.g., transition/physic. risks).

Climate change

(3.1.1.1) Risk identifier

Select from:

Risk2

(3.1.1.3) Risk types and primary environmental risk driver

Market

Other market risk, please specify :Decrease in market value of real estate assets that collateralize mortgages due to increasing demand for energy-efficient buildings.

(3.1.1.4) Value chain stage where the risk occurs

Select from:

Banking (Bank) portfolio

(3.1.1.5) Risk type mapped to traditional financial services industry risk classification

Select all that apply

Credit risk

(3.1.1.6) Country/area where the risk occurs

Select all that apply

Italy

(3.1.1.9) Organization-specific description of risk

Risk associated with loss of market value to real estate assets that collateralise mortgages associated with an increasing shift towards a low-emissions economy and greater demand for energy efficient buildings, driven both by regulatory and market pressure, which in turn affects loan-to-value for significant lending exposures.

(3.1.1.10) % of portfolio value vulnerable to this risk

Select from:

41-50%

(3.1.1.11) Primary financial effect of the risk

Select from:

Decreased asset value or asset useful life leading to write-offs, asset impairment or early retirement of existing assets

(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

Short-term

Medium-term

(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

About as likely as not

(3.1.1.14) Magnitude

Select from:

Medium-low

(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

The anticipated financial effect is associated with exposure to loans collateralized by real estate assets potentially subject to depreciation linked to their poor energy performance in the context of market and regulatory pressures from the transition to a low-emissions economy. Loss in value of the collaterals may require additional capital buffers.

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

Yes

(3.1.1.19) Anticipated financial effect figure in the short-term – minimum (currency)

26200000000

(3.1.1.20) Anticipated financial effect figure in the short-term – maximum (currency)

26300000000

(3.1.1.21) Anticipated financial effect figure in the medium-term – minimum (currency)

26200000000

(3.1.1.22) Anticipated financial effect figure in the medium-term – maximum (currency)

26300000000

(3.1.1.25) Explanation of financial effect figure

Outstanding amount for mortgage loans that are subject to a significant risk of loss of value of real estate assets posted as collateral due to the energy and climate transition.

(3.1.1.26) Primary response to risk

Policies and plans

Develop a climate transition plan

(3.1.1.27) Cost of response to risk

2500000

(3.1.1.28) Explanation of cost calculation

BPER Banca and its subsidiaries have undertaken several projects to integrate climate factors into the general risk management framework, including the integration of the internal data model and data collection systems, dedicated scenario analysis and advisory, and developing products and adaptation solutions to integrate the sustainable finance offering to clients.

(3.1.1.29) Description of response

In response to regulatory developments and demands, the Group is committed to integrating climate and environmental risk factors within traditional risk management processes. Within its sustainability strategy, the Group has identified opportunities related to climate on a 1-3 year timeframe, aligned with the 2022-2025 BPER evolution Business Plan, aiming to support the transition of its customers. The Group has identified carbon-related assets within its credit and security portfolio and assessed the climate risk exposure of its credit portfolio. The sustainability strategy is embodied in the ESG Infusion Programme, a core part of the new Business Plan, and focuses on: Enhancing the green offer; Redesigning the data governance model; Engaging the value chain (customers and suppliers); Reducing direct impacts; Reviewing risk management processes. These pillars are supported by ongoing development of scenario analysis methodology and portfolio carbon footprint monitoring. In 2023, the Group defined its first decarbonization targets for key sectors (Power Generation and Oil & Gas) in accordance with the NZBA. The Bank aims to balance its goals with the commercial and corporate sustainability of BPER Banca while reducing loan impacts. The Group has defined KPIs to measure and monitor its environmental impacts. In 2022, the Bank launched a project to evolve strategic planning processes by including ESG drivers through dedicated measures and KPIs (e.g., transition/physic. risks).

[Add row]

(3.1.2) Provide the amount and proportion of your financial metrics from the reporting year that are vulnerable to the substantive effects of environmental risks.

Climate change

(3.1.2.1) Financial metric

Select from:

Assets

(3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

26200000000

(3.1.2.3) % of total financial metric vulnerable to transition risks for this environmental issue

Select from:

11-20%

(3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

241000000

(3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

Select from:

Less than 1%

(3.1.2.7) Explanation of financial figures

Figures disclosed indicate the approximate value of loan exposures for mortgages collateralized by real estate assets that have low energy performance or are vulnerable to extreme weather events, associated with transition and physical risk, respectively.

[Add row]

(3.6) Have you identified any environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?

Climate change

(3.6.1) Environmental opportunities identified

Select from:

Yes, we have identified opportunities, and some/all are being realized

Forests

(3.6.1) Environmental opportunities identified

Select from:

No

(3.6.2) Primary reason why your organization does not consider itself to have environmental opportunities

Select from:

Not an immediate strategic priority

(3.6.3) Please explain

During the reporting year, BPER Banca did not identify any significant opportunity related to forests and/or water. This is because these environmental issues are not currently considered relevant to the bank's core business, and their impact is deemed minimal in relation to BPER's operational activities. However, the organization will continue to monitor these issues and adjust its environmental management strategies as necessary to ensure long-term sustainability.

Water

(3.6.1) Environmental opportunities identified

Select from:

No

(3.6.2) Primary reason why your organization does not consider itself to have environmental opportunities

Select from:

Not an immediate strategic priority

(3.6.3) Please explain

During the reporting year, BPER Banca did not identify any significant opportunity related to forests and/or water. This is because these environmental issues are not currently considered relevant to the bank's core business, and their impact is deemed minimal in relation to BPER's operational activities. However, the organization will continue to monitor these issues and adjust its environmental management strategies as necessary to ensure long-term sustainability.
[Fixed row]

(3.6.1) Provide details of the environmental opportunities identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Products and services

Development of new products or services through R&D and innovation

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

Banking portfolio

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

Italy

(3.6.1.8) Organization specific description

In 2024 as part of its company's strategy, the BPER Group aims at supporting companies and families in their ecological and climate-related transition and, thus, offers products and services which have a positive environmental impact. In 2024, approx. 3 billion was disbursed for products and services for environmental purposes, of which over Euro 900 million for Retail customers and almost Euro 700 million for Corporate customers, in addition to approx. Euro 1.4 billion concerning the purchase of tax credits generated by green interventions in 2024 (of which 1 billion dedicated to Corporate customers, the rest to Retail customers). Among the types of products considered, the following should be noted: green mortgages and loans, ecobonus, products for circular economy and energy transition, green loans and project finance.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

- Increased revenues resulting from increased demand for products and services

(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

- Medium-term

(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

- Virtually certain (99–100%)

(3.6.1.12) Magnitude

Select from:

- Medium-low

(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

In order to implement an effective climate strategy capable on the one hand of managing risks and on the other of multiplying opportunities, the BPER 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: • full 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 offer of ESG investments (45% of ESG AuM) and the issue of Green Bonds for at least Euro 1 billion; • direct emissions (Scope 1) 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). Consistent with the “ESG-linked Loan Origination Policy” and the strategies of the 2024-2027 Business Plan, which envisaged concrete targets and actions based on a number of relevant drivers, a target is included that refers to the identification of a ceiling of more than Euro 7 billion of ESG disbursement within the Plan’s time horizon. The target is financial in nature and is measurable and monitored systematically. The target includes the provision of financing to private and corporate customers operating in Italy, divided into the three components E-environmental, S-social and G-governance. The distribution of funding foresees moderate progressive growth over the years. The base value from which progress is measured is 0. The target applies to the three-year period 2025-2027. To set the target, the Group operated in continuity with the planning of the previous three-year period. BPER devotes constant attention to the evolution of market trends and customer expectations in order to define a coherent product and service offer; however, in this specific case the target definition process did not include the involvement of BPER customer representatives. Business Plan targets are constantly monitored and submitted to the Management Sustainability Committee on a quarterly basis.

(3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

Yes

(3.6.1.19) Anticipated financial effect figure in the medium-term - minimum (currency)

3325290005

(3.6.1.20) Anticipated financial effect figure in the medium-term - maximum (currency)

3325290005

(3.6.1.23) Explanation of financial effect figures

The legal climate change financial opportunities identified by the BPER Group are the result of the following items: Euro 3 billion (disbursed for products and services for environmental purposes, of which over Euro 900 million for Retail customers and almost Euro 700 million for Corporate customers, in addition to approx. Euro 1.4 billion concerning the purchase of tax credits generated by green interventions in 2024 (of which 1 billion dedicated to Corporate customers, the rest to Retail customers).s) and 325,290,000 delivered in 2024 in Products and services with ESG purposes.

(3.6.1.24) Cost to realize opportunity

7961501

(3.6.1.25) Explanation of cost calculation

For operating costs consider the following items: approx 810000 average cost for 10 BPER FTE approx and 7151501 as cost linked to the development of business activity.

(3.6.1.26) Strategy to realize opportunity

In order to implement an effective climate strategy capable on the one hand of managing risks and on the other of multiplying opportunities, the BPER 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: • 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 offer of ESG investments (45% of ESG AuM) and the issue of Green Bonds for at least Euro 1 billion. These analyses are an important support in the definition of Credit policies (thanks to the assessment of exposure in relation to the different sectors in the portfolio) and commercial evaluations, especially with regard to the analysis of short and long term transition risk. The BPER Group intends to improve its leadership in the management of sustainability issues to become more efficient, competitive and to be a credible and reliable partner for its customers in the development of a more sustainable, fair and inclusive society.

[Add row]

(3.6.2) Provide the amount and proportion of your financial metrics in the reporting year that are aligned with the substantive effects of environmental opportunities.

Climate change

(3.6.2.1) Financial metric

Select from:

Assets

(3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

3325290004.56

(3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

Select from:

1-10%

(3.6.2.4) Explanation of financial figures

In 2024, the BPER Group followed a strategy aimed at supporting sustainability through financing activities in line with the main sustainable lending frameworks. The amount and proportion of financial metrics aligned with environmental opportunities refers to loan disbursed through ESG products for corporate and retail clients, specifically those classified as "green" under environmental criteria. For 2024-2027 period, the Group set over 7€ billion for ESG products. In 2024, loans already disbursed and attributable to the environmental component amount to approx. Euro 4.1 bln and include: green financing for ecological transition and energy efficiency, green mortgages for the renovation of residential buildings, sustainability linked credit products for SMEs. These initiatives support the objective of the 2024-2027 business plan and the commitment undertaken by the Net Zero Banking Alliance.

[Add row]

C4. Governance

(4.1) Does your organization have a board of directors or an equivalent governing body?

(4.1.1) Board of directors or equivalent governing body

Select from:

Yes

(4.1.2) Frequency with which the board or equivalent meets

Select from:

More frequently than quarterly

(4.1.3) Types of directors your board or equivalent is comprised of

Select all that apply

Executive directors or equivalent

Non-executive directors or equivalent

Independent non-executive directors or equivalent

(4.1.4) Board diversity and inclusion policy

Select from:

Yes, and it is publicly available

(4.1.5) Briefly describe what the policy covers

The BPER Banca Group values diversity, equity, and inclusion (D&I) as key drivers of innovation, growth, and organizational sustainability. It fosters a culture that ensures an inclusive environment free from discrimination based on gender, age, disability, health, ethnicity, origin, sexual orientation or identity, religion, or political beliefs enabling full individual potential. With attention to its market's social, economic, and cultural context, the Group focuses on gender diversity and supports employees in gender social affirmation, ensuring equal opportunity and treatment through inclusive and neutral criteria. Aligned with laws, the Corporate Governance Code, and the BPER Code of Ethics, this Policy defines the principles guiding the Group, its Corporate Bodies, Subsidiaries, and personnel. Board and Committee

actions cooptation, shareholder guidelines, appointments, and succession plans must consider these principles. Key commitments: • Foster inclusive culture and competitive advantage; • Ensure equity in hiring, training, promotion, pay, and exit; • Promote merit-based, discrimination-free advancement; • Offer training to boost skills and drive cultural change; • Enable work-life balance and inclusive career paths; • Support employees with disabilities; • Prevent workplace harassment; • Support transgender employees' gender affirmation; • Promote responsible internal/external DEI communication.

(4.1.6) Attach the policy (optional)

Giugno 2025_Policy on diversity, equity and inclusion.pdf

[Fixed row]

(4.1.1) Is there board-level oversight of environmental issues within your organization?

	Board-level oversight of this environmental issue
Climate change	Select from: <input checked="" type="checkbox"/> Yes
Forests	Select from: <input checked="" type="checkbox"/> Yes
Water	Select from: <input checked="" type="checkbox"/> Yes
Biodiversity	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(4.1.2) Identify the positions (do not include any names) of the individuals or committees on the board with accountability for environmental issues and provide details of the board's oversight of environmental issues.

Climate change

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

- Director on board
- Chief Executive Officer (CEO)
- Chief Financial Officer (CFO)
- Board-level committee
- President

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

- Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

- Board Terms of Reference
- Board mandate
- Individual role descriptions

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

- Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

- Reviewing and guiding annual budgets
- Overseeing and guiding scenario analysis
- Overseeing the setting of corporate targets
- Monitoring progress towards corporate targets
- Overseeing and guiding public policy engagement
- Approving and/or overseeing employee incentives
- Overseeing and guiding major capital expenditures
- Monitoring the implementation of the business strategy

- Approving corporate policies and/or commitments
- Monitoring the implementation of a climate transition plan
- Overseeing and guiding acquisitions, mergers, and divestitures
- Monitoring compliance with corporate policies and/or commitments
- Overseeing and guiding the development of a climate transition plan
- Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
- Overseeing reporting, audit, and verification processes

(4.1.2.6) Scope of board-level oversight

Select all that apply

- Risks and opportunities to our own operations
- Risks and opportunities to our banking activities
- The impact of our own operations on the environment
- Risks and opportunities to our investment activities
- The impact of our banking activities on the environment
- The impact of our investing activities on the environment

(4.1.2.7) Please explain

BPER Banca has developed robust and structured governance mechanisms to integrate environmental topics, such as climate change, into its management strategies. These tools are essential to ensuring that ESG issues are a key part of the Board's overall oversight. Sustainability Committee: This Board-level committee supports all sustainability-related matters, impacting processes, structures, and controls to ensure sustainable development, in line with the Corporate Governance Code and international principles. At least annually, it examines: • the Group's ESG Policy and its effectiveness in engaging stakeholders and achieving sustainability goals; • ESG regulatory documents, final reports, and disclosures, including the CSRD Sustainability Statement; • any reports from the CEO regarding ESG issues encountered. The Committee also plays a strategic role in ESG positioning, evaluating metrics, indices, benchmarks, and initiatives to promote sustainability culture. It reviews macro-trends—technological, environmental, economic, political—and monitors related initiatives. It reports at least annually to the Board of Directors on its activities. To fulfill its duties, the Committee: • works with other internal Board committees; • is supported by competent corporate functions; • may access all necessary corporate information; • receives resources as defined by the Board; • may engage internal or external experts. Control and Risk Committee: This Committee supports the Board in evaluating ESG risks, as part of the broader internal control system. It examines the Group Risk Map, Risk Appetite, and Risk Tolerance, as well as capital and liquidity management strategies. It periodically assesses scenarios, including stress tests, to determine the ESG risk profile under varying conditions. ESG issues are regularly discussed during meetings. The Committee also reviews risk management policies and quarterly risk reporting, including ESG-specific risks. ESG Management Committee: Established by the Board and chaired by the CFO, it includes all Chiefs of the Parent Company, the financial reporting officer, and other key functions such as Planning & Control, Organisation, and the ESG Strategy Office. Together, the CFO and Head of the ESG Strategy Office coordinate the committee's work. The ESG Management Committee facilitates coordination between Corporate and Group departments, supporting the CEO in managing sustainability at both Parent and Group level. It monitors the Group's positioning on sustainability and alignment with the 17 UN SDGs, and it promotes and manages ESG strategy in line with the Business Plan.

Forests

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

- Director on board
- Chief Executive Officer (CEO)
- Chief Financial Officer (CFO)
- Board-level committee
- President

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

- Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

- Board Terms of Reference
- Board mandate
- Individual role descriptions

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

- Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

- Reviewing and guiding annual budgets
- Approving and/or overseeing employee incentives
- Overseeing and guiding scenario analysis
- Overseeing and guiding major capital expenditures

- ☑ Overseeing the setting of corporate targets
- ☑ Monitoring progress towards corporate targets
- ☑ Approving corporate policies and/or commitments
- ☑ Overseeing and guiding the development of a climate transition plan
- ☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
- ☑ Monitoring the implementation of the business strategy
- ☑ Overseeing reporting, audit, and verification processes
- ☑ Monitoring compliance with corporate policies and/or commitments

(4.1.2.6) Scope of board-level oversight

Select all that apply

- ☑ Risks and opportunities to our own operations
- ☑ Risks and opportunities to our banking activities
- ☑ The impact of our own operations on the environment
- ☑ Risks and opportunities to our investment activities
- ☑ The impact of our banking activities on the environment
- ☑ The impact of our investing activities on the environment

(4.1.2.7) Please explain

BPER Banca has developed robust and structured governance mechanisms to integrate environmental topics, such as climate change, into its management strategies. These tools are essential to ensuring that ESG issues are a key part of the Board's overall oversight. Sustainability Committee: This Board-level committee supports all sustainability-related matters, impacting processes, structures, and controls to ensure sustainable development, in line with the Corporate Governance Code and international principles. At least annually, it examines: • the Group's ESG Policy and its effectiveness in engaging stakeholders and achieving sustainability goals; • ESG regulatory documents, final reports, and disclosures, including the CSRD Sustainability Statement; • any reports from the CEO regarding ESG issues encountered. The Committee also plays a strategic role in ESG positioning, evaluating metrics, indices, benchmarks, and initiatives to promote sustainability culture. It reviews macro-trends—technological, environmental, economic, political—and monitors related initiatives. It reports at least annually to the Board of Directors on its activities. To fulfill its duties, the Committee: • works with other internal Board committees; • is supported by competent corporate functions; • may access all necessary corporate information; • receives resources as defined by the Board; • may engage internal or external experts. Control and Risk Committee: This Committee supports the Board in evaluating ESG risks, as part of the broader internal control system. It examines the Group Risk Map, Risk Appetite, and Risk Tolerance, as well as capital and liquidity management strategies. It periodically assesses scenarios, including stress tests, to determine the ESG risk profile under varying conditions. ESG issues are regularly discussed during meetings. The Committee also reviews risk management policies and quarterly risk reporting, including ESG-specific risks. ESG Management Committee: Established by the Board and chaired by the CFO, it includes all Chiefs of the Parent Company, the financial reporting officer, and other key functions such as Planning & Control, Organisation, and the ESG Strategy Office. Together, the CFO and Head of the ESG Strategy Office coordinate the committee's work. The ESG Management Committee facilitates coordination between Corporate and Group departments, supporting the CEO in managing sustainability at both Parent and Group level. It monitors the Group's positioning on sustainability and alignment with the 17 UN SDGs, and it promotes and manages ESG strategy in line with the Business Plan.

Water

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

- Director on board
- Chief Executive Officer (CEO)
- Chief Financial Officer (CFO)
- Board-level committee
- President

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

- Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

- Board Terms of Reference
- Board mandate
- Individual role descriptions

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

- Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

- Reviewing and guiding annual budgets
- Approving and/or overseeing employee incentives
- Overseeing and guiding scenario analysis
- Overseeing and guiding major capital expenditures

- ☑ Overseeing the setting of corporate targets
- ☑ Monitoring progress towards corporate targets
- ☑ Approving corporate policies and/or commitments
- ☑ Overseeing and guiding the development of a climate transition plan
- ☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
- ☑ Monitoring the implementation of the business strategy
- ☑ Overseeing reporting, audit, and verification processes
- ☑ Monitoring compliance with corporate policies and/or commitments

(4.1.2.6) Scope of board-level oversight

Select all that apply

- ☑ Risks and opportunities to our own operations
- ☑ Risks and opportunities to our banking activities
- ☑ The impact of our own operations on the environment
- ☑ Risks and opportunities to our investment activities
- ☑ The impact of our banking activities on the environment
- ☑ The impact of our investing activities on the environment

(4.1.2.7) Please explain

BPER Banca has developed robust and structured governance mechanisms to integrate environmental topics, such as climate change, into its management strategies. These tools are essential to ensuring that ESG issues are a key part of the Board's overall oversight. Sustainability Committee: This Board-level committee supports all sustainability-related matters, impacting processes, structures, and controls to ensure sustainable development, in line with the Corporate Governance Code and international principles. At least annually, it examines: • the Group's ESG Policy and its effectiveness in engaging stakeholders and achieving sustainability goals; • ESG regulatory documents, final reports, and disclosures, including the CSRD Sustainability Statement; • any reports from the CEO regarding ESG issues encountered. The Committee also plays a strategic role in ESG positioning, evaluating metrics, indices, benchmarks, and initiatives to promote sustainability culture. It reviews macro-trends—technological, environmental, economic, political—and monitors related initiatives. It reports at least annually to the Board of Directors on its activities. To fulfill its duties, the Committee: • works with other internal Board committees; • is supported by competent corporate functions; • may access all necessary corporate information; • receives resources as defined by the Board; • may engage internal or external experts. Control and Risk Committee: This Committee supports the Board in evaluating ESG risks, as part of the broader internal control system. It examines the Group Risk Map, Risk Appetite, and Risk Tolerance, as well as capital and liquidity management strategies. It periodically assesses scenarios, including stress tests, to determine the ESG risk profile under varying conditions. ESG issues are regularly discussed during meetings. The Committee also reviews risk management policies and quarterly risk reporting, including ESG-specific risks. ESG Management Committee: Established by the Board and chaired by the CFO, it includes all Chiefs of the Parent Company, the financial reporting officer, and other key functions such as Planning & Control, Organisation, and the ESG Strategy Office. Together, the CFO and Head of the ESG Strategy Office coordinate the committee's work. The ESG Management Committee facilitates coordination between Corporate and Group departments, supporting the CEO in managing sustainability at both Parent and Group level. It monitors the Group's positioning on sustainability and alignment with the 17 UN SDGs, and it promotes and manages ESG strategy in line with the Business Plan.

Biodiversity

(4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

- Director on board
- Chief Executive Officer (CEO)
- Chief Financial Officer (CFO)
- Board-level committee
- President

(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

- Yes

(4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

- Board Terms of Reference
- Board mandate
- Individual role descriptions

(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

- Scheduled agenda item in every board meeting (standing agenda item)

(4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

- Reviewing and guiding annual budgets
- Approving and/or overseeing employee incentives
- Overseeing and guiding scenario analysis
- Overseeing and guiding major capital expenditures

- ☑ Overseeing the setting of corporate targets
- ☑ Monitoring progress towards corporate targets
- ☑ Approving corporate policies and/or commitments
- ☑ Overseeing and guiding the development of a climate transition plan
- ☑ Reviewing and guiding the assessment process for dependencies, impacts, risks, and opportunities
- ☑ Monitoring the implementation of the business strategy
- ☑ Overseeing reporting, audit, and verification processes
- ☑ Monitoring compliance with corporate policies and/or commitments

(4.1.2.6) Scope of board-level oversight

Select all that apply

- ☑ Risks and opportunities to our own operations
- ☑ Risks and opportunities to our banking activities
- ☑ The impact of our own operations on the environment
- ☑ Risks and opportunities to our investment activities
- ☑ The impact of our banking activities on the environment
- ☑ The impact of our investing activities on the environment

(4.1.2.7) Please explain

BPER Banca has developed robust and structured governance mechanisms to integrate environmental topics, such as climate change, into its management strategies. These tools are essential to ensuring that ESG issues are a key part of the Board's overall oversight. Sustainability Committee: This Board-level committee supports all sustainability-related matters, impacting processes, structures, and controls to ensure sustainable development, in line with the Corporate Governance Code and international principles. At least annually, it examines: • the Group's ESG Policy and its effectiveness in engaging stakeholders and achieving sustainability goals; • ESG regulatory documents, final reports, and disclosures, including the CSRD Sustainability Statement; • any reports from the CEO regarding ESG issues encountered. The Committee also plays a strategic role in ESG positioning, evaluating metrics, indices, benchmarks, and initiatives to promote sustainability culture. It reviews macro-trends—technological, environmental, economic, political—and monitors related initiatives. It reports at least annually to the Board of Directors on its activities. To fulfill its duties, the Committee: • works with other internal Board committees; • is supported by competent corporate functions; • may access all necessary corporate information; • receives resources as defined by the Board; • may engage internal or external experts. Control and Risk Committee: This Committee supports the Board in evaluating ESG risks, as part of the broader internal control system. It examines the Group Risk Map, Risk Appetite, and Risk Tolerance, as well as capital and liquidity management strategies. It periodically assesses scenarios, including stress tests, to determine the ESG risk profile under varying conditions. ESG issues are regularly discussed during meetings. The Committee also reviews risk management policies and quarterly risk reporting, including ESG-specific risks. ESG Management Committee: Established by the Board and chaired by the CFO, it includes all Chiefs of the Parent Company, the financial reporting officer, and other key functions such as Planning & Control, Organisation, and the ESG Strategy Office. Together, the CFO and Head of the ESG Strategy Office coordinate the committee's work. The ESG Management Committee facilitates coordination between Corporate and Group departments, supporting the CEO in managing sustainability at both Parent and Group level. It monitors the Group's positioning on sustainability and alignment with the 17 UN SDGs, and it promotes and manages ESG strategy in line with the Business Plan.

[Fixed row]

(4.2) Does your organization's board have competency on environmental issues?

Climate change

(4.2.1) Board-level competency on this environmental issue

Select from:

- Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

- Consulting regularly with an internal, permanent, subject-expert working group
- Engaging regularly with external stakeholders and experts on environmental issues
- Integrating knowledge of environmental issues into board nominating process
- Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)
- Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Academic

- Postgraduate education (e.g., MSc/MA/PhD in environment and sustainability, climate science, environmental science, water resources management, forestry, etc.), please specify :MSc in environmental and sustainability

Additional training

- Training in an environmental subject by a certified organization, please specify :A one-year training program, supported by a top consulting firm, covered ESG in credit risk, climate risk expectations, and new EU reporting standards. A separate session focused on the CSRD and its impact on sustainability reporting.

Experience

- Active member of an environmental committee or organization

Forests

(4.2.1) Board-level competency on this environmental issue

Select from:

- Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

- Consulting regularly with an internal, permanent, subject-expert working group
- Engaging regularly with external stakeholders and experts on environmental issues
- Integrating knowledge of environmental issues into board nominating process
- Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)
- Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Academic

- Postgraduate education (e.g., MSc/MA/PhD in environment and sustainability, climate science, environmental science, water resources management, forestry, etc.), please specify :MSc in Environmental and Sustainability

Additional training

- Training in an environmental subject by a certified organization, please specify :A one-year training program, supported by a top consulting firm, covered ESG in credit risk, climate risk expectations, and new EU reporting standards. A separate session focused on the CSRD and its impact on sustainability reporting.

Experience

- Active member of an environmental committee or organization

Water

(4.2.1) Board-level competency on this environmental issue

Select from:

Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

- Consulting regularly with an internal, permanent, subject-expert working group
- Engaging regularly with external stakeholders and experts on environmental issues
- Integrating knowledge of environmental issues into board nominating process
- Regular training for directors on environmental issues, industry best practice, and standards (e.g., TCFD, SBTi)
- Having at least one board member with expertise on this environmental issue

(4.2.3) Environmental expertise of the board member

Academic

- Postgraduate education (e.g., MSc/MA/PhD in environment and sustainability, climate science, environmental science, water resources management, forestry, etc.), please specify :MSc in Environmental and Sustainability

Additional training

- Training in an environmental subject by a certified organization, please specify :A one-year training program, supported by a top consulting firm, covered ESG in credit risk, climate risk expectations, and new EU reporting standards. A separate session focused on the CSRD and its impact on sustainability reporting.

Experience

- Active member of an environmental committee or organization

[Fixed row]

(4.3) Is there management-level responsibility for environmental issues within your organization?

	Management-level responsibility for this environmental issue
Climate change	Select from: <input checked="" type="checkbox"/> Yes
Forests	Select from: <input checked="" type="checkbox"/> Yes
Water	Select from: <input checked="" type="checkbox"/> Yes
Biodiversity	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(4.3.1) Provide the highest senior management-level positions or committees with responsibility for environmental issues (do not include the names of individuals).

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Executive level

- Chief Financial Officer (CFO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- Assessing environmental dependencies, impacts, risks, and opportunities
- Assessing future trends in environmental dependencies, impacts, risks, and opportunities

- Managing environmental dependencies, impacts, risks, and opportunities

Engagement

- Managing public policy engagement related to environmental issues
- Managing value chain engagement related to environmental issues

Policies, commitments, and targets

- Measuring progress towards environmental corporate targets
- Setting corporate environmental targets

Strategy and financial planning

- Developing a climate transition plan
- Implementing a climate transition plan issues
- Conducting environmental scenario analysis environmental issues
- Managing annual budgets related to environmental issues
- Implementing the business strategy related to environmental issues
- Developing a business strategy which considers environmental issues
- Managing acquisitions, mergers, and divestitures related to environmental issues
- Managing major capital and/or operational expenditures relating to environmental issues

Other

- Providing employee incentives related to environmental performance

(4.3.1.3) Coverage of responsibilities

Select all that apply

- Dependencies, impacts, risks, and opportunities related to our banking activities
- Dependencies, impacts, risks, and opportunities related to our investing activities
- Dependencies, impacts, risks and opportunities related to our own operations and/or upstream value chain

(4.3.1.4) Reporting line

Select from:

- Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- More frequently than quarterly

(4.3.1.6) Please explain

Management Committee was established by the previous Board of Directors in 2020 and renamed the ESG Management Committee in 2022. This Committee, whose Regulation was updated in 2022, is comprised of the Chief Financial Officer (CFO), who acts as chair, 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. The ESG Management Committee facilitates the coordination of Corporate and Group Departments with regard to sustainability issues and supports the Chief Executive Officer in the management of ESG and sustainability issues at both Parent Company and Group level. In addition, the Committee monitors the BPER Group's positioning in terms of sustainability and the 17 goals of the UN's Agenda 2030 for sustainable development (SDGs) and promotes and manages the ESG strategy and sustainability issues, in line with what is defined in the Business Plan which is integrating the sustainability issues, with the support of the ESG Strategy Office. The Regulations of this Committee were updated in 2024, integrating additional controls on gender equality, environmental and energy issues and the related Integrated Environmental and Energy Management System (EMS) therein. It should also be noted that the Group has a Risk Committee (management) chaired by the Chief Executive Officer, of which the Chief Risk Officer is the secretary. The Committee has consultative powers and supports the Chief Executive Officer in the activities connected with the definition and implementation of the Risk Appetite Framework, of the risk governance policies (including ESG risks) and of the capital adequacy process of the Group and of the subsidiaries that are a part of it.

Forests

(4.3.1.1) Position of individual or committee with responsibility

Executive level

- Chief Financial Officer (CFO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- Assessing environmental dependencies, impacts, risks, and opportunities
- Managing environmental dependencies, impacts, risks, and opportunities

Strategy and financial planning

- Conducting environmental scenario analysis

(4.3.1.3) Coverage of responsibilities

Select all that apply

- Dependencies, impacts, risks, and opportunities related to our banking activities
- Dependencies, impacts, risks, and opportunities related to our investing activities
- Dependencies, impacts, risks and opportunities related to our own operations and/or upstream value chain

(4.3.1.4) Reporting line

Select from:

- Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- More frequently than quarterly

(4.3.1.6) Please explain

Management Committee was established by the previous Board of Directors in 2020 and renamed the ESG Management Committee in 2022. This Committee, whose Regulation was updated in 2022, is comprised of the Chief Financial Officer (CFO), who acts as chair, 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. The ESG Management Committee facilitates the coordination of Corporate and Group Departments with regard to sustainability issues and supports the Chief Executive Officer in the management of ESG and sustainability issues at both Parent Company and Group level. In addition, the Committee monitors the BPER Group's positioning in terms of sustainability and the 17 goals of the UN's Agenda 2030 for sustainable development (SDGs) and promotes and manages the ESG strategy and sustainability issues, in line with what is defined in the Business Plan which is integrating the sustainability issues, with the support of the ESG Strategy Office. The Regulations of this Committee were updated in 2024, integrating additional controls on gender equality, environmental and energy issues and the related Integrated Environmental and Energy Management System (EMS) therein. It should also be noted that the Group has a Risk Committee (management) chaired by the Chief Executive Officer, of which the Chief Risk Officer is the secretary. The Committee has consultative powers and supports the Chief Executive Officer in the activities connected with the definition and implementation of the Risk Appetite Framework, of the risk governance policies (including ESG risks) and of the capital adequacy process of the Group and of the subsidiaries that are a part of it.

Water

(4.3.1.1) Position of individual or committee with responsibility

Executive level

- Chief Financial Officer (CFO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- Assessing environmental dependencies, impacts, risks, and opportunities
- Managing environmental dependencies, impacts, risks, and opportunities

Strategy and financial planning

- Conducting environmental scenario analysis

(4.3.1.3) Coverage of responsibilities

Select all that apply

- Dependencies, impacts, risks, and opportunities related to our banking activities
- Dependencies, impacts, risks, and opportunities related to our investing activities
- Dependencies, impacts, risks and opportunities related to our own operations and/or upstream value chain

(4.3.1.4) Reporting line

Select from:

- Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- More frequently than quarterly

(4.3.1.6) Please explain

Management Committee was established by the previous Board of Directors in 2020 and renamed the ESG Management Committee in 2022. This Committee, whose Regulation was updated in 2022, is comprised of the Chief Financial Officer (CFO), who acts as chair, 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. The ESG Management Committee facilitates the coordination of Corporate and Group Departments with regard to sustainability issues and supports the Chief Executive Officer in the management of ESG and sustainability issues at both Parent Company and Group level. In addition, the Committee monitors the BPER Group's positioning in terms of sustainability and the 17 goals of the UN's Agenda 2030 for sustainable development (SDGs) and promotes and manages the ESG strategy and sustainability issues, in line with what is defined in the Business Plan which is integrating the sustainability issues, with the support of the ESG Strategy Office. The Regulations of this Committee were updated in 2024, integrating additional controls on gender equality, environmental and energy issues and the related Integrated Environmental and Energy Management System (EMS) therein. It should also be noted that the Group has a Risk Committee (management) chaired by the Chief Executive Officer, of which the Chief Risk Officer is the secretary. The Committee has consultative powers and supports the Chief Executive Officer in the activities connected with the definition and implementation of the Risk Appetite Framework, of the risk governance policies (including ESG risks) and of the capital adequacy process of the Group and of the subsidiaries that are a part of it.

Biodiversity

(4.3.1.1) Position of individual or committee with responsibility

Executive level

- Chief Financial Officer (CFO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- Assessing environmental dependencies, impacts, risks, and opportunities
- Managing environmental dependencies, impacts, risks, and opportunities

Strategy and financial planning

- Conducting environmental scenario analysis

(4.3.1.3) Coverage of responsibilities

Select all that apply

- Dependencies, impacts, risks, and opportunities related to our banking activities
- Dependencies, impacts, risks, and opportunities related to our investing activities
- Dependencies, impacts, risks and opportunities related to our own operations and/or upstream value chain

(4.3.1.4) Reporting line

Select from:

- Reports to the Chief Executive Officer (CEO)

(4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- More frequently than quarterly

(4.3.1.6) Please explain

Management Committee was established by the previous Board of Directors in 2020 and renamed the ESG Management Committee in 2022. This Committee, whose Regulation was updated in 2022, is comprised of the Chief Financial Officer (CFO), who acts as chair, 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. The ESG Management Committee facilitates the coordination of Corporate and Group Departments with regard to sustainability issues and supports the Chief Executive Officer in the management of ESG and sustainability issues at both Parent Company and Group level. In addition, the Committee monitors the BPER Group's positioning in terms of sustainability and the 17 goals of the UN's Agenda 2030 for sustainable development (SDGs) and promotes and manages the ESG strategy and sustainability issues, in line with what is defined in the Business Plan which is integrating the sustainability issues, with the support of the ESG Strategy Office. The Regulations of this Committee were updated in 2024, integrating additional controls on gender equality, environmental and energy issues and the related Integrated Environmental and Energy Management System (EMS) therein. It should also be noted that the Group has a Risk Committee (management) chaired by the Chief Executive Officer, of which the Chief Risk Officer is the secretary. The Committee has consultative powers and supports the Chief Executive Officer in the activities connected with the definition and implementation of the Risk Appetite Framework, of the risk governance policies (including ESG risks) and of the capital adequacy process of the Group and of the subsidiaries that are a part of it.

[Add row]

(4.5) Do you provide monetary incentives for the management of environmental issues, including the attainment of targets?

Climate change

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

Yes

(4.5.2) % of total C-suite and board-level monetary incentives linked to the management of this environmental issue

17.5

(4.5.3) Please explain

The 2024 Remuneration Policy is strongly related to the strategic guidelines of the Business Plan ended 31 December 2024 and crafted with the objective of creating value for shareholders, employees, customers and all stakeholders in order to ensure close correlation and consistency between remuneration, the results achieved, the expected development guidelines, the sustainability of the initiatives implemented and sound and prudent risk management as well as compliance with the regulatory provisions.

Forests

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

No, but we plan to introduce them in the next two years

(4.5.3) Please explain

BPER does not have monetary incentives linked to forests.

Water

(4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

No, but we plan to introduce them in the next two years

(4.5.3) Please explain

*BPER does not have monetary incentives linked to water.
[Fixed row]*

(4.5.1) Provide further details on the monetary incentives provided for the management of environmental issues (do not include the names of individuals).

Climate change

(4.5.1.1) Position entitled to monetary incentive

Board or executive level

Board/Executive board

(4.5.1.2) Incentives

Select all that apply

Bonus – set figure

Shares

(4.5.1.3) Performance metrics

Targets

Progress towards environmental targets

Achievement of environmental targets

Organization performance against an environmental sustainability index

Strategy and financial planning

Board approval of climate transition plan

Emission reduction

- Implementation of an emissions reduction initiative
- Reduction in emissions intensity
- Increased share of renewable energy in total energy consumption
- Reduction in absolute emissions

Resource use and efficiency

- Reduction of virgin wood fiber used in paper and packaging products (e.g., by reducing material input, or using recycled content/alternative fibers)
- Eliminating deforestation and conversion of other natural ecosystems in direct operations and/or other parts of the value chain

Policies and commitments

- Increased supplier compliance with environmental requirements
- New or tighter environmental requirements applied to purchasing practices

Engagement

- Increased engagement with suppliers on environmental issues
- Increased engagement with customers on environmental issues

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

- Both Short-Term and Long-Term Incentive Plan, or equivalent

(4.5.1.5) Further details of incentives

The performance metrics for BPER Group's incentive plans align with short-term and long-term strategic goals, emphasizing environmental and ESG targets. The Short-Term Incentive Plan (MBO) measures performance annually, with 20% of the objectives for 2024 linked to ESG components such as progress towards environmental targets, achievement of environmental goals, and organizational performance against an environmental sustainability index. Specific KPIs are embedded in the "Strategic Scorecard" assigned to the CEO and C-Level Managers, ensuring accountability and focus on sustainability metrics within the annual performance framework. The Long-Term Incentive Plan, spanning from 2022 to 2025, integrates sustainability into its multi-year performance metrics, with 15% of the targets focused on ESG areas like Sustainable Finance, Energy Transition, Diversity & Inclusion, and Training Projects. This long-term perspective fosters alignment between the interests of top management and those of shareholders and other stakeholders, promoting sustainable value creation over an extended period. Quantitative details highlight the integration of emission reduction initiatives, such as increasing the share of renewable energy in total energy consumption and reducing emissions intensity. These goals are part of both short-term and long-term plans, ensuring annual achievements contribute to broader sustainability targets.

The MBO's short-term metrics are complemented by the LTI's long-term objectives, creating a cohesive approach to incentivizing sustainable performance. The incentive plans apply across the entire BPER Group, which operates predominantly in Italy. This regional focus ensures consistency in performance metrics application, considering the geographical diversity of the Group's operations. Sectorally, the plans align with the banking industry's regulatory framework, emphasizing sustainable finance and ESG compliance, reflecting the growing importance of these areas in financial services. Operationally, the incentive plans address the specific needs of different functions within the Group. From top executives to commercial functions, the plans ensure all organization levels align with the Group's strategic objectives, including environmental sustainability. Incorporating both annual and multi-year metrics ensures short-term achievements align with long-term goals, fostering a culture of continuous improvement and accountability in sustainability performance.

(4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

The performance metrics in BPER Group's incentive plans are designed to achieve the organization's environmental commitments and climate transition goals. The Short-Term Incentive Plan (MBO) dedicates 20% of its objectives for 2024 to ESG components, such as progress towards environmental targets, achievement of sustainability goals, and performance against an environmental sustainability index. These KPIs are part of the "Strategic Scorecard" assigned to the CEO and C-Level Managers, promoting accountability and focus on sustainability in annual performance reviews. The Long-Term Incentive Plan (LTI), covering 2024 to 2027, assigns 15% of its targets to sustainability, emphasizing Sustainable Finance, Energy Transition, Diversity & Inclusion, and Training Projects. This alignment ensures that top management's interests are consistent with those of shareholders and stakeholders, promoting sustainable value creation over a multi-year period. Quantitative details of these incentives include initiatives like increasing the share of renewable energy in total consumption and reducing emissions intensity. These goals are part of both short-term and long-term plans, ensuring annual achievements contribute to broader, multi-year sustainability targets. The MBO's short-term metrics complement the LTI's long-term objectives, creating a cohesive framework for incentivizing sustainable performance. Regionally, these incentive plans apply across BPER Group's operations, predominantly in Italy, ensuring consistent application of performance metrics. Sectorally, the plans align with the banking industry's regulatory framework, emphasizing sustainable finance and ESG compliance, reflecting the growing importance of these areas in financial services. Operationally, the incentive plans are tailored to meet the specific needs of different functions within the Group. From top executives to commercial roles, all levels of the organization are aligned with the Group's strategic objectives, including environmental sustainability. Both annual and multi-year metrics ensure that short-term achievements support long-term goals, fostering continuous improvement and accountability in sustainability performance.

[Add row]

(4.6) Does your organization have an environmental policy that addresses environmental issues?

	Does your organization have any environmental policies?
	Select from:

	Does your organization have any environmental policies?
	<input checked="" type="checkbox"/> Yes

[Fixed row]

(4.6.1) Provide details of your environmental policies.

Row 1

(4.6.1.1) Environmental issues covered

Select all that apply

Climate change

(4.6.1.2) Level of coverage

Select from:

Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

Direct operations

Downstream value chain

Portfolio

(4.6.1.4) Explain the coverage

In line with the Code of Ethics and ESG Policy, the document follows international sustainability principles to promote a financial system central to the ecological transition and long-term value for communities. Through its Integrated Environmental and Energy Management System (SGAE), BPER Banca: - prevents, manages,

and reduces environmental and energy impacts from its activities; - promotes rational energy use; - actively fights climate change through practices, products, and services, supporting the EU goal of zero CO₂ emissions by 2050 as part of the Net Zero Banking Alliance. The Bank adopts a proactive approach, launching initiatives to boost environmental responsibility and resource sustainability, in line with the UN Global Compact, SDGs, and 2030 Agenda. It supports eco-friendly technologies to improve energy efficiency. Site management is based on: - awareness of the key role of real estate in climate action and energy transition; - evaluating business needs while avoiding waste and considering ESG impacts; - promoting responsible behaviors to cut consumption and improve processes; - monitoring environmental aspects, including energy use, with direct or indirect impacts.

(4.6.1.5) Environmental policy content

Environmental commitments

- Commitment to comply with regulations and mandatory standards
- Commitment to take environmental action beyond regulatory compliance
- Commitment to implementation of nature-based solutions that support landscape restoration and long-term protection of natural ecosystems
- Commitment to stakeholder engagement and capacity building on environmental issues

Climate-specific commitments

- Commitment to 100% renewable energy
- Commitment to net-zero emissions
- Commitment to not invest in fossil-fuel expansion
- Commitment to not funding climate-denial or lobbying against climate regulations

Social commitments

- Commitment to promote gender equality and women's empowerment
- Commitment to respect internationally recognized human rights

(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

- Yes, in line with the Paris Agreement

(4.6.1.7) Public availability

Select from:

Publicly available

(4.6.1.8) Attach the policy

Policy governing the management of environmental and energy issues.pdf

[Add row]

(4.7) Does the policy framework for the portfolio activities of your organization include environmental requirements that clients/investees need to meet, and/or exclusion policies?

	Policy framework for portfolio activities include environmental requirements for clients/investees, and/or exclusion policies
Banking (Bank)	Select from: <input checked="" type="checkbox"/> Yes, our framework includes both policies with environmental client/investee requirements and environmental exclusion policies
Investing (Asset manager)	Select from: <input checked="" type="checkbox"/> Yes, our framework includes both policies with environmental client/investee requirements and environmental exclusion policies

[Fixed row]

(4.7.1) Provide details of the policies which include environmental requirements that clients/investees need to meet.

Banking (Bank)

(4.7.1.1) Environmental issues covered

Select all that apply

Climate change

(4.7.1.2) Type of policy

Select all that apply

- Credit/lending policy

(4.7.1.3) Public availability

Select from:

- Publicly available

(4.7.1.4) Attach the policy

Abstract Policy ESG in materia di concessione del credito.pdf

(4.7.1.5) Value chain stages of client/investee covered by policy

Select from:

- Direct operations and upstream/downstream value chain

(4.7.1.6) Industry sectors covered by the policy

Select all that apply

- Fossil Fuels
- Manufacturing
- Infrastructure
- Power generation
- Transportation services
- Food, beverage & agriculture

(4.7.1.9) % of portfolio covered by the policy in relation to total portfolio value

100

(4.7.1.11) Explain how criteria coverage and/or exceptions have been determined

The percentage of portfolio coverage by the ESG policy was determined by assessing the total value of assets under management (AUM) that adhere to the specific criteria set forth in the policy. This includes investments and financing provided to sectors identified as high ESG impact areas, such as Power Generation, Mining (excluding coal), Oil & Gas, and Defense. The calculation considers the total AUM against the subset of assets covered under the ESG policy, ensuring compliance with relevant standards and alignment with the BPER Group's sustainability commitments. The exception criteria applied, as outlined in column 11, were selected based on specific considerations for certain industries and operations. For instance, exceptions are made for companies in sectors like Energy or Oil & Gas that demonstrate a clear transition plan towards reducing carbon emissions or increasing their share of renewable energy production. Similarly, companies involved in activities with significant social impacts, such as agriculture or real estate, are evaluated based on their adherence to social and environmental guidelines outlined in the policy. These exceptions are made to support companies that are making documented efforts towards sustainability and alignment with environmental goals. The Group is committed to assessing and supporting companies that have a documented plan and/or strategy for the progressive transition to a low-carbon economy, in consistent with the targets set by the Paris Agreement, encouraging the greater use of renewable sources and projects with a high positive environmental and/or social impact. In order to identify the exclusion and financeability criteria for activities and/or transactions involving sectors with a high ESG impact, the BPER Group has taken into account the requirements and best practices contained within the European regulatory framework (e.g., EU Taxonomy, "Fit for 55" package, etc.) and international (UNEP FI).

(4.7.1.12) Requirements for clients/investees

Environmental commitments

- Commitment to comply with regulations and mandatory standards
- Other environmental commitment, please specify :BPER Group does not provide lending or financial products for counterparties or operations that negatively affect UNESCO world heritage sites, wetlands covered by the Ramsar convention or Alliance for Zero Extinction sites o IUCN Category I-VI areas

Social commitments

- Adoption of the UN International Labour Organization principles
- Commitment to respect internationally recognized human rights

(4.7.1.13) Measurement of proportion of clients/investees compliant with the policy

Select from:

- Yes

(4.7.1.14) % of clients/investees compliant with the policy

100

(4.7.1.15) % of portfolio value that is compliant with the policy

(4.7.1.16) Target year for 100% compliance

Select from:

- Already met

Investing (Asset manager)**(4.7.1.1) Environmental issues covered**

Select all that apply

- Climate change

(4.7.1.2) Type of policy

Select all that apply

- Risk policy
 Sustainable/Responsible Investment Policy
 Investment policy/strategy

(4.7.1.3) Public availability

Select from:

- Publicly available

(4.7.1.4) Attach the policy

Abstract of Policy for governing the risk of non-compliance in relation to sustainability in the provision of investment services.pdf

(4.7.1.5) Value chain stages of client/investee covered by policy

Select from:

- Direct operations

(4.7.1.6) Industry sectors covered by the policy

Select all that apply

- Services
- Materials
- Manufacturing
- Power generation
- Transportation services
- Food, beverage & agriculture

(4.7.1.9) % of portfolio covered by the policy in relation to total portfolio value

100

(4.7.1.11) Explain how criteria coverage and/or exceptions have been determined

The percentage of portfolio coverage reported was calculated by including financial instruments within the scope of the Advisory and Portfolio Management Services to which the controls set out in the Policy apply. Specifically, this includes instruments listed in the commercial catalogues and selection lists used for portfolio construction, for which an ESG score is available—either from independent external data providers (on a 0–10 scale) or internal analysis, as defined in section 3.8 of the Policy. Exceptions apply in cases where, despite the ESG framework being applicable, instruments with an ESG score below the internally defined threshold (e.g., below 25 or 26 for recommended and managed portfolios, as per sections 3.2.4 and 3.2.5) are included in the portfolios. Such exceptions are allowed only when financial characteristics are deemed sufficiently relevant to justify their inclusion, based on the overall efficiency of the portfolio. These exceptions are formally documented and reported quarterly to the Group Portfolio Management and Advisory Coordination Committee.

(4.7.1.12) Requirements for clients/investees

Environmental commitments

- Commitment to comply with regulations and mandatory standards

Social commitments

- Adoption of the UN International Labour Organization principles
- Commitment to respect internationally recognized human rights

Additional references/Descriptions

- Description of membership and financial support provided to organizations that seek to influence public policy

(4.7.1.13) Measurement of proportion of clients/investees compliant with the policy

Select from:

Yes

(4.7.1.14) % of clients/investees compliant with the policy

100

(4.7.1.15) % of portfolio value that is compliant with the policy

100

(4.7.1.16) Target year for 100% compliance

Select from:

Already met

[Add row]

(4.7.2) Provide details of your exclusion policies related to industries, activities and/or locations exposed or contributing to environmental risks.

Banking (Bank)

(4.7.2.1) Type of exclusion policy

Select from:

All coal

(4.7.2.2) Fossil fuel value chain

Select all that apply

Upstream

Midstream

- Downstream

(4.7.2.3) Year of exclusion implementation

2022

(4.7.2.4) Phaseout pathway

Select all that apply

- New business/investment for new projects
- New business/investment for existing projects

(4.7.2.5) Year of complete phaseout

2030

(4.7.2.6) Country/area the exclusion policy applies to

Select all that apply

- Italy
- Luxembourg

(4.7.2.7) Description

To meet the Paris Agreement goals and 2030 targets for renewable energy (Fit for 55), OECD and European countries are expected to reduce coal use in production. In this context, the BPER Group supports the transition to a low-emission green economy by helping clients shift toward cleaner energy (e.g., renewables, gas) and promoting a gradual coal phase-out. In the coal sector, the most sensitive activities are: - coal extraction; - transformation of fossil coal (e.g., coking products); - coal trading and commercialization. Aligned with national and Group-level goals, BPER adopts a phase-out approach for financial exposure to companies in the “Coal” sector. This is a Net Zero Banking Alliance priority, with phase-out targets by 2030 for OECD and 2040 for non-OECD countries. The Group will not finance projects for the construction/expansion of coal mines (Greenfield Projects) or the acquisition of companies operating in extraction, transformation, or coal trading. However, financing related to the conversion or remediation of mining sites may be considered—also through acquisition—if aimed at redevelopment. Such operations will undergo standard financial analysis plus additional criteria: - environmental and social impact quality; - pollutant emission management; - water resource use; - mine closure and restoration plans; - labor rights (ILO conventions); - local community impacts (displacement, economy); - cultural heritage protection. These must include specific due diligence to evaluate intervention effectiveness. In the electricity sector, to reduce financed emissions, BPER will phase out exposure by 2030 to companies not meeting positive screening and whose energy mix includes: - over 20% from coal and oil. For such entities or special purpose vehicles (SPVs): - non-purpose loans will not be increased; - financing will only be allowed if aligned with EU Taxonomy or tied to covenants for either 55% renewable production by 2030 or

a 30% cut in GHG intensity. BPER will not finance, under any form, projects for the development, construction, or expansion of coal-fired power plants (CFPP), including via SPVs or investor entities.

Investing (Asset manager)

(4.7.2.1) Type of exclusion policy

Select from:

Other, please specify :Exposure to: - controversial weapons (landmines, cluster munitions, chemical weapons and biological weapons) - aerospace & defense - casinò & gaming

(4.7.2.3) Year of exclusion implementation

2024

(4.7.2.4) Phaseout pathway

Select all that apply

- New business/investment for new projects
- New business/investment for existing projects
- Existing business/investment for existing projects

(4.7.2.5) Year of complete phaseout

2030

(4.7.2.6) Country/area the exclusion policy applies to

Select all that apply

- Worldwide

(4.7.2.7) Description

The policy outlines an exclusion criterion based on ESG scoring. Specifically, within both the Advisory and Portfolio Management Services, products that fall within the lowest ESG score quintile (i.e., below a defined threshold—score < 25 or < 26 depending on the context) are excluded from the recommended or managed

portfolios. This ESG score is calculated using methodologies from independent data providers, assessing exposure to and management of sustainability-related risks. However, exceptions to exclusion are permitted in well-justified cases, particularly when a product exhibits financial characteristics that contribute significantly to overall portfolio efficiency. These exceptions must be expressly motivated, monitored, and reported quarterly to the Comitato di Coordinamento Gestioni di Portafogli e Advisory. The policy does not specify exclusions targeting specific industries, activities, or geographical locations; instead, it applies a score-based ESG quality filter that implicitly accounts for environmental risk exposure through the data provider's methodology, which includes evaluation of sector-specific ESG factors.
 [Add row]

(4.8) Does your organization include covenants in financing agreements to reflect and enforce your environmental policies?

	Covenants included in financing agreements to reflect and enforce policies
	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(4.8.1) Provide details of the covenants included in your organization's financing agreements to reflect and enforce your environmental policies.

Row 1

(4.8.1.1) Environmental issue

Select all that apply

Climate change

(4.8.1.2) Types of covenants used

Select all that apply

- Margin or pricing depends on sustainability criteria
- Minimum level of taxonomy aligned assets are mandated

(4.8.1.3) Asset class/product types covered by covenants

Select all that apply

- Corporate loans

(4.8.1.4) Criteria for how covenants are applied

Select from:

- Selected clients

(4.8.1.5) % of clients covered by covenants

1

(4.8.1.6) % of portfolio covered in relation to total portfolio value

1

(4.8.1.7) Provide details on which environmental policies your covenants enforce and how

Green Loans are aimed at accelerating the transition of companies towards greater environmental sustainability of their business model, linking it to predefined objectives (for example, the reduction of CO2 emissions). In recent years, the Group participated in the pool financing with other Italian and international banks of the largest "green" loan ever granted in Italy and for the transport sector worldwide, aimed at the construction of trains that allow significant CO2 reductions and whose production materials are 98% recyclable. In 2023, the Group introduced specific environmental sustainability criteria for two real estate transactions: one worth Euro 18 million related to the refurbishing of one of the main hotel facilities on the Sorrento coast and the other worth Euro 15 million (on an overall loan pool of Euro 78 million) related to the construction of an office complex in Milan. Both will be built using innovative and sustainable techniques that will guarantee the best environmental performance. The BPER Group adopts the definition of sustainable development as meeting the needs of current generations without compromising the ability of future generations to meet their own needs. The BPER Group intends to support this concept in its broadest sense, which includes environmental, social, governance, and economic considerations. In its financing activities, the Group also pays attention to ESG factors and evaluates, from a perspective of prospective financial sustainability, elements such as: responsible use of natural resources and their impact on ecosystems; adequate conditions of safety, health, fairness, equity, and inclusion; income and employment generation in line with ethical principles and good corporate; governance practices; governance capacity, including the proper management of risks, including climate and environmental risks. Considering its local area of operation and its business model, the BPER Group has developed a differentiated ESG approach depending on the type of counterparty.

[Add row]

(4.9) Does your organization offer its employees a pension scheme that incorporates environmental criteria in its holdings?

Climate change

(4.9.1) Pension scheme incorporates environmental criteria in its holdings

Select from:

Yes, as an investment option

(4.9.2) Describe how funds within the pension scheme are selected and how your organization ensures that environmental criteria are incorporated

Arca Fondi SGR a company included in the consolidated perimeter of the BPER Group. Arca Fondi SGR manages one of the pension funds available to employees of the BPER Group. In March 2020, the Board of Directors of Arca approved the amendments to the regulation of the ARCA Previdenza Pension Fund, integrating the investment policy of three sectors (out of four) with explicit reference to ESG factors. As a result of these changes, the affected sectors (annuity, growth and high growth) have been added the suffix "Sustainable" to the historical name. These changes been operational since October 2020.

Forests

(4.9.1) Pension scheme incorporates environmental criteria in its holdings

Select from:

No, but we plan to incorporate in the next two years

(4.9.3) Explain why your organization does not incorporate criteria for this environmental issue into the pension scheme holdings

BPER Banca has chosen not to incorporate criteria for forest and water themes in pension plan investments for several reasons, primarily related to strategic priorities and resource allocation. Currently, forest and water themes are not considered a priority compared to the company's core business, which focuses on other crucial aspects of financial management and sustainability.

Water

(4.9.1) Pension scheme incorporates environmental criteria in its holdings

Select from:

- No, but we plan to incorporate in the next two years

(4.9.3) Explain why your organization does not incorporate criteria for this environmental issue into the pension scheme holdings

BPER Banca has chosen not to incorporate criteria for forest and water themes in pension plan investments for several reasons, primarily related to strategic priorities and resource allocation. Currently, forest and water themes are not considered a priority compared to the company's core business, which focuses on other crucial aspects of financial management and sustainability.

[Fixed row]

(4.10) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

(4.10.1) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

Select from:

- Yes

(4.10.2) Collaborative framework or initiative

Select all that apply

- Net Zero Banking Alliance
- Principles for Responsible Investment (PRI)
- UN Global Compact
- UNEP FI Principles for Responsible Banking

(4.10.3) Describe your organization's role within each framework or initiative

BPER's Head of ESG Strategy is in the European Banking Federation working group that monitors the legal development of the EU Taxonomy. The focus of the activities is towards the collection of relevant data and experiences from different banking sector participants, so that it can be put forward consistent and well-substantiated positions before the regulators, especially regarding the position and capabilities of the banking sector. Furthermore, BPER's participation in the European Banking Federation working group is also influenced by its membership in the Net-Zero Banking Alliance, where BPER Banca declares its commitment to

align its loan portfolio and investments with the goals of the Paris Agreement. In order to fulfill its commitments, BPER has already undertaken several initiatives, such as the implementation of a transition plan and simultaneous engagement activities with suppliers through the ESG Rating Project. Moreover, BPER Group participates to several national and supranational working groups and initiatives, for example: - ABI ("Associazione Bancaria Italiana"); - UN Global Compact; - "Forum per la Finanza Sostenibile"; - FEduF ("Fondazione per l'educazione finanziaria e il risparmio"); Impona Etica; Fondazione Sodalitas; Sustainability Makers; Associazione per la RSI. It is important to specify that BPER do not make any contributions to and spending for political campaigns, political organizations, lobbyists or lobbying organizations, trade associations and other tax-exempt groups, in compliance with the BEPER Group's Code of Ethics. The engagement process described above refers to a mere participation to national and supranational working groups.

[Fixed row]

(4.11) In the reporting year, did your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may (positively or negatively) impact the environment?

(4.11.1) External engagement activities that could directly or indirectly influence policy, law, or regulation that may impact the environment

Select all that apply

Yes, we engaged directly with policy makers

(4.11.2) Indicate whether your organization has a public commitment or position statement to conduct your engagement activities in line with global environmental treaties or policy goals

Select from:

Yes, we have a public commitment or position statement in line with global environmental treaties or policy goals

(4.11.3) Global environmental treaties or policy goals in line with public commitment or position statement

Select all that apply

Paris Agreement

(4.11.4) Attach commitment or position statement

2024 Annual Reports.pdf

(4.11.5) Indicate whether your organization is registered on a transparency register

Select from:

No

(4.11.8) Describe the process your organization has in place to ensure that your external engagement activities are consistent with your environmental commitments and/or transition plan

BPER's Head of ESG Strategy is in the European Banking Federation working group that monitors the legal development of the EU Taxonomy. The focus of the activities is towards the collection of relevant data and experiences from different banking sector participants, so that it can be put forward consistent and well-substantiated positions before the regulators, especially regarding the position and capabilities of the banking sector. Furthermore, BPER's participation in the European Banking Federation working group is also influenced by its membership in the Net-Zero Banking Alliance, where BPER Banca declares its commitment to align its loan portfolio and investments with the goals of the Paris Agreement. In order to fulfill its commitments, BPER has already undertaken several initiatives, such as the implementation of a transition plan and simultaneous engagement activities with suppliers through the ESG Rating Project. Moreover, BPER Group participates to several national and supranational working groups and initiatives, for example: - ABI ("Associazione Bancaria Italiana"); - UN Global Compact; - "Forum per la Finanza Sostenibile"; - FEduF ("Fondazione per l'educazione finanziaria e il risparmio"); Imponta Etica; Fondazione Sodalitas; Sustainability Makers; Associazione per la RSI.. It is important to specify that BPER do not make any contributions to and spending for political campaigns, political organizations, lobbyists or lobbying organizations, trade associations and other tax-exempt groups, in compliance with the BPER Group's Code of Ethics. The engagement process described above refers to a mere participation to national and supranational working groups.

[Fixed row]

(4.11.1) On what policies, laws, or regulations that may (positively or negatively) impact the environment has your organization been engaging directly with policy makers in the reporting year?

Row 1

(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers

Sustainable Finance (EU Taxonomy)

(4.11.1.2) Environmental issues the policy, law, or regulation relates to

Select all that apply

Climate change

(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment

Other

Other, please specify :Climate-Related Reporting

(4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

National

(4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

Europe

(4.11.1.6) Your organization's position on the policy, law, or regulation

Select from:

Support with no exceptions

(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

Participation in working groups organized by policy makers

(4.11.1.9) Funding figure your organization provided to policy makers in the reporting year relevant to this policy, law, or regulation (currency)

0

(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

BPER's Taxonomy is relevant to achieving the group's environmental commitments and transition plan as it provides a framework to clearly define sustainable economic activities and direct investments towards projects that support environmental objectives. Compliance with the European Taxonomy ensures that BPER's activities align with environmental sustainability criteria, facilitating the transition to a low-carbon economy. This alignment is crucial for meeting regulatory

requirements and investor expectations, as well as enhancing the bank's reputation as a responsible and forward-thinking institution. The Taxonomy has informed BPER's engagement by establishing specific criteria for sustainable activities, guiding the bank in its investment decisions and business practices. This has led to the development of targeted strategies and products that promote environmental sustainability, such as green loans and sustainable bonds. BPER's commitment to the Taxonomy also underscores its dedication to transparency and accountability in sustainability reporting, facilitating stakeholder assessment of the bank's progress towards its environmental goals. The success of BPER's involvement with the Taxonomy is measured by monitoring key performance indicators (KPIs) that reflect the bank's environmental impact and progress. These KPIs include the reduction of greenhouse gas emissions, the increase in the share of green investments, and improvements in energy efficiency across operations. Regular reporting on these metrics ensures that BPER stays on track to meet its environmental commitments and allows for strategy adjustments as needed to achieve desired outcomes.

(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals

Select from:

- Yes, we have evaluated, and it is aligned

(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation

Select all that apply

- Paris Agreement
- Another global environmental treaty or policy goal, please specify :Paris Agreement Goals; Kunming-Montreal Global Biodiversity Framework; Sustainable Development Goal 6 (Clear Water and Sanitation)

[Add row]

(4.12) Have you published information about your organization's response to environmental issues for this reporting year in places other than your CDP response?

Select from:

- Yes

(4.12.1) Provide details on the information published about your organization's response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.

Row 1

(4.12.1.1) Publication

Select from:

- In mainstream reports, in line with environmental disclosure standards or frameworks

(4.12.1.2) Standard or framework the report is in line with

Select all that apply

- ESRS
- GRI
- TCFD

(4.12.1.3) Environmental issues covered in publication

Select all that apply

- Climate change

(4.12.1.4) Status of the publication

Select from:

- Complete

(4.12.1.5) Content elements

Select all that apply

- Strategy
- Governance
- Emission targets
- Emissions figures
- Risks & Opportunities
- Value chain engagement
- Dependencies & Impacts
- Content of environmental policies

(4.12.1.6) Page/section reference

Pages from 84 to 358; Section: Consolidated Sustainability Statement

(4.12.1.7) Attach the relevant publication

2024 Annual Reports.pdf

(4.12.1.8) Comment

This document constitutes the Consolidated Sustainability Statement of the BPER Banca Group for the year 2024, prepared pursuant to Italian Legislative Decree 125/2024, which implements the Corporate Sustainability Reporting Directive (CSRD). The information provided in the Consolidated Sustainability Statement 2024 includes information on material impacts, risks and opportunities related to the BPER 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. In particular, upstream information was included on suppliers (main, strategic), shareholders (material, based on communications made pursuant to Article 120 of the Consolidated Law on Finance), subscribers of bonds issued, subscribers of capital instruments issued and customers with direct and indirect funding instruments. The downstream information instead relates to customers for financing transactions and Product Companies. The Group provides this disclosure in accordance with the European Sustainability Reporting Standards (ESRS); within the Consolidated Sustainability Statement, relevant information prescribed by Regulation (EU) 2020/852 - EU Taxonomy Regulation and its Delegated Acts is also disclosed.

Row 2

(4.12.1.1) Publication

Select from:

In mainstream reports, in line with environmental disclosure standards or frameworks

(4.12.1.2) Standard or framework the report is in line with

Select all that apply

ESRS

GRI

TCFD

TNFD

(4.12.1.3) Environmental issues covered in publication

Select all that apply

- Climate change
- Water

(4.12.1.4) Status of the publication

Select from:

- Complete

(4.12.1.5) Content elements

Select all that apply

- Strategy
- Risks & Opportunities
- Dependencies & Impacts
- Public policy engagement
- Water accounting figures
- Water pollution indicators
- Content of environmental policies

(4.12.1.6) Page/section reference

Pages from 241 to 332 / Section: ESG Risk

(4.12.1.7) Attach the relevant publication

Public Disclosure as at 31 December 2024.pdf

(4.12.1.8) Comment

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.

[Add row]

C5. Business strategy

(5.1) Does your organization use scenario analysis to identify environmental outcomes?

Climate change

(5.1.1) Use of scenario analysis

Select from:

Yes

(5.1.2) Frequency of analysis

Select from:

Annually

Forests

(5.1.1) Use of scenario analysis

Select from:

Yes

(5.1.2) Frequency of analysis

Select from:

Annually

Water

(5.1.1) Use of scenario analysis

Select from:

Yes

(5.1.2) Frequency of analysis

Select from:

Annually

[Fixed row]

(5.1.1) Provide details of the scenarios used in your organization's scenario analysis.

Climate change

(5.1.1.1) Scenario used

Climate transition scenarios

NGFS scenarios framework, please specify :Net Zero 2050

(5.1.1.3) Approach to scenario

Select from:

Qualitative and quantitative

(5.1.1.4) Scenario coverage

Select from:

Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply

Policy

Market

Chronic physical

- Reputation
- Technology
- Acute physical

(5.1.1.6) Temperature alignment of scenario

Select from:

- 1.5°C or lower

(5.1.1.7) Reference year

2024

(5.1.1.8) Timeframes covered

Select all that apply

- 2025
- 2030
- 2040
- 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

- Changes to the state of nature
- Changes in ecosystem services provision
- Climate change (one of five drivers of nature change)

Finance and insurance

- Cost of capital
- Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands

- ✓ Consumer sentiment
- ✓ Consumer attention to impact
- ✓ Impact of nature footprint on reputation

Regulators, legal and policy regimes

- ✓ Global regulation
- ✓ Level of action (from local to global)

Relevant technology and science

- ✓ Granularity of available data (from aggregated to local)

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

BPER conducted its climate scenario analysis based on the NGFS Phase IV framework, focusing specifically on the Orderly – Net Zero 2050 scenario. This scenario assumes a timely and smooth transition, with globally coordinated climate policies that limit global temperature rise to 1.5°C by 2100. The approach aligns with best market practices and regulatory expectations (e.g. ESRS, EBA, CRR). Key assumptions include:

- *Policy landscape: early and progressively more ambitious decarbonization policies, aligned with the Paris Agreement and implemented in a globally coordinated manner.*
- *Macroeconomic trends: sustainable economic growth supported by carbon pricing, incentives for innovation, and structural changes across sectors.*
- *National/regional variables: moderate geographic variation due to harmonized policies; low physical exposure across the Group's areas of operation in Italy.*
- *Technology development: rapid deployment of low-carbon technologies, energy efficiency measures, renewable energy, electrification of end uses, and sustainable mobility.*
- *Energy usage and mix: extensive shift to renewables, phase-out of fossil fuels, and decarbonization of electricity supply.*

Assumptions on severity of drivers: Under this scenario, both physical and transition risks are moderate to low, due to policy predictability, technological readiness, and gradual sectoral transformation. Impacts on the banking portfolio are assumed to be progressive and manageable through strategic planning and customer engagement. Uncertainties and constraints: Uncertainties relate to the actual pace of global implementation and the extent of convergence across jurisdictions. Additional constraints include data availability for certain counterparties and supply chains, and modelling limitations regarding macro-financial feedback loops and non-linear climate events. The analysis is conducted on the consolidated perimeter of the BPER Group, and serves as a foundation for further integration of climate scenarios in strategic planning, risk management, and product innovation.

(5.1.1.11) Rationale for choice of scenario

Relevance to Corporate Strategy Resilience The "Net Zero 2050" scenario is crucial for our organization's strategy resilience, aligning with our goals of sustainability and long-term value creation. Envisioning a net-zero emissions future by 2050 helps us identify strategic shifts and necessary investments to stay competitive in a low-carbon economy. Alignment with Climate Change Mitigation Goals This scenario- Net zero 2050 – (aligned with RCP 1.9 IPCC) belongs to the NGFS Orderly transition scenario family and limits global warming to +1.5°C, in line with international climate agreements like the Paris Agreement, By aligning our strategic planning with global climate policies, we effectively manage transition risks and seize opportunities in a decarbonized world. Scenario Sources and Data Models The scenario relies on robust data from the Network for Greening the Financial System (NGFS) and the Intergovernmental Panel on Climate Change (IPCC). These

sources provide climate projections and economic impact assessments, including macroeconomic forecasts, energy transition pathways, and carbon pricing projections, essential for evaluating the financial implications of a net-zero transition. Environmental Scenario Analysis for Business Activities We use environmental scenario analysis to understand the impact of environmental issues on our lending, investment, and insurance activities, as well as operations. This comprehensive approach prepares us for various future states, enabling us to develop strategies that enhance resilience to environmental risks and capitalize on sustainable economy opportunities. Strategic Integration and Benefits Integrating the "Net Zero 2050" scenario into our strategic planning ensures our business model remains resilient and adaptive to the evolving climate landscape. This proactive approach mitigates risks and positions us as leaders in sustainability and innovation, aligning our long-term goals with global efforts to combat climate change.

Forests

(5.1.1.1) Scenario used

Forests scenarios

- Customized publicly available forests scenario, please specify :Based on TNFD LEAP approach – nature-related risk assessment framework

(5.1.1.3) Approach to scenario

Select from:

- Qualitative

(5.1.1.4) Scenario coverage

Select from:

- Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply

- Acute physical
- Chronic physical
- Policy
- Reputation

(5.1.1.7) Reference year

(5.1.1.8) Timeframes covered

Select all that apply

- 2025
- 2030
- 2040
- 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

- Changes to the state of nature
- Number of ecosystems impacted
- Changes in ecosystem services provision

Finance and insurance

- Sensitivity of capital (to nature impacts and dependencies)

Stakeholder and customer demands

- Impact of nature footprint on reputation
- Sensitivity to inequity of nature impacts

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

The analysis conducted through the LEAP process was based on the assumption that economic activities may generate material impacts on ecosystems, leading to a progressive loss of natural capital and biodiversity. The framework assumes that such environmental risks—if not properly managed—can translate into financial risks for the Group, in line with emerging scientific and regulatory evidence. The main uncertainty concerns the availability and granularity of nature-related data, especially along the value chain and for indirect exposures. The assessment of sectoral materiality is based on environmentally extended input-output models which, while robust, depend on the quality of the underlying data. Key constraints include: (i) the lack of standardized and widely accepted models for quantifying nature-related risks; (ii) challenges in integrating results into traditional risk assessment systems; and (iii) the still qualitative nature of the methodology. However, the Group has launched a progressive strategy to strengthen the LEAP approach in alignment with expected EU regulatory developments.

(5.1.1.11) Rationale for choice of scenario

BPER Group adopted the LEAP process from the Taskforce on Nature-related Financial Disclosures (TNFD) as it represents the most advanced methodological framework for the qualitative assessment of nature-related risks and opportunities. This choice enables the Group to anticipate evolving European regulatory expectations (in particular, CSRD's ESRS E4) and to strengthen the identification of counterparties potentially exposed to environmental risks linked to biodiversity, natural capital, and ecosystem services. The LEAP approach was applied to several companies, through a sectoral and territorial assessment of impacts and dependencies. These findings were integrated into the Group's ESG risk mapping, supporting credit portfolio resilience in light of future environmental and regulatory scenarios.

Water

(5.1.1.1) Scenario used

Water scenarios

- Customized publicly available water scenario, please specify :Based on TNFD LEAP approach – nature-related risk assessment framework

(5.1.1.3) Approach to scenario

Select from:

- Qualitative

(5.1.1.4) Scenario coverage

Select from:

- Portfolio

(5.1.1.5) Risk types considered in scenario

Select all that apply

- Policy
- Market
- Reputation
- Technology
- Acute physical
- Chronic physical

(5.1.1.7) Reference year

2024

(5.1.1.8) Timeframes covered

Select all that apply

- 2025
- 2030
- 2040
- 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

- Number of ecosystems impacted

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

BPER includes water stress among the chronic physical hazards assessed in its physical risk scenario analysis. The risk engine evaluates all identified acute and chronic hazards and determines their materiality based on geography, portfolio typology, and exposure relevance. Assumptions: Water stress refers to conditions where agricultural systems may be unable to survive due to insufficient water supply. The scenario analysis is based on hazard mapping and vulnerability assessments, which identify areas potentially affected and support the evaluation of exposure. Constraints and uncertainties: Hazards such as water stress may be excluded from the scenario if deemed immaterial for the analyzed perimeter, for example in relation to mortgage portfolios. The assessment is constrained by the granularity of available data and the characteristics of the loan portfolio, which may limit the visibility of water-related risks. Exclusions are based on factors such as geographical irrelevance, non-applicability to specific portfolio types, or outcomes of risk materiality assessments.

(5.1.1.11) Rationale for choice of scenario

Water stress is included among the chronic physical hazards assessed in BPER's scenario analysis to ensure a comprehensive understanding of physical environmental risks that may impact credit portfolios. Its inclusion reflects the growing relevance of water availability as a systemic driver of risk in specific geographies and sectors. The selection of water stress aligns with the broader framework adopted for physical risk analysis, which includes both acute and chronic climate-related hazards. This approach is consistent with regulatory expectations under the CRR and EBA Guidelines, as well as with the ESRS requirements on risk identification related to natural capital. Although not all hazards are retained for all portfolios due to materiality filters, water stress is evaluated across the perimeter to determine its potential significance. Its relevance is particularly considered in relation to agricultural exposures and real estate assets located in areas with high water

dependency. By including water-related stressors in our scenario analysis, we enhance our capacity to anticipate possible disruptions in water availability and their implications on asset valuation and borrower resilience. This supports strategic decision-making, portfolio steering, and the development of robust adaptation strategies.

[Add row]

(5.1.2) Provide details of the outcomes of your organization’s scenario analysis.

Climate change

(5.1.2.1) Business processes influenced by your analysis of the reported scenarios

Select all that apply

- Risk and opportunities identification, assessment and management
- Strategy and financial planning
- Resilience of business model and strategy
- Capacity building
- Target setting and transition planning

(5.1.2.2) Coverage of analysis

Select from:

- Portfolio

(5.1.2.3) Summarize the outcomes of the scenario analysis and any implications for other environmental issues

BPER has conducted climate scenario analyses using NGFS v4 pathways, including "Net Zero 2050" (orderly) and "Current Policies" (hot house world), to assess the resilience of its business model over short, medium, and long-term horizons up to 2050. The scenarios were enriched with internal macro-financial projections and covered both transition and physical risks. • Key insights gained include the identification of climate-vulnerable areas within the mortgage collateral portfolio (over 730,000 assets analysed), based on a proprietary scoring model (SPRI) using geographic, physical, and EPC data. Results highlighted exposure to flood risk, heatwaves, and subsidence, particularly in southern Italy and coastal zones. These insights informed the integration of climate physical risk indicators into credit risk management. • On transition risk, ~60,000 corporate counterparties were assessed, focusing on sectors with high emissions and sensitivity to carbon pricing or regulatory shifts. Around 20% of the portfolio was found to be highly exposed to transition risk. Projections were developed to simulate financial trajectories under different climate scenarios, and results were embedded into sector-specific credit policies and portfolio concentration limits. • The scenario analysis influenced BPER’s strategy by: – supporting the development of green financial products (e.g. energy efficiency mortgages) throughout the 2024 reporting year and as part of the Group Strategic plan; – integrating climate risk in ICAAP/ILAAP processes and RAF calibration; – contributing to ESG target setting in strategic planning.

Quantitative outcomes include a Green Asset Ratio of 2.8% in 2024 (up from 1.5% in 2023), 100% renewable electricity consumption, and a market-based emissions intensity of 9.11 tCO₂e/million € net revenues. These metrics reflect the effect of current climate-related investments and the Group's transition planning. Climate scenario analysis is now embedded in internal environmental risk management processes and supports long-term alignment with climate targets.

Forests

(5.1.2.1) Business processes influenced by your analysis of the reported scenarios

Select all that apply

Risk and opportunities identification, assessment and management

(5.1.2.2) Coverage of analysis

Select from:

Portfolio

(5.1.2.3) Summarize the outcomes of the scenario analysis and any implications for other environmental issues

In 2024, BPER conducted a nature-related scenario analysis following the LEAP approach developed by the Taskforce on Nature-related Financial Disclosures (TNFD). The analysis considered short- and medium-term horizons (2030, 2050) and focused on the Group's dependencies and impacts on ecosystems, biodiversity, and the provision of ecosystem services. Using a materiality matrix based on sectoral and geographic exposure, the Group assessed over 210,000 counterparties—covering approximately €80 billion in exposures—by mapping risks related to nature degradation and ecosystem disruption. These results were incorporated into the Group's ESG risk mapping and internal risk classification models. Key insights included the identification of high-risk sectors (e.g. agriculture, extractives, construction) and geographies with high biodiversity sensitivity. The LEAP process revealed that disruptions to ecosystem services (such as water availability or pollination) could translate into increased credit risk and reputational exposure. The scenario analysis also supports long-term alignment with the European regulatory framework and contributes to the Bank's resilience by strengthening its ability to assess nature-related risk and prepare for future obligations. The LEAP-based insights did not produce quantitative financial impact modelling but were essential for identifying priority areas for mitigation and policy integration. Further refinement and iteration of the LEAP assessment are planned for 2025.

Water

(5.1.2.1) Business processes influenced by your analysis of the reported scenarios

Select all that apply

Risk and opportunities identification, assessment and management

Strategy and financial planning

- Resilience of business model and strategy
- Capacity building
- Target setting and transition planning

(5.1.2.2) Coverage of analysis

Select from:

- Portfolio

(5.1.2.3) Summarize the outcomes of the scenario analysis and any implications for other environmental issues

In 2024, BPER included a range of physical water-related hazards in its environmental scenario analysis as part of an integrated ESG risk framework. The analysis considered both acute and chronic risks, including droughts, floods, storm surges, thermal stress, and subsidence. These hazards were assessed at geographic level based on their materiality for the Group's portfolios. Specifically, the analysis included indicators such as: – Drought: identifying areas prone to water shortages; – Storm surge and coastal flood: assessing exposure to extreme water-related events along coastal areas; – River flood and surface runoff: mapping flood risk in floodplain zones; – Water stress and thermal stress: identifying regions under pressure from declining water availability or rising demand; – Subsidence: related to unsustainable groundwater extraction. While not all hazards were classified as material for all portfolios, key risks such as drought and flood were retained for detailed assessment. The analysis was performed using spatial vulnerability mapping, sectoral materiality assessment, and exposure classification updated to June 30, 2024. The results of the analysis were used to inform BPER's ESG risk mapping and will contribute to the progressive integration of nature-related risks into internal risk management frameworks, in alignment with ICAAP and upcoming regulatory expectations (e.g., CSRD, ESRS). The time horizons applied include 3 years (2024–2027), 6 years (to 2030), and 10 years (to 2050), to capture short-, medium-, and long-term water-related risks.

[Fixed row]

(5.2) Does your organization's strategy include a climate transition plan?

(5.2.1) Transition plan

Select from:

- Yes, we have a climate transition plan which aligns with a 1.5°C world

(5.2.3) Publicly available climate transition plan

Select from:

Yes

(5.2.7) Mechanism by which feedback is collected from shareholders on your climate transition plan

Select from:

We have a different feedback mechanism in place

(5.2.8) Description of feedback mechanism

Periodic stakeholder engagement, which covers climate and environmental topics and includes collecting shareholder's positions and priorities on the Group's climate commitments including transition plans.

(5.2.9) Frequency of feedback collection

Select from:

Annually

(5.2.10) Description of key assumptions and dependencies on which the transition plan relies

BPER's transition plan is based on science-aligned pathways, consistent with NZBA and NGFS "Orderly – Net Zero 2050" scenario. Key assumptions include: gradual tightening of EU climate regulation (e.g., Fit for 55, CSRD, EBA Guidelines), adoption of net-zero trajectories in high-impact sectors, increased demand for sustainable finance, and widespread access to ESG data and emissions factors. The plan depends on: • Timely implementation of EU and national policies enabling sectoral decarbonization; • Clients' ability to adapt and invest in low-carbon technologies; • Availability of granular, standardized ESG data to assess financed emissions and alignment; • Market readiness for transition products and credible offsetting instruments. BPER is implementing the plan through structured integration into risk and business governance: climate targets are embedded in credit policies, portfolio steering, and client engagement processes. The Group has activated a €7bn ESG credit plafond and has issued its first Green Bond, aligned with its Sustainable Finance Framework. Internally, tools such as the ESG Data Model and scoring methodologies are used to assess alignment with transition pathways. Resourcing is ensured through dedicated ESG roles across Risk, Planning and Lending functions, and through the ESG Strategy unit. The plan is funded via internal allocation mechanisms and supported by partnerships with data providers. It will be extended to proprietary investments by 2025 and reviewed regularly to reflect evolving regulatory, methodological and technological developments.

(5.2.11) Description of progress against transition plan disclosed in current or previous reporting period

BPER Banca set decarbonisation targets for five of the ten high carbon footprint sectors identified by the NZBA, supporting the sustainable transition within Alliance timelines: August 2023: • Power generation: 36% reduction in counterparties' weighted emission intensity, from 256 kg CO₂e/MWh in 2022 to 165 kg CO₂e/MWh by 2030. • Oil & Gas: 29% reduction in financed emissions by 2030, from 464 thousand tCO₂e in 2022. December 2024: • Iron & Steel: 27% reduction in portfolio emission intensity, from 275 tCO₂e/€m in 2023 to 201 tCO₂e/€m by 2030. • Aluminium: 24% reduction, from 460 tCO₂e/€m in 2023 to 350 tCO₂e/€m by 2030. • Commercial Real Estate: 47% reduction in financed property emission intensity, from 37 kg CO₂e/m² in 2023 to 19 kg CO₂e/m² by 2030. The Bank will communicate

targets for the remaining sectors by March 2025. Regarding Coal, BPER will phase out its limited exposure, applying restrictive policies outlined in the “ESG-linked Loan Origination Policy” since 2023. Setting these goals marks a key step in aligning BPER’s business with the Paris Agreement and strengthening its role in sustainability and climate change mitigation. The Bank integrates these targets across its operations, from credit policies to lending solutions for clients’ sustainable transition. Besides the “Decarbonisation Plan,” BPER launched the “2022-2030 Energy Plan” in 2022, updated in 2024 with the Business Plan “B:Dynamic|Full Value 2027.” The Plan aims to reduce Scope 1 and 2 emissions, supporting the Paris Agreement goal to limit global warming to 1.5°C and following best market practices. Targets include a 35% reduction of Scope 1 emissions by 2027, a 50.2% cut by 2030 from 2021 levels, and achieving 100% renewable electricity use (Scope 2 target reached by 31/12/2024). By 31/12/2024, BPER Group had fully sourced renewable energy, certified with Guarantees of Origin (GO), and advanced the energy efficiency measures of the Plan. In 2024, BPER signed a PPA with a national operator for energy from a domestic photovoltaic plant, covering around 10% of its needs. By the end of 2024, construction projects contributed to a -21% CO2e emissions cut. The remaining 2% reduction—needed to reach -23% but unachieved due to the early closure of the 2022-2025 Business Plan—was offset via the DKV Myclimate Card initiative.

(5.2.12) Attach any relevant documents which detail your climate transition plan (optional)

2024 Annual Reports.pdf

(5.2.13) Other environmental issues that your climate transition plan considers

Select all that apply

No other environmental issue considered

[Fixed row]

(5.3) Have environmental risks and opportunities affected your strategy and/or financial planning?

(5.3.1) Environmental risks and/or opportunities have affected your strategy and/or financial planning

Select from:

Yes, both strategy and financial planning

(5.3.2) Business areas where environmental risks and/or opportunities have affected your strategy

Select all that apply

Products and services

Operations

[Fixed row]

(5.3.1) Describe where and how environmental risks and opportunities have affected your strategy.

Products and services

(5.3.1.1) Effect type

Select all that apply

- Risks
- Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

- Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

The BPER Group considers climate and environmental risk factors as cross-cutting drivers affecting its banking risks, strategy, and business model. In line with its sustainability and risk management frameworks, the Group has integrated climate-related risks into its overall risk mapping process and evaluates their impact across credit, market, operational, strategic and reputational risks. As part of its 2024 corporate strategy, the BPER Group reaffirmed its commitment to actively supporting the ecological and climate transition of households and businesses. This is implemented through a wide range of financial products and services designed to promote environmental sustainability and resource efficiency. In 2024, approximately Euro 3 billion were disbursed in favor of environmental-purpose products and services. This included: • Over Euro 900 million to Retail customers, and • Almost Euro 700 million to Corporate customers. Additionally, the Group completed the purchase of tax credits generated by green interventions for a total of approximately Euro 1.4 billion, of which: • Around Euro 1 billion related to Corporate customers, and • The remaining part to Retail customers. The types of products and services offered included: • Green mortgages and green loans for energy efficiency improvements in residential and commercial real estate; • Ecobonus and Superbonus-linked financing for energy retrofits and renewable energy installations; • Loans supporting circular economy initiatives; • Project financing for renewable energy infrastructure, particularly in wind and solar power; • Financing lines dedicated to energy transition projects, including efficiency upgrades for industrial processes and low-emission mobility. These actions align with the Group's broader ESG strategy, which includes: • Integration of climate-related factors in credit risk assessment; • Enhancement of the internal taxonomy and environmental labelling of financial products; • Progressive alignment with the EU Taxonomy and the Green Asset Ratio disclosure. Moreover, BPER applies a prudential approach to the purchase of tax credits, supported by dedicated internal procedures, and has entered into framework agreements for the resale of such credits, amounting to Euro 2.74 billion for the 2023–2027 period.

Operations

(5.3.1.1) Effect type

Select all that apply

- Risks
- Opportunities

(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

- Climate change

(5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

In 2024, the BPER Group continued to embed environmental risks and opportunities within its operational model, recognizing them as cross-cutting factors that influence both performance and resilience. Climate and environmental considerations are integrated into the Group's facilities, infrastructure, and environmental management systems. A core area of operational focus is energy efficiency and GHG emission reduction. Under the 2022–2025 Energy Plan, the Group achieved a 23% reduction in emissions by end-2024, through a range of strategic decisions including:

- The conversion of 50 methane gas-fueled sites to electric heat pumps, targeting Scope 1 emission reduction from heating systems—the Group's main source of direct GHG emissions;*
- The conversion of 8 oil-fueled sites to heat pumps;*
- A gradual electrification of the company car fleet, replacing internal combustion vehicles with plug-in hybrid and electric models;*
- Implementation of a centralized F-gas leak detection platform, aimed at reducing fugitive emissions, under completion in 2024;*
- Expansion of the BEMS (Building Energy Management System) platform, with 50 new units installed in branches and 10 new monitoring systems in medium-to-large sites, reducing energy waste;*
- A Proof of Concept for an AI-based BEMS platform, tested in 2024, with potential rollout in 2025;*
- Continued optimisation of real estate and space usage, including refurbishment of the Management Centre in Modena and the closure of 449 branches since 2022, reducing both CO₂ emissions and operational costs. These initiatives are managed under the ISO 14001-certified Environmental Management System and align with short- and medium-term objectives of efficiency, cost containment, and decarbonization. BPER's 2024 energy mix included over 93,000 MWh from renewable sources (69.8% of total energy), with 1,599 MWh self-produced, contributing to over 44,000 tCO₂e saved. Operational Scope 3 categories are also monitored (e.g., commuting, business travel, purchased goods), and the Group adopts the GHG Protocol and DEFRA/ISPRa emission factors. Energy and emission intensity KPIs per m² and per FTE are tracked to guide infrastructure investments. These decisions are part of a broader environmental transition strategy consistent with the Paris Agreement and EU regulatory expectations, and demonstrate the application of the mitigation hierarchy (elimination of fossil sources, process optimization, monitoring and control).*

[Add row]

(5.3.2) Describe where and how environmental risks and opportunities have affected your financial planning.

Row 1

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

- Revenues
- Indirect costs
- Capital expenditures
- Acquisitions and divestments

(5.3.2.2) Effect type

Select all that apply

- Risks
- Opportunities

(5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements

Select all that apply

- Climate change

(5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements

BPER considers climate and environmental risk factors as cross-cutting drivers of banking risks and integrates them into its risk management framework through a methodological approach aimed at ensuring, under both business-as-usual and stress conditions, a risk profile that is sustainable and consistent with its business model. The Group's strategy also includes activities aimed at achieving sustainability goals, with the awareness that ESG-related risks can impact corporate performance and require careful and responsible corporate management. The integration of these factors is carried out by taking into account market developments, regulatory changes, supervisory expectations and stakeholder demands, in order to identify short, medium and long term management actions to mitigate the risks associated with pursuing sustainability objectives and to foster sustainable business opportunities. To strengthen the assessment of climate-related risk areas, the Group has further developed its scenario analysis activities, aligning with the methodologies of the Network for Greening the Financial System and the physical risk scenarios of the Intergovernmental Panel on Climate Change. Scenario analysis, initially aimed at ensuring regulatory disclosure, has become a key tool in supporting strategic processes, especially in relation to credit policies and commercial strategies for clients most exposed to transition risks. The Group's climate strategy is based on a comprehensive approach that combines risk mitigation with the pursuit of opportunities arising from the sustainable transition. This includes the full integration of ESG criteria into the credit assessment process, the support of a "just transition" for companies and households — also through the allocation of over €7 billion in ESG Corporate and Retail products — the increase in ESG investment offerings (accounting for 45% of ESG AuM) and the issuance of Green Bonds for at least €1 billion. Furthermore, the Group is committed to reducing direct Scope 1 emissions by 35% by 2027 (with 2021 as baseline) through energy efficiency measures and the reduction of financed emissions, in line with its NZBA commitments. BPER improve ESG skills development through employee engagement and training programmes, aiming to train at least 60% of its workforce annually, with the goal of strengthening proactive risk management capabilities and seizing the growth opportunities linked sustainable finance and ecological transition

[Add row]

(5.10) Does your organization use an internal price on environmental externalities?

(5.10.1) Use of internal pricing of environmental externalities

Select from:

- No, and we do not plan to in the next two years

(5.10.3) Primary reason for not pricing environmental externalities

Select from:

- Not an immediate strategic priority

(5.10.4) Explain why your organization does not price environmental externalities

BPER Banca does not currently use an internal price for environmental externalities. This decision is mainly influenced by the fact that implementing such a practice has not yet been identified as an immediate strategic priority. Currently, the institution's focus is on different strategic initiatives, which are considered to have a more direct and immediate impact on its business objectives and financial results. Although BPER Banca recognizes the importance of managing environmental externalities and is committed to sustainability, adopting an internal price for externalities requires a level of resources, capabilities, and expertise that, at present, do not align with the institution's immediate strategic priorities. Furthermore, the absence of a standardized procedure and a consolidated regulatory framework for the application of such prices within the banking sector represents an additional obstacle. However, BPER Banca continues to closely monitor regulatory and market developments in sustainability and the management of environmental externalities and periodically evaluates the opportunity to integrate advanced tools and practices that can contribute to improving its environmental impact and creating sustainable long-term value.

[Fixed row]

(5.11) Do you engage with your value chain on environmental issues?

Clients

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

- Yes

Investees

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

Yes

Suppliers

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

Yes

(5.11.2) Environmental issues covered

Select all that apply

Climate change

Smallholders

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

No, and we do not plan to within the next two years

(5.11.3) Primary reason for not engaging with this stakeholder on environmental issues

Select from:

Not an immediate strategic priority

(5.11.4) Explain why you do not engage with this stakeholder on environmental issues

BPER Banca primarily operates in an urban context and with clients from different economic sectors, making direct engagement with smallholders less immediately relevant. The lack of a standardized procedure and a clear regulatory framework for engaging with smallholders represents an additional obstacle, making it

challenging to implement effective strategies in this area. Nevertheless, BPER Banca recognizes the importance of smallholders in the agricultural value chain and in promoting sustainability. The institution continues to monitor regulatory and market developments related to smallholder engagement and periodically evaluates the opportunity to develop initiatives that can support these actors in a sustainable and mutually beneficial manner.

Investors and shareholders

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

Yes

(5.11.2) Environmental issues covered

Select all that apply

Climate change

Other value chain stakeholders

(5.11.1) Engaging with this stakeholder on environmental issues

Select from:

Yes

(5.11.2) Environmental issues covered

Select all that apply

Climate change

[Fixed row]

(5.11.3) Provide details of your environmental engagement strategy with your clients.

Row 1

(5.11.3.1) Type of clients

Select from:

- Clients of Banks

(5.11.3.2) Environmental issues covered by the engagement strategy

Select all that apply

- Climate change

(5.11.3.3) Type and details of engagement

Capacity building

- Support clients to set their own environmental commitments across their operations
- Other capacity building activity, please specify :It is a training roadshow aimed at raising awareness among companies (especially SMEs) on issues related to the energy/ecological/sustainable transition, the evolution of the regulatory framework, risks, and opportunities.

Financial incentives

- Other financial incentive, please specify :The main ESG lending products that the bank provides to support businesses in this transition process were presented.

Information collection

- Other information collection activity, please specify :In 2022, BPER Banca started using CRIF S.p.A.'s Synesgy Platform to administer ESG questionnaires to clients, continuing into 2024, to gather ESG data and obtain information on counterparties.

Innovation and collaboration

- Encourage clients to take Beyond Value Chain Mitigation (BVCM) actions
- Engage with clients to advocate for policy or regulatory change to address environmental challenges
- Facilitate adoption of a unified climate transition approach with clients
- Run a campaign to encourage innovation to reduce environmental impacts on products and services

(5.11.3.4) % of client-associated scope 3 emissions as reported in question 12.1.1

Select from:

- 1-25%

(5.11.3.5) % of portfolio covered in relation to total portfolio value

Select from:

Unknown

(5.11.3.6) Explain the rationale for the coverage of your engagement

The coverage results from a targeted engagement strategy. Clients were selected based on size, credit exposure, and sectoral risk—especially those exposed to transition risks or with high relevance under ECB expectations. The engagement initially focused on ~350 clients in 2022–2023 and continued in 2024 with ~200 companies. The use of the Synesgy platform (in collaboration with CRIF) aims to collect ESG data at the single-name level and to reduce reliance on sectoral proxies in ESG evaluation and credit decisions. This supports the definition of the Group’s decarbonisation trajectory and risk governance, in line with banking supervisory guidance.

(5.11.3.7) Describe how you communicate your engagement strategy to your clients and/or to the public

The strategy is communicated via direct outreach by relationship managers, institutional partnerships (e.g., Confindustria, Catholic University of Piacenza, University of Genoa), and participation in national roadshows. In 2024, a dedicated webpage was used to distribute ESG questionnaires, and clients were also invited through targeted campaigns. BPER also participates in the MEF (Ministero Economia e Finanza) led working group “Sustainability dialogue between SMEs and banks,” which aims to simplify ESG data collection and promote transparent communication between banks and enterprises.

(5.11.3.8) Attach your engagement strategy

2024 Annual Reports.pdf

(5.11.3.9) Staff in your organization carrying out the engagement

Select all that apply

Other, please specify :Area Colleagues - Business Centers

(5.11.3.10) Roles of individuals at the portfolio organizations you seek to engage with

Select all that apply

Investor relations managers

(5.11.3.11) Effect of engagement, including measures of success

BPER's strategy combines technical support, training, and ESG data collection. The Target Net Zero platform allows SMEs to measure emissions, set reduction targets, and plan decarbonisation actions. Engagement success is defined by the completion of carbon footprint analysis and the definition of a tailored investment plan. Through the Synesgy platform, clients receive an ESG score and tailored feedback. In 2024, ~200 companies were engaged directly. Positive outcomes include improved ESG transparency, eligibility for green loans, and reduced reliance on proxy data. Participation in the MEF working group further strengthens alignment with supervisory expectations.

(5.11.3.12) Escalation process for engagement when dialogue is failing

Select from:

- Yes, we have an escalation process

(5.11.3.13) Describe your escalation process

BPER has an informal escalation process: when clients fail to engage (e.g., ignore ESG questionnaires) actions may include: • Escalation via the relationship manager; • Limiting access to ESG-labelled products; • Internal reporting to ESG risk governance bodies; • Conditionality in credit terms or ESG scoring suspension. These measures are intended to re-engage clients while aligning with the Group's risk appetite and supervisory expectations.

[Add row]

(5.11.4) Provide details of your environmental engagement strategy with your investees.

Row 1

(5.11.4.1) Environmental issues covered by the engagement strategy

Select all that apply

- Climate change

(5.11.4.2) Type and details of engagement

Information collection

- Collect GHG emissions data at least annually from investees

Other, please specify

- Other, please specify :Application of a Due Diligence questionnaire and monitoring for external fund managers to promote the adoption of responsible investment practices, including strengthening climate commitments.

(5.11.4.3) % of scope 3 investees associated emissions as reported in 12.1.1/12.1.3

Select from:

76-99%

(5.11.4.4) % of investing (Asset managers) portfolio covered in relation to total portfolio value

Select from:

76-99%

(5.11.4.6) Explain the rationale for the coverage of your engagement

Coverage is reported as proportion of applicable assets for which data on emissions is available, as computed for the purpose of the Principal Adverse Impact statements of BPER Banca and its subsidiaries.

(5.11.4.7) Describe how you communicate your engagement strategy to your investees and/or to the public

Engagement is performed both via data collection on GHG emissions and the application of a dedicated Due Diligence questionnaire for external asset managers, and is reported to the public via regulated disclosure (e.g. Principal Adverse Impact statement drafted in accordance with SFDR art. 4) and transparency reporting in line with UN Principles for Responsible Investment commitments.

(5.11.4.8) Attach your engagement strategy

Abstract of Policy for governing the risk of non-compliance in relation to sustainability in the provision of investment services.pdf

(5.11.4.9) Staff in your organization carrying out the engagement

Select all that apply

Fund managers

(5.11.4.10) Roles of individuals at the portfolio organizations you seek to engage with

Select all that apply

Investor relations managers

(5.11.4.11) Effect of engagement, including measures of success

Engagement aims at increasing transparency by external managers that manage underlying funds, in turn promoting the adoption of sustainable investment practices. The commitment is strengthened by integrating the Group's standards into the due diligence process, which in turn affects manager selection.

(5.11.4.12) Escalation process for engagement when dialogue is failing

Select from:

No, we don't have an escalation process

[Add row]

(5.11.7) Provide further details of your organization's supplier engagement on environmental issues.

Climate change

(5.11.7.2) Action driven by supplier engagement

Select from:

Adaptation to climate change

(5.11.7.3) Type and details of engagement

Capacity building

Provide training, support and best practices on how to mitigate environmental impact

Information collection

Other information collection activity, please specify :Providing ESG ratings to our suppliers

(5.11.7.4) Upstream value chain coverage

Select all that apply

Tier 1 suppliers

(5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

76-99%

(5.11.7.6) % of tier 1 supplier-related scope 3 emissions covered by engagement

Select from:

Less than 1%

(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

Since 2022 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 2022-2025 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. The BPER Group is very careful in engaging its suppliers on sustainability initiatives relevant to the Bank. Information related to supplier sustainability is integrated at various points of the processes by the Purchasing Center Service, in particular in the suppliers' qualifications, tenders and information provided for the insertion of purchase orders (RDA). Regarding supplier qualification: the Jaggaer system has an interface with CRIF's Synesgy platform, thanks to which a valid questionnaire is verified for all suppliers who qualify. If the supplier has a valid Synesgy questionnaire, the relevant ESG scores are imported to Jaggaer and the overall score contributes 20% to the overall qualification assessment of the supplier. (In the latest quarterly monitoring available (1Q 2025), suppliers with a certified Synesgy questionnaire were 488. Considering that in the same reference period suppliers with orders (thus managed by the Purchasing Centre Service) were 736, the coverage rate was 66%. However, there are more suppliers with ODA on an annual basis (1,379 at the end of 2024); therefore, over this time horizon, the percentage of coverage is 35%) In the qualification questionnaire there is both a section dedicated to ESG questions that is mandatory for all suppliers, and an additional section dedicated to ESG questions that is optional, therefore not essential for the purposes of obtaining the status of qualification. Within the framework of tenders, these are managed in Jaggaer through a dedicated module, in which templates are configured with a predefined structure of questions to be asked to suppliers. In the tender templates, there are questions that concern the Minimum Environmental Criteria (MCE) required for specific product areas (e.g. information technology, interior furnishings, stationery, printers, etc.) Finally, when placing purchase orders on Jaggaer, the applicant is required to indicate whether ESG components are included in the supply. If yes, the applicant shall indicate for each position the amount related to ESG interventions.

(5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:

Yes

Water

(5.11.7.10) Engagement is helping your tier 1 suppliers meet an environmental requirement related to this environmental issue

Select from:

- No, this engagement is unrelated to meeting an environmental requirement

[Add row]

(5.11.9) Provide details of any environmental engagement activity with other stakeholders in the value chain.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

- Other value chain stakeholder, please specify :Employees, suppliers, and the community

(5.11.9.2) Type and details of engagement

Education/Information sharing

- Educate and work with stakeholders on understanding and measuring exposure to environmental risks
- Run an engagement campaign to educate stakeholders about the environmental impacts about your products, goods and/or services
- Share information on environmental initiatives, progress and achievements

Innovation and collaboration

- Run a campaign to encourage innovation to reduce environmental impacts

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

- 1-25%

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

BPER Banca selected stakeholders based on their direct involvement and influence on its sustainability goals. Employees were a primary focus, as their engagement is crucial to fostering a culture of sustainability within the organization. The entire workforce is involved in energy, environmental, and mobility initiatives such as "M'illumino di meno," car sharing for commuting, and energy-saving projects. BPER promoted sustainable mobility through various services. A daily corporate shuttle connects Modena Rail Station with Headquarters, facilitating commuting and encouraging public transport use (8,636 employees involved in 2024). The "Ricarica gratuita" (Free Recharging) pilot, launched in 2023 and continued in 2024, offers free electric vehicle charging (up to 15 hours/month) for employees and Top Management at Modena HQ, powered by BPER's photovoltaic systems (895 beneficiaries). The "Piantiamola" initiative directly involved employees, promoting sustainability as a shared value and encouraging eco-friendly practices at work and home. It aimed to reduce plastic use and raise environmental awareness. The "Piantiamola di inquinare!" project engaged employees in sustainable commuting, lowering CO2 emissions and promoting environmental responsibility. This initiative, carried out with the Wecity platform, aligned with European Sustainable Mobility Week, reflecting BPER's broader sustainability commitment. The 2022-2025 Industrial Plan included a target of providing ESG training to 50% of BPER Group employees annually. The "B:Dynamic|Full Value 2027" Business Plan further emphasizes enhancing ESG skills among employees. Participation in "M'illumino di meno" strengthened BPER's promotion of energy-saving and sustainable lifestyles, extending its environmental efforts beyond operations and reinforcing its commitment to broader societal impact. In summary, stakeholders were chosen for their ability to influence and contribute to BPER's sustainability goals. Employee, supplier, and community engagement fostered a comprehensive approach, ensuring the Bank's sustainability initiatives had broad and lasting impact.

(5.11.9.6) Effect of engagement and measures of success

The engagement activities have yielded several positive outcomes, both anticipated and achieved. Among the various sustainable mobility initiatives launched by BPER Bank in 2024, 8636 employees benefited from the company shuttle service and 895 employees and managers benefited from the electric charging service, thus helping to reduce environmental impacts. Other initiatives like The "Piantiamola di inquinare!" project engaged 208 employees spread across the Group's various branches who cycled, walked or rode a scooter to work for three months, covering a total of almost 42,000 km, thereby reducing almost 6 tonnes of CO2, equivalent to the result produced by more than 839 adult trees in one year by photosynthesis. Bper Banca joined "M'illumino di Meno" initiative in 2024, the International Day for Energy Saving and Sustainable Lifestyles conceived in 2005 and promoted by Caterpillar and Rai Radio 2 with Rai per il Sociale. For its 20th event, the day was dedicated to the theme of "No-borders", inviting municipalities, schools, universities and the entire community not only to act in their daily lives, but above all to seek alliances and develop international projects to "silence borders" and cross them in the name of a concrete, sustainable turnaround. For the occasion, BPER Banca switched off the signs of its headquarters in Modena and 650 branches nationwide for one night. These actions demonstrated BPER's commitment to environmental and sustainable organizational culture.

[Add row]

(5.14) Do your external asset managers have to meet environmental requirements as part of your organization's selection process and engagement?

	External asset managers have to meet specific environmental requirements as part of the selection process and engagement	Policy in place for addressing external asset manager non-compliance
	<i>Select from:</i> <input checked="" type="checkbox"/> Yes	<i>Select from:</i> <input checked="" type="checkbox"/> Yes, we have a policy in place for addressing non-compliance

[Fixed row]

(5.14.1) Provide details of the environmental requirements that external asset managers have to meet as part of your organization’s selection process and engagement.

Row 1

(5.14.1.1) Environmental issues covered by the requirement

Select all that apply

- Climate change

(5.14.1.2) Coverage

Select from:

- Majority of assets managed externally

(5.14.1.3) Environmental requirement that external asset managers have to meet

Select from:

- Other, please specify :Selection based on Sustainability Rating that factors the environmental performance of the asset classes underlying the funds managed by external asset managers.

(5.14.1.4) Mechanisms used to include environmental requirement in external asset manager selection

Select all that apply

- Review investment manager's environmental performance (e.g., active ownership, proxy voting records, under-weighting in high impact activities)
- Review investment manager's environmental policies

(5.14.1.5) Response to external asset manager non-compliance with environmental requirement

Select from:

- Exclude

[Add row]

(5.15) Does your organization exercise voting rights as a shareholder on environmental issues?

	Exercise voting rights as a shareholder on environmental issues	Primary reason for not exercising voting rights as a shareholder on environmental issues	Explain why you do not exercise voting rights on environmental issues
	Select from: <input checked="" type="checkbox"/> No, and we do not plan to in the next two years	Select from: <input checked="" type="checkbox"/> No standardized procedure	<i>The BPER Group, as a banking group, is not an institutional investor and therefore does not engage on environmental issues.</i>

[Fixed row]

C6. Environmental Performance - Consolidation Approach

(6.1) Provide details on your chosen consolidation approach for the calculation of environmental performance data.

Climate change

(6.1.1) Consolidation approach used

Select from:

Financial control

(6.1.2) Provide the rationale for the choice of consolidation approach

The perimeter of the Sustainability Reporting includes, in addition to the Parent Company BPER Banca S.p.A., all entities controlled by the Parent Company, regardless of the consolidation method used for the preparation of the financial information according to IAS/IFRS.

Forests

(6.1.1) Consolidation approach used

Select from:

Financial control

(6.1.2) Provide the rationale for the choice of consolidation approach

The perimeter of the Sustainability Reporting includes, in addition to the Parent Company BPER Banca S.p.A., all entities controlled by the Parent Company, regardless of the consolidation method used for the preparation of the financial information according to IAS/IFRS.

Water

(6.1.1) Consolidation approach used

Select from:

Financial control

(6.1.2) Provide the rationale for the choice of consolidation approach

The perimeter of the Sustainability Reporting includes, in addition to the Parent Company BPER Banca S.p.A., all entities controlled by the Parent Company, regardless of the consolidation method used for the preparation of the financial information according to IAS/IFRS.

Plastics

(6.1.1) Consolidation approach used

Select from:

Other, please specify :N/D

(6.1.2) Provide the rationale for the choice of consolidation approach

N/D

Biodiversity

(6.1.1) Consolidation approach used

Select from:

Other, please specify :N/D

(6.1.2) Provide the rationale for the choice of consolidation approach

N/D

[Fixed row]

C7. Environmental performance - Climate Change

(7.1) Is this your first year of reporting emissions data to CDP?

Select from:

No

(7.1.1) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

(7.1.1.1) Has there been a structural change?

Select all that apply

Yes, a divestment

Yes, a merger

Yes, other structural change, please specify :Liquidation

(7.1.1.2) Name of organization(s) acquired, divested from, or merged with

-Bridge Servicing S.p.A. (divested – 70% sold to Gardant S.p.A.) -BPER Reoco S.p.A. (merged – merged to BPER Real Estate S.p.A.) -Centro Fiduciario C.F. S.p.A. (liquidated and removed from Companies Register)

(7.1.1.3) Details of structural change(s), including completion dates

The scope of the companies involved in the consolidation has changed compared to 31 December 2023 as: • on 15 January 2024, the sale of the majority share of the share capital of Bridge Servicing s.p.a., equal to 70%, to Gardant s.p.a. was completed, with BPER Banca maintaining a minority stake, equal to the remaining 30%; • on 6 March 2024, the company Centro Fiduciario C.F. s.p.a. – in liquidation (consolidated with the equity method) was cancelled from the Company Register; • On 19 June 2024, the deed of merger by incorporation of BPER Reoco s.p.a into BPER Real Estate s.p.a was signed, with legal, accounting and fiscal effectiveness set for 1 July 2024. Following the merger, the shareholding held by The scope of the companies involved in the consolidation has changed compared to 31 December 2023 as: • on 15 January 2024, the sale of the majority share of the share capital of Bridge Servicing s.p.a., equal to 70%, to Gardant s.p.a. was completed, with BPER Banca maintaining a minority stake, equal to the remaining 30%; • on 6 March 2024, the company Centro Fiduciario C.F. s.p.a. – in liquidation (consolidated using the equity method) was cancelled from the Company Register; • On 19 June 2024, the deed of merger by incorporation of BPER Reoco s.p.a into BPER Real

Estate s.p.a was signed, with legal, accounting and fiscal effectiveness set for 1 July 2024. Following the merger, the shareholding held by BPER Banca in the capital of BPER Real Estate stands at 78.99%.

[Fixed row]

(7.1.2) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

(7.1.2.1) Change(s) in methodology, boundary, and/or reporting year definition?

Select all that apply

- Yes, a change in methodology
- Yes, a change in boundary

(7.1.2.2) Details of methodology, boundary, and/or reporting year definition change(s)

In 2024, BPER Banca introduced a major methodological and boundary update to its Scope 3 emissions inventory. The most significant change concerned Category 15 (Investments), which was expanded to include Scope 3 emissions of financed counterparties, in accordance with the PCAF methodology. In particular, the scope was extended to include sovereign bond portfolios and the updated methodology now also incorporates upstream and downstream activities of counterparties. Additionally, new Scope 3 categories were reported for the first time—such as Category 2 (Capital goods), Category 5 (Waste generated in operations), Category 7 (Employee commuting), and Category 13 (Downstream leased assets), the latter calculated based on estimated energy use in leased premises. As a result of the new methodology and the expanded reporting boundary, total Scope 3 emissions reported by BPER Banca in 2024 are not comparable with previous years and appear significantly higher than in 2023.

[Fixed row]

(7.1.3) Have your organization's base year emissions and past years' emissions been recalculated as a result of any changes or errors reported in 7.1.1 and/or 7.1.2?

(7.1.3.1) Base year recalculation

Select from:

- No, because the operations acquired or divested did not exist in the base year

(7.1.3.3) Base year emissions recalculation policy, including significance threshold

As of now, BPER Banca does not have a formal base year recalculation policy. However, in alignment with the GHG Protocol and CDP guidance, the Group has established 2024 as the base year for Scope 3 emissions, as it represents the first year with complete and reliable data across all relevant categories, including Category 15 (Investments). Previous Scope 3 data were partial and not consistent enough to support a reliable base year definition. No recalculation of past years has been performed.

(7.1.3.4) Past years' recalculation

Select from:

- No

[Fixed row]

(7.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.

Select all that apply

- Global GHG Accounting and Reporting Standard for the Financial Industry (PCAF)
- The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)
- The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard

(7.3) Describe your organization's approach to reporting Scope 2 emissions.

(7.3.1) Scope 2, location-based

Select from:

- We are reporting a Scope 2, location-based figure

(7.3.2) Scope 2, market-based

Select from:

We are reporting a Scope 2, market-based figure

(7.3.3) Comment

The methodology to compute BPER Banca's Scope 2 emissions is based on two approaches provided by the GHG Protocol: -Market-based: uses the European Residual Mixes 2022 published by AIB as emission factors. Market based emissions for 2024 are equal to 685,16 tCO₂e (Emissions associated with the thermal component only, emissions from electricity have been eliminated). Further, BPER has purchased and consumed 100% renewable electricity covered by Guarantees of Origin (GO) and has signed a PPA contract for photovoltaic energy, with GO from 2025. -Location-based: is based on conversion/emission factors defined by ESRS guidelines (Guidelines on the Application of the European Sustainability Reporting Standards (ESRS) in Environmental Matters in Banking Operations - Focus on disclosure requirements E1-5, E1-6 - 2024), total of 28.817,41 tCO₂e in the 2024. Location-based emissions between 2023 and 2024 did not increase due to an increase in consumption (If the 2023 emission factor had remained, LB emissions in tCO₂e for the 2024 reporting year would have been 25,281 tCO₂e. Compared to the previous year, a contraction of 1176 tCO₂e by the Bper Group), but due to an update of the emission factor of over 14% as reported in the Abi Guidelines. (Emission factor, Location-based, 2023: 267.96 [grCO₂eq/KWh] source Abi Guidelines 2023; Emission factor, Location-based, 2024: 307.30 [grCO₂eq/KWh] source Abi Guidelines 2024).

[Fixed row]

(7.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure?

Select from:

No

(7.5) Provide your base year and base year emissions.

Scope 1

(7.5.1) Base year end

12/30/2021

(7.5.2) Base year emissions (metric tons CO₂e)

14345

(7.5.3) Methodological details

The standard used for the calculation of Scope 1 emissions is the “Guidelines on the application in banks of GRI (Global Reporting Initiative) Environmental Standards” published by ABI Lab in December 2021. Furthermore, emissions related to Carige S.p.A. are included in the total base year emissions.

Scope 2 (location-based)

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

25441

(7.5.3) Methodological details

The standard used for the calculation of Scope 2 (market-based) is the “Guidelines on the application in banks of GRI (Global Reporting Initiative) Environmental Standards” published by ABI Lab in December 2021 and AIB, European Residual Mixes 2020. Furthermore, emissions related to Carige S.p.A. are included in the total base year emissions. Finally, the Scope 2 Market-Based target as of December 31, 2021, included only Electric Energy, as Thermal Energy (from district heating) was considered 100% renewable. However, following an improvement in data reporting, it was determined that Thermal Energy was not renewable as of December 31, 2022.

Scope 2 (market-based)

(7.5.1) Base year end

12/31/2021

(7.5.2) Base year emissions (metric tons CO2e)

399

(7.5.3) Methodological details

In 2021, BPER Banca's Scope 2 (market-based) emissions amounted to 399 tCO₂e. At that time, Scope 2 emissions were limited to electricity consumption, as thermal energy (district heating) was considered 100% renewable and therefore excluded from the calculation. The methodology used for the calculation was aligned with the "Guidelines on the application in banks of GRI Environmental Standards" published by ABI Lab (December 2021) and AIB (European Residual Mixes 2020). Furthermore, these emissions included those of both BPER Banca and the former CARIGE Group, which was already considered in the baseline year 2021.

Scope 3 category 1: Purchased goods and services

(7.5.1) Base year end

12/30/2024

(7.5.2) Base year emissions (metric tons CO₂e)

1314.81

(7.5.3) Methodological details

Emissions calculated using the average data method. Data sources include quantities of paper (recycled and virgin) and water consumption. Emission factors derived from UK GHG Conversion Factors 2024 – Business Material Use. Emissions from Gardant outsourcing services also included. Internal procurement records and supplier data used.

Scope 3 category 2: Capital goods

(7.5.1) Base year end

12/30/2024

(7.5.2) Base year emissions (metric tons CO₂e)

6631.7

(7.5.3) Methodological details

Emissions were estimated using data collected from suppliers regarding the expenditure (€ million) of materials purchased (IC services, electronic equipment and furnishings) by BPER Banca during the year 2024. The methodology applied is the average spend-based method as listed in the "Technical Guide for the calculation of Scope 3 emissions" of the GHG Protocol. To calculate emissions, the emission factors of the Eurostat tool.

Scope 3 category 5: Waste generated in operations

(7.5.1) Base year end

12/30/2024

(7.5.2) Base year emissions (metric tons CO2e)

17.48

(7.5.3) Methodological details

Emissions have been estimated using data collected from suppliers on the quantity (tonnes) of waste generated and destined for recovery or disposal by the Group during the year 2024. Emission factors from UK GHG Conversion Factors 2024 – Waste Disposal has applied by treatment type (recycling, landfill, incineration).

Scope 3 category 6: Business travel

(7.5.1) Base year end

12/30/2024

(7.5.2) Base year emissions (metric tons CO2e)

970.13

(7.5.3) Methodological details

Calculated using distance-based method (air: 694.88 tCO2e, rail: 159.24 tCO2e), while for room-night method for hotels (116.01 tCO2e) Emissions were estimated based on the number of hotel nights during business trips and were calculated using available destination information collected through bookings made. Travel data obtained from internal systems and external travel agency. Emission factors: UK GHG Conversion Factors 2024 – Business Travel,air,and land e Hotel Stay.

Scope 3 category 7: Employee commuting

(7.5.1) Base year end

12/30/2024

(7.5.2) Base year emissions (metric tons CO2e)

2929.96

(7.5.3) Methodological details

Includes employee commuting and homeworking. Data sourced from employee mobility surveys and corporate travel policies. Emissions calculated using distance-based method (commuting: 2,244.99 tCO2e), homeworking emissions per FTE hour (662.49 tCO2e), and shuttle service distance (22.48 tCO2e). Factors from UK Government GHG Conversion Factors for Company Reporting – Homeworking and Business Travel Land (for Company shuttle service and Home working commuting plans).

Scope 3 category 13: Downstream leased assets

(7.5.1) Base year end

12/30/2024

(7.5.2) Base year emissions (metric tons CO2e)

744.2

(7.5.3) Methodological details

Includes estimated Scope 1 and 2 emissions (natural gas: 100.86 tCO2e; electricity location-based: 643.34 tCO2e) from buildings leased to third parties. Based on estimated energy consumption transferred to tenants. Emission factors from ABI Lab – ESRS Environmental Guidelines Dec. 2024 and UK Government GHG Conversion Factors for Company Reporting 2024.

[Fixed row]

(7.6) What were your organization's gross global Scope 1 emissions in metric tons CO2e?

Reporting year

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

10614.44

(7.6.3) Methodological details

Scope 1 emissions are calculated in accordance with the GHG Protocol Standard. The reporting of emission sources and the emission factors used follow the “Guidelines for the application of the European Sustainability Reporting Standards (ESRS) in the banking sector – E1-5 and E1-6, 2024 edition; UK Government GHG Conversion Factors for Company Report” and Conversion factor extrapolated from supplier’s invoice - The main emission categories included are: •Natural gas, diesel for heating, and propane gas used in branches and buildings; •Company vehicle fleet emissions; •F-gas leaks from air conditioning systems. Emission factors are based on: •The ESRS-aligned ABI Lab guidelines for gas, diesel, and vehicle fuel use; •UK Government GHG Conversion Factors for Company Reporting – Refrigerant & Other (2024) for F-gases; •Propane-specific factors provided by the gas supplier. For 2024, gross Scope 1 emissions amounted to 10,614.44 tCO₂e, reported for the Group’s consolidated perimeter. The data is compiled using utility bills, supplier data and internal records. Where needed, conservative estimates are applied. Data is subject to limited assurance by an independent auditor.

[Fixed row]

(7.7) What were your organization’s gross global Scope 2 emissions in metric tons CO₂e?

Reporting year

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO₂e)

28817.41

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO₂e)

685.16

(7.7.4) Methodological details

Scope 2 emissions are calculated in accordance with the GHG Protocol Standard, using both location-based and market-based approaches. The methodologies and emission factors follow the “Guidelines for the application of the European Sustainability Reporting Standards (ESRS) in the banking sector – E1-5 and E1-6, 2024 edition”. For the market-based approach, emission factors are derived from the European Residual Mixes 2022 published by AIB. In 2024, BPER Group’s total market-based emissions amounted to 685.16 tCO₂e, relating to the thermal energy component (district heating), while the emissions deriving from the electricity component were equal to 0, thanks to the purchase and consumption of electricity deriving 100% from renewable sources and covered by Guarantees of Origin (GO) s. For the location-based approach, emission factors are those indicated in the above-mentioned ESRS guidelines, based on national average electricity mixes. The Group reports location-based emissions of 28,817.41 tCO₂e for 2024. location-based emissions between 2023 and 2024 did not increase due to an increase in consumption (If the 2023 emission factor had remained, LB emissions in tCO₂e for the 2024 reporting year would have been 25,281 tCO₂e. Compared to the previous year, a contraction of 1176 tCO₂e by the Bper Group), but due to an update of the emission factor of over 14% as reported in the Abi Guidelines. (Emission factor, Location-based, 2023: 267.96 [grCO₂eq/KWh] source Abi Guidelines 2023; Emission factor, Location-based, 2024: 307.30 [grCO₂eq/KWh] source Abi

Guidelines 2024). The emission sources include electricity and thermal energy consumed in all consolidated Group entities. Data is collected through utility bills and energy monitoring tools. In cases of missing data, conservative estimates are applied following sector best practices. Electricity procurement strategy focuses on decarbonisation strategy (Energy Plan 2022-2030, ecc.), with contracts including GO certification and a PPA signed for 2025–2028 with a photovoltaic energy producer. All Scope 2 data is subject to limited assurance by independent auditors.

[Fixed row]

(7.8) Account for your organization’s gross global Scope 3 emissions, disclosing and explaining any exclusions.

Purchased goods and services

(7.8.1) Evaluation status

Select from:

Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

1314.81

(7.8.3) Emissions calculation methodology

Select all that apply

Average data method

Other, please specify :UK Government GHG Conversion factors for company reporting, Material Use, DEFRA (2024).

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Emissions were estimated using data collected by suppliers regarding the quantity (tons) of recycled and non-recycled paper used by the Group during the year 2024. The emission calculation includes emissions generated through both the production of recycled and non-recycled paper. The methodology applied is the average data method in accordance with the GHG Protocol Technical Guidance for Calculating Scope 3 Emissions. The calculation used the emission factor from the UK

Government GHG Conversion Factors for Company Reporting – Material Use (2024). Emissions were calculated as: GHG emissions = Mass of purchased paper (kg) x emission factor (kg CO₂e/kg).

Capital goods

(7.8.1) Evaluation status

Select from:

Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO₂e)

6631.7

(7.8.3) Emissions calculation methodology

Select all that apply

Average data method

Other, please specify :EUROSTAT Environmental Statistics and accounts - Consumption-based accounting tool (2023)

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Emissions were estimated based on purchases of capital goods including ICT services, electronic equipment, telephony, and furniture. The emission calculation applied an average data method using emission factors derived from EUROSTAT Environmental statistics and accounts – Consumption-based accounting tool (2022). This approach is consistent with the GHG Protocol Scope 3 standard and complies with ESRS requirements E1-5 and E1-6. No primary data from suppliers was used; the methodology relies on external emission factors associated with expenditure categories.

Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.8.1) Evaluation status

Select from:

Not relevant, explanation provided

(7.8.5) Please explain

Energy consumption represents around 1% of BPER's annual expenditure. After evaluating its potential relevance we have reached the conclusion that this category is not relevant. It has not been quantified given its low value in the Group expenditures. In updating the greenhouse gas inventory, BPER conducted a significant analysis on all 15 scope 3 categories. The analysis revealed that this source is not relevant.

Upstream transportation and distribution

(7.8.1) Evaluation status

Select from:

Not relevant, explanation provided

(7.8.5) Please explain

In updating the greenhouse gas inventory, BPER conducted a significance analysis on all 15 scope 3 categories. The analysis revealed that this source is not relevant.

Waste generated in operations

(7.8.1) Evaluation status

Select from:

Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

17.48

(7.8.3) Emissions calculation methodology

Select all that apply

Average data method

Other, please specify :UK Government GHG Conversion Factors - Waste Disposal (2024)

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Emissions were estimated using UK Government GHG Conversion Factors - DEFRA 2024 emission factors for waste disposal. Waste data were derived from internal reporting on generated operational waste volumes and categorized by disposal method. Emissions were calculated using average data factors in line with the GHG Protocol Scope 3 guidelines and ESRS E1-5, E1-6.

Business travel

(7.8.1) Evaluation status

Select from:

Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

970.13

(7.8.3) Emissions calculation methodology

Select all that apply

Average data method

Other, please specify :UK Government GHG Conversion Factors for company reporting - Business Travel - DEFRA (2024)

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Emissions from business travel were calculated using data on distances traveled by air and rail, as well as hotel nights, applying DEFRA 2024 emission factors. The methodology follows the average data method in line with GHG Protocol guidance and ESRS disclosure requirements.

Employee commuting

(7.8.1) Evaluation status

Select from:

Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

2929.26

(7.8.3) Emissions calculation methodology

Select all that apply

Distance-based method

Other, please specify :UK Government GHG Conversion Factors (2024) - DEFRA Homeworking Factors (2024)

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Emissions were estimated based on data from BPER's employee commuting surveys (commuting plans), shuttle service usage, and remote working. The emission factors used were taken from DEFRA 2024 (Business travel-land, Homeworking) and calculations align with ESRS E1-5, E1-6.

Upstream leased assets

(7.8.1) Evaluation status

Select from:

Not relevant, explanation provided

(7.8.5) Please explain

Leasing activities only affect a small proportion of BPER's business. Only 1 out of the 14 within the group has leasing activities (Sardaleasing) therefore was not considered substantial enough to be considered. Furthermore, in updating the greenhouse gas inventory, BPER conducted a significance analysis on all 15 scope 3 categories. The analysis revealed that this source is not relevant.

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from:

Not relevant, explanation provided

(7.8.5) Please explain

Due to the nature of the BPER business, downstream transportation and distribution is below the threshold of the materiality assessment. Thus, this category is not considered relevant. In updating the greenhouse gas inventory, BPER conducted a significance analysis on all 15 scope 3 categories. The analysis revealed that this source is not relevant.

Processing of sold products

(7.8.1) Evaluation status

Select from:

Not relevant, explanation provided

(7.8.5) Please explain

The emissions related to the processing of our sold products are not considered to be relevant for BPER. BPER provides services as financial products that do not require direct emissions. The use-phase emissions are considered to be very low compared to other emissions of BPER. Furthermore, in updating the greenhouse gas inventory, BPER conducted a significance analysis on all 15 scope 3 categories. The analysis revealed that this source is not relevant.

Use of sold products

(7.8.1) Evaluation status

Select from:

Not relevant, explanation provided

(7.8.5) Please explain

The emissions related to the use of our sold products are not considered to be relevant for BPER. BPER provides services as financial products that do not require direct emissions. The use-phase emissions are considered to be very low compared to other emissions of BPER. Furthermore, in updating the greenhouse gas inventory, BPER conducted a significance analysis on all 15 scope 3 categories. The analysis revealed that this source is not relevant.

End of life treatment of sold products

(7.8.1) Evaluation status

Select from:

Not relevant, explanation provided

(7.8.5) Please explain

BPER does not produce physical products that require end of life treatment. This category is not applicable to our business and not relevant for BPER. Furthermore, in updating the greenhouse gas inventory, BPER conducted a significance analysis on all 15 scope 3 categories. The analysis revealed that this source is not relevant.

Downstream leased assets

(7.8.1) Evaluation status

Select from:

Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

744.2

(7.8.3) Emissions calculation methodology

Select all that apply

- Average data method
- Other, please specify :ESRS 2024 Guidelines; GHG Protocol - Corporate Value Chain (Scope 3) Standard

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Emissions were calculated based on energy consumption (natural gas and electricity) in buildings owned by BPER Real Estate and Adras but leased to third parties. The location-based method was applied using conversion factors from ESRS and GHG Protocol Scope 3 guidelines.

Franchises

(7.8.1) Evaluation status

Select from:

- Not relevant, explanation provided

(7.8.5) Please explain

BPER does not grant franchising rights. This category is not applicable to our business and not relevant for BPER. urthermore, in updating the greenhouse gas inventory, BPER conducted a significance analysis on all 15 scope 3 categories. The analysis revealed that this source is not relevant.

Other (upstream)

(7.8.1) Evaluation status

Select from:

- Not relevant, explanation provided

(7.8.5) Please explain

There are no other relevant upstream activities.

Other (downstream)

(7.8.1) Evaluation status

Select from:

Not relevant, explanation provided

(7.8.5) Please explain

There are no other relevant downstream activities.

[Fixed row]

(7.9) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	Select from: <input checked="" type="checkbox"/> Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	Select from: <input checked="" type="checkbox"/> Third-party verification or assurance process in place
Scope 3	Select from: <input checked="" type="checkbox"/> Third-party verification or assurance process in place

[Fixed row]

(7.9.1) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

Row 1

(7.9.1.1) Verification or assurance cycle in place

Select from:

Annual process

(7.9.1.2) Status in the current reporting year

Select from:

Complete

(7.9.1.3) Type of verification or assurance

Select from:

Limited assurance

(7.9.1.4) Attach the statement

2024 Annual Reports.pdf

(7.9.1.5) Page/section reference

Annual Report 2024 - Page 255 (GHG Scope 1 Emissions); Annual Report 2024 - Pages 664-678 (Independent Auditors Report)

(7.9.1.6) Relevant standard

Select from:

ISAE3000

(7.9.1.7) Proportion of reported emissions verified (%)

100

Row 2

(7.9.1.1) Verification or assurance cycle in place

Select from:

Annual process

(7.9.1.2) Status in the current reporting year

Select from:

Complete

(7.9.1.3) Type of verification or assurance

Select from:

Limited assurance

(7.9.1.4) Attach the statement

GHG Statement 2024.pdf

(7.9.1.5) Page/section reference

GHG Statement 2024 - Page 10 (GHG Scope 1 Emissions); GHG Statement 2024 - Pages 21-23 (Independent Auditors Report)

(7.9.1.6) Relevant standard

Select from:

ISAE 3410

(7.9.1.7) Proportion of reported emissions verified (%)

100

[Add row]

(7.9.2) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.

Row 1

(7.9.2.1) Scope 2 approach

Select from:

- Scope 2 location-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

- Annual process

(7.9.2.3) Status in the current reporting year

Select from:

- Complete

(7.9.2.4) Type of verification or assurance

Select from:

- Limited assurance

(7.9.2.5) Attach the statement

2024 Annual Reports.pdf

(7.9.2.6) Page/ section reference

Annual Report 2024 - Page 255 (GHG Scope 2 Emissions); Annual Report 2024 - Pages 664-678 (Independent Auditors Report)

(7.9.2.7) Relevant standard

Select from:

- ISAE3000

(7.9.2.8) Proportion of reported emissions verified (%)

100

Row 2

(7.9.2.1) Scope 2 approach

Select from:

Scope 2 market-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

Annual process

(7.9.2.3) Status in the current reporting year

Select from:

Complete

(7.9.2.4) Type of verification or assurance

Select from:

Limited assurance

(7.9.2.5) Attach the statement

2024 Annual Reports.pdf

(7.9.2.6) Page/ section reference

Annual Report 2024 - Page 255 (GHG Scope 2 Emissions); Annual Report 2024 - Pages 664-678 (Independent Auditors Report)

(7.9.2.7) Relevant standard

Select from:

ISAE3000

(7.9.2.8) Proportion of reported emissions verified (%)

100

Row 3

(7.9.2.1) Scope 2 approach

Select from:

Scope 2 location-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

Annual process

(7.9.2.3) Status in the current reporting year

Select from:

Complete

(7.9.2.4) Type of verification or assurance

Select from:

Limited assurance

(7.9.2.5) Attach the statement

GHG Statement 2024.pdf

(7.9.2.6) Page/ section reference

(7.9.2.7) Relevant standard

Select from:

ISAE 3410

(7.9.2.8) Proportion of reported emissions verified (%)

100

Row 4

(7.9.2.1) Scope 2 approach

Select from:

Scope 2 market-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

Annual process

(7.9.2.3) Status in the current reporting year

Select from:

Complete

(7.9.2.4) Type of verification or assurance

Select from:

Limited assurance

(7.9.2.5) Attach the statement

(7.9.2.6) Page/ section reference

GHG Statement 2024 - Page 10 (GHG Scope 2 Emissions); GHG Statement 2024 - Pages 21-23 (Independent Auditors Report)

(7.9.2.7) Relevant standard

Select from:

ISAE 3410

(7.9.2.8) Proportion of reported emissions verified (%)

100

[Add row]

(7.9.3) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.

Row 1

(7.9.3.1) Scope 3 category

Select all that apply

Scope 3: Investments

Scope 3: Capital goods

Scope 3: Business travel

Scope 3: Employee commuting

Scope 3: Downstream leased assets

Scope 3: Purchased goods and services

Scope 3: Waste generated in operations

(7.9.3.2) Verification or assurance cycle in place

Select from:

Annual process

(7.9.3.3) Status in the current reporting year

Select from:

Complete

(7.9.3.4) Type of verification or assurance

Select from:

Limited assurance

(7.9.3.5) Attach the statement

2024 Annual Reports.pdf

(7.9.3.6) Page/section reference

Annual Report 2024 - Page 255 (GHG Scope 3 Emissions); Annual Report 2024 - Pages 664-678 (Independent Auditors Report)

(7.9.3.7) Relevant standard

Select from:

ISAE3000

(7.9.3.8) Proportion of reported emissions verified (%)

100

Row 2

(7.9.3.1) Scope 3 category

Select all that apply

Scope 3: Investments

Scope 3: Purchased goods and services

- Scope 3: Capital goods
- Scope 3: Business travel
- Scope 3: Employee commuting
- Scope 3: Downstream leased assets

- Scope 3: Waste generated in operations

(7.9.3.2) Verification or assurance cycle in place

Select from:

- Annual process

(7.9.3.3) Status in the current reporting year

Select from:

- Complete

(7.9.3.4) Type of verification or assurance

Select from:

- Limited assurance

(7.9.3.5) Attach the statement

GHG Statement 2024.pdf

(7.9.3.6) Page/section reference

GHG Statement 2024 - Pages 11-14 (GHG Scope 3 Emissions); GHG Statement 2024 - Pages 21-23 (Independent Auditors Report)

(7.9.3.7) Relevant standard

Select from:

- ISAE 3410

(7.9.3.8) Proportion of reported emissions verified (%)

(7.10) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Select from:

Decreased

(7.10.1) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.

Change in renewable energy consumption

(7.10.1.1) Change in emissions (metric tons CO₂e)

316

(7.10.1.2) Direction of change in emissions

Select from:

Decreased

(7.10.1.3) Emissions value (percentage)

2.4

(7.10.1.4) Please explain calculation

In 2024, BPER Banca continued to source 100% of its electricity from renewable sources certified through Guarantees of Origin (GO). This full transition to zero-emission electricity directly reduced Scope 2 market-based emissions, which decreased by 316 tCO₂e compared to 2023 (from 1,001 tCO₂e to 685 tCO₂e). The reduction corresponds to approximately 2.39% of the previous year's combined Scope 1 and 2 emissions (13,196 tCO₂e). This outcome reflects the strategic implementation of BPER's long-term decarbonization roadmap, aligned with the "Piano Energetico 2022–2030", and confirms the full elimination of residual Scope 2

emissions from purchased electricity. The renewable supply mix is tracked and verified through contractual instruments and reporting aligned with CDP and GHG Protocol guidance.

Other emissions reduction activities

(7.10.1.1) Change in emissions (metric tons CO₂e)

1581

(7.10.1.2) Direction of change in emissions

Select from:

Decreased

(7.10.1.3) Emissions value (percentage)

11.9

(7.10.1.4) Please explain calculation

The 1,581 tCO₂e reduction in Scope 1 emissions is attributable to structured energy efficiency measures implemented under BPER's Energy Plan 2022–2030. Key drivers include building retrofit projects (thermal insulation, HVAC upgrades), gradual downsizing or closure of underused branches, and optimized heating management. In 2024, BPER achieved 2,547.65 MWh of energy savings, avoiding 1,164.66 tCO₂e, as reported in its ESG Report. Additionally, the Group expanded the application of its ISO 50001-certified Energy Management System across 20 representative buildings, improving real-time monitoring and operational control. These activities collectively contributed to an 11.98% reduction in Scope 1+2 emissions compared to 2023, without affecting operational capacity or business continuity. The emissions impact is calculated based on verified Scope 1 reductions (from 12,195 to 10,614 tCO₂e), supported by measured energy performance data.

[Fixed row]

(7.10.2) Are your emissions performance calculations in 7.10 and 7.10.1 based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Select from:

Location-based

(7.23) Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?

Select from:

No

(7.29) What percentage of your total operational spend in the reporting year was on energy?

Select from:

More than 0% but less than or equal to 5%

(7.30) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired electricity	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired heat	Select from: <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired steam	Select from: <input checked="" type="checkbox"/> No
Consumption of purchased or acquired cooling	Select from: <input checked="" type="checkbox"/> No
Generation of electricity, heat, steam, or cooling	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(7.30.1) Report your organization's energy consumption totals (excluding feedstocks) in MWh.

Consumption of fuel (excluding feedstock)

(7.30.1.1) Heating value

Select from:

Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

0

(7.30.1.3) MWh from non-renewable sources

40238.53

(7.30.1.4) Total (renewable + non-renewable) MWh

40238.53

Consumption of purchased or acquired electricity

(7.30.1.1) Heating value

Select from:

Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

91546.46

(7.30.1.3) MWh from non-renewable sources

0

(7.30.1.4) Total (renewable + non-renewable) MWh

91546.46

Consumption of purchased or acquired heat

(7.30.1.1) Heating value

Select from:

Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

0

(7.30.1.3) MWh from non-renewable sources

3064.64

(7.30.1.4) Total (renewable + non-renewable) MWh

3064.64

Consumption of self-generated non-fuel renewable energy

(7.30.1.1) Heating value

Select from:

Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

1599.33

(7.30.1.4) Total (renewable + non-renewable) MWh

1599.33

Total energy consumption

(7.30.1.1) Heating value

Select from:

Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

93145.79

(7.30.1.3) MWh from non-renewable sources

40238.53

(7.30.1.4) Total (renewable + non-renewable) MWh

133384.32

[Fixed row]

(7.30.16) Provide a breakdown by country/area of your electricity/heat/steam/cooling consumption in the reporting year.

Italy

(7.30.16.1) Consumption of purchased electricity (MWh)

91396.66

(7.30.16.2) Consumption of self-generated electricity (MWh)

1599.33

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

29189.06

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

122185.05

Luxembourg

(7.30.16.1) Consumption of purchased electricity (MWh)

149.8

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

114.61

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

264.41

[Fixed row]

(7.45) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Row 1

(7.45.1) Intensity figure

0.00000149

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

11299.6

(7.45.3) Metric denominator

Select from:

unit total revenue

(7.45.4) Metric denominator: Unit total

7568356000

(7.45.5) Scope 2 figure used

Select from:

Market-based

(7.45.6) % change from previous year

11.34

(7.45.7) Direction of change

Select from:

Decreased

(7.45.8) Reasons for change

Select all that apply

- Change in renewable energy consumption
- Other emissions reduction activities

(7.45.9) Please explain

BPER Banca's intensity figure per unit of revenue decreased by 2024, driven by combined emissions reduction and revenue growth. The organization achieved full decarbonization of Scope 2 (market-based) emissions via 100% renewable electricity purchases, certified by Guarantees of Origin (GO). In parallel, Scope 1 emissions declined due to targeted efficiency projects such as building retrofits, improved heating systems, and closure of inefficient sites, delivering 2,547.65 MWh energy savings and avoiding 1,164.66 tCO₂e. While net income further increased, the figure remained stable, ensuring that the intensity drop reflects real environmental performance gains. These actions reflect BPER's decarbonization targets under its Energy Plan 2022–2030, monitored through an ISO 50001-certified energy management system applied across 20 buildings. Note that the figure was restated compared to last year due to changes in the calculation for "revenue" introduced to ensure consistency with the annual report disclosure prepared in accordance with the EU CSRD and ESRS.

Row 2

(7.45.1) Intensity figure

0.58

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO₂e)

11299.6

(7.45.3) Metric denominator

Select from:

- full time equivalent (FTE) employee

(7.45.4) Metric denominator: Unit total

19532

(7.45.5) Scope 2 figure used

Select from:

Market-based

(7.45.6) % change from previous year

10.77

(7.45.7) Direction of change

Select from:

Decreased

(7.45.8) Reasons for change

Select all that apply

Other emissions reduction activities

(7.45.9) Please explain

The decrease in emissions intensity per employee is driven by absolute emission reductions under BPER's Energy Plan 2022–2030. Key actions included retrofitting HVAC systems, branch downsizing, fuel optimization, and broader use of smart working. In 2024, these activities led to a significant Scope 1 reduction, with additional contributions from renewable energy use. FTE headcount remained stable, ensuring that the intensity drop reflects real environmental performance gains.

Row 3

(7.45.1) Intensity figure

0.01

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

11299.6

(7.45.3) Metric denominator

Select from:

square meter

(7.45.4) Metric denominator: Unit total

1277196

(7.45.5) Scope 2 figure used

Select from:

Market-based

(7.45.6) % change from previous year

0

(7.45.7) Direction of change

Select from:

No change

(7.45.8) Reasons for change

Select all that apply

Other, please specify :No reasons for change due to no changes in figures intensity metrics

(7.45.9) Please explain

No significant changes are observed as the intensity figures varies in proportion to the number of subsidiaries and assets of the Group.
[Add row]

(7.53) Did you have an emissions target that was active in the reporting year?

Select all that apply

Absolute target

Portfolio target

(7.53.1) Provide details of your absolute emissions targets and progress made against those targets.

Row 1

(7.53.1.1) Target reference number

Select from:

Abs 1

(7.53.1.2) Is this a science-based target?

Select from:

Yes, we consider this a science-based target, but we have not committed to seek validation of this target by the Science Based Targets initiative within the next two years

(7.53.1.4) Target ambition

Select from:

1.5°C aligned

(7.53.1.5) Date target was set

12/30/2021

(7.53.1.6) Target coverage

Select from:

Organization-wide

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

Carbon dioxide (CO2)

- Methane (CH4)
- Nitrous oxide (N2O)

(7.53.1.8) Scopes

Select all that apply

- Scope 1

(7.53.1.11) End date of base year

12/31/2021

(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

14345

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

0.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

14345.000

(7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

(7.53.1.54) End date of target

12/30/2030

(7.53.1.55) Targeted reduction from base year (%)

50.2

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

7143.810

(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)

10614

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

10614.000

(7.53.1.78) Land-related emissions covered by target

Select from:

No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.1.79) % of target achieved relative to base year

51.81

(7.53.1.80) Target status in reporting year

Select from:

Underway

(7.53.1.82) Explain target coverage and identify any exclusions

BPER Banca has voluntarily used the SBTI tool for the identification of Scope 1 and 2 emission reduction percentages by 2030, using the Sector Decarbonisation Approach (SDA) methodology and related sector decarbonisation pathway - Service Buildings (SDA Approach) - aligned with the climate scenario that limits the

temperature increase to 1.5°C. The Scope 1 and 2 emission reduction strategy defined by BPER Banca is therefore aligned with the international community's calls for limiting the global average temperature increase in 2050 to within 1.5°C compared to pre-industrial levels, and exploits the best practices available in the market for climate change mitigation.

(7.53.1.83) Target objective

The BPER Group's goal for reducing Scope 1 emissions is a core component of the 2022-2030 Energy Plan. This plan aims to cut direct Scope 1 emissions by 50.2% by 2030, from a baseline of 14,345 tonnes of CO₂ equivalent in 2021 to 7,143.9 tonnes of CO₂ equivalent. Strategic actions include converting gas generators to heat pumps, electrifying the company fleet, and implementing platforms to detect gas leaks. These efforts align with international commitments to limit the global temperature increase to 1.5C above pre-industrial levels.

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

BPER has established the "2022-2030 Energy Plan," published in 2022 and updated in 2024 with the launch of the new 2024-2027 Business Plan "B:Dynamic|Full Value 2027." The goal is to reduce Scope 1 and 2 emissions in line with the Paris Agreement and best market practices for climate change mitigation. Specifically, the target is to cut direct Scope 1 emissions by -35% by 2027 and by -50.2% by 2030 compared to the 2021 baseline, and to use 100% electricity from renewable sources. As at 31 December 2024, the BPER Group achieved the target of purchasing 100% renewable electricity with Guarantees of Origin (GO) and consolidated the gradual implementation of the energy efficiency measures outlined in the Plan. The actions under the 2022-2025 Energy Plan led to a -23% emission reduction by the end of 2024, thanks to: Conversion of gas-fired generators to heat pumps: in 2024, 50 sites previously powered by methane gas were converted, continuing the replacement process started in recent years, as these generators are the main source of the Group's emissions. Fleet electrification: gradual replacement of internal combustion vehicles with plug-in hybrid and/or electric cars. F-gas leak detection platform: under implementation in 2024, following the completion of the master data update, to help reduce CO₂ emissions linked to refrigerant leaks. Optimisation of management spaces: continued refurbishment of BPER Banca's Management Centre in Modena and rationalisation of real estate assets, including the closure of 449 branches between 2022 and 2024, to cut both operating costs and CO₂ emissions. BEMS (Building Energy Management System) with AI algorithms: in 2024, a Proof of Concept was conducted to assess compatibility with internal systems, with full implementation planned for 2025. Extension of the BEMS control perimeter: 10 new devices were installed at medium-to-large sites to reduce waste and emissions. Installation of 50 new BEMS units across BPER branches: for real-time management and monitoring of energy consumption. Conversion of oil-fired boilers to heat pumps: 8 sites converted in 2024. Additionally, in 2024, a PPA (Power Purchase Agreement) was signed with a national provider for energy supply from a newly built photovoltaic plant in Italy, covering around 10% of the Bank's energy needs. To offset the remaining 2% reduction gap—caused by the early closure of the 2022-2025 Business Plan—the DKV Myclimate Card compensation project was activated.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

Yes

Row 2

(7.53.1.1) Target reference number

Select from:

Abs 2

(7.53.1.2) Is this a science-based target?

Select from:

Yes, we consider this a science-based target, but we have not committed to seek validation of this target by the Science Based Targets initiative within the next two years

(7.53.1.4) Target ambition

Select from:

1.5°C aligned

(7.53.1.5) Date target was set

12/30/2021

(7.53.1.6) Target coverage

Select from:

Organization-wide

(7.53.1.7) Greenhouse gases covered by target

Select all that apply

Carbon dioxide (CO₂)

Methane (CH₄)

Nitrous oxide (N₂O)

(7.53.1.8) Scopes

Select all that apply

Scope 2

(7.53.1.9) Scope 2 accounting method

Select from:

Market-based

(7.53.1.11) End date of base year

12/30/2021

(7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO2e)

399

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

0.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

399.000

(7.53.1.34) Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2

100

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

(7.53.1.54) End date of target

12/30/2030

(7.53.1.55) Targeted reduction from base year (%)

100

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

0.000

(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)

0

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

0.000

(7.53.1.78) Land-related emissions covered by target

Select from:

No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.1.79) % of target achieved relative to base year

100.00

(7.53.1.80) Target status in reporting year

Select from:

Achieved and maintained

(7.53.1.82) Explain target coverage and identify any exclusions

The BPER Group has achieved its goal of reducing market-based emissions by 31.12.2023 by purchasing and consuming 100% electricity from renewable sources covered by GO (Guarantee of Origin).

(7.53.1.83) Target objective

The BPER Group's goal for Scope 2 emissions is to achieve 100% electricity consumption from renewable sources. This target, which was part of the 2022-2030 Energy Plan, was successfully met in 2023. These efforts align with international commitments to limit the global temperature increase to 1.5C above pre-industrial levels. By ensuring that all electricity consumed is sourced from renewables, BPER significantly reduces its indirect emissions and supports a sustainable transition.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

Yes

(7.53.1.86) List the emissions reduction initiatives which contributed most to achieving this target

The BPER Group has achieved its goal of reducing market-based emissions by 31.12.2023 by purchasing and consuming 100% electricity from renewable sources covered by GO (Guarantee of Origin).

[Add row]

(7.53.4) Provide details of the climate-related targets for your portfolio.

Row 1

(7.53.4.1) Target reference number

Select from:

Por1

(7.53.4.2) Target type

Select from:

Weighted average carbon intensity

(7.53.4.4) Methodology used when setting the target

Select from:

NZBA Target Setting Guidelines

(7.53.4.5) Date target was set

08/01/2023

(7.53.4.6) Target is set and progress against it is tracked at

Select from:

Sector level

(7.53.4.7) Sector

Select from:

Power generation

(7.53.4.8) Portfolios covered by the target

Select all that apply

Banking (Bank)

(7.53.4.10) Asset classes covered by the target

Select all that apply

Loans

(7.53.4.12) Target type: Absolute or intensity

Select from:

Intensity

(7.53.4.14) % of portfolio emissions covered by the target

0.48

(7.53.4.16) Metric (or target numerator if intensity)

Select from:

Other, please specify :counterparty weighted kgCO2e

(7.53.4.17) Target denominator

Select from:

Other, please specify :kWh

(7.53.4.18) % of portfolio covered in relation to total portfolio value

1.43

(7.53.4.21) Frequency of target reviews

Select from:

Every five years

(7.53.4.22) End date of base year

12/30/2022

(7.53.4.23) Figure in base year

0.256

(7.53.4.24) We have an interim target

Select from:

No

(7.53.4.27) End date of target

12/30/2030

(7.53.4.28) Figure in target year

0.165

(7.53.4.29) Figure in reporting year

0.136

(7.53.4.30) % of target achieved relative to base year

131.86813186813185

(7.53.4.31) Target status in reporting year

Select from:

Underway

(7.53.4.34) Is this a science-based target?

Select from:

Yes, we consider this a science-based target, and it has been set in line with the Glasgow Financial Alliance for Net Zero (GFANZ) commitments, but we have not committed to seek validation by the Science Based Targets initiative within the next two years

(7.53.4.35) Target ambition

Select from:

1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

For this sector, the scope of the analysis concerns companies operating in the electricity generation sector. In particular, counterparties active in the sectors related to the transmission, distribution and sale of electricity were excluded from the scope of analysis, as they were not relevant for the definition of decarbonisation targets. Based on the market best practice, the evaluation of emissions only considers Scope 1 related to direct greenhouse gas emissions; the Scope 2 and Scope 3 emissions were excluded due to their small size (i.e. 1% of the portfolio emissions).

(7.53.4.38) Target objective

The target to 2030 for the Power generation sector envisages a 36% reduction in the weighted emission intensity of portfolio counterparties, from a base (as of 2022) of 0.256 kilogram CO₂ equivalents per kilowatt-hour (0.256 kgCO₂e/kWh) to an average value of 0.165 kilogram CO₂ equivalents per kilowatt-hour (0.165 kgCO₂e/kWh).

Row 2

(7.53.4.1) Target reference number

Select from:

Por2

(7.53.4.2) Target type

Select from:

Absolute portfolio emissions

(7.53.4.4) Methodology used when setting the target

Select from:

NZBA Target Setting Guidelines

(7.53.4.5) Date target was set

08/01/2023

(7.53.4.6) Target is set and progress against it is tracked at

Select from:

Sector level

(7.53.4.7) Sector

Select from:

Fossil Fuels

(7.53.4.8) Portfolios covered by the target

Select all that apply

Banking (Bank)

(7.53.4.10) Asset classes covered by the target

Select all that apply

Loans

(7.53.4.12) Target type: Absolute or intensity

Select from:

Absolute

(7.53.4.14) % of portfolio emissions covered by the target

80.99

(7.53.4.16) Metric (or target numerator if intensity)

Select from:

tCO2e

(7.53.4.18) % of portfolio covered in relation to total portfolio value

2.29

(7.53.4.21) Frequency of target reviews

Select from:

Every five years

(7.53.4.22) End date of base year

12/30/2022

(7.53.4.23) Figure in base year

464315

(7.53.4.24) We have an interim target

Select from:

No

(7.53.4.27) End date of target

12/30/2030

(7.53.4.28) Figure in target year

328382

(7.53.4.29) Figure in reporting year

6100170

(7.53.4.30) % of target achieved relative to base year

-4146.053570509001

(7.53.4.31) Target status in reporting year

Select from:

Underway

(7.53.4.34) Is this a science-based target?

Select from:

Yes, we consider this a science-based target, and it has been set in line with the Glasgow Financial Alliance for Net Zero (GFANZ) commitments, but we have not committed to seek validation by the Science Based Targets initiative within the next two years

(7.53.4.35) Target ambition

Select from:

1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

In line with market practice, in order to determine the proper decarbonisation scenario to apply, the upstream, midstream and downstream segments of the sector's value chain were analysed in relation to the classification of companies in the portfolio. The upstream segment (B6 and B9) comprises activities such as exploration, production and extraction of oil and gas from wells. The midstream segment (D35, H49, G46) covers the transport and storage of oil and gas, while the downstream segment (C19) deals with the refining of crude oil and natural gas into final products such as gasoline, diesel and jet fuel. In addition, exposures related to the retail sale of fuel were considered (G47.3.0). The evaluation of emissions is focused on Scope 1, relating to direct greenhouse gas emissions, Scope 2, relating to indirect emissions resulting from the generation of purchased electricity, and Scope 3, relating to indirect emissions associated with the counterparty's business activity, in relation to the materiality of emissions in BPER Banca's portfolio and the reference scenario. The alignment of BPER Banca's portfolio with the interim decarbonisation targets for 2030 and long-term 2050 targets was defined through the IEA Global (i) Net Zero Emissions (i.e. IEA NZE) and (ii) Stated Policies (i.e. STEPS) scenarios. The calculation of the targets refers directly to the Net Zero 2050 scenario defined by the International Energy Agency (IEA) and in line with the requirements of the Alliance.

(7.53.4.38) Target objective

The target to 2030 for the "Oil and Gas" sector envisages a 29% reduction in emissions financed by BPER Banca, starting from a base of 464,315 tonnes of CO2 equivalents (464,315 tCO2 e) in 2022, and reaching a value of 328,382 tonnes of CO2 equivalents (328,382 tCO2 e) in 2030. The calculation of the target for this sector refers directly to the Net Zero 2050 scenario defined by the International Energy Agency (IEA) and in line with the requirements of the Alliance. For the Oil and Gas sector, a counterparty selection strategy was pursued with the aim of not penalising operations with the sector's main customers and simultaneously achieving a reduction in emission intensity. The 32% GCA growth in the sector is mostly concentrated on counterparties already in the portfolio, with 47% of the total increase in exposure due to BPER Factor exposures with an average residual maturity of about six months. Against the increase in overall exposure, there is in fact a reduction in Scope 1 financed emissions of -40% and Scope 2 emissions that are substantially unchanged. On the other hand, with regard to Scope 3 emissions, the figure is not comparable to previous surveys, as a new methodology for calculating counterparty emissions has been applied which, in accordance with the PCAF guidelines, also includes upstream or downstream activities of business operations.

Row 3

(7.53.4.1) Target reference number

Select from:

Por3

(7.53.4.2) Target type

Select from:

Weighted average carbon intensity

(7.53.4.4) Methodology used when setting the target

Select from:

NZBA Target Setting Guidelines

(7.53.4.5) Date target was set

11/30/2024

(7.53.4.6) Target is set and progress against it is tracked at

Select from:

Sector level

(7.53.4.7) Sector

Select from:

Materials

(7.53.4.8) Portfolios covered by the target

Select all that apply

Banking (Bank)

(7.53.4.10) Asset classes covered by the target

Select all that apply

Loans

(7.53.4.12) Target type: Absolute or intensity

Select from:

Intensity

(7.53.4.14) % of portfolio emissions covered by the target

0.39

(7.53.4.16) Metric (or target numerator if intensity)

Select from:

Other, please specify

(7.53.4.17) Target denominator

Select from:

Other, please specify :€mln

(7.53.4.18) % of portfolio covered in relation to total portfolio value

0.34

(7.53.4.21) Frequency of target reviews

Select from:

Every five years

(7.53.4.22) End date of base year

12/30/2024

(7.53.4.23) Figure in base year

(7.53.4.24) We have an interim target

Select from:

No

(7.53.4.27) End date of target

12/30/2030

(7.53.4.28) Figure in target year

350

(7.53.4.29) Figure in reporting year

262

(7.53.4.30) % of target achieved relative to base year

180

(7.53.4.31) Target status in reporting year

Select from:

New

(7.53.4.34) Is this a science-based target?

Select from:

Yes, we consider this a science-based target, and it has been set in line with the Glasgow Financial Alliance for Net Zero (GFANZ) commitments, but we have not committed to seek validation by the Science Based Targets initiative within the next two years

(7.53.4.35) Target ambition

Select from:

1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

To define the target for the Aluminium sector, the IEA NZE Aluminium Global reference scenario was used. For this scenario, only Scope 1 emissions data are publicly available (i.e. World Energy Outlook 2023, Table A.4 c); for Scope 2, emissions from electricity consumption for the aluminium sector published by the International Aluminium Institute were considered.

(7.53.4.38) Target objective

The 2030 target for the Aluminium sector envisages a 24% reduction in emission intensity at portfolio level, from a base of 460 tonnes of CO2 equivalent per exposure in the sector in millions of Euro (460.49 tCO2 e/€ million) by 2023 to an average value of 350 tonnes of CO2 equivalent per exposure in the sector (350.25 tCO2 e/€ million) by 2030. The calculation of the target for the Aluminium sector 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 Net-Zero Banking Alliance.

Row 4

(7.53.4.1) Target reference number

Select from:

Por4

(7.53.4.2) Target type

Select from:

Weighted average carbon intensity

(7.53.4.4) Methodology used when setting the target

Select from:

NZBA Target Setting Guidelines

(7.53.4.5) Date target was set

11/30/2024

(7.53.4.6) Target is set and progress against it is tracked at

Select from:

Sector level

(7.53.4.7) Sector

Select from:

Materials

(7.53.4.8) Portfolios covered by the target

Select all that apply

Banking (Bank)

(7.53.4.10) Asset classes covered by the target

Select all that apply

Loans

(7.53.4.12) Target type: Absolute or intensity

Select from:

Intensity

(7.53.4.14) % of portfolio emissions covered by the target

1.15

(7.53.4.16) Metric (or target numerator if intensity)

Select from:

Other, please specify :counterparty weighted tCO2e

(7.53.4.17) Target denominator

Select from:

Other, please specify :€mln

(7.53.4.18) % of portfolio covered in relation to total portfolio value

1.43

(7.53.4.21) Frequency of target reviews

Select from:

Every five years

(7.53.4.22) End date of base year

12/30/2024

(7.53.4.23) Figure in base year

275

(7.53.4.24) We have an interim target

Select from:

No

(7.53.4.27) End date of target

12/30/2030

(7.53.4.28) Figure in target year

201

(7.53.4.29) Figure in reporting year

180

(7.53.4.30) % of target achieved relative to base year

128.3783783783784

(7.53.4.31) Target status in reporting year

Select from:

New

(7.53.4.34) Is this a science-based target?

Select from:

Yes, we consider this a science-based target, and it has been set in line with the Glasgow Financial Alliance for Net Zero (GFANZ) commitments, but we have not committed to seek validation by the Science Based Targets initiative within the next two years

(7.53.4.35) Target ambition

Select from:

1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

For the Iron and Steel sector, the IEA NZE Steel Global reference scenario was used to define the target. It should be noted that only Scope 1 emissions data are publicly available for the reference scenario (i.e. World Energy Outlook 2023, Table A.4 c), therefore, an estimate based on data made available by IEA within the World Energy Outlook 2023 was used for Scope 2.

(7.53.4.38) Target objective

The 2030 target for the Iron and Steel sector envisages a 27% reduction in emission intensity at portfolio level, from a base of 275 tonnes of CO2 equivalent per exposure in the sector in millions of Euro (275.15 tCO2 e/€ million) by 2023 to an average value of 201.27 tonnes of CO2 equivalent per exposure in the sector by 2030. In the Iron and Steel sector, the emission intensity decreased from a baseline of 275 tCO2 e/€ million to 180 tCO2 e/€ million as at 31 December 2024, registering a 35% reduction due to the decrease in the emission profile of the counterparties in the portfolio. The calculation of the target for the Iron & Steel sector 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 Net-Zero Banking Alliance.

Row 5

(7.53.4.1) Target reference number

Select from:

Por5

(7.53.4.2) Target type

Select from:

Weighted average carbon intensity

(7.53.4.4) Methodology used when setting the target

Select from:

NZBA Target Setting Guidelines

(7.53.4.5) Date target was set

11/30/2024

(7.53.4.6) Target is set and progress against it is tracked at

Select from:

Sector level

(7.53.4.7) Sector

Select from:

Infrastructure

(7.53.4.8) Portfolios covered by the target

Select all that apply

Banking (Bank)

(7.53.4.10) Asset classes covered by the target

Select all that apply

Loans

(7.53.4.12) Target type: Absolute or intensity

Select from:

Intensity

(7.53.4.14) % of portfolio emissions covered by the target

2.3

(7.53.4.16) Metric (or target numerator if intensity)

Select from:

Other, please specify :counterparty weighted kCO2e

(7.53.4.17) Target denominator

Select from:

Other, please specify :mq

(7.53.4.18) % of portfolio covered in relation to total portfolio value

80.83

(7.53.4.21) Frequency of target reviews

Select from:

Every five years

(7.53.4.22) End date of base year

12/30/2024

(7.53.4.23) Figure in base year

36.8

(7.53.4.24) We have an interim target

Select from:

No

(7.53.4.27) End date of target

12/30/2030

(7.53.4.28) Figure in target year

19

(7.53.4.29) Figure in reporting year

37.1

(7.53.4.30) % of target achieved relative to base year

-1.6853932584269906

(7.53.4.31) Target status in reporting year

Select from:

New

(7.53.4.34) Is this a science-based target?

Select from:

Yes, we consider this a science-based target, and it has been set in line with the Glasgow Financial Alliance for Net Zero (GFANZ) commitments, but we have not committed to seek validation by the Science Based Targets initiative within the next two years

(7.53.4.35) Target ambition

Select from:

- 1.5°C aligned

(7.53.4.37) Please explain target coverage and identify any exclusions

The Real Estate perimeter includes only loans with the purpose of purchasing real estate, distinguished by type of asset rather than by ATECO/NACE code. General Purpose loans, e.g. to companies operating in the construction sector, but without the purpose of purchasing real estate, are therefore excluded from this perimeter. This choice is in line with the NZBA's own indications and is due to the need to ensure homogeneity in the application of emission calculation methodologies and reference scenarios. Commercial real estate loans financed by BPER were therefore taken into account. For the Commercial Real Estate sector, the reference scenario is the CRREM (Carbon Risk Real Estate Monitor). This scenario addresses the challenge of estimating the risk and uncertainty associated with real estate decarbonisation, creating a methodological body and empirically quantifying the different scenarios and their impact on investors' portfolios. The reference scenario was derived from CRREM PATHWAYS V2 data, updated to 3 March 2024. In particular, the route used considers a physical intensity of emissions (tCO₂e/m²) specific to Italy.

(7.53.4.38) Target objective

The 2030 target for the "Commercial real estate" sector envisages a 47% reduction in emission intensity at the level of financed property, from a base of 37 kilograms of CO₂ equivalent per square metre (37 kgCO₂ e/ m²) in 2023 to an average value of 19 kilograms of CO₂ equivalent per square metre (19 kgCO₂ e/ m²) by 2030. Among the targets published during 2024, the emission intensity for the commercial real estate sector remained stable: 37.1 kgCO₂ /m² compared to 36.8 kgCO₂ / m² at baseline.

[Add row]

(7.54) Did you have any other climate-related targets that were active in the reporting year?

Select all that apply

- Targets to increase or maintain low-carbon energy consumption or production
- Net-zero targets

(7.54.1) Provide details of your targets to increase or maintain low-carbon energy consumption or production.

Row 1

(7.54.1.1) Target reference number

Select from:

Low 1

(7.54.1.2) Date target was set

01/01/2022

(7.54.1.3) Target coverage

Select from:

Organization-wide

(7.54.1.4) Target type: energy carrier

Select from:

Electricity

(7.54.1.5) Target type: activity

Select from:

Consumption

(7.54.1.6) Target type: energy source

Select from:

Renewable energy source(s) only

(7.54.1.7) End date of base year

12/31/2021

(7.54.1.8) Consumption or production of selected energy carrier in base year (MWh)

89039

(7.54.1.9) % share of low-carbon or renewable energy in base year

99

(7.54.1.10) End date of target

12/31/2023

(7.54.1.11) % share of low-carbon or renewable energy at end date of target

100

(7.54.1.12) % share of low-carbon or renewable energy in reporting year

100

(7.54.1.13) % of target achieved relative to base year

100.00

(7.54.1.14) Target status in reporting year

Select from:

Achieved and maintained

(7.54.1.16) Is this target part of an emissions target?

No, this target is not part of an emissions target.

(7.54.1.17) Is this target part of an overarching initiative?

Select all that apply

No, it's not part of an overarching initiative

(7.54.1.19) Explain target coverage and identify any exclusions

It is specified that in the 2022-2025 Business Plan, Bper declares that by the end of 2022, 100% of the purchased electric energy will be sourced from renewable sources. Therefore, supply contracts for all legal entities within the Group were adjusted by December 31, 2022, to ensure the purchase and consumption of 100% renewable energy. However, the BPER Group also reached the objective of 100% electricity provision from renewable sources as early as 2023 by entering into specific contracts with its suppliers.

(7.54.1.20) Target objective

The objective of the target was the purchase of Guarantees of Origin to ensure the consumption of 100% renewable energy.

(7.54.1.22) List the actions which contributed most to achieving this target

*The achievement of the target has been facilitated by the purchase of Guarantees of Origin to ensure the consumption of 100% renewable energy.
[Add row]*

(7.54.3) Provide details of your net-zero target(s).

Row 1

(7.54.3.1) Target reference number

Select from:

NZ1

(7.54.3.2) Date target was set

07/31/2023

(7.54.3.3) Target Coverage

Select from:

Banking (Bank)

(7.54.3.4) Targets linked to this net zero target

Select all that apply

Por1

(7.54.3.5) End date of target for achieving net zero

01/01/2050

(7.54.3.6) Is this a science-based target?

Select from:

Yes, we consider this a science-based target, but we have not committed to seek validation of this target by the Science Based Targets initiative within the next two years

(7.54.3.8) Scopes

Select all that apply

Scope 1

(7.54.3.9) Greenhouse gases covered by target

Select all that apply

Carbon dioxide (CO2)

Methane (CH4)

Nitrous oxide (N2O)

(7.54.3.10) Explain target coverage and identify any exclusions

1. General Purpose Portfolio 2. For this sector, the scope of the analysis concerns companies operating in the electricity generation sector. In particular, counterparties active in the sectors related to the transmission, distribution and sale of electricity were excluded from the scope of analysis, as they were not relevant for the definition of decarbonisation targets. Based on the market best practice, the evaluation of emissions only considers Scope 1 related to direct greenhouse gas emissions; the Scope 2 and Scope 3 emissions were excluded due to their small size (i.e. 1% of the portfolio emissions). 3. The reference scenario for target setting is the IEA Net-Zero 2050 for Global PowerGen Sector.

(7.54.3.11) Target objective

The interim target to 2030 for the Power generation sector envisages a 36% reduction in the weighted emission intensity of portfolio counterparties, from a base (as of 2022) of 0.256 kilogram CO₂ equivalents per kilowatt-hour (0.256 kgCO₂e/kWh) to an average value of 0.165 kilogram CO₂ equivalents per kilowatt-hour (0.165 kgCO₂e/kWh).

(7.54.3.12) Do you intend to neutralize any residual emissions with permanent carbon removals at the end of the target?

Select from:

Unsure

(7.54.3.13) Do you plan to mitigate emissions beyond your value chain?

Select from:

No, we do not plan to mitigate emissions beyond our value chain

(7.54.3.17) Target status in reporting year

Select from:

Underway

(7.54.3.19) Process for reviewing target

The performance as at 31 December 2024 is 0.136 kgCO₂ e/kWh, a 47% reduction compared to the baseline and substantially in line with the previous monitoring as at 31.12.2023 (0.127 kgCO₂ e/kWh). Despite the decrease in Scope 1 emissions considered in the target, the evolution of the counterparties in the portfolio and the update of the national sector data used for calculation purposes, keep the emission intensity broadly in line with the previous monitoring exercise.

Row 2

(7.54.3.1) Target reference number

Select from:

NZ2

(7.54.3.2) Date target was set

07/31/2023

(7.54.3.3) Target Coverage

Select from:

- Banking (Bank)

(7.54.3.4) Targets linked to this net zero target

Select all that apply

- Por2

(7.54.3.5) End date of target for achieving net zero

01/01/2050

(7.54.3.6) Is this a science-based target?

Select from:

- Yes, we consider this a science-based target, but we have not committed to seek validation of this target by the Science Based Targets initiative within the next two years

(7.54.3.8) Scopes

Select all that apply

- Scope 1
- Scope 2
- Scope 3

(7.54.3.9) Greenhouse gases covered by target

Select all that apply

- Carbon dioxide (CO₂)
- Methane (CH₄)
- Nitrous oxide (N₂O)

(7.54.3.10) Explain target coverage and identify any exclusions

1. *General Purpose Portfolio 2. In line with market practice, in order to determine the proper decarbonisation scenario to apply, the upstream, midstream and downstream segments of the sector's value chain were analysed in relation to the classification of companies in the portfolio. The upstream segment (B6 and B9) comprises activities such as exploration, production and extraction of oil and gas from wells. The midstream segment (D35, H49, G46) covers the transport and storage of oil and gas, while the downstream segment (C19) deals with the refining of crude oil and natural gas into final products such as gasoline, diesel and jet fuel. In addition, exposures related to the retail sale of fuel were considered (G47.3.0).*3. *The reference scenario for target setting is the IEA Net-Zero 2050 for Oil & Gas.*

(7.54.3.11) Target objective

The interim target to 2030 for the "Oil and Gas" sector envisages a 29% reduction in emissions financed by BPER Banca, starting from a base of 464,315 tonnes of CO2 equivalents (464,315 tCO2 e) in 2022, and reaching a value of 328,382 tonnes of CO2 equivalents (328,382 tCO2 e) in 2030. The calculation of the target for this sector refers directly to the Net Zero 2050 scenario defined by the International Energy Agency (IEA) and in line with the requirements of the Alliance.

(7.54.3.12) Do you intend to neutralize any residual emissions with permanent carbon removals at the end of the target?

Select from:

Unsure

(7.54.3.13) Do you plan to mitigate emissions beyond your value chain?

Select from:

No, we do not plan to mitigate emissions beyond our value chain

(7.54.3.17) Target status in reporting year

Select from:

Underway

(7.54.3.19) Process for reviewing target

For the Oil and Gas sector, a counterparty selection strategy was pursued with the aim of not penalising operations with the sector's main customers and simultaneously achieving a reduction in emission intensity. The 32% GCA growth in the sector is mostly concentrated on counterparties already in the portfolio, with 47% of the total increase in exposure due to BPER Factor exposures with an average residual maturity of about six months. Against the increase in overall exposure, there is in fact a reduction in Scope 1 financed emissions of -40% and Scope 2 emissions that are substantially unchanged. On the other hand, with regard to Scope

3 emissions, the figure is not comparable to previous surveys, as a new methodology for calculating counterparty emissions has been applied which, in accordance with the PCAF guidelines, also includes upstream or downstream activities of business operations.

Row 3

(7.54.3.1) Target reference number

Select from:

NZ3

(7.54.3.2) Date target was set

11/30/2024

(7.54.3.3) Target Coverage

Select from:

Banking (Bank)

(7.54.3.4) Targets linked to this net zero target

Select all that apply

Por3

(7.54.3.5) End date of target for achieving net zero

12/31/2049

(7.54.3.6) Is this a science-based target?

Select from:

Yes, we consider this a science-based target, but we have not committed to seek validation of this target by the Science Based Targets initiative within the next two years

(7.54.3.8) Scopes

Select all that apply

- Scope 1
- Scope 2

(7.54.3.9) Greenhouse gases covered by target

Select all that apply

- Carbon dioxide (CO2)
- Methane (CH4)
- Nitrous oxide (N2O)

(7.54.3.10) Explain target coverage and identify any exclusions

1. *General Purpose Portfolio 2. BPER's loans portfolio includes exposures to counterparties operating in sectors related to the production of aluminium; the valuation of emissions considers Scope 1, relating to direct greenhouse gas emissions, and Scope 2, relating to indirect emissions resulting from purchased electricity generation. To define the target for the Aluminium sector, the IEA NZE Aluminium Global reference scenario was used. For this scenario, only Scope 1 emissions data are publicly available (i.e. World Energy Outlook 2023, Table A.4 c); for Scope 2, emissions from electricity consumption for the aluminium sector published by the International Aluminium Institute were considered.*

(7.54.3.11) Target objective

The 2030 interim target for the Aluminium sector envisages a 24% reduction in emission intensity at portfolio level, from a base of 460 tonnes of CO2 equivalent per exposure in the sector in millions of Euro (460.49 tCO2 e/€ million) by 2023 to an average value of 350 tonnes of CO2 equivalent per exposure in the sector (350.25 tCO2 e/€ million) by 2030. The calculation of the target for the Aluminium sector 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 Net-Zero Banking Alliance.

(7.54.3.12) Do you intend to neutralize any residual emissions with permanent carbon removals at the end of the target?

Select from:

- Unsure

(7.54.3.13) Do you plan to mitigate emissions beyond your value chain?

Select from:

- No, we do not plan to mitigate emissions beyond our value chain

(7.54.3.17) Target status in reporting year

Select from:

Underway

(7.54.3.19) Process for reviewing target

As at 31 December 2024, the emission intensity decreased from 460 tCO₂ e/€ million to 262 tCO₂ e/€ million, a reduction of 43% compared to the baseline. The improvement shows an evolution in the management of financed emissions, with a decrease in both the exposure and emission profile of the counterparties in the portfolio, in line with decarbonisation targets.

Row 4

(7.54.3.1) Target reference number

Select from:

NZ4

(7.54.3.2) Date target was set

11/30/2024

(7.54.3.3) Target Coverage

Select from:

Banking (Bank)

(7.54.3.4) Targets linked to this net zero target

Select all that apply

Por4

(7.54.3.5) End date of target for achieving net zero

12/31/2049

(7.54.3.6) Is this a science-based target?

Select from:

- Yes, we consider this a science-based target, but we have not committed to seek validation of this target by the Science Based Targets initiative within the next two years

(7.54.3.8) Scopes

Select all that apply

- Scope 1
 Scope 2

(7.54.3.9) Greenhouse gases covered by target

Select all that apply

- Carbon dioxide (CO₂)
 Methane (CH₄)
 Nitrous oxide (N₂O)

(7.54.3.10) Explain target coverage and identify any exclusions

1. General Purpose Portfolio 2. For this sector, companies operating in the sectors related to the production of iron and steel were considered; the emission assessment considers Scope 1, relating to direct greenhouse gas emissions, and Scope 2, relating to indirect emissions resulting from purchased electricity generation. It should be noted that the portfolio-wide intensity, 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 CO₂e emissions per Euro of portfolio value. For the Iron and Steel sector, the IEA NZE Steel Global reference scenario was used to define the target. It should be noted that only Scope 1 emissions data are publicly available for the reference scenario (i.e. World Energy Outlook 2023, Table A.4 c), therefore, an estimate based on data made available by IEA within the World Energy Outlook 2023 was used for Scope 2.

(7.54.3.11) Target objective

The 2030 interim target for the Iron and Steel sector envisages a 27% reduction in emission intensity at portfolio level, from a base of 275 tonnes of CO₂ equivalent per exposure in the sector in millions of Euro (275.15 tCO₂ e/€ million) by 2023 to an average value of 201.27 tonnes of CO₂ equivalent per exposure in the sector by 2030. The calculation of the target for the Iron and Steel sector 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 Net-Zero Banking Alliance.

(7.54.3.12) Do you intend to neutralize any residual emissions with permanent carbon removals at the end of the target?

Select from:

Unsure

(7.54.3.13) Do you plan to mitigate emissions beyond your value chain?

Select from:

No, we do not plan to mitigate emissions beyond our value chain

(7.54.3.17) Target status in reporting year

Select from:

Underway

(7.54.3.19) Process for reviewing target

In the Iron and Steel sector, the emission intensity decreased from a baseline of 275 tCO₂ e/€ million to 180 tCO₂ e/€ million as at 31 December 2024, registering a 35% reduction due to the decrease in the emission profile of the counterparties in the portfolio.

Row 5

(7.54.3.1) Target reference number

Select from:

NZ5

(7.54.3.2) Date target was set

11/30/2024

(7.54.3.3) Target Coverage

Select from:

Banking (Bank)

(7.54.3.4) Targets linked to this net zero target

Select all that apply

Por5

(7.54.3.5) End date of target for achieving net zero

12/31/2049

(7.54.3.6) Is this a science-based target?

Select from:

Yes, we consider this a science-based target, but we have not committed to seek validation of this target by the Science Based Targets initiative within the next two years

(7.54.3.8) Scopes

Select all that apply

Scope 1

Scope 2

Scope 3

(7.54.3.9) Greenhouse gases covered by target

Select all that apply

Carbon dioxide (CO2)

Methane (CH4)

Nitrous oxide (N2O)

(7.54.3.10) Explain target coverage and identify any exclusions

1. Real Estate Portfolio 2. The Real Estate perimeter includes only loans with the purpose of purchasing real estate, distinguished by type of asset rather than by ATECO/NACE code. General Purpose loans, e.g. to companies operating in the construction sector, but without the purpose of purchasing real estate, are therefore excluded from this perimeter. This choice is in line with the NZBA's own indications and is due to the need to ensure homogeneity in the application of emission calculation methodologies and reference scenarios. Commercial real estate loans financed by BPER were therefore taken into account. For the Commercial Real

Estate sector, the reference scenario is the CRREM (Carbon Risk Real Estate Monitor). This scenario addresses the challenge of estimating the risk and uncertainty associated with real estate decarbonisation, creating a methodological body and empirically quantifying the different scenarios and their impact on investors' portfolios. The reference scenario was derived from CRREM PATHWAYS V2 data, updated to 3 March 2024. In particular, the route used considers a physical intensity of emissions (tCO₂e/m²) specific to Italy.

(7.54.3.11) Target objective

The 2030 target for the "Commercial real estate" sector envisages a 47% reduction in emission intensity at the level of financed property, from a base of 37 kilograms of CO₂ equivalent per square metre (37 kgCO₂ e/ m²) in 2023 to an average value of 19 kilograms of CO₂ equivalent per square metre (19 tCO₂ e/ m²) by 2030. Among the targets published during 2024, the emission intensity for the commercial real estate sector remained stable: 37.1 kgCO₂ / m² compared to 36.8 kgCO₂ / m² at baseline.

(7.54.3.12) Do you intend to neutralize any residual emissions with permanent carbon removals at the end of the target?

Select from:

Unsure

(7.54.3.13) Do you plan to mitigate emissions beyond your value chain?

Select from:

No, we do not plan to mitigate emissions beyond our value chain

(7.54.3.17) Target status in reporting year

Select from:

Underway

(7.54.3.19) Process for reviewing target

BPER recognises its role in supporting corporate customers through financing for sustainable real estate and the energy efficiency improvement of existing stock. However, the decarbonisation of the sector also depends on the actions of all stakeholders, including the implementation of public policies to support the energy transition, such as the EU Directive on the energy performance of buildings, which must be transposed at the national level.

[Add row]

(7.55) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

Select from:

Yes

(7.55.1) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e
Under investigation	0	`Numeric input
To be implemented	5	8240
Implementation commenced	4	966
Implemented	6	44402.86
Not to be implemented	0	`Numeric input

[Fixed row]

(7.55.2) Provide details on the initiatives implemented in the reporting year in the table below.

Row 1

(7.55.2.1) Initiative category & Initiative type

Transportation

Employee commuting

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

10.41

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

Scope 3 category 7: Employee commuting

(7.55.2.4) Voluntary/Mandatory

Select from:

Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

0

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

26840

(7.55.2.7) Payback period

Select from:

No payback

(7.55.2.8) Estimated lifetime of the initiative

Select from:

Ongoing

(7.55.2.9) Comment

The intercompany car pooling platform (Jojob) is available to employees for sharing cars between several people on the home-work-home journey, which is allowed to significantly reduce the number of cars in circulation with consequent benefits on pollution, improved social relations between people and economic savings in terms of per capita cost of fuel, oil, tires and motorway tolls. During 2024, the use of the app increased significantly, thanks to which the emission into the atmosphere of 10,414 tCO₂ was avoided (78,045 km avoided), while in In 2023, 4.1 tCO₂ were saved, for a total of 31,898 km avoided.

Row 2

(7.55.2.1) Initiative category & Initiative type

Low-carbon energy consumption

Solar PV

(7.55.2.2) Estimated annual CO₂e savings (metric tonnes CO₂e)

783.47

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

Scope 2 (market-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

512000

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

0

(7.55.2.7) Payback period

Select from:

16-20 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

Ongoing

(7.55.2.9) Comment

In 2024, the Group produced, through its plants, 1.713,81 MWh of renewable energy, recording a slight decrease of 6.3% compared to the previous year. The installed power compared to the previous year increased by 51.3 kWp, going from 2,3947 kWp to 2,446 kWp (of which active plants equal to 1,724.54 kWp and three plants installed at the Sassari offices with a total power equal to 721.87 kWp and activation expected by June 2025).

Row 3

(7.55.2.1) Initiative category & Initiative type

Energy efficiency in buildings

Building Energy Management Systems (BEMS)

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

1164.66

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

Scope 1

Scope 2 (market-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

223000

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

910169

(7.55.2.7) Payback period

Select from:

4-10 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

Ongoing

(7.55.2.9) Comment

During 2024, the BPER Group consolidated the progressive implementation of energy efficiency actions envisaged by the 2022-2030 Energy Plan. In 2024, compared to 2023, the BPER Group achieved overall reductions of 2,547 MWh.

Row 4

(7.55.2.1) Initiative category & Initiative type

Company policy or behavioral change

Other, please specify :Employee Engagement and Waste reduction

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

Scope 3 category 5: Waste generated in operations

(7.55.2.4) Voluntary/Mandatory

Select from:

Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

0

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

0

(7.55.2.7) Payback period

Select from:

No payback

(7.55.2.8) Estimated lifetime of the initiative

Select from:

Ongoing

(7.55.2.9) Comment

To reduce its direct impacts on the environment and at the same time launch efficiency and cost saving actions, the BPER Group has included in the 2022-2025 Industrial Plan several very challenging initiatives regarding the responsible management of raw materials to support the fight against climate change. In addition to the 2022-2025 Energy Plan, there was the review of the impact of the supply chain and an ambitious target of reducing the paper used by 2025, the result of which achieved at 31/12/2024 was equal to -21%. In 2024, as in 2023, 99% of the total recycled paper was used in the offices and branches, the remaining 1% has an

international certification that guarantees its origin from sustainably and responsibly managed forests. Promoting AES (Authorised Electronic Signature) and QES (Qualified Electronic Signature), saving 429.75 tons of paper in 2024 (plus 54,9% from 2023). "Arca different initiatives saved 4.73 tCO2e. BPER CARD online statements: 69% emailed, saving 37.16 tons of paper. F24 dematerialization saved 12.7 tons of paper in 2024. Mail project saved 78.5 tons of paper in 2024. "Edicola Digitale" replaced paper subscriptions with digital formats. Night-time printing blocks and fax elimination in branches. BPER Factor's WIP (Web Interactive Platform). The set of actions described above implemented with respect to its own operations, aimed at employees and customers and carried out continuously, produced a reduction of 562.90 t of paper in 2024.

Row 5

(7.55.2.1) Initiative category & Initiative type

Transportation

- Employee commuting

(7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

6

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

- Scope 3 category 7: Employee commuting

(7.55.2.4) Voluntary/Mandatory

Select from:

- Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

0

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

7320

(7.55.2.7) Payback period

Select from:

- No payback

(7.55.2.8) Estimated lifetime of the initiative

Select from:

- Ongoing

(7.55.2.9) Comment

In 2024 BPER Banca carried out the initiative “Piantiamola d’inquinare!”, with the support of the Wecity platform, in order to reduce CO₂ emissions into the atmosphere. The initiative – now in its fourth edition – involved 208 employees, distributed across the Group’s various branches, who for three months went to work by bicycle, on foot or by scooter for a total of almost 42 thousand km travelled, thus reducing almost 6 tons of CO₂, equal to the result produced by 839 adult trees in a year in their photosynthesis work. For each trip, the Wecity app calculated the CO₂ saved (1 kg every 7 kilometres travelled approximately) and created a ranking based on this value. The initiative integrated well with the various initiatives included in the “European Sustainable Mobility Week” (16-22 September 2024).

Row 6

(7.55.2.1) Initiative category & Initiative type

Low-carbon energy consumption

- Low-carbon electricity mix

(7.55.2.2) Estimated annual CO₂e savings (metric tonnes CO₂e)

41850.47

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

- Scope 2 (market-based)

(7.55.2.4) Voluntary/Mandatory

Select from:

Voluntary

(7.55.2.5) Annual monetary savings (unit currency – as specified in 1.2)

0

(7.55.2.6) Investment required (unit currency – as specified in 1.2)

323000

(7.55.2.7) Payback period

Select from:

No payback

(7.55.2.8) Estimated lifetime of the initiative

Select from:

Ongoing

(7.55.2.9) Comment

*In 2024, all BPER Group companies purchased and consumed 100% green electricity covered by GO (Guarantees of Origin) for a total consumption of 95,947 MWh.
[Add row]*

(7.55.3) What methods do you use to drive investment in emissions reduction activities?

Row 1

(7.55.3.1) Method

Select from:

- Dedicated budget for energy efficiency

(7.55.3.2) Comment

During the course of 2024 the BPER Group has consolidated the gradual implementation of the energy efficiency measures foreseen by the 2022-2030 Energy Plan. The BPER Group achieved an overall reduction of 2,547 MWh in 2024 compared to 2023. The 2022-2025 Business Plan includes ambitious initiatives to cut direct emissions (Scope 1) by 50.2% by 2030 and to increase the use of renewable energy. The target for reducing emissions by 23% initially to reach by the end of 2025 was obtained one year before at 2024. The goal is to reduce CO2 emissions to 7,143.9 tCO2e by 2030 from 14,345 tCO2e in 2021, through actions outlined in three successive Business Plans. Specific actions in the 2022-2025 Energy Plan include: Conversion of gas-fired generators to heat pumps. Electrification of the car fleet. A gas leakage research platform. Optimization of office space use. Centralized BEMS management with AI algorithms. Expansion of the BEMS control and monitoring systems. Implementation of BEMS control and monitoring systems in management centers. Furthermore, 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. Another certification that attests to the environmental sustainability of the properties was obtained for the office building in Ancona via Stamira. This property obtained the LEED certification which attests to the level of sustainability of a building with reference to the entire life cycle. In 2024, BPER Banca signed a PPA (Power Purchase Agreement) for the multi-year (seven years) supply of electricity from renewable sources (photovoltaic) with the issuance of Guarantees of Origin from 1 January 2025. Following its membership, BPER Banca set decarbonisation targets for its portfolios on five 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: Power generation, Oil and Gas, Iron and Steel, Aluminium and Commercial Real Estate.

Row 2

(7.55.3.1) Method

Select from:

- Employee engagement

(7.55.3.2) Comment

In 2024, the Group implemented employee listening and engagement initiatives to enhance engagement, promote corporate culture and values, and support business objectives. In July 2024, on behalf of the CEO and with support from HR and Internal Communication, the Group launched the "People Survey 2024 | Where listening begins, the future begins": an internal climate survey with 67 statements and 2 open-ended questions to assess employee well-being, gather feedback, identify critical issues, and define improvement actions. On environmental responsibility, all employees were asked: "Is the Group doing a good job of promoting environmental responsibility?" Several sustainable mobility initiatives involved employees directly: An inter-company carpooling platform (Jojob) for home-work commutes significantly reduced emissions. In 2024, 10.4 tCO₂ and 78,045 km were saved, compared to 4.1 tCO₂ and 31,898 km in 2023. 18 Home-Work Commute Plans were approved in 2024 for sites with over 100 employees, as required by Italian Law 77/2020. An e-bike sharing service has been available at several branches

and at the Modena HQ since 2023. A daily corporate shuttle now connects Modena Railway Station to the HQ, encouraging public transport use and reducing GHG emissions. BPER Banca also promoted environmental awareness through various initiatives: “Piantiamola” (Let’s plant it): a dedicated intranet section for environmental actions and sustainability projects. Installation of water dispensers at main offices to reduce plastic use. An Energy Saving Handbook, shared on the intranet, encourages behaviors to optimize energy consumption (e.g., lighting, air conditioning). “Piantiamola di inquinare!” (Let’s stop polluting!), in partnership with Wecity: 208 employees cycled, walked, or used scooters for commuting, covering 42,000 km and avoiding 6 tCO₂, tracked by the Wecity app, aligning with the European Sustainable Mobility Week. Participation in “M’illumino di Meno 2024”, with lights switched off at HQ and 650 branches for one night. In addition, BPER Banca provided training on the ISO 14001 and 50001 environmental and energy management systems for all employees operating in the 20 certified sites. This contributed to energy efficiency projects within the 2022-2030 Energy Plan, targeting a 50% reduction in Scope 1 emissions by 2030.

Row 3

(7.55.3.1) Method

Select from:

Dedicated budget for other emissions reduction activities

(7.55.3.2) Comment

BPER Group advanced its energy efficiency measures outlined in the 2022-2030 Energy Plan, aiming to reduce emissions in line with the Paris Agreement. During the course of 2024 the BPER Group has consolidated the gradual implementation of the energy efficiency measures foreseen by the 2022-2030 Energy Plan. The BPER Group achieved an overall reduction of 2,547 MWh in 2024 compared to 2023. The 2022-2025 Business Plan includes ambitious initiatives to cut direct emissions (Scope 1) by 50.2% by 2030 and to increase the use of renewable energy. The target for reducing emissions by 23% initially to reach by the end of 2025 was obtained one year before at 2024. The goal is to reduce CO₂ emissions to 7,143.9 tCO₂e by 2030 from 14,345 tCO₂e in 2021, through actions outlined in three successive Business Plans. Specific actions in the 2022-2025 Energy Plan include: Conversion of gas-fired generators to heat pumps. Electrification of the car fleet. A gas leakage research platform. Optimization of office space use. Centralized BEMS management with AI algorithms. Expansion of the BEMS control and monitoring systems. Implementation of BEMS control and monitoring systems in management centers. Furthermore, 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. Another certification that attests to the environmental sustainability of the properties was obtained for the office building in Ancona via Stamira. This property obtained the LEED certification which attests to the level of sustainability of a building with reference to the entire life cycle. In 2024, BPER Banca signed a PPA (Power Purchase Agreement) for the multi-year (seven years) supply of electricity from renewable sources (photovoltaic) with the issuance of Guarantees of Origin from 1 January 2025. Following its membership, BPER Banca set decarbonisation targets for its portfolios on five 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.

[Add row]

(7.79) Has your organization retired any project-based carbon credits within the reporting year?

Select from:

Yes

(7.79.1) Provide details of the project-based carbon credits retired by your organization in the reporting year.

Row 1

(7.79.1.1) Project type

Select from:

Energy efficiency: households

(7.79.1.2) Type of mitigation activity

Select from:

Emissions reduction

(7.79.1.3) Project description

Through its parent company BPER Banca and Banca Cesare Ponti, the BPER Group carries out projects to offset CO2 emissions generated in relation to corporate mobility. This initiative provides funding for climate change mitigation projects in partnership with DKV Euro service. More specifically, through the use of the eco-friendly DKV CARD CLIMATE fuel card, the offsetting of fleet emissions is certified for every litre of fuel purchased. In fact, BPER Banca and Banca Cesare Ponti invest an additional contribution in Myclimate-certified offsetting projects. The non-profit organisation Myclimate is one of the main providers of offsetting measures and satisfies the most stringent standards (CDM - Clean Development Mechanism, Gold Standard and Plan Vivo). The financial contribution raised goes to support three Myclimate climate protection projects that are Gold Standard certified. Of the three projects in question, two relate to energy efficiency projects and one to access to water. See the details below: • installation of solar plants in the Dominican Republic; • financing for the purchase of efficient stoves in Kenya; • funding for the development of modern water filtration technology for families and schools through the drinking water project in Uganda.

(7.79.1.4) Credits retired by your organization from this project in the reporting year (metric tons CO2e)

2322.74

(7.79.1.5) Purpose of retirement

Select from:

Voluntary offsetting

(7.79.1.6) Are you able to report the vintage of the credits at retirement?

Select from:

- Yes

(7.79.1.7) Vintage of credits at retirement

2024

(7.79.1.8) Were these credits issued to or purchased by your organization?

Select from:

- Purchased

(7.79.1.9) Carbon-crediting program by which the credits were issued

Select from:

- Gold Standard

(7.79.1.10) Method the program uses to assess additionality for this project

Select all that apply

- Other, please specify :Positive Lists

(7.79.1.11) Approaches by which the selected program requires this project to address reversal risk

Select all that apply

- No risk of reversal

(7.79.1.12) Potential sources of leakage the selected program requires this project to have assessed

Select all that apply

- Upstream/downstream emissions
- Activity-shifting
- Market leakage

Ecological leakage

(7.79.1.13) Provide details of other issues the selected program requires projects to address

DKV my Climate Card is relying on an international carbon credit certification scheme, "Gold Standard". This is one of the major carbon credit programs. It has a high level of credibility based on the methodology taken in accounting and assessment of the projects.

(7.79.1.14) Please explain

BPER Banca SPA offset a total of 2,322.74 tons of CO2e for 2024 using DKV Myclimate card services. Below are the detailed responses to the requested information about this project. The responsibility for carbon credit purchases within BPER Banca falls to the sustainability team. The selection of these projects is based on rigorous sustainability and environmental impact criteria. Independent verification by third party body ensures that the tracked emissions and related offsets comply with the Greenhouse Gas Protocol standards. For more details on project selection, you can visit Myclimate dedicated site on Climate projects. In summary, the BPER Banca offsetting project through DKV My Climate card represents a significant commitment to reducing greenhouse gas emissions, supported by independent verification and stringent selection criteria.

[Add row]

C12. Environmental performance - Financial Services

(12.1) Does your organization measure the impact of your portfolio on the environment?

Banking (Bank)

(12.1.1) We measure the impact of our portfolio on the climate

Select from:

Yes

(12.1.2) Disclosure metric

Select all that apply

Financed emissions

Other carbon footprinting and/or exposure metrics (as defined by TCFD)

(12.1.5) We measure the impact of our portfolio on forests

Select from:

No, and we do not plan to do so in the next two years

(12.1.6) Primary reason for not measuring portfolio impact on forests

Select from:

Lack of tools or methodologies available

(12.1.7) Explain why your organization does not measure its portfolio impact on forests

BPER Group has focused efforts on climate change in line with overall market maturity and available data and methodology. The Group reassesses on a periodic basis the relevance of additional environmental factors and the feasibility of their integration in the risk and impact framework.

(12.1.8) We measure the impact of our portfolio on water

Select from:

No, and we do not plan to do so in the next two years

(12.1.9) Primary reason for not measuring portfolio impact on water

Select from:

Lack of tools or methodologies available

(12.1.10) Explain why your organization does not measure its portfolio impact on water

BPER Group has focused efforts on climate change in line with overall market maturity and available data and methodology. The Group reassesses on a periodic basis the relevance of additional environmental factors and the feasibility of their integration in the risk and impact framework.

(12.1.11) We measure the impact of our portfolio on biodiversity

Select from:

No, and we do not plan to do so in the next two years

(12.1.12) Primary reason for not measuring portfolio impact on biodiversity

Select from:

Lack of tools or methodologies available

(12.1.13) Explain why your organization does not measure its portfolio impact on biodiversity

BPER Group has focused efforts on climate change in line with overall market maturity and available data and methodology. The Group reassesses on a periodic basis the relevance of additional environmental factors and the feasibility of their integration in the risk and impact framework.

Investing (Asset manager)

(12.1.1) We measure the impact of our portfolio on the climate

Select from:

Yes

(12.1.2) Disclosure metric

Select all that apply

- Financed emissions

(12.1.5) We measure the impact of our portfolio on forests

Select from:

- No, and we do not plan to do so in the next two years

(12.1.6) Primary reason for not measuring portfolio impact on forests

Select from:

- Lack of tools or methodologies available

(12.1.7) Explain why your organization does not measure its portfolio impact on forests

BPER Group has focused efforts on climate change in line with overall market maturity and available data and methodology. The Group reassesses on a periodic basis the relevance of additional environmental factors and the feasibility of their integration in the risk and impact framework.

(12.1.8) We measure the impact of our portfolio on water

Select from:

- No, and we do not plan to do so in the next two years

(12.1.9) Primary reason for not measuring portfolio impact on water

Select from:

- Lack of tools or methodologies available

(12.1.10) Explain why your organization does not measure its portfolio impact on water

BPER Group has focused efforts on climate change in line with overall market maturity and available data and methodology. The Group reassesses on a periodic basis the relevance of additional environmental factors and the feasibility of their integration in the risk and impact framework.

(12.1.11) We measure the impact of our portfolio on biodiversity

Select from:

- No, but we plan to do so in the next two years

(12.1.12) Primary reason for not measuring portfolio impact on biodiversity

Select from:

- Lack of tools or methodologies available

(12.1.13) Explain why your organization does not measure its portfolio impact on biodiversity

BPER Group has focused efforts on climate change in line with overall market maturity and available data and methodology. The Group reassesses on a periodic basis the relevance of additional environmental factors and the feasibility of their integration in the risk and impact framework.

[Fixed row]

(12.1.1) Provide details of your organization's financed emissions in the reporting year and in the base year.

Banking (Bank)

(12.1.1.1) Asset classes covered in the calculation

Select all that apply

- Loans
- Equity investments
- Other, please specify :Securities

(12.1.1.2) Financed emissions (metric unit tons CO2e) in the reporting year

68916626

(12.1.1.3) % of portfolio covered in relation to total portfolio value

71.26

(12.1.1.4) Total value of assets included in the financed emissions calculation

92414952637.00

(12.1.1.5) % of financed emissions calculated using data obtained from clients/investees (optional)

1

(12.1.1.6) Emissions calculation methodology

Select from:

The Global GHG Accounting and Reporting Standard for the Financial Industry (PCAF)

(12.1.1.7) Weighted data quality score (for PCAF-aligned data quality scores only)

2

(12.1.1.8) Financed emissions (metric unit tons CO2e) in the base year

68916626

(12.1.1.9) Base year end

12/30/2024

(12.1.1.10) % of undrawn loan commitments included in the financed emissions calculation

0

(12.1.1.11) Please explain the details of and assumptions used in your calculation

With reference to the accounting year 2024, following the broadening of the accounting perimeter (exposure: Euro 92,41 billion) of the counterparties, the value of financed emissions equals the sum of 65,208,729 tCO2 e, ascribable to General Purpose Loans, and 879,347 tCO2 e, ascribable to loans for real estate purchases (subdivided between commercial and residential properties, in line with PCAF standards), and 13,264 tCO2 e, ascribable to Investment in Subsidiaries. The loan portfolio carbon footprint was calculated on the Bank data updated to 31 December 2024, including the following Group Legal Entities: BPER Banca, Banco di Sardegna, Sardaleasing, BPER Factor and Bibanca. The securities portfolio analysis included approximately 1500 securities in the portfolio that referred to four legal

entities of the Group (BPER Banca, Banco di Sardegna, BPER Bank Luxemburg, Sardaleasing and Banca Cesare Ponti). The value of the exposures included in the analyses amounts to approximately 90% of the Group's securities portfolio (excluding government bonds and intra-group exposures from the calculation); for the remaining portion of securities exposures (approx. 15% of the securities in the portfolio, in terms of Euro value), the information, to be acquired via the qualified infoprovider, and needed to apply the methodology adopted to calculate financed emissions is not available. The securities portfolio analysed, net of the exclusions indicated (government securities, supranational issuers and intra-group exposures and companies for which the data necessary for the application of the methodology are not available), consists of approximately 950 issuers, for which the Bank has information and data from a qualified infoprovider in order to calculate the financed emissions on the basis of the methodology adopted. The counterparties excluded from the analysis are those for which the information necessary for its application is not available.

Investing (Asset manager)

(12.1.1.1) Asset classes covered in the calculation

Select all that apply

- Bonds
- Equity investments
- Fixed income

(12.1.1.2) Financed emissions (metric unit tons CO2e) in the reporting year

2420348

(12.1.1.3) % of portfolio covered in relation to total portfolio value

80

(12.1.1.4) Total value of assets included in the financed emissions calculation

148742039200.00

(12.1.1.5) % of financed emissions calculated using data obtained from clients/investees (optional)

0

(12.1.1.6) Emissions calculation methodology

Select from:

GHG Protocol: A Corporate Accounting and Reporting Standard

(12.1.1.8) Financed emissions (metric unit tons CO2e) in the base year

1961150

(12.1.1.9) Base year end

12/30/2024

(12.1.1.10) % of undrawn loan commitments included in the financed emissions calculation

0

(12.1.1.11) Please explain the details of and assumptions used in your calculation

The financed emissions are calculated for the funds and portfolios managed by the Asset management subsidiaries of BPER Group, Banca Cesare Ponti, Banco di Sardegna and ARCA SGR as well as BPER Banca, based on the data collected for the disclosure on Principal Adverse Impact drafted in accordance with art. 4 of EU SFDR. The coverage data is computed on the basis of the coverage of GHG emissions attained by individual subsidiaries for the applicable portfolio (i.e. investments in corporate issuers and securities), weighted by the respective value of AUM of the portfolio managed by each subsidiary.

[Fixed row]

(12.1.3) Provide details of the other metrics used to track the impact of your portfolio on the environment.

Climate change

(12.1.3.1) Portfolio

Select from:

Banking (Bank)

(12.1.3.2) Portfolio metric

Select from:

Carbon intensity (tCO2e/Million revenue)

(12.1.3.3) Metric value in the reporting year

0.009

(12.1.3.4) % of portfolio covered in relation to total portfolio value

71.26

(12.1.3.5) Total value of assets included in the calculation

92408517619

(12.1.3.6) % of emissions calculated using data obtained from clients/investees

1

(12.1.3.7) Please explain the details and key assumptions used in your assessment

The carbon intensity is calculated by weighting the total emissions for the Banking portfolio (Scope 3, cat 15 GHG protocol) by the revenues disclosed as per ESRS E1-6 of the annual report.

[Add row]

(12.2) Are you able to provide a breakdown of your organization's financed emissions and other portfolio carbon footprinting metrics?

Banking (Bank)

(12.2.1) Portfolio breakdown

Select all that apply

Yes, by asset class

Yes, by industry

Yes, by scope

Investing (Asset manager)

(12.2.1) Portfolio breakdown

Select all that apply

Yes, by scope

(12.2.2) Please explain why you do not provide a breakdown of your portfolio impact on the climate

The nature of investments, made in part in alternative funds or in other asset classes, does not provide for a direct breakdown of the AUM according to the categories provided for reporting.

[Fixed row]

(12.2.1) Break down your organization's financed emissions and other portfolio carbon footprinting metrics by asset class, by industry, and/or by scope.

Row 1

(12.2.1.1) Portfolio

Select from:

Investing (Asset manager)

(12.2.1.2) Portfolio metric

Select from:

Absolute portfolio emissions (tCO2e)

(12.2.1.5) Clients'/investees' scope

Select from:

Scope 1

(12.2.1.7) Value of assets covered in the calculation

4536061542

(12.2.1.8) Financed emissions or alternative metric

404636

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

Not applicable

(12.2.1.12) Please explain the details, assumptions and exclusions in your calculation

The financed emissions are calculated for the funds and portfolios managed by the Asset management subsidiaries of BPER Group, Banca Cesare Ponti and ARCA SGR, based on the data collected for the disclosure on Principal Adverse Impact (PAI) drafted in accordance with art. 4 of EU SFDR. The coverage data is computed on the basis of the coverage of GHG emissions attained by individual subsidiaries for the applicable portfolio (i.e. investments in corporate issuers and securities), weighted by the respective value of AUM of the portfolio managed by each subsidiary. Breakdown by Scope 1, 2 and 3 emissions is based on client data obtained through dedicated data provisions sources as part of the PAI disclosure process.

Row 2

(12.2.1.1) Portfolio

Select from:

Investing (Asset manager)

(12.2.1.2) Portfolio metric

Select from:

Absolute portfolio emissions (tCO2e)

(12.2.1.5) Clients'/investees' scope

Select from:

Scope 2

(12.2.1.7) Value of assets covered in the calculation

4536061542

(12.2.1.8) Financed emissions or alternative metric

52794

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

Not applicable

(12.2.1.12) Please explain the details, assumptions and exclusions in your calculation

The financed emissions are calculated for the funds and portfolios managed by the Asset management subsidiaries of BPER Group, Banca Cesare Ponti and ARCA SGR, based on the data collected for the disclosure on Principal Adverse Impact (PAI) drafted in accordance with art. 4 of EU SFDR. The coverage data is computed on the basis of the coverage of GHG emissions attained by individual subsidiaries for the applicable portfolio (i.e. investments in corporate issuers and securities), weighted by the respective value of AUM of the portfolio managed by each subsidiary. Breakdown by Scope 1, 2 and 3 emissions is based on client data obtained through dedicated data provisions sources as part of the PAI disclosure process.

Row 3

(12.2.1.1) Portfolio

Select from:

Investing (Asset manager)

(12.2.1.2) Portfolio metric

Select from:

Absolute portfolio emissions (tCO2e)

(12.2.1.5) Clients'/investees' scope

Select from:

Scope 3

(12.2.1.7) Value of assets covered in the calculation

4536061542

(12.2.1.8) Financed emissions or alternative metric

1962917

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

Not applicable

(12.2.1.12) Please explain the details, assumptions and exclusions in your calculation

The financed emissions are calculated for the funds and portfolios managed by the Asset management subsidiaries of BPER Group, Banca Cesare Ponti and ARCA SGR, based on the data collected for the disclosure on Principal Adverse Impact (PAI) drafted in accordance with art. 4 of EU SFDR. The coverage data is computed on the basis of the coverage of GHG emissions attained by individual subsidiaries for the applicable portfolio (i.e. investments in corporate issuers and securities), weighted by the respective value of AUM of the portfolio managed by each subsidiary. Breakdown by Scope 1, 2 and 3 emissions is based on client data obtained through dedicated data provisions sources as part of the PAI disclosure process.

Row 4

(12.2.1.1) Portfolio

Select from:

Banking (Bank)

(12.2.1.2) Portfolio metric

Select from:

Absolute portfolio emissions (tCO2e)

(12.2.1.5) Clients'/investees' scope

Select from:

Scope 1

(12.2.1.7) Value of assets covered in the calculation

49241404384

(12.2.1.8) Financed emissions or alternative metric

1791136

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

No

(12.2.1.12) Please explain the details, assumptions and exclusions in your calculation

Figures disclosed include General purpose lending to corporate borrowers and Treasury investments in corporate issuers; financed emissions is calculated using the standard attribution factor in line with the PCAF methodology for the relevant asset classes. Exposures in mortgages are excluded from the breakdown as they are computed on the basis of emission factors published by PCAF, which do not provide for separate data on Scope 1, 2 and 3 emissions of buildings.

Row 5

(12.2.1.1) Portfolio

Select from:

Banking (Bank)

(12.2.1.2) Portfolio metric

Select from:

Absolute portfolio emissions (tCO2e)

(12.2.1.5) Clients'/investees' scope

Select from:

Scope 2

(12.2.1.7) Value of assets covered in the calculation

49241404384

(12.2.1.8) Financed emissions or alternative metric

715550

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

No

(12.2.1.12) Please explain the details, assumptions and exclusions in your calculation

Figures disclosed include General purpose lending to corporate borrowers and Treasury investments in corporate issuers; financed emissions is calculated using the standard attribution factor in line with the PCAF methodology for the relevant asset classes. Exposures in mortgages are excluded from the breakdown as they are computed on the basis of emission factors published by PCAF, which do not provide for separate data on Scope 1, 2 and 3 emissions of buildings.

Row 6

(12.2.1.1) Portfolio

Select from:

Banking (Bank)

(12.2.1.2) Portfolio metric

Select from:

Absolute portfolio emissions (tCO2e)

(12.2.1.5) Clients'/investees' scope

Select from:

Scope 3

(12.2.1.7) Value of assets covered in the calculation

49241404384

(12.2.1.8) Financed emissions or alternative metric

63689329

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

No

(12.2.1.12) Please explain the details, assumptions and exclusions in your calculation

Figures disclosed include General purpose lending to corporate borrowers and Treasury investments in corporate issuers; financed emissions is calculated using the standard attribution factor in line with the PCAF methodology for the relevant asset classes. Exposures in mortgages are excluded from the breakdown as they are computed on the basis of emission factors published by PCAF, which do not provide for separate data on Scope 1, 2 and 3 emissions of buildings.

Row 7

(12.2.1.1) Portfolio

Select from:

Banking (Bank)

(12.2.1.2) Portfolio metric

Select from:

Absolute portfolio emissions (tCO2e)

(12.2.1.3) Industry

Select from:

Food, beverage & agriculture

(12.2.1.7) Value of assets covered in the calculation

2996977550

(12.2.1.8) Financed emissions or alternative metric

5835409

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

No

(12.2.1.12) Please explain the details, assumptions and exclusions in your calculation

Figures disclosed cover the emissions for the Agriculture sector, based on the economic activities selected as part of the target setting performed in line with the Group's Net Zero Banking Alliance commitment.

Row 8

(12.2.1.1) Portfolio

Select from:

Banking (Bank)

(12.2.1.2) Portfolio metric

Select from:

Absolute portfolio emissions (tCO2e)

(12.2.1.3) Industry

Select from:

Materials

(12.2.1.7) Value of assets covered in the calculation

595013152

(12.2.1.8) Financed emissions or alternative metric

2682483

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

No

(12.2.1.12) Please explain the details, assumptions and exclusions in your calculation

Figures disclosed cover the emissions for the Iron and Aluminum sectors, based on the economic activities selected as part of the target setting performed in line with the Group's Net Zero Banking Alliance commitment.

Row 9

(12.2.1.1) Portfolio

Select from:

Banking (Bank)

(12.2.1.2) Portfolio metric

Select from:

Absolute portfolio emissions (tCO2e)

(12.2.1.3) Industry

Select from:

Fossil Fuels

(12.2.1.7) Value of assets covered in the calculation

770851105

(12.2.1.8) Financed emissions or alternative metric

6100169

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

No

(12.2.1.12) Please explain the details, assumptions and exclusions in your calculation

Figures disclosed cover the emissions for the Oil & Gas sector, based on the economic activities selected as part of the target setting performed in line with the Group's Net Zero Banking Alliance commitment.

Row 10

(12.2.1.1) Portfolio

Select from:

Banking (Bank)

(12.2.1.2) Portfolio metric

Select from:

Absolute portfolio emissions (tCO2e)

(12.2.1.3) Industry

Select from:

Power generation

(12.2.1.7) Value of assets covered in the calculation

483762179

(12.2.1.8) Financed emissions or alternative metric

95023

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

No

(12.2.1.12) Please explain the details, assumptions and exclusions in your calculation

Figures disclosed cover the emissions for the Power Generation sector, based on the economic activities selected as part of the target setting performed in line with the Group's Net Zero Banking Alliance commitment.

Row 11

(12.2.1.1) Portfolio

Select from:

Banking (Bank)

(12.2.1.2) Portfolio metric

Select from:

Absolute portfolio emissions (tCO2e)

(12.2.1.3) Industry

Select from:

Infrastructure

(12.2.1.7) Value of assets covered in the calculation

1334718558

(12.2.1.8) Financed emissions or alternative metric

173274

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

No

(12.2.1.12) Please explain the details, assumptions and exclusions in your calculation

Figures disclosed cover the emissions for the Commercial Real Estate sector, based on the economic activities selected as part of the target setting performed in line with the Group's Net Zero Banking Alliance commitment.

Row 12

(12.2.1.1) Portfolio

Select from:

Banking (Bank)

(12.2.1.2) Portfolio metric

Select from:

Absolute portfolio emissions (tCO2e)

(12.2.1.4) Asset class

Select from:

Bonds

(12.2.1.6) % of asset class emissions calculated in the reporting year based on total value of assets

90

(12.2.1.7) Value of assets covered in the calculation

7716969863

(12.2.1.8) Financed emissions or alternative metric

987290

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

No

(12.2.1.12) Please explain the details, assumptions and exclusions in your calculation

The emissions disclosed are associated with own investments made as part of the Group's capital management, and are calculated in line with the relevant PCAF methodology.

Row 13

(12.2.1.1) Portfolio

Select from:

Banking (Bank)

(12.2.1.2) Portfolio metric

Select from:

Absolute portfolio emissions (tCO2e)

(12.2.1.4) Asset class

Select from:

Loans

(12.2.1.6) % of asset class emissions calculated in the reporting year based on total value of assets

93

(12.2.1.7) Value of assets covered in the calculation

70116776968

(12.2.1.8) Financed emissions or alternative metric

66088076

(12.2.1.9) Are you able to provide the gross exposure for your undrawn loan commitment separately from the drawn loan commitment?

Select from:

No

(12.2.1.12) Please explain the details, assumptions and exclusions in your calculation

The emissions disclosed are associated with loans outstanding in the reporting period, and are calculated in line with the relevant PCAF methodology for.
[Add row]

(12.3) State the values of your financing and insurance of fossil fuel assets in the reporting year.

Lending to all fossil fuel assets

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

290726353

(12.3.3) New loans advanced in reporting year (unit currency – as specified 1.2)

0

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0.1

(12.3.6) Details of calculation

Exposures for each sector were calculated selecting specific economic activities based on NACE code, excluding distribution and wholesale of products. The new loans were calculated based on the inception date of individual loans, selecting those that were issued after the start of the reporting period. The % of portfolio exposure was calculated as a ratio to applicable loan portfolio (general purpose lending to non-financial corporations).

Lending to thermal coal

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

0

(12.3.3) New loans advanced in reporting year (unit currency – as specified 1.2)

0

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0

(12.3.6) Details of calculation

Exposures for each sector were calculated selecting specific economic activities based on NACE code, excluding distribution and wholesale of products. The new loans were calculated based on the inception date of individual loans, selecting those that were issued after the start of the reporting period. The % of portfolio exposure was calculated as a ratio to applicable loan portfolio (general purpose lending to non-financial corporations).

Lending to met coal

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

644511

(12.3.3) New loans advanced in reporting year (unit currency – as specified 1.2)

0

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0

(12.3.6) Details of calculation

Exposures for each sector were calculated selecting specific economic activities based on NACE code, excluding distribution and wholesale of products. The new loans were calculated based on the inception date of individual loans, selecting those that were issued after the start of the reporting period. The % of portfolio exposure was calculated as a ratio to applicable loan portfolio (general purpose lending to non-financial corporations).

Lending to oil

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

290081842

(12.3.3) New loans advanced in reporting year (unit currency – as specified 1.2)

127140782

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0.1

(12.3.6) Details of calculation

Exposures for each sector were calculated selecting specific economic activities based on NACE code, excluding distribution and wholesale of products. The new loans were calculated based on the inception date of individual loans, selecting those that were issued after the start of the reporting period. The % of portfolio exposure was calculated as a ratio to applicable loan portfolio (general purpose lending to non-financial corporations).

Lending to gas

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

Yes

(12.3.2) Value of the fossil fuel assets in your portfolio (unit currency - as specified in 1.2)

0

(12.3.3) New loans advanced in reporting year (unit currency – as specified 1.2)

0

(12.3.5) % of portfolio value comprised of fossil fuel assets to total portfolio value in reporting year

0

(12.3.6) Details of calculation

Exposures for each sector were calculated selecting specific economic activities based on NACE code, excluding distribution and wholesale of products. The new loans were calculated based on the inception date of individual loans, selecting those that were issued after the start of the reporting period. The % of portfolio exposure was calculated as a ratio to applicable loan portfolio (general purpose lending to non-financial corporations).

Investing in all fossil fuel assets (Asset manager)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

No, but we plan to report our portfolio's exposure to fossil fuel in the next two years

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

Select from:

- No standardized procedure

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

While the breakdown for asset under management by economic sectors is available and supports Principal Adverse Impacts disclosure in line with SFDR requirements, it is not currently feasible to rework the calculations to select the specific economic activities required; BPER Group is preparing to refine available data breakdown to fit the calculation for the future reporting periods.

Investing in thermal coal (Asset manager)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

- No, but we plan to report our portfolio's exposure to fossil fuel in the next two years

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

Select from:

- No standardized procedure

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

While the breakdown for asset under management by economic sectors is available and supports Principal Adverse Impacts disclosure in line with SFDR requirements, it is not currently feasible to rework the calculations to select the specific economic activities required; BPER Group is preparing to refine available data breakdown to fit the calculation for the future reporting periods.

Investing in met coal (Asset manager)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

- No, but we plan to report our portfolio's exposure to fossil fuel in the next two years

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

Select from:

- No standardized procedure

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

While the breakdown for asset under management by economic sectors is available and supports Principal Adverse Impacts disclosure in line with SFDR requirements, it is not currently feasible to rework the calculations to select the specific economic activities required; BPER Group is preparing to refine available data breakdown to fit the calculation for the future reporting periods.

Investing in oil (Asset manager)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

- No, but we plan to report our portfolio's exposure to fossil fuel in the next two years

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

Select from:

- No standardized procedure

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

While the breakdown for asset under management by economic sectors is available and supports Principal Adverse Impacts disclosure in line with SFDR requirements, it is not currently feasible to rework the calculations to select the specific economic activities required; BPER Group is preparing to refine available data breakdown to fit the calculation for the future reporting periods.

Investing in gas (Asset manager)

(12.3.1) Reporting values of the financing and/or insurance of fossil fuel assets

Select from:

- No, but we plan to report our portfolio's exposure to fossil fuel in the next two years

(12.3.7) Primary reason for not providing values of the financing and/or insurance to fossil fuel assets

Select from:

- No standardized procedure

(12.3.8) Please explain why you are not providing values of the financing and/or insurance to fossil fuel assets

While the breakdown for asset under management by economic sectors is available and supports Principal Adverse Impacts disclosure in line with SFDR requirements, it is not currently feasible to rework the calculations to select the specific economic activities required; BPER Group is preparing to refine available data breakdown to fit the calculation for the future reporting periods.

[Fixed row]

(12.4) Does your organization provide finance and/or insurance to companies in the commodity value chain? If so, for each commodity and portfolio, state the values of your financing and/or insurance in the reporting year.

Lending to companies operating in the timber products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

- Unknown

Lending to companies operating in the palm oil value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

- Unknown

Lending to companies operating in the cattle products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Lending to companies operating in the soy value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Lending to companies operating in the rubber value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Lending to companies operating in the cocoa value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Lending to companies operating in the coffee value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Investing (asset manager) to companies operating in the timber products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Investing (asset manager) to companies operating in the palm oil value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Investing (asset manager) to companies operating in the cattle products value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Investing (asset manager) to companies operating in the soy value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Investing (asset manager) to companies operating in the rubber value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Investing (asset manager) to companies operating in the cocoa value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

Investing (asset manager) to companies operating in the coffee value chain

(12.4.1) Finance or insurance provided to companies operating in the value chain for this commodity

Select from:

Unknown

[Fixed row]

(12.5) In the reporting year, did your organization finance and/or insure activities or sectors that are aligned with, or eligible under, a sustainable finance taxonomy? If so, are you able to report the values of that financing and/or underwriting?

Banking (Bank)

(12.5.1) Reporting values of the financing and/or insurance of activities or sectors that are eligible under or aligned with a sustainable finance taxonomy

Select from:

Yes

(12.5.2) Taxonomy under which portfolio alignment is being reported

Select from:

EU Taxonomy for Sustainable Activities

(12.5.3) Total assets in your portfolio (unit currency as selected in 1.2)

129686995000.00

(12.5.4) Total assets covered in the calculation of the taxonomy KPIs in the reporting year

114671320302.85

(12.5.5) Total assets excluded from the calculation of your alignment KPIs in the reporting year

27786174760.21

(12.5.6) Aligned assets based on turnover of investees in the reporting year (unit currency as selected in 1.2)

3233603427.38

(12.5.7) Share of aligned assets based on turnover of investees out of total assets in the reporting year

2.8

(12.5.8) Eligible assets based on turnover of investees in the reporting year

37900274420.48

(12.5.9) Share of eligible assets based on turnover of investees in the reporting year out of total assets in the reporting year

33.1

(12.5.10) Aligned assets based on CAPEX of investees in the reporting year (unit currency as selected in 1.2)

3455573033.37

(12.5.11) Share of aligned assets based on CAPEX of investees out of total asset in the reporting year

3

(12.5.12) Eligible assets based on CAPEX of investees in the reporting year

38026025167.36

(12.5.13) Share of eligible assets based on CAPEX of investees out of total asset in the reporting year

33.2

(12.5.14) Share of aligned assets contributing to climate change mitigation based on turnover of investees in the reporting year

2.7

(12.5.15) Share of aligned assets contributing to climate change mitigation that is transitional based on turnover of investees in the reporting year

0.1

(12.5.16) Share of aligned assets contributing to climate change mitigation that is enabling based on turnover of investees in the reporting year

0.4

(12.5.17) Share of aligned assets contributing to climate change adaptation based on turnover of investees in the reporting year

0

(12.5.18) Share of aligned assets contributing to climate change adaptation that is adapted based on turnover of investees in the reporting year

0

(12.5.19) Share of aligned assets contributing to climate change adaptation that is enabling based on turnover of investees in the reporting year

0

(12.5.20) Share of aligned assets contributing to climate change mitigation based on CAPEX of investees in the reporting year

2.9

(12.5.21) Share of aligned assets contributing to climate change mitigation that is transitional based on CAPEX of investees in the reporting year

0

(12.5.22) Share of aligned assets contributing to climate change mitigation that is enabling based on CAPEX of investees in the reporting year

0.5

(12.5.23) Share of aligned assets contributing to climate change adaptation based on CAPEX of investees in the reporting year

0

(12.5.24) Share of aligned assets contributing to climate change adaptation that is adapted based on CAPEX of investees in the reporting year

0

(12.5.25) Share of aligned assets contributing to climate change adaptation that is enabling based on CAPEX of investees in the reporting year

0

(12.5.32) “Do No Significant Harm” requirements met

Select from:

Yes

(12.5.33) Details of “Do No Significant Harm” analysis

The alignment quotas, for which the DNSH criteria defined by the reference regulations have been analyzed, derive from: Exposures to businesses, or loans and advances, debt securities, and equity instruments; Loans to retail customers, particularly with regard to loans guaranteed by residential properties.

(12.5.34) Details of calculation

With regard to loans secured by residential real estate, the Group has analyzed the DNSH (Do No Significant Harm) criteria set out in the regulation for the relevant economic activity. In particular, a detailed analysis was carried out on the physical risks to which each individual property used as collateral is exposed, in order to be able to include it in the numerator of the Green Asset Ratio (GAR) among the exposures aligned with the Taxonomy. With regard to the financial assets managed by the Group, information on compliance with the DNSH criteria was obtained either through an external information provider or based on information published by individual counterparties subject to the Taxonomy Reporting obligation, with reference to FY 2023."

Investing (Asset manager)

(12.5.1) Reporting values of the financing and/or insurance of activities or sectors that are eligible under or aligned with a sustainable finance taxonomy

Select from:

Yes

(12.5.2) Taxonomy under which portfolio alignment is being reported

Select from:

EU Taxonomy for Sustainable Activities

(12.5.3) Total assets in your portfolio (unit currency as selected in 1.2)

185927549000.00

(12.5.4) Total assets covered in the calculation of the taxonomy KPIs in the reporting year

36996368420.48

(12.5.5) Total assets excluded from the calculation of your alignment KPIs in the reporting year

0

(12.5.6) Aligned assets based on turnover of investees in the reporting year (unit currency as selected in 1.2)

1313620385.07

(12.5.7) Share of aligned assets based on turnover of investees out of total assets in the reporting year

3.6

(12.5.8) Eligible assets based on turnover of investees in the reporting year

4416401290.75

(12.5.9) Share of eligible assets based on turnover of investees in the reporting year out of total assets in the reporting year

11.9

(12.5.10) Aligned assets based on CAPEX of investees in the reporting year (unit currency as selected in 1.2)

2122745004.1

(12.5.11) Share of aligned assets based on CAPEX of investees out of total asset in the reporting year

5.7

(12.5.12) Eligible assets based on CAPEX of investees in the reporting year

5264486411.15

(12.5.13) Share of eligible assets based on CAPEX of investees out of total asset in the reporting year

14.2

(12.5.14) Share of aligned assets contributing to climate change mitigation based on turnover of investees in the reporting year

3.3

(12.5.15) Share of aligned assets contributing to climate change mitigation that is transitional based on turnover of investees in the reporting year

0.4

(12.5.16) Share of aligned assets contributing to climate change mitigation that is enabling based on turnover of investees in the reporting year

1.6

(12.5.17) Share of aligned assets contributing to climate change adaptation based on turnover of investees in the reporting year

0.1

(12.5.18) Share of aligned assets contributing to climate change adaptation that is adapted based on turnover of investees in the reporting year

0

(12.5.19) Share of aligned assets contributing to climate change adaptation that is enabling based on turnover of investees in the reporting year

0.1

(12.5.20) Share of aligned assets contributing to climate change mitigation based on CAPEX of investees in the reporting year

5.3

(12.5.21) Share of aligned assets contributing to climate change mitigation that is transitional based on CAPEX of investees in the reporting year

1.9

(12.5.22) Share of aligned assets contributing to climate change mitigation that is enabling based on CAPEX of investees in the reporting year

0.8

(12.5.23) Share of aligned assets contributing to climate change adaptation based on CAPEX of investees in the reporting year

0.3

(12.5.24) Share of aligned assets contributing to climate change adaptation that is adapted based on CAPEX of investees in the reporting year

0

(12.5.25) Share of aligned assets contributing to climate change adaptation that is enabling based on CAPEX of investees in the reporting year

0.1

(12.5.32) “Do No Significant Harm” requirements met

Select from:

Yes

(12.5.33) Details of “Do No Significant Harm” analysis

The alignment quotas, for which the DNSH criteria defined by the reference regulations have been analyzed, derive from: Exposures to businesses, or loans and advances, debt securities, and equity instruments.

(12.5.34) Details of calculation

With reference to the financial activities managed by the Group, information regarding compliance with the DNSH criteria was obtained through an external information provider or based on the information published by the individual counterparties subject to the obligation to publish the Taxonomy Reporting, relating to FY 2023.

[Fixed row]

(12.6) Do any of your existing products and services enable clients to mitigate and/or adapt to the effects of environmental issues?

	Existing products and services enable clients to mitigate and/or adapt to the effects of environmental issues
	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(12.6.1) Provide details of your existing products and services that enable clients to mitigate and/or adapt to the effects of environmental issues, including any taxonomy or methodology used to classify the products and services.

Row 1

(12.6.1.1) Environmental issue

Select all that apply

Climate change

(12.6.1.2) Product/service enables clients to mitigate and/or adapt to climate change

Select all that apply

Mitigation

Adaptation

(12.6.1.3) Portfolio

Select from:

- Banking (Bank)

(12.6.1.4) Asset class

Select from:

- Loans

(12.6.1.5) Type of product classification

Select all that apply

- Products that have sustainable investment as their core objective

(12.6.1.6) Taxonomy or methodology used to identify product characteristics

Select all that apply

- Externally classified using other taxonomy or methodology, please specify :The methodology has been determined by the project itself (European Horizon 2020 Funds, European Mortgage Federation, the Royal Institute of Chartered Surveyors, E.ON, Ca' Foscari University of Venice, and Goethe University of Frankfurt)

(12.6.1.7) Type of solution financed, invested in or insured

Select all that apply

- Green buildings and equipment

(12.6.1.8) Description of product/service

The BPER Group has joined the European pilot project for energy efficiency interventions and introduced new green financing options. Funded by the European Horizon 2020 Funds, the project is promoted by an international consortium comprising the European Mortgage Federation - Covered Bond Council, the Royal Institute of Chartered Surveyors, E.ON, Ca' Foscari University of Venice, and Goethe University of Frankfurt. It involves various stakeholders, banks, public institutions, and specialized companies in the energy and real estate sectors. The project's primary goal is to establish a standardized "green mortgage" that incentivizes individuals to improve energy efficiency in their properties or purchase already energy-efficient properties. The incentive is based on preferential economic conditions. The initiative operates on the assumption that energy efficiency measures can mitigate risks for banks by increasing the property's value. BPER Banca was selected to participate in this initiative, driven by ABI, BEI, and UniCredit, due to its sector expertise, collaboration in technical panels of ABI on renewable

energy and real estate, and its designation as the pilot bank for Italy, chosen by the European Commission and the European Investment Bank (EIB). The project's third phase, focused on developing products aligned with the green mortgage working group's recommendations, was already activated in 2020. However, the activities faced significant delays due to the COVID-19 pandemic. BPER Banca's offering includes two types of loans: mortgages and personal loans. The Green Mortgage is available to customers purchasing energy-efficient properties classified in energy classes A and B. Personal Loans, on the other hand, cater to those seeking to install renewable energy systems, thermohydraulic systems, thermal insulation, or purchase electric or hybrid vehicles, scooters, electric bikes, or energy-efficient appliances. The objective is to enhance the energy efficiency of homes, making them more eco-friendly and sustainable, or to acquire other eco-sustainable assets. In November 2021, the BPER Banca Group expanded its green loan options in its mortgage loan catalogue, adding "construction and renovation" to the existing "purchase" purpose. For personal loans, customers requesting a green loan were given the opportunity to access a pre-amortization period of up to 18 months for work covered by Ecobonus/Superbonus deductions.

(12.6.1.9) % of portfolio aligned with a taxonomy or methodology in relation to total portfolio value

1.05

(12.6.1.10) % of asset value aligned with a taxonomy or methodology

4.4

(12.6.1.11) Product considers principal adverse impacts on environmental factors

Select from:

Yes

(12.6.1.12) Details on how the principal adverse impacts on environmental factors are considered in this product

For the verification of the Do No Significant Harm (DNSH) criteria, i.e. the verification that no significant damage is caused with respect to the objective of Climate change adaptation, the Bank has decided to use the condensed physical risk score also used as part of the risk assessment processes in the context of the disclosures provided pursuant to the Pillar 3 information. For the purposes of verifying the DNSH criterion, the BPER Group has decided, from a conservative perspective, to only consider aligned the exposures relating to properties having a condensed physical risk score equal to "Low" and "Moderate".

Row 2

(12.6.1.1) Environmental issue

Select all that apply

Climate change

(12.6.1.2) Product/service enables clients to mitigate and/or adapt to climate change

Select all that apply

- Mitigation
- Adaptation

(12.6.1.3) Portfolio

Select from:

- Investing (Asset manager)

(12.6.1.4) Asset class

Select from:

- Other, please specify :Investment Funds

(12.6.1.5) Type of product classification

Select all that apply

- Products that promote environmental and/or social characteristics
- Products that have sustainable investment as their core objective

(12.6.1.6) Taxonomy or methodology used to identify product characteristics

Select all that apply

- Externally classified using other taxonomy or methodology, please specify :The asset management company considers the transparency requirements introduced by artt. 8-9 of regulation (EU) 2022/1288 as a template and guideline to structure investment products that substantially support positive environmental impacts.

(12.6.1.7) Type of solution financed, invested in or insured

Select all that apply

- Not applicable

(12.6.1.8) Description of product/service

The Fund invests primarily in shares of large-cap North American issuers with stable growth prospects over time and high liquidity, denominated primarily in dollars and characterized by high environmental, social, and corporate governance standards. Specifically, the securities are selected from among those of issuers committed to reducing greenhouse gas emissions, contributing to the decarbonization of the economic system, or facilitating the transition to a system characterized by low greenhouse gas emissions, in line with the objectives of the Paris Climate Agreement. The asset management company has developed a methodology that, based on internal and external data, assesses all financial instruments from a sustainability perspective. The process of assigning sustainability metrics involves breaking down the portfolio instruments into their basic components (bonds or equities) and subsequently associating the sustainability metric. This model allows for the integration of ESG risk factors into the investment decisions for the Fund.

(12.6.1.9) % of portfolio aligned with a taxonomy or methodology in relation to total portfolio value

11.6

(12.6.1.10) % of asset value aligned with a taxonomy or methodology

41

(12.6.1.11) Product considers principal adverse impacts on environmental factors

Select from:

Yes

(12.6.1.12) Details on how the principal adverse impacts on environmental factors are considered in this product

The investment products managed by the Group subsidiaries apply an internally developed model to ensure that sustainable investments in the portfolio do not cause significant harm to any environmental or social objective as defined in Article 2(17) of Regulation (EU) 2019/2088. Specifically, the principle of "doing no significant harm" is verified by the asset management company through the use of a proprietary methodology that involves assessing the ESG rating, calculated using an internal model based on data from the information provider MSCI, for all sustainable investments in the portfolio: each sustainable investment in the portfolio must have an ESG rating of at least BBB-. In order to comply with the "do no significant harm" principle of sustainable investments, the Fund also considers the PAIs listed in Table 1 of Annex 1 to Delegated Regulation (EU) 2022/1288, integrated with the elements of Tables 2 and 3 of Annex 1 to Delegated Regulation (EU) 2022/1288 (PAI 13 "non-recycled waste rate" and PAI 2 "accident rate," respectively).

[Add row]

(12.7) Has your organization set targets for deforestation and conversion-free and/or water-secure lending, investing and/or insuring?

Forests

(12.7.1) Target set

Select from:

No, we have not set such targets, but we plan to within the next two years

(12.7.2) Explain why your organization has not set targets for deforestation- and conversion-free and/or water-secure lending, investing and/or insuring

The BPER Group has already identified and assessed climate-related risks and opportunities and is planning to enlarge the analysis to include the emerging ESG issues. Nevertheless, standards and guidelines related emerging ESG issues for the financial sector are still under development, such as forests and water security.

Water

(12.7.1) Target set

Select from:

No, we have not set such targets, but we plan to within the next two years

(12.7.2) Explain why your organization has not set targets for deforestation- and conversion-free and/or water-secure lending, investing and/or insuring

The BPER Group has already identified and assessed climate-related risks and opportunities and is planning to enlarge the analysis to include the emerging ESG issues. Nevertheless, standards and guidelines related emerging ESG issues for the financial sector are still under development, such as forests and water security.
[Fixed row]

C13. Further information & sign off

(13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?

	Other environmental information included in your CDP response is verified and/or assured by a third party
	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

(13.1.1) Which data points within your CDP response are verified and/or assured by a third party, and which standards were used?

Row 1

(13.1.1.1) Environmental issue for which data has been verified and/or assured

Select all that apply

- Climate change
- Forests
- Water

(13.1.1.2) Disclosure module and data verified and/or assured

Environmental performance – Financial services

- Alignment with a sustainable finance taxonomy

- Products and services footprint verification
- Progress against targets
- All data points in module 12

(13.1.1.3) Verification/assurance standard

General standards

- ISAE 3000
- ISAE 3410, Assurance Engagements on Greenhouse Gas Statements

(13.1.1.4) Further details of the third-party verification/assurance process

BPER Banca obtained limited assurance from Deloitte on its consolidated sustainability reporting for the financial year ended 31 December 2024. Based on the work performed, Deloitte did not identify any matters that would lead them to believe that the information included in the report was not prepared, in all material respects, in accordance with: the European Sustainability Reporting Standards (ESRS), as adopted by the European Commission pursuant to Directive (EU) 2013/34; and Article 8 of Regulation (EU) 2020/852 (EU Taxonomy Regulation). This limited assurance covers all disclosures included in the 2024 sustainability report.

(13.1.1.5) Attach verification/assurance evidence/report (optional)

2024 Annual Reports.pdf
[Add row]

(13.3) Provide the following information for the person that has signed off (approved) your CDP response.

(13.3.1) Job title

Chief Executive Officer

(13.3.2) Corresponding job category

Select from:

Chief Executive Officer (CEO)

[Fixed row]

(13.4) Please indicate your consent for CDP to share contact details with the Pacific Institute to support content for its Water Action Hub website.

Select from:

Yes, CDP may share our Disclosure Submission Lead contact details with the Pacific Institute

