

# Report on Consolidated Operations of the Cassa Centrale Group 2024 Consolidated Sustainability Report

## 2024 Consolidated Sustainability Report

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# 1. General Disclosures

## 1.1 Reporting Criteria

ESRS 2

### 1.1.1 General Criteria for Consolidated Sustainability Reporting

[ESRS 2 BP-1]

**Legislative Decree 125/2024**, transposing **Directive (EU) 2022/2464 (Corporate Sustainability Directive - CSRD)**, replaces and updates the previous Legislative Decree 254/2016, introducing new corporate reporting requirements for large Public-Interest Entities, including the Cassa Centrale Banca Credito Cooperativo Italiano Cooperative Banking Group (hereinafter also referred to as the “Cassa Centrale Group” or the “Group”), applicable from 1 January 2025, regarding financial year 2024.

In accordance with the new regulatory provisions, the Group, as a “large” Public-Interest Entity, is required to prepare Consolidated Sustainability Statement (hereinafter also referred to as the “Statement” or “document”). The purpose is to provide a comprehensive picture of the business, its performance and results, and the environmental, social and governance impacts generated.

This document, on the basis of Article 6 of the aforementioned Legislative Decree, has therefore been prepared in accordance with the requirements of the **European Sustainability Reporting Standards (ESRS)**, adopted with **Delegated Regulation (EU) 2023/2772**. These standards lay down specific reporting requirements, including policies adopted, actions taken, targets set and progress achieved with respect to ESG issues. This Report was prepared exploring the issues of relevance identified on the basis of a double materiality analysis conducted in accordance with ESRS standards. These are:

- Climate change;
- Own workforce;
- Affected communities;
- Consumers and end-users;
- Business conduct.

The Report was prepared on a consolidated basis in order to provide all stakeholders with a complete and comprehensive picture of the Group’s sustainability performance.

#### Reporting process

[ESRS 2 BP-1]

The 2024 Consolidated Sustainability Report constitutes a separate section of the Report on Operations, which is an integral part of the Annual Financial Report of the Cassa Centrale Group.

The Statement provides an overview of relevant impacts, risks and opportunities (“IROs”), identified through the double materiality analysis conducted during the reporting year (for more details, see section 1.4 “Management of Impacts, Risks and

Opportunities”). Unless specified otherwise, the data and information contained in this document refer to the financial year from 1 January 2024 to 31 December 2024.

As this is the first year of reporting under the CSRD, data from the previous year have not been included, as they reflect the previous reporting standards and are not directly comparable with the information required by the European Sustainability Reporting Standards (ESRS).

## Reporting scope

[ESRS 2 BP-1]

The qualitative and quantitative data in the Consolidated Sustainability Statement of the Cassa Centrale Group refers to the Group performance at 31 December 2024.

Reporting scope includes data of the Parent Company (Cassa Centrale Banca), the 65 Affiliated Banks and the 8 fully consolidated Subsidiaries. In addition to these, reporting includes Group subsidiaries consolidated with the equity method that significantly influence the Group’s sustainability performance for the year 2024 (Centrale Trading S.r.l., Claris Rent S.p.A., Centrale Soluzioni Immobiliari S.r.l. in liquidazione, Assicura S.r.l., Cassa Rurale Alta Valsugana Soluzioni Immobiliari S.r.l., Raiffeisen Immobilien S.r.l., Società Agricola Terre Della Rocca S.r.l., Azienda Agricola Antoniana S.r.l., and Agorà S.r.l.) for the purpose of quantifying emissions.

Equity investments over which the Group exercises significant influence but not operational control (Partecipazioni Cooperative S.r.l., Finanziaria Trentina della Cooperazione - Fincoop S.p.A., Servizi e Finanza Fvg S.r.l., Rendena Golf S.p.A., Rittner Horn Bergbahnen Ag, Le Cupole S.r.l., Cabel Holding S.p.A.), were included in the calculation of Scope 3 emissions, as required by the standards. Finally, the company Scouting S.p.A., over which the Group exercises significant influence but not operational control, was included in the value chain.

For further details with regard to the list of consolidated companies, please refer to the 2024 Consolidated Financial Statements of the Cassa Centrale Group. Any further limitations in the scope are suitably indicated in the report.

There are no subsidiaries within the scope of consolidation that are exempt from Consolidated Sustainability Reporting. There are two Affiliated Banks, however, that pursuant Article 7 of Legislative Decree 125/2024 are exempt from individual reporting by virtue of their inclusion in consolidated reporting: Banca Prealpi Sanbiagio Credito Cooperativo - Società Cooperativa e BVR Banca Veneto Centrale - Credito Cooperativo Italiano - Società Cooperativa. Reporting provides information not only on activities carried out directly by the Cassa Centrale Group, but also includes data on the value chain, upstream and downstream. In particular, information is provided on suppliers and customers, with specific reference to credit and investment activity, as well as a description of the policies, actions taken and objectives set for the management of links in the value chain.

Impacts, risks and opportunities (IROs) affecting the value chain are covered in the materiality-analysis section and explored in more detail in the topic-specific disclosures. Group policies, objectives and actions, where they involve actors in the value chain, are clearly indicated in the respective sections, ensuring transparency in the management approach. Some metrics, such as those related to Scope 3 emissions, include value-chain information. Where metrics consider such data, this is specified in the corresponding sections, providing a clear and comprehensive picture of the coverage and relevance of the information presented.

It should be noted that the Cassa Centrale Group did not omit information on intellectual property, know-how and the results of innovation.

No company utilised the exemption from disclosing information on upcoming developments or matters under negotiation.

## 1.1.2 Disclosures in relation to specific circumstances

### Time horizons

[ESRS 2 BP-2]

In preparing the Consolidated Sustainability Statement and in identifying impacts, risks and opportunities, the Group has considered short-, medium- and long-term time horizons, as defined below.

- Short-term: the reference period considered by the company for its financial statements (one year). It should be noted that the reference period used for risk assessment, i.e. three years, was adopted solely for financial materiality purposes.
- Medium-term: up to five years from the end of the short-term reference period.
- Long-term: beyond five years.

### Value-chain estimation

[ESRS 2 BP-2]

[ESRS 2 MDR-A]

Any estimates in calculations concerning the value chain have been appropriately flagged in the reference indicators by means of a table. It is noted that no metrics included within the document have been validated by an external body other than the party issuing the certification of compliance.

Datapoints requiring data on monetary resources falling under capital expenditure (CapEx) and operational expenditure (OpEx) for the Group's management of IROs have not been included in this report as, based on the analysis carried out, the amounts were not significant.

### Sources of estimation and outcome uncertainty

[ESRS 2 BP-2]

To ensure an accurate representation of performance and reliability of data, the use of estimates has been limited. Where used, estimates are clearly flagged in the reference indicator. Any uncertainties in outcomes are highlighted through specific comments or footnotes, providing the information necessary for correct interpretation of the data.

In particular, the information subject to the estimation process, and therefore subject to greater inherent limitations due to the limited availability and relative accuracy of the information used for calculation purposes, concerns Scope 3 emissions. The Cassa Centrale Group has adopted recognised frameworks for gathering, estimating and reporting data on these emissions wherever direct calculations were not available, including:

- GHG Protocol;
- Partnership for Carbon Accounting Financials (PCAF).

In the absence of primary data from stakeholders, the Group has relied on estimation techniques involving assumptions based on the best available information. These techniques include:

- emission factors from recognised sources;
- proxy data.

Please refer to section "2. Environmental Information", chapter "2.2 Climate Change", paragraph "2.2.4.2 Direct and indirect emissions".

In reporting forward-looking information – including future targets and objectives – uncertainties are inherent and, therefore, such information may be subject to change.

### Disclosures stemming from other legislation or generally accepted sustainability reporting pronouncements

[ESRS 2 BP-2]

The Cassa Centrale Group, which qualifies as a large enterprise and a Public-Interest Entity (PIE) pursuant to Article 1 of Legislative Decree 125/24, is subject to the requirements to include information in its Sustainability Report on how and to what extent the Group's activities are associated with economic activities considered environmentally sustainable pursuant to

Regulation (EU) 2020/852 (the Green Taxonomy). In accordance with ESRS 1, this information has been reported in the environmental section of this document.

With regard to the recommendations of the Task Force on Climate-Related Financial Disclosures (TCFD), these have been fully integrated into the reporting standard on climate change, ESRS E1 – Climate Change. As a result, the Cassa Centrale Group no longer provides a separate overview of the recommendations, as their descriptions are dealt with in the sections on Corporate Governance and Sustainability, SBM-3, the Double Materiality Analysis and in the section on climate change.

### Incorporation by reference

[ESRS 2 BP-2]

All information required under the ESRS is contained in full within this document. In particular, no inclusions were made by reference to other documentation.

## 1.2 Governance

### 1.2.1 Administrative, management and supervisory bodies

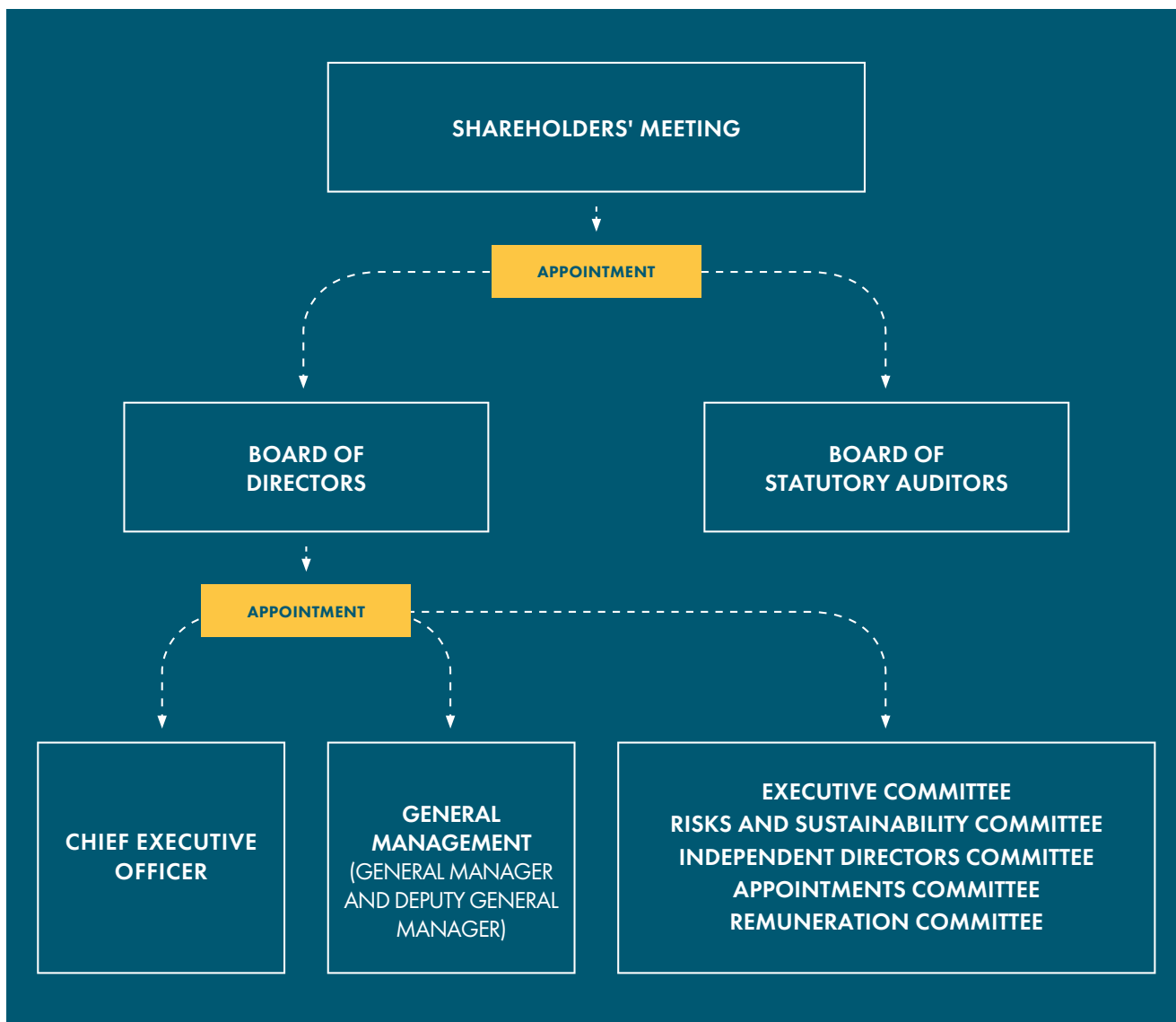
[ESRS 2 GOV-1]

[ESRS 2 MDR-M]

Cassa Centrale Banca adopts a traditional governance system, the structure of which consists of:

- **Annual General Meeting:** appoints the Board of Directors and Board of Statutory Auditors, and establishes their remuneration. The Meeting is called at least once a year and resolves upon approval of the separate financial statements and on the allocation and distribution of profits;
- **Board of Directors:** responsible for the strategic supervision and management of the Group;
- **Chief Executive Officer:** performs executive and management duties for the Company and the Group;
- **Executive Committee:** in charge of implementing Corporate Governance and Risk Management Policies;
- **4 Board Committees** (Risks and Sustainability, Independent Directors, Appointments, Remuneration);
- **Board of Statutory Auditors:** exercises control in relation to compliance with law and the Articles of Association, as well as the adequacy of the organisational and administrative-accounting structure.

The roles played by the bodies listed above are detailed in the Report on Operations in paragraph 1.3 “Corporate Governance”.



The **Board of Directors** of Cassa Centrale Banca, as at 31 December 2024, is composed of **15 members**, in accordance with Article 22 of the Parent Company's Articles of Association.

Although Italian law does not expressly regulate the figure of workers' representative, the Cassa Centrale Group, in its Articles of Association (section 22.2), establishes and directly regulates the appointment of **10 members** who "represent the Affiliated Banks", i.e. persons who hold positions in the Affiliated Banks' administrative bodies or General Management, or in the General Management of the Company itself. This ensures adequate local representation of Affiliated Banks and areas in which the Cooperative Banking Group operates.

Of the remaining members:

- **4 members** qualify as independent directors, in accordance with the independence requirements set forth in the relevant laws and regulations;
- **1 member** is an external director, unrelated to the Affiliated Banks.

The Board of Directors complies with the statutory and regulatory requirements concerning gender representation, guaranteeing the minimum percentage of members belonging to the least represented gender, as well as all rules concerning composition of the governing body. Since the Group was established, Cassa Centrale Banca has guaranteed gender balance, in line with the Corporate Governance Project, which dictates minimum representation of one-fifth for the least represented gender.

With the renewal of corporate offices for the three-year period 2022-2024, this percentage was further increased. This brought the number of Directors of the least represented gender to 5 out of 15, equal to 33% of the total, with a ratio of female to male components of 0.5, thus fully implementing the provisions of Bank of Italy Circular 285, Update No. 35.

In accordance with the Articles of Association, the Board of Directors of Cassa Centrale Banca is composed of members with diversified skills, aimed at ensuring effective and informed management of the Parent Company. This diversity of expertise is designed to cover all necessary areas, supporting decision-making processes and the effective functioning of board committees.


The composition of the Board reflects a balance of executive and non-executive members, including independent directors, thus ensuring independent judgement and multiple perspectives. It also takes into account geographical and sector-specific aspects of the Group's operations, introducing expertise related to the products, markets and areas in which the Parent Company operates.

The characteristics of composition of the Board are designed to:

- **fuel debate and discussion within the administrative body**, creating an open and inclusive decision-making environment;
- **foster independent thought and rational decision-making processes**, enabling informed strategic decisions;
- **support corporate processes, including strategizing**, risk management and oversight of the work of senior management;
- **ensure a range of approaches and perspectives**, harnessing differing experience for detailed analysis and strategic decisions;
- **protect the multiple interests of stakeholders**, promoting sound and prudent management of the Group.

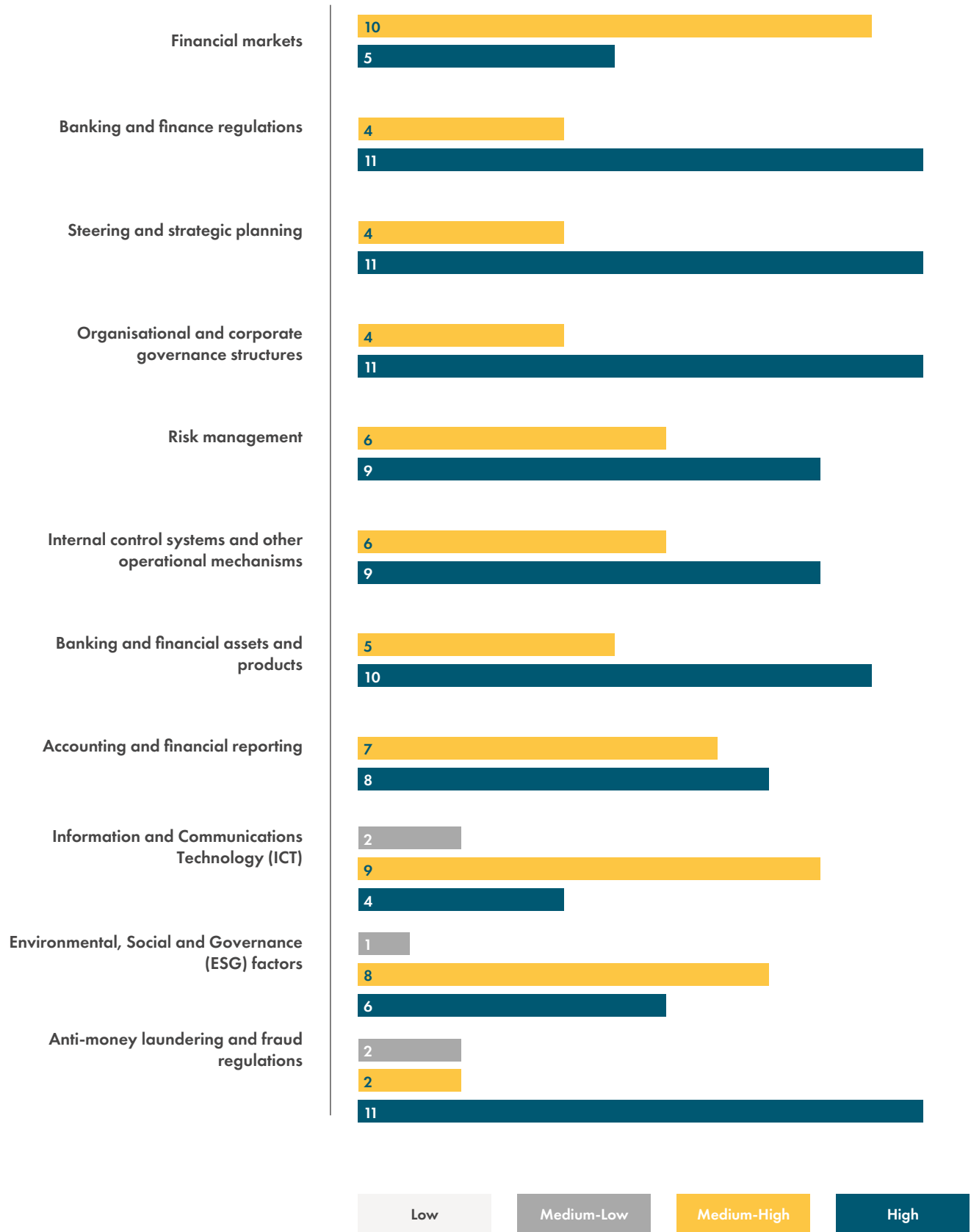
To this end, each area of expertise is led by qualified members who are able to ensure detailed analysis and informed strategic decisions.

### Professional Profile of the Board of Directors

Academics and/or Lawyers	
Accountants and Auditors	
Banking and governance consultants	
Bank Managers	
IT Managers	
Entrepreneurs and Freelancers	

## Adequacy of expertise of the Board of Directors

The following graph illustrates the level of competence of directors, self-assessed on a scale from 1 (Low) to 4 (High), highlighting the areas of greatest specialisation within the Board.



Below is a table presenting the composition of the Board of Directors of Cassa Centrale Banca by number and percentage.

### Composition of the Board of Directors, Board Committees and Board of Statutory Auditors of the Parent Company

BOARD OF DIRECTORS AND BOARD COMMITTEES OF THE PARENT COMPANY	31/12/2024					
	Board of Directors	Executive Committee	Risks and Sustainability Committee	Independent Directors Committee	Remuneration Committee	Appointments Committee
<b>No. of Directors</b>	<b>15</b>	<b>5</b>	<b>5</b>	<b>3</b>	<b>3</b>	<b>3</b>
Executive	5	5	-	-	-	-
Non-Executive	10	-	5	3	3	3
of which, independent	4	-	3	3	2	2
% of which independent	26.7%	-	60.0%	100.0%	66.7%	66.7%
<b>Women</b>	<b>5</b>	<b>1</b>	<b>3</b>	<b>2</b>	<b>1</b>	<b>1</b>
<b>Men</b>	<b>10</b>	<b>4</b>	<b>2</b>	<b>1</b>	<b>2</b>	<b>2</b>
<b>% Women of total</b>	<b>33.3%</b>	<b>20.0%</b>	<b>60.0%</b>	<b>66.7%</b>	<b>33.3%</b>	<b>33.3%</b>
<b>% Men of total</b>	<b>66.7%</b>	<b>80.0%</b>	<b>40.0%</b>	<b>33.3%</b>	<b>66.7%</b>	<b>66.7%</b>
<b>Average ratio of female to male members</b>	<b>50.0%</b>	<b>25.0%</b>	<b>150.0%</b>	<b>200.0%</b>	<b>50.0%</b>	<b>50.0%</b>
< 30 years	-	-	-	-	-	-
30-50 years	1	-	-	1	1	1
> 50 years	14	5	5	2	2	2
% of Directors <30 years	-	-	-	-	-	-
% of Directors 30-50 years of age	6.7%	-	-	33.3%	33.3%	33.3%
% of Directors >50 years old	93.3%	100.0%	100.0%	66.7%	66.7%	66.7%

PARENT COMPANY BOARD OF STATUTORY AUDITORS BY GENDER	31/12/2024				
	Men	Women	Total	% Men of total	% Women of total
Chairman of Board of Statutory Auditors	1	-	1	100.0%	-
Standing member of the Board of Statutory Auditors	-	2	2	-	100.0%
<b>Total - Board of Statutory Auditors</b>	<b>1</b>	<b>2</b>	<b>3</b>	<b>33.3%</b>	<b>66.7%</b>

Affiliated Banks of the Cassa Centrale Group are defined by primary and secondary legislation applicable to mutual credit cooperatives.

The organisation of BCC Banks provides for a Board of Directors usually composed of Members. Individual directors must meet specific requirements of good repute and competence as set out by banking regulations and Group guidelines. The system ensures a balance of management autonomy for individual Banks and coordination with the Parent Company, which provides strategic support and oversight to ensure system stability.

In the composition of corporate bodies, the Group promotes respect for the principles of gender representation, both for the Board of Directors and the Board of Statutory Auditors, in line with values of fairness and inclusion. This commitment aims to ensure diverse governance, which can enhance decision-making and foster a more balanced approach to business management.

In compliance with Bank of Italy Circular No. 285 of 17 December 2013, the Group's Affiliated Banks, classified as small banks or banks of operational complexity, are expected to progressively adjust their position. The initial target is to reach 20% of the least represented gender, before then aligning with the 33% threshold by 30 June 2027.

This provision is formalised in the “Group Model for the optimal qualitative and quantitative composition of the corporate bodies and management of the Affiliated Banks”, updated on 14 December 2023, which dictates that corporate bodies must ensure gender quotas are observed upon full or partial renewal of their members. All Affiliated Banks of the Group have already reached the minimum quota of 20%. In 2024, female membership of the Boards of Directors within the reporting scope, excluding the Parent Company, sits at 25%.

The table below provides an overview, at Group level, of the breakdown by gender of the corporate bodies.

**Composition of the Board of Directors and the Board of Statutory Auditors of the Companies within the reporting scope (excluding Cassa Centrale Banca)**

CORPORATE EXECUTIVES BY GENDER	31/12/2024				
	Men	Women	Total	% Men of total	% Women of total
Chairperson of Board of Directors	72	6	78	92.3%	7.7%
Deputy Chairperson	82	12	94	87.2%	12.8%
Other administrators	297	132	429	69.2%	30.8%
<b>Total - Board of Directors</b>	<b>451</b>	<b>150</b>	<b>601</b>	<b>75.0%</b>	<b>25.0%</b>
Chairman of Board of Statutory Auditors	61	13	74	82.4%	17.6%
Standing member of the Board of Statutory Auditors	78	71	149	52.3%	47.7%
<b>Total - Board of Statutory Auditors</b>	<b>139</b>	<b>84</b>	<b>223</b>	<b>62.3%</b>	<b>37.7%</b>

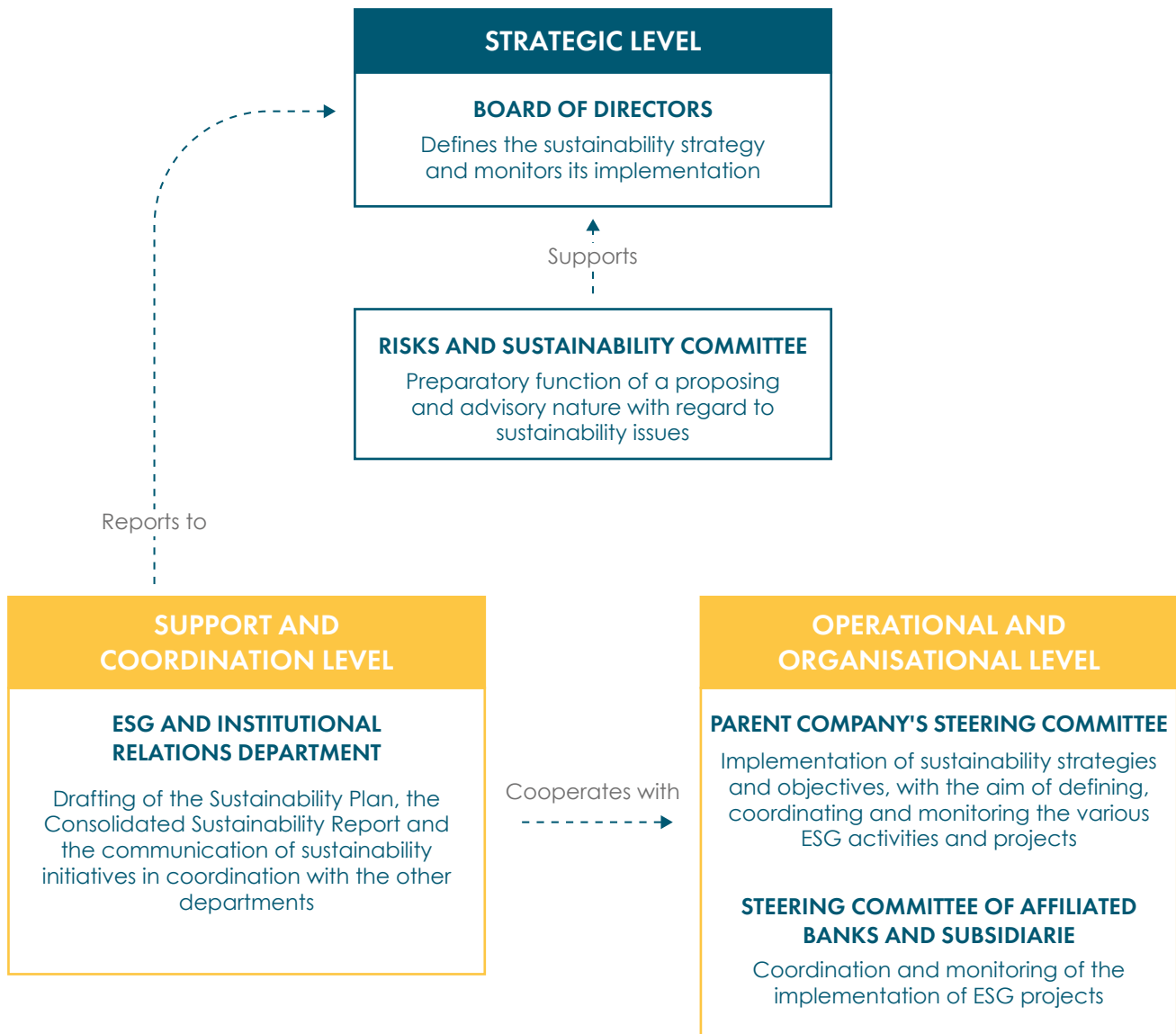
**Sustainability Governance**

[ESRS 2 GOV-1]

To meet the challenges of sustainability and guide the financial sector towards increasingly responsible models, the Group has established structured and detailed Sustainability Governance. Sustainability Governance refers to a strategic architecture through which the Group ensures ESG goals are met in a coherent, integrated and measurable way. This system enables effective coordination of the various Group departments and bodies, ensuring transparent communication and constant monitoring of ESG impacts, risks and opportunities.

The Group’s current organisational structure in the ESG sphere features:

- **a strategic level**, involving the Board of Directors and the Risk and Sustainability Committee, with the task of overseeing strategic decisions and guiding actions towards achievement of the Group’s ESG goals;
- **an organisational and coordination level**, including the Parent Company’s Steering Committee and the Steering Committees of the Affiliated Banks and subsidiaries, which are responsible for implementing ESG initiatives in their different regions;
- **an operational and support level**, represented by the ESG and Institutional Relations Department, which is responsible for defining ESG goals and metrics, drafting the Consolidated Sustainability Statement and related activities (including updating Group ESG policies) as well as communicating ESG initiatives and promoting dialogue with stakeholders.



### Board of Directors

The Board of Directors is the body assigned with strategic oversight and management of the company. During its meetings, the Board of Directors periodically examines the results of processes, including those related to ESG issues, which undergo prior and in depth analysis by the Risk and Sustainability Committee and, based on their respective areas of expertise, by the Remuneration and Appointments Committees. The Board of Directors is also responsible for oversight of impacts, risks and opportunities, according to the respective areas of expertise.

Specifically, the Board of Directors is responsible for oversight of the organisation's due diligence, as well as processes to identify and manage ESG impacts, ensuring that Group activities comply with current policies. In this context, with the support of the Risk and Sustainability Committee, the Board of Directors is responsible, among other activities, for reviewing and approving:

- the sustainability (ESG) strategies and policies;
- the strategy for improving management of impacts, risks and opportunities, defined following the double materiality analysis and further detailed analysis by the Risk Management Department (including analysis for identification of material climate and environmental risks);
- the Sustainability Plan, which sets out the Group's approach to Sustainability through detailed objectives, translating the values enshrined in the Articles of Association of Cassa Centrale Banca and Affiliated Banks, as well as in the Code of Ethics, into concrete goals;

- the **Consolidated Sustainability Statement**, ensuring that it is prepared and published in accordance with current CSRD regulations, monitoring the Group’s sustainability performance and approving any reports of particular significance;
- the Group’s **Code of Ethics**, in which it is emphasised that respect for and protection of the environment are fundamental elements of the Group’s strategy and mission. Its commitment is also formalised in a dedicated policy (“Environmental Policy”);
- the **Remuneration Policies** and the variable remuneration components related to sustainability.

The members of the Board of Directors have a wide range of expertise, appropriately distributed amongst members. This ensures they contribute effectively to the identification and execution of corporate strategies and to guaranteeing effective management of risks, including ESG risks, in all areas of the Cassa Centrale Group.

To further reinforce this expertise, Members of the Board of Directors participate in dedicated training courses with a specific focus on sustainability. One example is the training seminars provided in 2024 on ESG issues for corporate executives of the Cassa Centrale Banca Group.

Training activities covered the integration of sustainability into bank processes regarding data, models, scenarios and expertise, as well as how credit and investment policies can influence strategic choices. Obligations arising from the Corporate Sustainability Reporting Directive and the EU Delegated Regulation 2023/2772 on Sustainability Reporting Standards (ESRS), changes with respect to the Non-Financial Statement, the ECB and EBA climate stress test, and the regulatory framework of the Civil Code and the Corporate Governance Code were discussed in detail. The skills acquired enable adequate support for Members of the Board of Directors in assessment of sustainability-related risks and opportunities, mitigating legal and reputational risks, and in adoption of strategies aligned with these regulations.

These programmes, delivered by external trainers in cooperation with specialised departments of the Parent Company, offer insights into regulatory changes, market developments and sustainability challenges, including material impacts, risks and opportunities (IRO). Meanwhile, Corporate Representatives of the Affiliated Banks participate in a training programme that has been validated by the European Central Bank as part of the Fit&Proper assessment process.

The number of hours of training provided to the Parent Company’s Board of Directors and Board of Statutory Auditors, as well as sustainability training, are listed below.

### Cassa Centrale Banca governance-sustainability expertise

NUMBER OF TRAINING HOURS	31/12/2024					
	Sustainability training			Total training		
	Men	Women	Total	Men	Women	Total
Board of Directors	30	15	45	180	109	289
Board of Statutory Auditors	3	6	9	31	49	80
<b>Total</b>	<b>33</b>	<b>21</b>	<b>54</b>	<b>211</b>	<b>158</b>	<b>369</b>

### Risks and Sustainability Committee

The Risk and Sustainability Committee is an internal board committee composed of five non-executive directors, three of whom are independent, and plays a central role in supporting the Board of Directors. Specifically, the Committee deals with issues related to risks and the internal control system, in accordance with the requirements of Bank of Italy Circular 285/2013, as amended, and the provisions set out in its Internal Regulations.

In the ESG sphere, the Committee provides analysis, proposals and advice, assisting the Board of Directors in assessment and decision making regarding the management of sustainability impacts, risks and opportunities. Its contribution aims to ensure the integration of these aspects into corporate strategies, promoting sustainable governance aligned with the cooperative identity of the Group.

For the ESG sphere, the Committee is responsible for supporting the Board of Directors in:

- **verifying proper implementation of strategies, risk-governance policies (including ESG risks) and the Risk Appetite Framework (RAF), and capital and liquidity management policies;**
- **verifying and overseeing consistent integration of sustainability-risk drivers and associated impacts** into the existing internal control and risk management system, in accordance with applicable regulatory requirements;
- **defining the guidelines and objectives of the Sustainability Plan**, in line with the Strategic Plan (whose compliance is periodically monitored), **as well as Sustainability policies** aimed at the sustainable creation of value considering the contribution the Group can make to achieving the Sustainable Development Goals defined by the United Nations (2030 Agenda) and any subsequent international protocols and standards;
- **periodic monitoring of compliance with targets set in the Sustainability Plan**, which in turn considers the supervisory expectations of the Strategic and Operating Plan for the management of climate and environmental risks and is integrated into the Group's Strategic Plan;
- **in assessing ESG impacts on Stakeholders** and the related engagement activities;
- **identifying the correct application of the main standards and methods for preparing the Consolidated Sustainability Statement** and activities to update the double materiality analysis.

In 2024, the Risks and Sustainability Committee met 17 times. Three of these meetings were held jointly with the Appointments Committee and three others with the Remuneration Committee.

For further details, please refer to the specific section on the Committee in paragraph 1.3 "Corporate Governance" of the Report on Operations.

#### **ESG Steering Committees of the Parent Company and Affiliated Banks and Subsidiaries**

The Group's organisational and operational structure in the ESG sphere is made up of ESG Steering Committees of the Parent Company and Affiliated Banks and Subsidiaries.

The **Parent Company's ESG Steering Committee** corresponds with the ESG Executive Committee, consisting of the Chief Officers and chaired by the Chief Executive Officer. The following tasks are assigned to the ESG Steering Committee:

- support the competent bodies in the strategic proposal related to ESG issues;
- draft periodic reports to the Risk and Sustainability Committee and the Board of Directors on the monitoring of the Parent Company's Sustainability Plan and the progress of initiatives to achieve strategic ESG positioning targets;
- prepare and collectively define the draft Sustainability Plan and related strategic objectives, in line with the Strategic Plan and climate-related and environmental risk governance framework periodically defined based on the context and material exposure of the Group;
- promote the exchange of information and ensure the necessary synergies between the different ESG components and projects;
- propose, monitor, steer and coordinate the dynamics and operations of the main ESG projects, with particular reference to ESG integration into the business;
- involve the Departments in the activation of specific ESG projects, fostering cross-functional collaboration;
- promote cooperation and synergy among Affiliated Banks in terms of dissemination of best practices and extension of Targets to the Group.

Parent Company ESG Steering Committee meetings are periodically extended to include Directors of the subsidiaries.

In addition, **ESG Steering Committees have been established for Affiliated Banks and Subsidiaries**, chaired by individual ESG Managers, identified from the General Management team of the Subsidiary or Affiliated Bank. The ESG Steering

Committee of each Affiliated Bank and Subsidiary has the aim of coordinating and monitoring activity of the Affiliated Banks and Companies with regard to relevant ESG projects, where envisaged by the Sustainability Plan, and further ESG-related activities. In addition, the Steering Committee's role is to foster cross-functional collaboration within the Affiliated Banks and Subsidiaries and with the Parent Company, building a shared ESG culture.

The "Community of Practice of ESG Representatives" was established in 2023, within which the good ESG practices of the Affiliated Banks are shared and where guidance and supporting materials are distributed for the periodic conduct of the Banks' Steering Committees.

In order to monitor the progress of the Group's ESG initiatives, regular meetings (at least quarterly) of the ESG Steering Committees of the Parent Company and of the Affiliated Banks and Subsidiaries are scheduled. The information flows stipulate that for the Affiliated Banks and Subsidiaries, the minutes of the ESG Steering Committee are sent to the Parent Company, which notes the progress of sustainability initiatives in the individual territories. Close and continuous collaboration between different internal Group functions ensures that sustainability and the management of associated impacts, risks and opportunities is an integral part of corporate strategy.

The Parent Company's ESG Steering Committee met four times in 2024 to discuss and examine the progress of Sustainability Plan projects and, more generally, the progress of strategic positioning targets. Two sessions were devoted to climate and environmental risks and corresponding business strategy.

The Cassa Centrale Group implements a structured ESG training programme aimed at the administrative, management and supervisory bodies of Affiliated Banks and Subsidiaries, aimed at furthering expertise in environmental, social and governance spheres. Courses address regulatory updates, ESG risk management, strategic sustainability initiatives and impact assessment and mitigation methods.

Training is flexible, delivered via remote and pre-recorded sessions, enabling Members of the Board of Directors and Board of Statutory Auditors to constantly refresh their knowledge. This approach ensures increasingly informed and knowledgeable governance, competent in key ESG issues and capable of integrating sustainability principles into strategy and management.

#### Governance-sustainability expertise for reporting scope (excluding Cassa Centrale Banca)

NUMBER OF TRAINING HOURS	31/12/2024					
	Sustainability training			Total training		
	Men	Women	Total	Men	Women	Total
Board of Directors	1,060	376	1,436	7,881	2,907	10,788
Board of Statutory Auditors	323	205	528	2,847	1,656	4,503
<b>Total</b>	<b>1,383</b>	<b>581</b>	<b>1,964</b>	<b>10,728</b>	<b>4,563</b>	<b>15,291</b>

#### ESG and Institutional Relations Department

The Parent Company's ESG and Institutional Relations Department defines the ESG strategy and monitors the implementation of projects.

The Department coordinates activities for the preparation of the Consolidated Sustainability Statement and external communication of all initiatives related to sustainability/ESG issues at Group level.

## 1.2.2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

[ESRS 2 GOV-2]

The Board of Directors and the Risk and Sustainability Committee receive regular, structured information flows aimed at ensuring effective oversight of ESG issues and monitoring achievement of the Group's strategic sustainability goals.

These bodies are updated monthly on the progress of projects included in the Sustainability Plan, the evolution of ESG risks and the progress of related strategies. On a quarterly basis, following ESG Steering Committee meetings, a detailed update is shared on progress towards strategic targets and developments of ESG initiatives. Reports include detailed analyses and precise information to ensure continuous monitoring.

The Board of Directors plays a central role in overseeing the Group's strategy and decisions, ensuring that relevant impacts, risks and opportunities (IROs) are considered at all stages of the decision-making process. The IROs identified through the double materiality analysis and formalised in the Sustainability Plan are essential to:

- **define** concrete and measurable **targets**;
- **ensure** continuous **monitoring** of the achievement of these targets;
- **align Group policies** with strategic values and objectives, ensuring integrated management of ESG risks.

In this context, the Risk and Sustainability Committee provides analysis, proposals and advice, assisting the Board in assessing IROs, sustainability policies and corporate strategies in the ESG sphere.

During the financial year, the Board of Directors and the Committee addressed strategic sustainability issues including:

- **approval and monitoring of targets** defined in the Sustainability Plan;
- **ESG risk assessment and management**, with a focus on climate and environmental risks;
- **approval of policies** to reinforce the Group's alignment with ESG principles and applicable regulations;
- **monitoring of reporting metrics and activities** required by regulations, including approval of the double materiality analysis and the resulting material impacts, risks and opportunities, and Sustainability Reporting in accordance with the CSRD.

Through these processes, the Board of Directors ensures that the Group's strategy is fully integrated with ESG issues, while guaranteeing responsible and transparent governance.

## 1.2.3 Integration of sustainability-related performance in incentive schemes

[ESRS 2 GOV-3]

[ESRS 2 MDR-M]

The Cassa Centrale Group adopts a system of remuneration and incentive policies aimed at ensuring alignment with its values, corporate strategies and the mutual nature of Affiliated Banks, with a view to sustainable and responsible management. These policies aim to reconcile the interests of all stakeholders, ensuring consistency with long-term strategic objectives, including those related to sustainable finance and ESG factors. The Group's remuneration policies are structured to support sustainable growth by incentivising a prudent management approach, in accordance with the current regulatory framework. Specifically, they take into account credit-risk monitoring and management strategies, including provisions for impaired loans, ensuring that the incentive system does not lead to inopportune conduct or excessive risk-taking, preserving the stability of the Group and the financial system as a whole.

The incentive system assigns a performance card to each recipient, which is attached to the letter of assignment for the Incentive Plan. This establishes qualitative and quantitative targets consistent with assigned responsibilities and Group strategies. It is divided into three areas: group goals, reflecting overall strategic priorities; role-related goals, linked to specific individual responsibilities; and ESG goals, aimed at integrating sustainability principles into company performance.

ESG goals are integrated into remuneration policies through specific performance metrics, included on the performance scorecards. These indicators cover environmental, social and governance aspects and are aligned with the Group’s Sustainability Plan. The Material Risk Takers at the consolidated level (the categories of individuals whose professional activities have or may have a material impact on the risk profile of the Bank or Banking Group), with variable remuneration based on an MBO incentive scheme, are assessed on sustainability targets for a total of 15%, referring for the year 2024 to:

- procurement of a growing percentage of electricity from renewable sources (certified in Italy);
- achievement of the milestones set out for 2024 following receipt of the ECB Combined Decision on climate and environmental risks;
- execution of ESG training plans for corporate bodies and employees of all Group companies.

### Share of variable remuneration dependent on sustainability-related targets and/or impacts

SHARE OF VARIABLE REMUNERATION DEPENDENT ON SUSTAINABILITY-RELATED TARGETS AND/OR IMPACTS	UoM	31/12/2024
	%	15.0%

#### Metrics

The only employee holding administrative, management and supervisory positions is the Chief Executive Officer, as he also holds the position of Group General Manager. A variable remuneration component is also provided for the Group’s Material Risk Takers, which includes the Parent Company Chief Officers.

The aim for the coming years is to maintain the component linked to ESG goals at 15%, which can be achieved through the introduction of additional qualitative-quantitative KPIs and definition of a structured process to monitor and implement ESG KPIs. The goals are updated annually together with the Remuneration Policy.

Group companies annually submit their remuneration and incentive policies to the Board of Directors and/or the Annual General Meeting for approval. Individual companies are responsible for compliance with the regulations directly applicable to them and for proper implementation of the Parent Company’s guidelines. For further details, please refer to the section on “3. Social Information”, chapter “3.1 Own Workforce”, paragraph “3.1.2.1 Policies related to own workforce”.

## 1.2.4 Statement on due diligence

[ESRS 2 GOV-4]

Currently, although it has not formalised a structured sustainability due-diligence process, the Cassa Centrale Group has developed an approach to managing current and potential risks and impacts, including those related to human rights. This system makes it possible to monitor and address key ESG issues through tools and procedures integrated into business processes.

The following table shows the sections of the Sustainability Report describing the Group’s approach to the management of impacts, risks and opportunities (IRO), ensuring constant monitoring and progressive alignment with industry best practices.

Core aspects of due diligence	Paragraphs in sustainability statements
a) Integrating due diligence into governance, strategy and business model	<p>Chapter 1.2 Governance - 1.2.1 Administrative, management and supervisory bodies (GOV-1)</p> <p>Chapter 1.2 Governance - 1.2.3 Integration of sustainability-related performance in incentive schemes (GOV-3)</p> <p>Chapter 1.4 Management of Impacts, Risks and Opportunities - 1.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model (SBM-3)</p>
b) Involving stakeholders in all key phases of due diligence	<p>Chapter 1.2 Governance - 1.2.2 Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies (GOV-2)</p> <p>Chapter 1.3 Strategy - 1.3.2 Interests and views of stakeholders (SBM-2)</p> <p>Chapter 3.1 Own Workforce - 3.1.2.2 Processes for engaging with own workers (S1-2)</p> <p>Chapter 3.2 Affected Communities - 3.2.2.2 Processes for engaging with affected communities (S3-2)</p> <p>Chapter 3.3 Consumers and End-Users - 3.3.1 Strategy: impacts, risks and opportunities (S4-2)</p>
c) Identifying and assessing negative impacts	<p>Chapter 1.4 Management of Impacts, Risks and Opportunities - 1.4.1 Double materiality analysis process (SBM-3)</p> <p>Chapter 1.4 Management of Impacts, Risks and Opportunities - 1.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model (IRO-1)</p>
d) Acting to address negative impacts	<p>Chapter 2.2 Climate Change - 2.2.3.2 Actions and initiatives (E1-3)</p> <p>Chapter 3.1 Own workforce - 3.1.2.1 Policies related to own workforce (S1-1)</p> <p>Chapter 3.1 Own Workforce - 3.1.3 Workforce composition and attraction of group personnel (S1-4)</p> <p>Chapter 3.1 Own Workforce - 3.1.5 Worker welfare (S1-4)</p> <p>Chapter 3.2 Affected Communities - 3.2.3 Actions and initiatives on affected communities (S3-4)</p> <p>Chapter 3.3 Consumers and End-Users - 3.3.5 Access to quality information and responsible business practices (S4-1)</p> <p>Chapter 3.3 Consumers and End-Users - 3.3.7 Responsible finance (S4-4)</p> <p>Chapter 4.1 Business Conduct - 4.1.2.2 Corporate culture and business conduct policies (G1-1)</p> <p>Chapter 4.1 Business Conduct - 4.1.3.1 Prevention and detection of corruption and bribery (G1-3)</p>
e) Monitoring the effectiveness of actions, and communications	<p>Chapter 2.2 Climate Change - 2.2.5 Targets related to climate change mitigation and adaptation (E1-4)</p> <p>Chapter 3.1 Own Workforce - 3.1.3 Workforce composition and attraction of group personnel (S1-9, S1-17)</p> <p>Chapter 3.1 Own Workforce - 3.1.6 Workforce targets (S1-5)</p> <p>Chapter 3.3 Consumers and End-Users - 3.3.8 Targets regarding members and customers (S4-5)</p> <p>Chapter 4.1 Business Conduct - 4.1.3.1 Prevention and detection of corruption and bribery (G1-3)</p> <p>Chapter 4.1 Business Conduct - 4.1.4 Management of relationships with suppliers (G1-2)</p>

## 1.2.5 Risk management and internal controls over sustainability reporting

[ESRS 2 GOV-5]

The Cassa Centrale Group has formalised a set of operational instructions and qualitative and quantitative controls to manage the risk inherent in the Consolidated Sustainability Statement information. The aim is to ensure the accuracy, completeness and reliability of ESG information provided. These controls are designed to ensure that the collection, validation and reporting of sustainability data are structured, consistent with reference standards and integrated with existing business processes.

Identification and assessment of risks related to Consolidated Sustainability Statement is carried out through a structured control process, which includes:

- **involvement of departments of the Parent Company, Subsidiaries and Affiliated Banks**, with the support of the Sustainability Reporting Officers;
- **definition of data collection and verification procedures**, which set out first-level controls performed by the responsible Departments and by Subsidiaries;
- **data review and validation by the External Relations and Sustainability Service**, which coordinates the entire process and ensures the consistency of information provided.

To support governance and monitoring of ESG issues, the Group has adopted a series of internal regulations aimed at ensuring structured oversight of the main processes impacted by sustainability. These regulations include:

- The **Group Sustainability Regulations**, governing the process for definition of the Group Sustainability Plan, functioning of ESG Steering Committees and related information flows between the Parent Company, Affiliated Banks and Subsidiaries;
- the **Planning and Management Control Cycle Regulations**, which define key processes related to the Group's strategic and operational planning, also in relation to ESG issues;
- the **Risk Management Function Regulations**, establishing the responsibilities, duties and organisational procedures of the Group Risk Management Function, ensuring monitoring of ESG risks and their integration into traditional risk-management frameworks;
- the **Group Regulations on Preparation of Consolidated Sustainability Reporting**, governing roles, responsibilities, duties and shared and uniform criteria for the planning, gathering, control and certification of Group sustainability data and information. These Regulations are accompanied by a Procedure with a more operational scope, divided according to the steps of the reporting process and the point for internal control of the process itself.

They are subject to periodic updates in the event of regulatory changes or developments in the Group's organisational structures.

The findings of risk assessment and controls are integrated directly into the process, which formalises the elements assessed, including:

- correctness and relevance of the ESRS indicators to be reported, in line with the double materiality analysis;
- completeness in terms of scope, clear presentation and data verifiability;
- consistency of reported data with other published documents.

The gathering of sustainability information forms an integral part of the Group's internal control system. To ensure the consistency and reliability of information reported, the process involves cross-functional collaboration and the adoption of standardised data-collection procedures with automatic and manual internal controls. The risk management system for ESG reporting has already been implemented, starting with this Report, through the implementation of mitigation strategies to ensure data reliability and compliance with regulatory requirements. These strategies include:

- data collection and validation procedures at all levels of the company, involving i) automatic checks aimed at identifying and reporting any data-entry anomalies to the Sustainability Statement Officer, ii) checks by compilers/contributors on

the completeness and accuracy of data and information, iii) verification by the Sustainability Statement Officers of the accuracy, consistency and completeness of data entered in data-collection tools;

- periodic internal audits to review the completeness and integrity of sustainability data, verifying that all information has been correctly reported;
- implementation of a system of continuous monitoring of ESG performance, in line with strategic objectives and ESRS requirements.

Progress in data collection and Consolidated Sustainability Statement is periodically submitted to the Risk and Sustainability Committee and the Board of Directors. The draft report is examined by the Risk and Sustainability Committee, after which the Chief Executive Officer submits it to the Board of Directors for approval with the consolidated financial statements. At the same time, the draft is shared with the Board of Statutory Auditors and the Independent Auditors, who carry out the appropriate checks to ensure compliance with current regulations.

## 1.2.6 The Group regulatory system

[ESRS 2 MDR-P]

In the context of its business activity, the Cassa Centrale Group has adopted various tools to ensure alignment with the values and principles of mutual credit cooperation. Specifically, the Group has adopted the “Cooperative Credit Charter of Values” and the Code of Ethics. The latter forms an integral part of the Organisation, Management and Control Model pursuant to Legislative Decree No. 231/2001, which Cassa Centrale Banca has applied since 2008 and which is periodically updated. Model 231 is discussed in detail in section “4. Information on Governance”, chapter “4.1 Business Conduct”, paragraph “4.1.2.2 Corporate culture and business conduct policies”.

These tools are accompanied by a structured policy framework for sustainability issues aimed at preventing, mitigating and remedying current and potential impacts, addressing risks and seizing opportunities. In this context, the Group has adopted specific environmental, social and governance policies, defining guidelines and principles to govern its activity and stakeholder relations.

These policies not only promote a culture of responsibility and transparency, but also translate concretely into the integration of ESG criteria into procedures, regulations and processes. In recent years, the Group has progressively reinforced its application of these principles, including them in key areas, such as the reduction of environmental impacts, selection of suppliers, granting of loans and other strategic areas. The model for interaction with local areas, rooted in continuous stakeholder engagement, leads to policy-making that considers relationships of proximity.

In 2025, the Cassa Centrale Group launched a project to update its policy system, with the aim of ensuring effective and structured management of all material impacts, risks and opportunities. This process ensures that all IROs identified are controlled through targeted, up-to-date policies, aligned with the evolving regulatory and strategic environment. Updates aim to strengthen the integration of ESG issues into business processes, ensuring that Group policies reflect the priorities identified in the double materiality analysis. The policies introduced detailed in the paragraphs that follow, which focus specifically on reporting issues.

# GUIDELINES



CODE OF ETHICS



CHARTER OF VALUES FOR COOPERATIVE CREDIT

# MAIN ESG POLICIES



ANTI-CORRUPTION POLICY



ENVIRONMENTAL POLICY



POLICY ON ARMS BROKERING



GROUP POLICY FOR THE MANAGEMENT OF OCCUPATIONAL HEALTH AND SAFETY



DIVERSITY POLICY



HUMAN RIGHTS POLICY



REMUNERATION AND INCENTIVE POLICIES



GROUP POLICY ON ESG ASPECTS IN RELATION TO GRANTING OF LOANS

The document also introduces and illustrates additional policies beyond the ESG sphere, where these govern specific issues covered in Sustainability Reporting (e.g. Group Information Security Policy).

# 1.3 Strategy

## 1.3.1 Strategy, business model and value chain

[ESRS 2 SBM-1]  
 [ESRS 2 MDR-M]

### Group Values and Mission

The Cassa Centrale Group is founded on a distinctive development model, in which diversity is considered a value and local identity a fundamental principle. Cooperative Credit has its origins in the late 19th century, when the first banking operations inspired by principles of cooperation and localism began to take shape, promoting community growth for 140 years.

In this context, since 1 January 2019, the **Cassa Centrale Banca Cooperative Banking Group** has operated as a set of mutual, local and independent Cooperative Banks built on principles of mutuality, sharing and independence. Cassa Centrale Banca, founded in 1974 by the 133 Rural Banks then operating in Trentino, acts as the Parent Company. For more information on the Group’s structure and organisation, please refer to the dedicated section in the Report on Operations.

The Group’s founding values are outlined in the Cooperative Credit Charter of Values and the founding principles and objectives of the Group, defined in **Article 4 of the Cohesion Contract**. These principles guide the actions of **Cooperative Credit Banks, Rural Banks and Raiffeisenkassen**, differentiating them from other forms of banking by their participatory governance model and their orientation towards mutual benefit.

The Group’s values are reflected in the following fundamental principles, in line with the **Sustainable Development Goals** of the 2030 Agenda:

CHARTER OF VALUES FOR CREDITI COOPERATIVO AND AGENDA 2030			
<p><b>THE PERSON IS KEY AND CENTRAL</b></p> 	<p><b>COMMITMENT</b></p> 	<p><b>AUTONOMY</b></p>	<p><b>PROMOTION OF PARTICIPATION</b></p> 
<p><b>COOPERATION</b></p> 	<p><b>USEFULNESS, SERVICE AND BENEFITS</b></p> 	<p><b>PROMOTION OF LOCAL DEVELOPMENT</b></p> 	<p><b>PERMANENT TRAINING</b></p> 
<p><b>SHAREHOLDERS</b></p> 	<p><b>DIRECTORS</b></p>	<p><b>EMPLOYEES</b></p>	<p><b>YOUNG ADULTS</b></p>

Likewise, Art. 2 of the Articles of Association specifies the objectives and business purposes of the Cooperative Credit Banks, some of which can be linked directly to specific goals of the 17 SDGs established by the 2030 Agenda. The Articles of Association furthermore affirm how each Affiliated Bank, by choice, stands out “based on its own social orientation and decision to construct the common good”.

## Art. 2 ARTICLES OF ASSOCIATION OF THE AFFILIATED BANKS

“The purpose of the Company is to provide support to cooperative PARTNERS and members of the local COMMUNITIES in banking transactions and services, pursuing the improvement of their moral, cultural and financial conditions and promoting the development of cooperation and education in savings and pension planning, as well as social cohesion and responsible, sustainable growth in the local areas in which it operates.”



### The distinctive Cooperative Credit model

The cooperative nature of the Cassa Centrale Group gives rise to an original business model, with the following distinctive elements:

- **cooperative governance** - the principle of one-person-one-vote guarantees a democratic decision-making system based on broad-based participation. The Board of Directors is typically elected from among the members of the ownership structure;
- **ownership base** - **100% of cooperative members** reside and/or operate in the Bank's areas of operations;
- **localism** - at least **95% of** each Cooperative Credit Bank's **exposure** is within its local area;
- **prevalent mutuality** - more than **50% of exposure** is taken on by, or guaranteed by, cooperative members;
- **solidity** - at least **70% of profits** must be allocated to indivisible reserves, enabling capital strengthening;
- **promotion and development of cooperation**: **3% of profits** are allocated to dedicated mutual funds.

Residual shares of net profit may be allocated in accordance with the provisions of the Articles of Association or as resolved by the Annual General Meeting, allocating them to share revaluations, in compliance with cooperative regulations, to other reserves, to the distribution of dividends to members within the limits set out by regulations, or to charity and mutual-assistance funds.

As shown in the table below, the Affiliated Banks have proposed to allocate 86% of 2024 profits to legal and other indivisible reserves, 8% to charity and mutual-assistance funds, and 3% to mutual funds.

### Breakdown of Affiliated Banks' net profit

ALLOCATION OF NET PROFIT		31/12/2024
<b>Net profit in Euro</b>		<b>1,158,096,129</b>
<b>Allocation to:</b>		
legal reserve and other indivisible reserves (excluding retained earnings/losses)		995,790,299
share repurchase reserve		2,200,000
retained earnings or losses/coverage of losses		6,701,201
mutual funds for the promotion and development of the cooperative		34,742,883
charity and mutual-assistance fund		92,275,104
dividends to cooperative members		8,393,428
refunds to cooperative members		17,307,627
share revaluations		435,588
other		250,000

### Value chain

[ESRS 2 SBM-1]

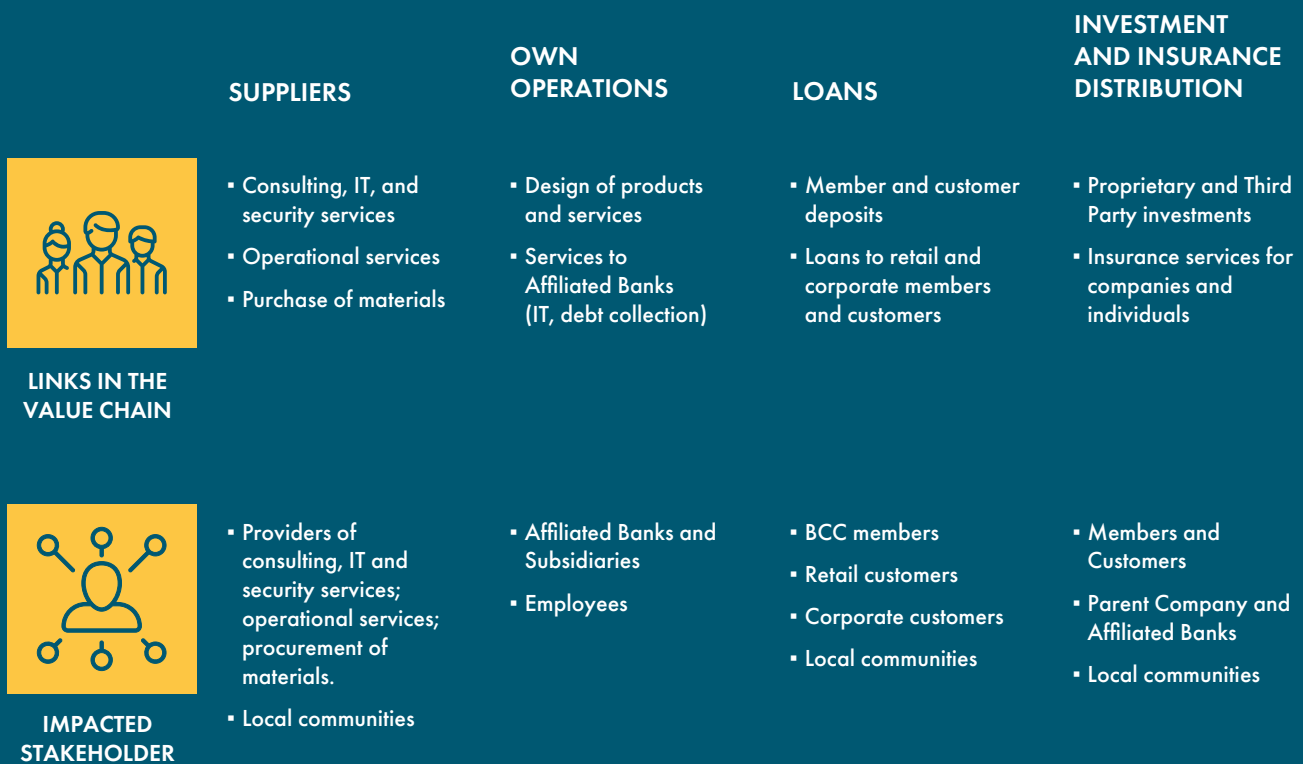
The Cassa Centrale Group operates in all of Italy through the Parent Company's regional offices, offering proximity and service to 65 Cooperative Credit Banks, Rural Banks and the associate Raiffeisenkassen (hereinafter also the "Affiliated Banks") and other customer banks.

The Cassa Centrale Group is organised into the following regional areas:

- Trentino-Alto Adige Area;
- North East: Veneto and Friuli Venezia Giulia;
- North West: Lombardy, Piedmont, Aosta Valley and Liguria;
- Central: Emilia-Romagna, Tuscany, Umbria, Marche, Abruzzo, Lazio and Sardinia;
- South: Apulia, Basilicata, Calabria, Campania, Molise and Sicily.

Integration of the principles of environmental protection, social growth and economic development is central to the Group's strategy and is reflected at every stage of the value chain. The Group's operating model consists of four main links in the value chain, as depicted in the infographic below. The main organisational activities of the Cassa Centrale Group fall under "Own Operations", with the main service offerings pertaining to the "Loans" and "Investments and Insurance Distribution" links. All stakeholders and activities in the value chain are described in the following paragraphs.

## VALUE CHAIN



Group companies operating in specific businesses are considered within the banking value chain.

Below is a description of the value chain. The corresponding data was gathered centrally via digital tools, using primary supplier and customer data, some of which was also acquired from external InfoProvider. Data was processed utilising management tools in compliance with confidentiality agreements and data protection is guaranteed by the Group's **Personal Data Processing Regulations**, in accordance with GDPR legislation.

### Suppliers

The first link in the value chain involves the purchase of services essential to the Group's operations, including consulting, IT, security, operational services and procurement of materials. Stakeholders involved include the suppliers themselves and the local communities in which they operate.

Classification of suppliers considers the threshold of economic exposure and goods/services offered, with the categories of "marginal suppliers", with annual orders totalling less than EUR 20 thousand "ordinary suppliers", with annual orders between EUR 20 thousand and EUR 250 thousand, and "strategic suppliers", with annual orders over EUR 250 thousand. In 2024, purchase order transactions were made with more than 18,000 suppliers active in the Supplier Register. Of these:

- 84.4% received orders below the threshold of EUR 20 thousand in the financial year at Group level (marginal suppliers);
- 13.6% received orders between EUR 20 thousand and EUR 250 thousand in the financial year at Group level (ordinary suppliers);
- 2% received total orders exceeding EUR 250 thousand in the financial year at Group level or were involved in outsourced services (strategic suppliers).

Further details on supply-chain management and sustainability strategies applied to suppliers is provided in the section “4. Information on Governance”, chapter “4.1 Business Conduct”, section “4.1.4 Management of relationships with suppliers”.

### Own operations

The second link concerns the design and delivery of products and services, as well as IT support and loan-recovery management for Affiliated Banks. In this phase, stakeholders involved include Affiliated Banks, Subsidiaries and Group employees.

Affiliated Banks, with a network of **1,491 branches** in **1,086 Italian municipalities**, play a strategic role in the value chain, acting as intermediaries for the Group’s services for local communities. The Parent Company’s strategic and operational support allows them to be more competitive and respond effectively to their customers’ financing and investment needs. For more details on branches and services, please refer to the section “3. Social Information”, chapter “3.2 Affected Communities”, paragraph “3.2.2 Processes for engaging with affected communities”.

As at 31 December 2024 personnel working for the Group consisted of 12,284 people throughout the country, as well as in Luxembourg, as shown in the table below.

### Number of employees by geographical area for the reporting scope

NUMBER OF EMPLOYEES BY GEOGRAPHICAL AREA	31/12/2024	%
Trentino-Alto Adige	2,933	23.9%
North East	2,750	22.4%
North West	2,731	22.2%
Central	2,619	21.3%
South	1,233	10.0%
Foreign	18	0.2%
<b>Total</b>	<b>12,284</b>	<b>100.0%</b>

The range of products and services is divided into two main business areas:

- **services to Banks**, including strategic, operational and technological support for the efficiency and competitiveness of Group Banks. The Group also serves several local Banks (savings banks, local banks and private banks) as clients;
- **products and services for customers of Affiliated Banks**, with targeted financial solutions for families, businesses and institutions, including loans, investments and payments.

For more information on the structure of costs and revenues, please refer to section “4. Operating performance of the Cassa Centrale Group” in the Report on Operations.

### Services to Affiliated Banks

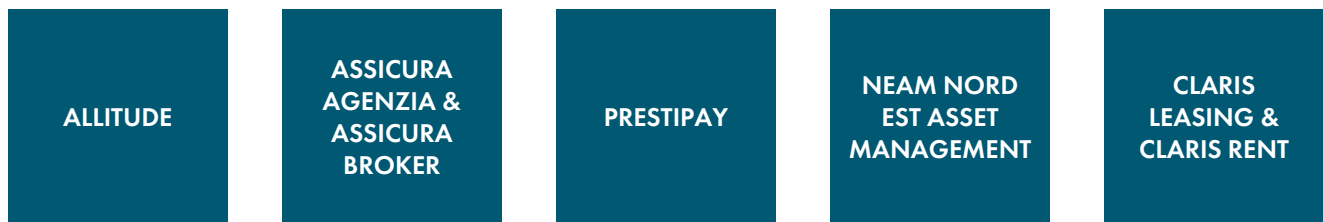
Affiliated Cooperative Credit, Rural and Raiffeisenkassen Banks operate with a model that values proximity to customers and relationships. To promote development, the Parent Company and its Subsidiaries provide services dedicated to operational efficiency, innovation and risk management. Over time, Cassa Centrale Banca has consolidated its strategic support role, providing Affiliated Banks and other client banks with competitive solutions, innovative products and highly specialised consulting.

For further details on the **Cohesion Agreement** and the **Guarantee Agreement**, please refer to the **Report on Operations** and in particular to the section “Composition of the Cassa Centrale Banca Credito Cooperativo Italiano Cooperative Banking Group”.

The Parent Company’s regional offices are located in Trento, with the Registered office and General Management, Padua, Udine, Brescia, Milan, Cuneo, Bologna, Rome and Bari.

Through its Subsidiaries, the Group operates in several areas:

- ICT and back office services, with Allitude S.p.A.;
- leasing and rental services, with Claris Leasing S.p.A. and Claris Rent S.p.A.;
- insurance and brokerage services, with Assicura Agenzia S.r.l. and Assicura Broker S.r.l.;
- collective asset management services, with Nord Est Asset Management S.A. (NEAM);
- consumer credit services, with Prestipay S.p.A.;
- other ancillary services with other companies in the value chain.



### **Allitude**

Allitude is the Cassa Centrale Group company specialising in outsourcing of banking services and IT solutions for the financial sector.

Consolidated expertise, continuous technological innovation and careful management of IT security, has made Allitude a benchmark in the provision of IT and back-office services supporting Affiliated Banks of the Cassa Centrale Group throughout Italy.

Through an integrated offer, the company provides advanced solutions for management of technological infrastructure, evolution of banking information systems and optimisation of operational processes, guaranteeing efficiency, reliability and business continuity.

### **Assicura Agenzia and Assicura Broker**

Assicura Agenzia is the Subsidiary of Cassa Centrale Banca that develops bank insurance products, offering concrete solutions for targeted cover and risk-management requirements as well as pension and savings needs of households and small and medium-sized enterprises. This insurance company of the Cassa Centrale Group specialises in insurance products for private individuals and companies.

With its wide range of products and services, Assicura Agenzia is a leader in the distribution of insurance solutions, operating through the Affiliated Banks of the Cassa Centrale Group across Italy.

Its range includes policies offering cover to individuals, families, assets and professional activities, with customised solutions meeting customers' security and pension requirements. Through its innovative model and qualified advisory service, the company guarantees protection and support for every stage of life.

This sits alongside the services offered by Assicura Broker, a subsidiary of Assicura Agenzia specialised in consultancy and the management of risks that require tailor-made solutions with targeted expertise. Assicura Broker searches the entire national and international insurance market for the most suitable cover for specific needs and guarantees correct application of policies in the event of a claim.

## Prestipay

Prestipay is a Cassa Centrale Group company specialising in the Consumer Loans segment.

Its specialised expertise, precise risk control and a comprehensive range of products and services, make the company a leader in the creation of Consumer Credit services distributed to customers by the Affiliated Banks of the Cassa Centrale Group throughout Italy. Through the "Prestipay" brand, the Company offers a complete range of personalised and accessible financing solutions including personal loans, flexible loans and salary or pension-backed loans.

## Claris Leasing and Claris Rent

Claris Rent and Claris Leasing are the Cassa Centrale Group companies specialising in long-term rental and leasing, offering flexible and innovative solutions for individuals, businesses and professionals. Both companies operate with a sustainability and efficiency-oriented approach.

Claris Rent, a subsidiary of Claris Leasing, provides long-term rental services, giving customers access to vehicles and capital goods without tying up capital, offering customised formulas including assistance and complete management. Claris Leasing offers financial and operational leasing solutions to support business growth and facilitate access to capital goods and vehicles, with tailor-made offers for optimised financial planning.

With their comprehensive offer and highly specialised services, Claris Rent and Claris Leasing are trusted partners for mobility and financial innovation, supporting the economic development of the areas in which they operate.

## NEAM

NEAM S.A. (Nord Est Asset Management) is the asset management company of the Cassa Centrale Group, specialised in innovative and sustainable investment solutions for private, institutional and corporate clients. NEAM operates with a strategic approach geared towards long-term value creation.

With consolidated expertise and a rigorous management model, the company offers a diversified range of investment funds and customised solutions that incorporate ESG criteria, aimed at balancing returns and sustainability. Implementing careful market analysis and constant risk monitoring, NEAM helps Cassa Centrale Banca, Affiliated Banks and, through them, customers, to build efficient and responsible portfolios.

## Products and services for customers of Affiliated Banks

The Group's Affiliated Banks offer a wide range of customer products and services, with a focus on sustainability and economic growth in their local areas. The Cassa Centrale Group provides banking and financial solutions to cooperative members and customers, also acting as a contractual counterparty in the provision of various services. The range is divided into specific business lines, specifically:

- **Loans and finance:** access to credit is central to supporting economic and social development. The Group promotes sustainable and responsible lending through:
  - **mortgage loans and green loans**, aimed at energy efficiency, renewable energy and sustainable mobility;
  - **loans to businesses**, with tailor-made solutions for business growth and innovation;
  - **microcredit and financial-inclusion solutions** to support small and local businesses;
  - **ordinary and pooled loans**, including loans with favourable terms;
  - **leasing and long-term rental** to facilitate productive and innovative investments;
  - **management of impaired loans** and valuation of real estate for sustainable asset management;
  - **consumer loans**, through Prestipay S.p.A., to meet the financial needs of families;
  - **assistance regarding the National Recovery and Resilience Plan (NRRP)**, with consultancy services and support in accessing funds.

- **Investment and asset management:** Affiliated Banks offer investment and asset management solutions that incorporate ESG criteria and sustainability, while ensuring reliability, continuity and operational efficiency. The Cassa Centrale Group provides an intermediation service enabling Affiliated Banks to offer a wide range of financial solutions, increasingly focusing on sustainable products. The finance segment offering includes:
  - **sustainable NEF funds** with an increasing quota in investment portfolios;
  - **ESG asset management**, balancing returns and environmental impacts;
  - **institutional asset management**, for professional and diversified management of investments;
  - **investment funds**, with solutions that integrate sustainability principles;
  - **online trading**, for direct access to financial markets, through the promotion and placement of the Directa platform and Masterchart service;
  - **advanced financial consulting**, with customised services for efficient management of savings;
  - **insurance and insurance brokerage**, for asset protection and financial planning.
  
- **Payments and banking services:** the Group's Affiliated Banks offer advanced payment and transaction management solutions, providing a comprehensive service for private and corporate customers. The Cassa Centrale Group supports Affiliated Banks with management of collection and payment, interbank settlements and the issue of innovative payment instruments. The range includes:
  - **payment cards and POS services, e-money and digital services**, for retail and corporate customers, with innovative tools for management of financial transactions;
  - **digital banking**, for omnichannel access to banking services;
  - **collection and payment services**, with efficient and integrated transaction management solutions;
  - **treasury services for Public Bodies**, supporting the financial transactions of institutional bodies;
  - **foreign services**, including channelling international payments, management of documentary credit and international import/export guarantees;
  - **centralised services for Banks**, to optimise payment and settlement operations.

As part of its operations, the Cassa Centrale Group has progressively increased its commitment and sought to promote customer awareness of products and services with a social and environmental purpose:

- granting sustainable loans, i.e., providing funding only for projects that have a positive impact on the community, and avoiding projects that can cause significant harm;
- offering "green" products such as "green" loans and "green" bonds;
- offering investment products that incorporate ESG and environmental-impact-assessment criteria, consistent with customer sustainability preferences.

## Credit

The third link in the value chain regards the management of member and customer deposits as well as lending to retail and corporate customers. Credit activity is a central pillar of the Group's business model. The impact of lending extends to the members of the Cooperative Credit Banks, retail and corporate customers, as well as the local communities benefiting from financial support offered.

One of the most significant changes introduced in 2024 was the adoption of a structured commercial segmentation model, aimed at increasing the effectiveness of lending strategies and promoting sustainable and inclusive development.

For private customers, this model is based on total funding bands, with the following categories: Low Mass Base, Low Mass Active, High Mass, Low Affluent, High Affluent and Private.

For corporate customers, the classification is determined by turnover and agreed funding, dividing companies into: Small Economic Operators, Small Businesses and Enterprises.

This segmentation has enabled detailed mapping of the distribution of the Group Banks' corporate customers by sector, highlighting the breakdown of client companies:

- 21% in commerce,
- 18% in services,
- 14% in construction,
- 12% in manufacturing,
- 10% in agriculture and animal husbandry,
- 10% in accommodation and catering,
- 8% professionals,
- 3% in public services,
- 3% in logistics,
- 1% in utilities.

During the reporting period, the number of Group customers increased for almost all sectors, with particularly significant growth across all sectors except commerce.

With reference to the stock of gross loans at the end of 2024, volumes totalled EUR 50.7 billion disbursed, with:

- 51.3% to families, associations and third-sector organisations,
- 35.9% to small and medium-sized enterprises,
- 10.9% large enterprises,
- and the remaining 2% to Public Authorities and financial companies.

The breakdown of loans by business sector is as follows:

- 29.6% to manufacturing activities,
- 22.8% to construction and real-estate companies,
- 18% to commercial activities,
- 12.4% to other services,
- 11.5% to the hotel and catering sector,
- and 5.7% to agriculture.

### **Investment and insurance distribution**

The fourth link concerns the management of investments, including own and third-party investments, and the provision of insurance services to individuals and companies. Stakeholders include cooperative members and customers, the Parent Company and Affiliated Banks, as well as local communities.

Downstream, the Group serves both end customers, including families, businesses and public authorities, and Affiliated Banks. The service offering is designed to provide financing and investment solutions with a sustainable approach.

Loans include mortgage loans, consumer credit, leasing and long-term rental, with a focus on green products to support the ecological transition. Investments include insurance services, asset management, investment funds and advanced financial consultancy, with a focus on the incorporation of ESG criteria.

## Associates and their business

The reporting scope of Cassa Centrale Group includes Associated Companies, consolidated at equity, over which Affiliated Banks hold the majority of voting rights in ordinary Annual General Meetings and exercise operational control. Although they fall outside core banking business, these companies were acquired mainly through Affiliated Banks as part of debt-collection operations and to support investments in the local areas where the Group operates.

These include:

- **Società Agricola Terre Della Rocca S.r.l.**, operating in the viticulture industry, is controlled by Banca di Bologna Real Estate S.p.A. (Banca di Bologna);
- **Azienda Agricola Antoniana S.r.l.**, acquired by Cassa Padana, was founded as a dairy farm in a small town outside Brescia. As of 2021, it ceased direct management of operations while retaining ownership of the land, on which an agricultural lease was signed with an option to redeem the land;
- **Agorà S.r.l.**, a real-estate company of Cassa Padana, was acquired as part of credit-recovery operations, and the business unit was sold during the year.

## Group Strategy

[ESRS 2 SBM-1]

Since it was founded, the Cassa Centrale Group has placed sustainability at the heart of its strategy, progressively evolving its approach for the integration of advanced ESG governance models and working towards the definition of ESG governance solutions.

With a view to increasing integration of Group strategy with business and operations, for the first time the 2024-2027 Strategic Plan includes projects of the Sustainability Plan (SP). This includes objectives of the Strategic and Operational Plan on Climate and Environmental Risks (developed in response to the European Central Bank's Supervisory expectations). The Group's Multi-Year Strategic Plan and the Sustainability Plan are reviewed and updated annually.



Through the Strategic Planning process, the Parent Company ensures integration and synergy of Group planning — the Multi-Year Strategic Plan and the Annual Operating Plan — and the sustainability objectives defined by the Sustainability Plan, also taking into account context in which the Group operates and exposures with reference to sustainability, climate-change and environmental risks and opportunities.

The Cassa Centrale Group integrates sustainability into its strategies, developing solutions for responsible finance and promoting investments with positive impacts on environment and society. Key initiatives include:

- **sustainable finance** - development of ESG products and services to promote responsible investment;
- **inclusive governance** - Affiliated Banks' active participation in defining strategies, ensuring independence and technical support;
- **capital strength** - prudent management of financial resources, with a **CET1 ratio** among the best in the national banking system;
- **community relations** - support for local initiatives and enhancement of the Group's social role in the local areas in which it operates.

Through this approach, Cassa Centrale Banca, together with its subsidiaries, ensures the stability and efficiency of Affiliated Banks, contributing to the economic and social growth of communities.

In this regard, the Parent Company's Planning Department coordinates the preparation and monitoring of the Multi-Year Strategic Plan and the Annual Operating Plan (of the Group and the Parent Company), taking into account the relevant goals among those defined in the Sustainability Plan and integrating the results of specific ESG analyses into planning activities. For definition and updating of the Plan, the Parent Company's ESG Steering Committee and the ESG and Institutional Relations Department evaluate synergies with the Multi-Year Strategic Plan prepared by the Planning Department. The Budget & Planning Service (within the Planning Department) ensures complete consistency between the defined objectives and the risk-assumption and capital-allocation policies set out in the Multi-Year Strategic Plan and the Annual Operating Plan, including the strategic sustainability goals defined in the Sustainability Plan.

More details on the Group Sustainability Plan can be found in the section "1. General Disclosures", chapter "1.4 Management of Impacts, Risks and Opportunities", paragraph "1.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model".

#### **Euricse and the Best Practices questionnaire**

Internal monitoring and sharing of initiatives for environmental and social sustainability continues. The survey of best practices, now in its fourth edition and in partnership with Euricse, is based on a questionnaire gathering information on the various initiatives launched within the Group, and was carried out in the summer of 2024. This involved all 65 Affiliated Banks, Cassa Centrale Banca and certain Subsidiaries. Gathering this information on initiatives makes it possible to harness the wealth of experience gained and encourages dialogue and cooperation between the various Group entities.

#### **UN Global Compact participation**

In 2024, the Cassa Centrale Group renewed its participation in the UN Global Compact, the United Nations initiative launched in the early 2000s to promote sustainable business policies and responsible business practices.

The UN Global Compact pursues two complementary objectives: on the one hand, to integrate these principles into corporate strategy and daily activities of participating organisations, and on the other, to promote dialogue and coo-

peration with all relevant stakeholders, while supporting achievement of the Sustainable Development Goals (SDGs) set by the United Nations for 2030.

The Group undertakes to meet its reporting obligation of informing its stakeholders of its progress in implementing the Ten Principles and supporting the broader UN SDGs through its Communication On Progress (COP). In 2024, the Group prepared its Communication on Progress on the results achieved during 2023, in relation to the integration and implementation of the Principles enshrined in this framework.

### 1.3.2 Interests and views of stakeholders

[ESRS 2 SBM-2]

In 2024, the Cassa Centrale Group continued reinforcing activity aimed at listening to and engaging with stakeholders, further consolidating dialogue as a strategic tool for the creation of long-term value, both tangible and intangible. Proximity to local areas, members and customers is a distinguishing feature of the Group, which works closely with communities on a daily basis in order to respond effectively to their needs, taking them into account in the definition of Group strategy.

To ensure structured interaction, the Group adopts dedicated procedures for communication in special circumstances, such as critical events or crises, ensuring transparency and responsiveness. Additionally, the Group Code of Ethics and Group Policies set out guiding principles for stakeholder relations, reinforcing the Group's commitment to social responsibility and cooperation. Structured stakeholder engagement is planned for implementation in 2025.

Engagement of internal and external stakeholders aims to ensure dialogue, transparency and collaboration, promoting strategic alignment and strengthening ties with the local area. Through a combination of digital tools, dedicated events and institutional communication channels, the Group fosters collaboration, dissemination of best practices and alignment of all parties involved, thus enhancing the efficiency and sustainability of the operating model.

The Group tracks stakeholder engagement through feedback analysis, performance monitoring and direct contact, enabling it to adapt strategies and policies to respond swiftly to emerging needs and increase the effectiveness of shared initiatives. The administrative, management and supervisory bodies receive regular updates on stakeholder opinions and interests, ensuring that this information is integrated into decision-making processes. Stakeholder expectations and concerns are analysed through dedicated reports and specific meetings, ensuring constant alignment of corporate strategy and local needs. In addition, the administrative, management and supervisory bodies receive updates on the various sustainability initiatives launched to respond, where this is deemed appropriate, to the interests and opinions of key stakeholders (e.g. results of employee, member or customer surveys, and ESG preferences expressed by customers through the MiFID questionnaire).

The Cassa Centrale Group's operational and strategic planning process is based on multi-level dialogue with stakeholders, ensuring structured and participatory engagement. In particular:

- Affiliated Banks represent a direct channel for feedback from cooperative members and end customers, guaranteeing proximity with the local area;
- the Directors' Committee, chaired by the Chief Executive Officer, is composed of 12 members from the General Management of the Group's Affiliated Banks, identified according to the procedures and criteria established in the Group Regulations on the Directors' Committee. It gathers requests from Affiliated Banks established on the ground and makes independent proposals to the Parent Company regarding management of the Cooperative Banking Group. It also has an advisory function with reference to Group Policies and Regulations and any further non-binding opinions requested from the Committee by the Parent Company;
- Regional Annual General Meetings allow the Parent Company to gather input directly from each area, identifying their specific requirements and responding in a targeted manner to local needs.

This proactive approach enables interaction with a range of stakeholders, both internal and external, through different channels and tools, as set out below.

Stakeholders	Aim of engagement	Tools and channels of communication
<b>Internal stakeholders</b>		
<b>Affiliated Banks</b>	Ensure a constant flow of information and strategic updates, promote sharing of best practices and strengthen operational cooperation between Affiliated Banks. Strengthening of tools for digitalisation and innovation of banking processes and the adoption of sustainable solutions that increase efficiency and customer satisfaction.	<ul style="list-style-type: none"> <li>■ Extranet/documents portal</li> <li>■ Institutional / information websites and related dedicated sections</li> <li>■ Portals and dedicated Communities of Practice</li> <li>■ Reports, financial statements</li> <li>■ Regional Shareholders' Meetings</li> <li>■ Theme-based roadshows, targeting Management and specialist technical departments</li> <li>■ Dedicated events/meetings</li> <li>■ Information and statements</li> <li>■ Daily press review</li> </ul>
<b>Subsidiaries</b>	Strengthen coordination with Subsidiaries, ensure strategic and operational alignment and improve information sharing. Support for the integration of ESG criteria into business strategies, more effective risk management tools and investment in digitalisation.	<ul style="list-style-type: none"> <li>■ Extranet/documents portal</li> <li>■ Institutional / information websites and related dedicated sections</li> <li>■ Portals and dedicated Communities of Practice</li> <li>■ Reports, financial statements</li> <li>■ Daily press review</li> <li>■ Dedicated meetings</li> </ul>
<b>External stakeholders</b>		
<b>Affiliated Banks' customers</b>	Map the key challenges and opportunities of Affiliated Banks' end customers/users in relation to sustainability and develop financial products and services aligned with their needs. Customers are particularly sensitive to the provision of social and environmental products, costs of banking services, and sustainable investments.	<ul style="list-style-type: none"> <li>■ Institutional / information websites and related dedicated sections</li> <li>■ Press releases</li> <li>■ Inbank - Internet banking</li> <li>■ Information request form</li> <li>■ Active social networks</li> </ul>
<b>Parent Company shareholders</b>	Ensure transparency, gather feedback and share the Group's strategic and financial objectives. Shareholders expect sound governance, careful management of financial and non-financial risks, clear reporting on sustainable performance and a growth strategy geared towards long-term value creation.	<ul style="list-style-type: none"> <li>■ Shareholders' Meeting</li> <li>■ Reports, financial statements and press releases</li> <li>■ Institutional website</li> </ul>
<b>Cooperative members of the individual Affiliated Banks</b>	Promote active involvement of Cooperative Members of individual Affiliated Banks in strategic decisions and strengthen their sense that they are part of the credit cooperative. Members expect transparency on development strategies, a fair economic and social return, initiatives supporting mutuality and cooperation, as well as a strong commitment to regional sustainability and support for local communities.	<ul style="list-style-type: none"> <li>■ Annual general meeting</li> <li>■ Institutional / information websites and related dedicated sections</li> <li>■ Hard copy and online house organ, periodic newsletters</li> <li>■ Social Networks</li> <li>■ Intermediary local consultation bodies (e.g., Partners Councils, Area Committees, etc.)</li> <li>■ Area meetings prior to Shareholders' Meetings</li> <li>■ Dedicated meetings on cultural and current issues</li> <li>■ Committees and Young Member Groups</li> </ul>

Stakeholders	Aim of engagement	Tools and channels of communication
<b>Employees and family members</b>	<p>Incorporate the perspectives of employees through workers' representatives, improve corporate welfare and promote an inclusive and participative corporate culture. Major topics include organisational well-being, homeworking, inclusion, professional development opportunities, fair pay policies and sustainable mobility for employees.</p>	<ul style="list-style-type: none"> <li>■ Continuous dialogue and feedback with the Human Resources functions</li> <li>■ General analysis of resource needs/working climate surveys</li> <li>■ Corporate welfare initiatives</li> <li>■ Training</li> <li>■ Intranet and specific platforms</li> <li>■ Institutional / information websites and related dedicated sections</li> <li>■ LinkedIn page of Parent Company</li> <li>■ Dedicated events</li> </ul>
<b>Trade unions</b>	<p>Ensure dialogue and engagement on working conditions. Trade unions expect a concrete commitment to improving working conditions, open discussion on collective bargaining, greater protection of occupational health and safety, and more inclusive and employee-oriented company policies.</p>	<ul style="list-style-type: none"> <li>■ Discussions and meetings with the interested parties, supporting the Affiliated Banks, the Subsidiaries and Cassa Centrale Banca</li> <li>■ Dialogue with workers' representatives, as provided for in Legislative Decree 125/24, through the Group Trade Union Delegation</li> </ul>
<b>Third Sector, Authorities and Institutions (local authorities, general governments, regulators and trade associations)</b>	<p>Exercise local commitment and presence to promote social and sustainable development initiatives. The focus is on collaborating on financial-inclusion projects, promoting ethical and sustainable finance, supporting environmental and social initiatives, participating in territorial and infrastructural development, and enhancing the cooperative culture.</p>	<ul style="list-style-type: none"> <li>■ Meetings with representatives of local institutions and non-profit organisations</li> <li>■ Meetings and events in the Local Area, at central and peripheral levels</li> <li>■ Participation in work groups, round tables and technical committees</li> <li>■ Regional events and partnerships in local initiatives</li> <li>■ Support to social actions or projects</li> <li>■ Specific agreements and protocols</li> <li>■ Support for conferences</li> <li>■ Institutional / information websites and related dedicated sections</li> </ul>
<b>Suppliers of goods and services</b>	<p>Ensure responsible management of suppliers, promote sustainable procurement practices and ensure service quality. Suppliers expect transparent and fair procurement processes, digital innovation tools to improve business relationships and stability in long-term partnerships.</p>	<ul style="list-style-type: none"> <li>■ Institutional/information websites/related dedicated sections</li> <li>■ Meetings/phone calls</li> <li>■ Training</li> <li>■ Focus on local suppliers</li> <li>■ E-Procurement</li> <li>■ Periodic reporting</li> </ul>
<b>Means of communication</b>	<p>Promote transparency and dissemination of information and enhance corporate reputation. Key topics include institutional and financial communication, transparency in ESG reporting, raising awareness of sustainability issues, combating misinformation and increased use of digital channels for engagement with all stakeholders.</p>	<ul style="list-style-type: none"> <li>■ Interviews with top management</li> <li>■ Press releases</li> <li>■ Press conferences and regional events dedicated to spreading information of interest</li> <li>■ Media Area of the institutional website containing press releases, press kits and institutional images</li> <li>■ Social networks (Group LinkedIn)</li> <li>■ External Relations and Sustainability Service</li> </ul>

## 1.4 Management of Impacts, Risks and Opportunities

### 1.4.1 Double materiality analysis process

[ESRS 2 IRO-1]

The **Cassa Centrale Group** identifies and manages the most relevant sustainability issues through a **Double Materiality Analysis**. This identifies the **impacts** generated, or potentially generated, on the economy, society (including human rights) and the environment, as well as the **risks and opportunities** that these factors represent for the business model. This process was carried out in accordance with European reporting principles and the guidance provided by EFRAG (European Financial Reporting Advisory Group) in the Implementation Guidance “Materiality Assessment”, and is updated annually.

In 2024, on the basis of assessments from the previous year and in the absence of any major events that could significantly alter findings, the analysis was supplemented and refined, with an approach that made it possible to strengthen the connections between relevant impacts, risks and opportunities. The process was carried out with particular involvement of the Risk Management Function (detailed below), ensuring alignment with the Group’s risk-management methodologies. The assessments performed made it possible to identify the material topics and sub-topics, which form the basis for preparation of the 2024 Consolidated Sustainability Statement and updating of the Sustainability Plan.

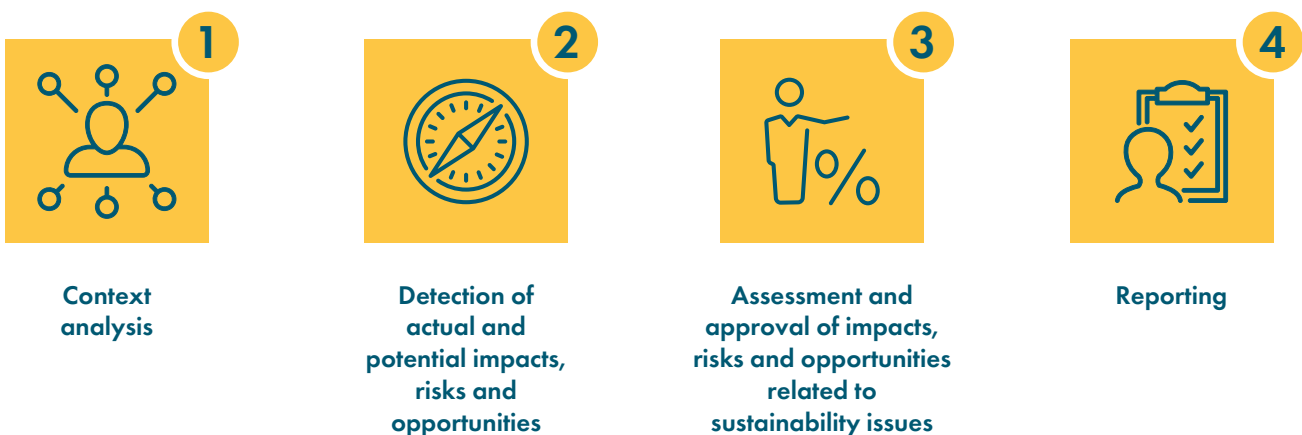
Assessments considered two aspects:

- **Impact materiality:** impacts, whether current or potential, positive or negative, that the organisation generates or could generate on the economy, society (including human rights) and the environment, throughout the entire value chain, including upstream and downstream activities directly attributable to the Group, including through products, services and business relationships;
- **Financial materiality:** risks or opportunities that could affect the Group’s cash flows, development, performance, competitive positioning and cost of capital in the short, medium or long term.

In line with ESRS guidance, both assessments take into account impacts, risks and opportunities (IROs) in the short, medium and long term, considering the entire value chain, including business relationships and associated stakeholders, even in the absence of direct contractual relationships.

#### Double Materiality Process

The process for defining and updating material impacts, risks and opportunities (IROs) for 2024 included the following steps:



## Phase 1: Context analysis

The first phase of the process focused on analysing the business model, including location and services provided, value chain and reference context, with particular attention to the dynamics of the banking and financial market. This process considered both the internal business and operations of the Group, and the external context, including key ESG trends and regulatory developments. Strategic corporate documents, such as the Code of Ethics, internal policies and the Group's commitments were also analysed, along with the ESRS disclosure requirements. The needs and issues identified through interaction with stakeholders during the year via various communication channels and regular meetings were also assessed. Finally, the analysis used competitor benchmarks and media searches to identify the most relevant emerging themes in the banking sector.

As part of the Double Materiality Analysis, the Group also conducted qualitative analyses regarding environmental issues that were not identified as "material".

**E2 IRO-1** With regard to pollution, company sites and operations along the value chain were considered.

**E3 IRO-1** For water and marine resources, the analysis included all company sites within the scope of consolidation, as well as activity along the value chain.

**E4 IRO-1** For biodiversity and ecosystems, considering the characteristics of the business model, no significant interrelationships were identified.

**E5 IRO-1** Finally, with regard to resource use and circular economy, the Group analysed its operations centred on the use of electronic equipment, such as portable computers, monitors, company mobile devices and accessories (e.g. mice and keyboards).

## Phase 2: Identification of potentially material impacts, risks and opportunities

The second phase of the process was aimed at identifying the IROs related to the Group's activities. These were categorised according to the topics listed by the CSRD and the European Sustainability Reporting Standards (ESRS) and, in particular, in correlation with the topics, sub-topics and sub-sub-topics set out in ESRS1.

While identifying IROs, the Cassa Centrale Group considered the dependencies of impacts in relation to resources and business relationships. The Group assessed interrelationships between natural resources, e.g. water or air, and relations with stakeholders, such as employees, cooperative members and customers, in order to identify connections between negative and positive impacts and risks and opportunities.

## Phase 3: Assessment and approval of findings

The main impacts, risks and opportunities (IROs) identified were subjected to an assessment process conducted by the main functions of the Parent Company, starting with findings from stakeholder engagement in 2023. Although a new structured phase of stakeholder engagement was not initiated in 2024, the validation of assessments was confirmed by responses to the questionnaire available on the Parent Company's website, which gives stakeholders the opportunity to express their view of the impacts generated by the Group. The responses confirmed the consistency of previous assessments, highlighting the absence of significant events or changes from the previous year and ensuring continuity in the identification of material topics for 2024.

In accordance with reporting standards, an assessment was made for each impact, risk and opportunity (IRO) based on significance/magnitude and, for potential IROs, also on probability of occurrence. In assessing impacts, the Cassa Centrale Group considered gross impacts, i.e. prior to any mitigation actions, and did not take into account any offsets generated by positive impacts on people and the environment.

A list of the criteria considered to determine the materiality of impacts is provided below.

- **significance:** measures the degree of severity based on the scale and scope of the impact, considering:
  - **scale:** measures the severity of a negative impact or the level of benefit of a positive impact on people or the environment;
  - **scope:** assesses the geographical reach or the number of people potentially affected by the impact;
  - **irremediable character** (only for negative impacts): indicates the complexity of remedying or neutralising a harmful impact;
- **probability** (for potential impacts only): measures the likelihood of an impact occurring within a given time horizon.

The following variables were used to assess financial risks and opportunities:

- **probability:** indicates the possibility that a financial risk or opportunity will arise;
- **magnitude:** measures the impact of a financial risk or opportunity on the Group's cash flows, development, performance, positioning, cost of capital or access to loans in the short, medium or long term. For financial risks, the ability of a risk to generate losses of varying degree, to the point of jeopardising the prudent management of the business, was assessed. For financial opportunities, the ability of a risk to generate economic benefits, such as increased revenues or cash flow, reduced cost of capital or improved access to loans, was estimated.

The significance of IROs is assessed on a scale of 1 to 4, where 1 represents the lowest materiality and 4 the highest.

The materiality threshold was determined using a matrix that combines the significance of each IRO — assessed on the basis of degree, scope and irremediable nature — or magnitude of the IRO with the probability of occurrence.

For each issue listed by the ESRS, the negative or positive impact, risk and opportunity with the maximum score was identified. For an IRO to be considered material, it had to score 3 or higher. This threshold represents the level above which an IRO is material for the Group, with potentially significant effects on business or financial performance. In contrast, IROs with a score below 3 were classified as non-material or of limited relevance, as they were characterised by low probability or low magnitude.

The materiality threshold was calibrated to balance IROs that, while having a medium probability, have a significant magnitude, and those that, while having a low probability, could generate significant impacts on the environment, communities, people or the Group itself. The results of the double materiality analysis were submitted to the Parent Company Board of Directors for prior approval.

### **Risk assessment by Risk Management**

In the assessment of financial materiality, specific areas of the Group's value chain were considered — the "Suppliers", "Own operations", "Loans" and "Investments" clusters — making it possible to analyse potential upstream and downstream risks. Risk Management assessed the financial materiality of risks within a quantitative/qualitative assessment framework, considering gross risks, which is classified on a scale of 1 to 4, as described above.

Cassa Centrale Group's risk identification process takes into account ESG risk dimensions assessed as specific physical and transition risk factors in terms of their influence (positive or negative) on traditional risks already incorporated in the internal risk management framework.

ESG risks concern possible negative financial consequences that could affect the Group, as a result of existing or potential impacts of ESG factors on counterparties or assets subject to investment. Specifically:

- climatic and environmental factors related to the quality and functioning of the natural environment and its systems include factors such as climate change, biodiversity, energy consumption, pollution and waste management. Depending on the nature, pace and objective of these changes, their impacts may vary in terms of different types of traditional financial and non-financial risks, including credit and counterparty risk, market risk, liquidity and funding risk, operational risk, portfolio real-estate risk, reputational risk, and strategic and business risk;

- social and governance factors, in relation to operational, reputational, strategic and business risk, revolve around the rights, welfare and interests of individuals and communities, and include governance provisions for environmental and social factors in counterparty policies and procedures.

The annual process of identifying material risks for the Group involves several interconnected stages. Firstly, the Risk Management Department initiates ongoing analysis of significant assets, exposures and legal entities to identify potentially material risks. Risks are then short-listed, establishing their hierarchy and taxonomy. After this mapping, the organisational structure necessary for management and monitoring of material risks is defined, ensuring continuous monitoring.

For IROs that are not included in the material-risk assessment process, additional qualitative/quantitative assessments were conducted on the basis of:

- analysis of the basis of operational losses recorded in the Group's internal Loss Data Collection database;
- analysis of synthetic indicators (ESG scores) that measure adequacy with respect to the factors suggested by the EBA, i.e. information areas to be taken into account in ESG assessment, on the basis of information from various authoritative data sources (ISTAT, MeF, Eurostat, ISPRA, RED Risk S.p.A., etc.). Information gathered through questionnaires distributed amongst Group customers was integrated into the individual EBA factors of the ESG score, which thus acquires greater accuracy as the questionnaire is completed and updated, either by overwriting the variables determined through analytical methods or by introducing new variables into the EBA factor assessment.

The sustainability risk assessment was conducted by Risk Management on the basis of a combination of several approaches, in order to capture both qualitative and quantitative aspects, adapting to short and long-term risks. Assessment tools include:

- i. analysis of climate-change scenario;
- ii. analysis of historical evidence (operational risk related to ESG issues);
- iii. analysis of synthetic scores for individual risk factors;
- iv. expert assessments of long-term economic impacts.

The climate risk assessment process is currently integrated into the Group's overall risk management framework, which is described in the following paragraph. However, as far as social and governance risks are concerned, the integration process is still being developed. At present, the Group does not possess advanced forecasting and scenario analysis tools to assess the long-term business impacts of social risks, nor simulation models enabling robust analyses of these aspects. Nevertheless, the process detailed here is judged, on a best effort basis, to be the best and most comprehensive framework of analysis currently available for formal adoption by the Group for assessment of these types of risks.

### ***Climate and environmental risk assessment***

The Group's main climate and environmental impacts relate to the value chain and primarily to loans to customers. In addition, the Group has identified non-material impacts related to internal energy consumption, resulting from the use of air conditioning, heating and lighting systems in buildings, as well as from company mobility. This consumption generates greenhouse gas emissions, a key environmental challenge.

Management and reduction of environmental impacts require a balanced and practical approach, aimed at minimising negative effects and maximising positive ones. Whilst the implementation of sustainable practices requires significant upfront investments that can have a negative effect on short-term profitability, the Cassa Centrale Group views the ecological transition as an opportunity. In the long term, this transition is seen as a means to reduce company operating costs through efficient use of resources and prevention of risks associated with climate change.

The Group has developed a structured process to identify, assess and integrate climate risks and opportunities into all of its operations, considering both the physical risks associated with extreme climate events and the challenges and opportunities arising from transition to a low-carbon economy.

It should also be noted that the process of identifying, assessing and managing climate and environmental risks is integrated into the overall process of identifying material risks and the resulting risk management processes.

Similarly, transition opportunities are constantly monitored to ensure that the Group can promptly adapt to new regulations, exploit market opportunities and implement sustainable technologies.

In fact, as mentioned in chapters “3.5 ECB DECISION - CLIMATE AND ENVIRONMENTAL RISKS” and “6.5 CLIMATE AND ENVIRONMENTAL RISKS” of the Report on Operations, following the “ECB Decision”, the Group has formalised a process for identifying and assessing climate and environmental risks. See these chapters for further details. As part of its supervisory functions, the ECB has progressively strengthened its approach to climate risk management, imposing the obligation on financial institutions to assess, manage and ensure transparency on these aspects. This analysis presents an overview of the impact of short, medium and long-term Climate and Environmental (C&E) risks.

Due to the nature of the Group’s business, the C&E risk materiality analysis is performed on all risks, but with a focus on credit, market, operational, liquidity and financing, real-estate portfolio, strategic and business, litigation and legal, and reputational risks, viewed from the perspective of economic activity (i.e. sub-sector), geographical location and Group Bank.

The methodology adopted by the Cassa Centrale Group to identify climate and environmental risks is integrated into the methodological framework already defined in the “Group Regulations on the Identification of Material Risks”, which continues to be the main reference for all recognition and mapping of material risks, including those related to climate and environmental aspects. In line with Basel Committee recommendations, the Group has decided not to establish a new Tier 1 financial risk category in the Risk Map. Instead it considers climate and environmental risks as lower-level risks within the existing financial categories, such as credit risk, market risk, operational risk, liquidity and funding risk, real-estate risk of the property portfolio, and strategic and business risk.

Below is an overview of the potential impacts of physical and transition risk factors within the traditional risk categories.

Risk	Risk type	Description
<b>Credit and counterparty risk</b>	Physical risk and transition risk	Credit and counterparty risk refers to a counterparty’s ability to meet its financial obligations. In this sense, climate change affects this capacity mainly through two channels: first in terms of changes in policies, regulations or market dynamics that may alter corporate creditworthiness and credit quality; and second in terms of the reduction in the value of real estate pledged as collateral resulting from the occurrence of physical risk events. The impact analysis focuses on the portfolios for corporate clients and individual customers. For companies, risk ratios based on balance-sheet indicators and business-related variables are used as proxies to estimate changes in Probability of Default (PD) and to calculate the impact in terms of Expected Credit Loss (ECL). For private individuals, on the other hand, the analysis considers the forecast delta value of one-year PD.
<b>Market risk</b>	Transition risk	Closely tied to changes in regulations, technology and behaviour that may influence asset prices and values. The impact analysis focuses on the Group’s own securities portfolio, taking Climate VaR (CVaR) as indicator, and with a focus on sovereign and corporate securities.
<b>Liquidity and funding risk</b>	Physical risk and transition risk	Resulting mainly from: i) changes in policies, technologies and consumer preferences oriented towards sustainability and reduction of carbon emissions, and ii) physical risk, the impact of which could, for example, materialise in terms of withdrawal of liquidity from customers’ current accounts to deal with potential damage caused by the occurrence of climate events. Analysis of impacts focuses on components most exposed to both physical and transition risk, such as demand deposits, instalment loans at maturity and irrevocable margins. A percentage increase in cash outflows and/or a reduction in cash inflows is associated with each class of climate and environmental (C&E) risk.
<b>Operational risk</b>	Physical risk and transition risk	Analysis of impacts focuses on operational losses from events related to climate and environmental (C&E) risks, recorded through Loss Data Collection and the Risk Control & Self Assessment process.
<b>Real estate portfolio risk</b>	Physical risk and transition risk	Physical risk refers to direct damage to property caused by extreme weather events or gradual climate-related changes. Transition risk, on the other hand, concerns indirect impacts resulting from the adoption of environmental policy, increased demand for sustainable real estate and technological advances in the sector.

Risk	Risk type	Description
<b>Strategic and business risk</b>	Physical risk and transition risk	The approach adopted focuses on the volumes of interest income and fees and commissions income from the operations of Affiliated Banks, which could potentially be exposed to risk in relation to the climate scenarios analysed.
<b>Litigation and legal risk</b>	Physical risk and transition risk	Physical risk refers to lawsuits arising from direct damage caused by the impacts of climate change, such as extreme weather events. Transition risk, on the other hand, concerns legal action tied to adaptation to climate policies, sustainability and compliance with evolving environmental regulations.
<b>Reputational risk</b>	Physical risk and transition risk	Risk primarily tied to transition to a low-carbon economy and the strategy and manner in which the Group responds to this transition.

To evaluate the direct and indirect effect of climate and environmental risks on existing financial risks, the Group adopted a transmission-channel approach. The transmission-channel approach establishes a set of causal relationships describing how financial risks are influenced by climatic and environmental risk factors, such as environmental degradation and climate change, through the impact these factors have on the economic value of financial assets (microeconomic impact) and on the business environment in which the Group operates (macroeconomic impact). They therefore represent a practical and theoretical tool with which the Group assesses the relevance of climate and environmental degradation in relation to risk parameters, enabling classification of risks as material and relevant.

The transmission methodology involves several steps, which are described below.

- **Climate and environmental risks:** include risks arising from environmental degradation (e.g. increased pollution, loss of biodiversity, water stress, etc.) and those generated by climate change (e.g. increase in natural disasters, rising sea levels, impacts on health and environmental balance);
- **Sources of financial risk:** these include the drivers generating transition risk, such as regulatory developments, fiscal policies, technological innovation and changing consumer preferences, as well as physical risk, which can arise from acute or chronic events (such as natural disasters) and geographical heterogeneity of impacts;
- **Causal chain:** maps causes at the microeconomic and macroeconomic level, explaining how transition and physical risks influence the vulnerability factors of the Group's business;
- **Vulnerability factors:** elements making the Group's business model and strategy vulnerable to climate and environmental risks. Risk parameters are identified for monitoring to assess their relevance.

The Group applies this methodology to ascertain the impact of climate and environmental shocks on each risk parameter in the short, medium and long term, analysing different business lines, portfolios, economic sectors and geographical contexts. This process is constantly updated and consolidated.

The time horizons considered in determining the relevant physical and transition risks (short, medium and long term) were established according to the following criteria:

- the short term is defined in full alignment with the time frame used by the Group in its planning, budgeting, ICAAP, stress test, etc. exercises, namely 3 years from the reference date;
- the medium term is defined in view of the fact that the transition is a complex process that takes more than three years to complete. However, this period is heavily linked to the declared objectives of the European Parliament's (i.e. 2030);
- the long term is defined in full alignment with the time frame defined in the decarbonisation targets of the economy according to the Paris Agreement (i.e. 2050).

Estimation of transition risk, applied to corporate counterparties (i.e. NFC - Non-Financial Corporation), is based on the Transition Risk Engine (TRE), which estimates the impacts of specific climate assumptions and related macroeconomic/sector-specific variables in terms of changes in revenues, expected additional costs (e.g. impact of carbon tax, ETS costs, etc.) and additional investments for energy efficiency under various climate scenarios (e.g. NGFS scenarios) at the individual company

level. The model combines real economic data and climate change scenarios with data extracted from the financial statements of companies from various sectors and countries. The purpose of the model is to identify and quantify the short, medium and long-term (up to 2050) impact of a climate-related technological transition on the financial situation of the Group's corporate customers. For the measurement of physical risk, the Group adopts a methodological approach, both for exposures secured by real estate (residential and commercial) and for the entire corporate scope, based on a dedicated Physical Risk Engine (PRE) developed by Prometeia. The Physical Risk Engine employs risk mapping procedures to cover a wide range of chronic and acute physical risks and, for the main risks, allows measurement of the economic impact on NFC budgets and property values. Climate hazard risk mapping, for a specific geographical location (the coordinates of which are identified at the end of the geo-localisation process of risk exposure), is based on calculation of the probability distribution and relative return period (RP) of each indicator used to assess the climate hazard in question.

With regard to climate scenarios, the Group uses NGFS scenarios for its materiality analysis. This choice was guided by the following rationale and considerations:

- the NGFS scenarios are based on shared scientific assumptions: the set of Shared Socioeconomic Pathways (SSPs) (economic scenarios) and the Representative Concentration Pathway (RCP) (emissions scenario) of the Intergovernmental Panel on Climate Change (IPCC);
- NGFS scenarios are currently widely used by financial intermediaries;
- NGFS scenarios are applied globally, with impacts at regional level;
- REMIND-MAgPIE is a comprehensive IAM framework that simulates, in a prospective manner, the dynamics and links between energy systems, land use, water, air pollution and health, economy and climate;
- the REMIND model includes the main features necessary for the Bank's analysis purposes (e.g. wealth of sector details).

For assessment of the operating context in which the Group operates or may operate in terms of economic sectors, geographical areas and products and services, the Group considered the potential impacts of climate change and environmental degradation on Group business lines (lending services, investment and funding) as an effect of climate and industrial policies promoted by the European Union based on the evolution of competitive dynamics and consumer preferences.

In assessing the impacts for the short, medium and long-term horizons, the Group took a set of three specific NGFS scenarios as a reference, assessing the Group's ability to handle:

- an "orderly transition" to an economy with a reduced or negligible carbon footprint compared to the current one ("Orderly Transition" or "Net Zero" scenario);
- a "disorderly transition", i.e. a delayed start of the measures needed to support the transition ("Disorderly Transition" or "Delayed Transition" scenario);
- a transition in a context of "current policies", i.e. a scenario that does not assume the introduction of measures to support the transition ("Hot House World" or "Current Policies" scenario).

The NGFS was established in 2017 and brings together Central Banks, Supervisory Authorities and other financial institutions from all around the world. The mission of the NGFS is to improve the understanding of climate-related risks to the financial system and support the incorporation of climate considerations into monetary-policy decisions, regulations and investment practices. The decision to use NGFS scenarios, a standard in use by many organisations and credit institutions, was based on the consideration that they provide an analysis framework for physical and transition risks related to climate change.

With a view to continuous improvement, a specific methodology was prepared which, integrating the Risk and Control Self-Assessment and Risk Impact Assessment processes, aims to monitor the evolution of specific threats in relation to climate change, along with the potential impacts. It sets out processes to verify the need to implement additional checks and controls and verify their correct functioning with a specific test plan, applying a short, medium and long-term forecast period.

At the overall Group level, the impact of climate risks (transition risk and physical risk), considering different scenarios (Net Zero, Delayed Transition and Hot-House World), is insignificant in the short and medium term, becoming more relevant in the long

term. Even in the scenario with the highest transition risk (i.e. Net Zero), positive, but nevertheless limited effects are observed: the increase in provisions would be limited, varying between +2.9% in the short term (2026, approx. EUR +19.0 million) and +6.9% in the long term (2050, approx. EUR +45.2 million). An overview of the increase in expected losses for the performing portfolio is provided below.

Below is a table summarising the judgements resulting from the materiality analysis by time horizon regarding first-level risk, conducted conservatively by assessing the impacts at a “static-balance-sheet” level (reference date 31/12/2023), i.e. by adopting judgement thresholds and identifying possible vulnerabilities to C&E risks.

Risk type	Short term (2026)	Medium term (2030)	Long term (2050)
Credit and counterparty risk	Not significant	Partially significant	Significant
Market risk	Not significant	Not significant	Not significant
Liquidity and funding risk	Not significant	Not significant	Partially significant
Operational risk	Not significant	Not significant	Not significant
Real estate portfolio risk	Partially significant	Partially significant	Significant
Strategic and business risk	Not significant	Partially significant	Partially significant
Litigation and legal risk	Not significant	Not significant	Not significant
Reputational risk	Not significant	Not significant	Not significant
<b>Group C&amp;E risk materiality assessment</b>	<b>Not significant</b>	<b>Partially significant</b>	<b>Significant</b>

The Group’s exposure to climate and environmental risks is rather limited and characterised by elements of long-term volatility due to the static replication of the same risk portfolios.

Looking at the economic sectors of greatest interest (manufacturing, wholesale and retail trade, construction, real estate, agriculture and accommodation and catering), the impact (transition and physical combined) remains contained even in the scenario with the greatest transition risk (Net Zero). The increase in expected losses is limited in the short and medium term and significant only in the long term. The increase in expected losses varies between +1.0% in the short term (2026) and +8.0% in the long term (2050). An overview of the increase in expected losses in the economic sectors mentioned for the performing portfolio is provided below.

With regard to the management portfolios considered material for the Group:

- In the short term, there are no significant impacts, in line with the findings at Group level, for the three scenarios considered. The exception is the “natural persons” portfolio (private individuals) in the Net-Zero scenario, due to the effect of the transition risk linked to the energy class of real-estate pledged as collateral. This would result in a potential increase in expected losses of more than 10%, or approximately EUR 13.2 million in additional losses;
- in the medium term, there are no significant impacts, in line with the findings at Group level, for the three scenarios considered. The exception is the “natural persons” portfolio (private individuals) in the Net-Zero scenario, where an increase in expected losses of more than 12% is expected (approximately EUR 13 million in additional expected losses), as well as the Small Business segment (mainly sole proprietors), with a potential increase in expected losses of approximately +9.38% (approximately EUR 10.6 million);
- in the long term, there are potential significant impacts, especially in the Net-Zero scenario. In general, the segments with greatest exposure are: Small Business (with a potential impact between 10.8% and 17.42%), SME Retail (between 7.14% and 10.38%) and SME Corporate (between 5.06% and 8.28%). The “natural persons” (private individuals) portfolio

does not show any significant impact over this time frame, due to a transition that is expected to take place in the medium term. In contrast, Large-Corporate and Commercial-Real-Estate portfolios are less susceptible to impacts, especially in the Net-Zero scenario.

## **Business continuity and resilience**

[ESRS E1 SBM-3]

As part of the analysis of climate and environmental risks, the Information Technology & Security Department conducted a specific analysis on the negative effects of climatic events on business continuity. Contingency plans were also developed to guarantee operational capacity and limit losses in the event of significant disruption, in line with current regulations and the European Central Bank (ECB) Guidelines on Climate and Environmental Risks.

Climatic events feature an additional critical quality, as they not only threaten the institution's operations, but also the fundamental social function that the institution serves in the territory, providing essential services such as access to cash and other essential resources for members of the population in need.

The Cassa Centrale Group supplements its strategy and business model in response to changes in climate, highlighting how these challenges are incorporated into decision-making processes and day-to-day operations. The approach adopted includes management of climate risks, measures to ensure business continuity and strategic adjustments required to promote long-term sustainability. The Cassa Centrale Group conducts an annual risk assessment on climate events, identifying residual risks and assessing mitigation actions.

The analysis conducted on Cassa Centrale Banca considered 30 types of events and scenarios, with over 300 possible occurrences. 61% of the scenarios were applicable, with a figure of 39% real exposure, for which the material risk levels were assessed. Most service-unavailability scenarios presented a low residual risk, but for natural events, such as flooding, the risk level is medium, with possible damage to infrastructure and operational spaces.

Affiliated Banks and Group Companies also conduct annual business-continuity analysis, the results of which for 2024 will be evaluated during 2025.

## Phase 4: Reporting

The Double Materiality Analysis resulted in **identification of topics and sub-topics that exceeded the materiality threshold**, in terms of both Impact Materiality and Financial Materiality.

Below is a table highlighting the ESRSs identified as relevant by the analysis.

Topics	Sub-topics	Materiality	
		Impact	Financial
E1 - Climate Change	Climate change mitigation	✓	✓
	Climate change adaptation	✓	✓
	Energy	✓	✓
E2 - Pollution	Pollution of air, water, soil, living organisms and food resources, Substances of (very high) concern and Microplastics	✗	✗
E3 - Water and marine resources	Water and Marine resources	✗	✗
E4 - Biodiversity and ecosystems	Direct impact drivers on biodiversity loss, Impacts on the state of species, Impacts on the extent and condition of ecosystems and Impacts and dependencies on ecosystem services	✗	✗
E5 - Resource use and circular economy	Resources inflows, including resource use	✗	✗
	Resource outflows related to products and services	✗	✗
	Waste	✗	✗
S1 - Own workforce	Working conditions, Equal treatment and opportunities for all, Other work-related rights	✓	✓
S2 - Workers in the value chain	Working conditions, Equal treatment and opportunities for all, Other work-related rights	✗	✗
S3 - Affected communities	Communities' economic, social and cultural rights, Communities' civil and political rights	✓	✓
	Rights of indigenous peoples	✗	✗
S4 - Consumers and end-users	Information-related impacts for consumers and/or end-users, Personal safety of consumers and/or end-users, Social inclusion of consumers and/or end-users	✓	✓
G1 - Business conduct	Corporate culture, Protection of whistle-blowers, Political engagement and lobbying activities, Management of relationships with suppliers including payment practices, Corruption and bribery	✓	✗
	Animal welfare	✗	✗

### 1.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model

[ESRS 2 SBM-1]

[ESRS 2 SBM-3]

[ESRS 2 MDR-T]

Material IROs are closely linked to the business model, the core values of Cooperative Credit, and the activities and services provided, with reference to the different links in the value chain, upstream and downstream. The context within which the Group operates can be understood from the Double Materiality process and description of the business model, as well as the value chain. It should be noted that no topic or sub-topic specifically created for the Group in relation to ESRS disclosure requirements has been included. Therefore, no specific distinctive elements were highlighted, only the standard topics and sub-topics.

The material impacts (divided into positive and negative), as well as material risks and opportunities are listed below, grouped according to the associated sub-topics. It is clearly indicated whether each is a positive impact, a negative impact, a risk or an opportunity, in order to provide a clear and complete view of the different implications related to the activities analysed, as well as the link in the value chain in relation to which the IRO could be generated. In the descriptions, it is specified whether the IRO is real or potential.

### Impact materiality

Topics	Sub-topics	Description	Positive/ negative impact	Links in the value chain	Impact contributed or caused	Time horizon
E1 - Climate Change	Climate change mitigation	Generation of GHG emissions in the supply chain related to business travel and commuting, purchases of goods and services, etc. (Current)	Negative impact	Suppliers	Contributed	Short, medium and long term
		Generation of GHG emissions in own operations due to the use of company cars and heating of Group branches. (Current)		Own operations		
		Generation of GHG emissions in the value chain related to loans to counterparties with high emissions and no climate transition plans. (Current)		Loans		
		Generation of GHG emissions related to investments in counterparties with high emissions. (Potential)		Investments		
	Climate change adaptation	Support for companies (e.g. debt restructuring, specific advice) engaged in sustainable transition both individually and in the broader economic context. (Current)	Positive impact	Loans	Contributed	Short, medium and long term
		Loans and new green products (e.g. green mortgages loans) for infrastructure development, business model transformation and implementation of advanced resource management strategies. (Current)				
		Development of new financial products to channel funds into environmentally virtuous activities and invest client funds in a more sustainable manner. (Current)				
	Energy	Loans to companies with high levels of energy consumption and/or energy intensity, without adequate checks on sustainability criteria. This could jeopardise transition to a more sustainable economic model. (Potential)	Negative impact	Loans	Contributed	Medium and long term
		Allocation of capital to companies with high levels of energy consumption and/or energy intensity, without adequate controls sustainability criteria. (Potential)		Investments		

Topics	Sub-topics	Description	Positive/negative impact	Links in the value chain	Impact contributed or caused	Time horizon
S1 - Own workforce	Working conditions, Equal treatment and opportunities for all, Other work-related rights	Implementation of accident and work-related-injury management systems, accompanied by training sessions open to all workers. (Current)	Positive impact	Own operations	Caused	Short, medium and long term
		Offer of solutions for flexible working time, access to homeworking, childcare and parental leave. (Current)				
		Promotion of an inclusive working environment, aimed at professional growth, gender equality and adequate remuneration. (Current)				
		Promotion of the improvement of training and professional development and enhancement of Cooperative Credit expertise among employees through the provision of targeted training courses that consider the personal and professional development of employees. (Current)				
S3 - Affected communities	Communities' economic, social and cultural rights	Creation of value in the area and development of business opportunities by sourcing products and services through local suppliers. Respect for suppliers' rights and training activities to meet the required social and environmental criteria. (Potential)	Positive impact	Suppliers	Caused	Short, medium and long term
		Promotion of local areas by supporting local activities and initiatives with associations and third-sector bodies, strengthening the social fabric and working against the depopulation of small villages. (Current)		Own operations		
		Positive impact linked to the ability to respond to customers' needs with solutions adapted to their requirements, with timeliness and innovative solutions (thanks to the widespread presence of physical branches near users). (Current)				
		Increasing awareness/knowledge of topics related with ESG and/or loans and savings, bringing certain categories closer to issues that are difficult to understand (e.g. young people and savings, workers and pensions, etc.) through the promotion of financial education initiatives aimed at shareholders, customers and/or potential customers and their households and other stakeholders. (Current)				
		Development of new products that meet the needs of the prevailing social fabric (e.g. households and local businesses) and increased training in finance, including cooperation and mutuality issues. (Current)				

Topics	Sub-topics	Description	Positive/negative impact	Links in the value chain	Impact contributed or caused	Time horizon
S4 - Consumers and end-users	Personal safety of consumers and/or end consumers, Information-related impacts	Access to transparent information and promotion of training and information in order to increase consumer awareness. (Current)	Positive impact	Loans	Caused	Short, medium and long term
		Increase in social inclusion by allowing access to loans through social products and agreements with institutions. (Current)		Own operations		
		Respect for the economic, social, cultural, civil and political rights of members, partners and customers, in particular by supporting companies with social and local promotional aims. (Current)				
G1 - Business conduct	Corporate culture/ Management of relationships with suppliers/ Political engagement and lobbying activities/ Corruption and bribery/ Protection of whistle-blowers	Economic stability of local supply chains fostered by timely payment practices and fair and responsible relationships with suppliers, especially local SMEs. (Current)	Positive impact	Suppliers	Caused	Short and medium term
		Consistency with cooperative principles is ensured by trust relationships and the training on the required criteria. (Current)				
		Strengthening organisational transparency and integrity that contributes to a more ethical and accountable business environment through a culture focused on corruption prevention, independence from political influence and effective protection of whistleblowers. (Current)		Own operations		
		Support of companies with a social mission or values aimed at creating a benefit for third parties (e.g. social cooperatives, benefit societies, BCorp, associations, etc.). (Potential)		Loans		
		Efficient allocation of capital towards the real and sustainable economy by fostering the growth of territories and local enterprises, in line with the cooperative mission. Promotion of ESG-consistent investments to strengthen the resilience of the economic system. (Current)		Investments		
		Exclusion of local suppliers from the value chain or the choice of suppliers without environmental and social certification, which may lead to increased risk associated with business operations. (Potential)	Suppliers	Contributed	Medium term	
		Granting of loans to parties without adequate controls in the areas of business ethics, corporate culture, political influence, whistleblowing and corruption and bribery, potentially leading to increased risk associated with corporate transactions. (Potential)	Loans			

For the definition of impacts, reasonably expected time horizons were considered, including short, medium and long term. For impacts, the time horizon is aligned with that indicated by ESRS1.

## Financial materiality

Topics	Sub-topics	Description	Risk/ Opportunity	Links in the value chain
E1 - Climate Change	Climate change mitigation	Access to European loans due to investment in counterparties with high-level sustainability profiles, particularly those engaged in emissions reduction.	Opportunities	Loans
		Increase in revenues and improvement of Group's positioning, thanks to the development of new banking products and advisory services aimed at supporting market decarbonisation.		Loans and investments
	Climate change adaptation	Increase in levels of risk related to the financing of corporate counterparties, which are ever more exposed to the effects of climate change such as floods and storms (e.g. high costs for repairing damage or restoring assets, including finding alternative sites), and increase in insolvencies and potential impacts on Group operations.	Risk	Loans
		Increase in revenues in the medium and long term and strengthened positioning through the development of new products, also in line with EU Taxonomy. Increase in resilience of counterparties and more robust and sustainable ecosystem due to greater adaptability to climate change.	Opportunities	Loans
Energy	Increase in revenues and improvement of brand reputation by offering new long-term products and services geared towards a greener and more resilient future, better aligned with sustainable banking criteria.	Opportunities	Loans	
S1 - Own workforce	Working conditions, Equal treatment and opportunities for all, Other work-related rights	Increased productivity and a simultaneous reduction in Operating costs due to increased trust in the organisation by employees and collaborators and increased credibility in the market, reflected in relationships with potential future employees.	Opportunities	Own operations
		Increased Group performance, with positive effects on Sales Revenues and staff performance results in an overall enhancement of the Group's performance.	Opportunities	Own operations
S3 - Affected communities	Economic, social and cultural rights of communities	Improvement in brand reputation due to role in supporting communities, public administrations and businesses, in response to the needs of the areas in which the Group operates.	Opportunities	Own operations
		Increase in the number of associations that collaborate with Credito Cooperativo in order to further the benefits generated in the region and sustain values of cooperation and mutuality.		Own transactions and loans
		Promotion of financial education in affected communities, particularly among young people, through learning initiatives run by Affiliated Banks.		Loans
S4 - Consumers and end-users	Personal safety of consumers and/or end users, Information-related impacts	Improved credibility in the marketplace and relations with members and customers through management of issues such as security and privacy.	Opportunities	Own operations
		Consolidation of the strategic market positioning and strengthening of Affiliated Banks' ownership structure/intergenerational turnover, thanks to strengthening of brand reputation and better ESG rating scores, as well as communication initiatives.		Loans

The current financial effects of climate risks on the Group's financial position, economic results and cash flows are not significant over a three-year horizon. However, in the medium term, these effects become moderately significant and, in the long term, more pronounced, mainly due to credit risk. In particular, in the Net-Zero scenario, climate risks could generate significant financial impacts, although these are subject to the volatility of forecasts and the uncertainty of scenario assumptions.

The risk assessment shows that, based on the distribution of the Group's exposure, the portfolio is more concentrated on "low-sensitive" sectors, which reduce the current risk of major corrections in the book values of assets and liabilities in the short term. The largest sectors by volume of exposure include manufacturing, accommodation and catering, construction and wholesale and retail trade, which together account for about 70% of the Group's Gross Book Value (GBV) to Non-Financial Corporations (NFC).

Exposure to highly sensitive sectors — including agriculture, forestry, fishing, electricity supply, gas, mining and quarrying, water supply and sewerage — is more limited, at around 24% of the Group's total exposure. However, in the long run, there is a significant risk of major revisions to the book values of specific assets, especially in agricultural sectors, where climate risks could have a greater impact.

Of the relevant portfolios, agriculture is the main area of focus for all time horizons considered, while significant impacts are mainly seen in the long term, with reference to exposures related to SME Retail and SME Corporate.

In line with the aforementioned analyses, the Group introduced, with the aim of quantifying provisions for the loans to customers portfolio, additional stress scenarios aimed at determining expected losses related to climate risks.

In particular, as reported in Part E - Information on risks and related hedging policies, in the last quarter of 2024, in the face of substantial replacement of measurement systems (IFRS 9 rating and models), the corrective measures on PD and LGD parameters were further refined, with the intention to incorporate into the model and, therefore, influence the provisions relating to loans to customers, the initial impacts related to climate risks and, in a more extensive approach, the main ESG factors. In this context, the Group, consistent with the results of the dual materiality analysis, which highlighted the relevance of a Credit and counterparty risk with reference to climate change (physical and transition risk), incorporated the potential long-term (2050) prospective effects of climate-related credit and counterparty risks of the most impacted economic sectors in the calculation of the expected loss. The quantification of the aforementioned effects amounted to approximately € 29 million as at 31 December 2024.

Opportunities, on the other hand, these were generated by the offer of services and products with an environmental and social purpose and will be presented within the topic-specific ESRS sections, along with the financial effects of opportunities, taken into account in the value of items reported according to the relevant IAS/IFRS in the consolidated financial statements.

### Strategic resilience

The Cassa Centrale Group recognises that climate and environmental change represent a central component of transformation for the Italian economic and financial system, with decisive impacts on business strategies. The resilience of the Group's strategy is ensured by its ability to address significant climate and environmental risks, as well as to seize the opportunities offered by transition to a low-carbon economy.

In the short term, the impacts of climate change on the Group's business model are managed through implementation of tools and policies that mitigate the effects of physical risk and promote gradual adaptation to emerging climate policies. Despite a slow economic environment due to the less-than-rapid adoption of sustainable models of consumption and production, the Group continues to support its customers, in particular small and medium-sized enterprises, with transition-specific financial solutions.

In the medium term, transition dynamics are expected to accelerate due to more effective climate and fiscal policies. In this scenario, the Group's strategy is proving resilient through the adoption of a strategic plan involving repositioning of its activities towards more sustainable sectors, mitigating risks associated with asset deterioration and promoting value creation for stakeholders. The Group is focused on development of sustainable technology and consumption models, supporting customers and partners with innovative and targeted financial products.

In the long term, the resilience of the Group's business model is embodied in a proven climate and environmental risk-management system, based on efficient and sustainable technologies and business models. The positive impacts of the transition become dominant, with a stabilising effect on the general economic environment and the sustainable finance market. The Group's ability to seize transition opportunities, through the development of sustainable funding, dedicated lending and asset management, is central to its long-term strategy.

### The Sustainability Plan

The Cassa Centrale Group's sustainability strategy is built around two important pillars that characterise how the Group operates and competes in the market, namely:

1. generation of wealth and shared development for members and local areas through central coordination of development initiatives for all products, services, solutions, expertise and platforms capable of responding to customer needs and meeting market challenges;
2. contribution to the economic, social and cultural development of local communities through central coordination and monitoring of initiatives to reallocate finance to sustainable financing, investment and bancassurance solutions, for which it is important to respond to newly arising customer needs, but also to manage and, where possible, mitigate risks.

The goals of the strategy are set out in the new 2024-2027 Sustainability Plan, approved in June 2024 (hereinafter also referred to as the "Plan"), and integrated into the 2024-2027 Strategic Plan. The Sustainability Plan continues to evolve in order to incorporate ESG issues into the business by leveraging the distinctive characteristics of cooperative credit and aims to accompany customers and the communities in which it operates in environmental and social transition, at the same time responding to:

- the expectations of legislators and supervisory bodies;
- the growing awareness of customers and the market;
- increases in the supply of GSS (green, social and sustainable) products and services.

The Plan is drawn up by the ESG and Institutional Relations Department with the contribution of Departments involved in implementing projects that support the achievement of the relevant targets. In particular, the goals and activities identified are determined by taking into account both the external context (e.g. existing policies, national and/or EU policy objectives) and the analyses performed internally (e.g. results of monitoring analyses, and discussions with Banks and Subsidiaries). Subsequently, they are discussed jointly with the Departments and duly approved after feasibility analysis. Moreover, progress towards these targets is monitored periodically through a number of appropriately identified annual milestones.

The Plan is drafted by promoting a shared approach to ESG initiatives, involving both subsidiaries and Affiliated Banks in the achievement of Group targets and recognition and assessment of the actions undertaken by individual Banks.

The ESG projects included in the Plan, associated with the five areas "ESG Governance", "Environment", "Customers", "Community and Members" and "People", reflect the material topics that emerged from the Double Materiality Analysis. This ensures a specific focus on key sustainability issues: climate change, workforce empowerment, community engagement, consumer and end-user protection, and the promotion of ethical and responsible business conduct.

### Goals of the Sustainability Plan

Material Topics - Double Materiality Analysis	Sustainability Plan: ESG Area	Commitments in the Sustainability Plan
E1 - Climate change	Environment	<ul style="list-style-type: none"> <li>■ <b>Increase efficiency of consumption at its properties and limit their environmental impact (strategy for sustainable management of real-estate portfolio)</b>, in terms of energy optimisation and mitigation of the physical risk of the real-estate portfolio, via a series of initiatives, including:               <ul style="list-style-type: none"> <li>a. upgrading measures and acquirement of system energy certifications;</li> <li>b. improvement of energy consumption through purchase of renewable electricity;</li> <li>c. promotion of sustainable conduct in operations;</li> <li>d. insurance coverage to reduce unexpected losses due to adverse weather events.</li> </ul> </li> </ul>
		<ul style="list-style-type: none"> <li>■ <b>Reduce the carbon footprint of operations and credit exposures (decarbonisation strategy)</b> by calculating the greenhouse gas emissions of the Group's own operations and exposures (financed emissions) with the aim of setting reduction targets on the basis of decarbonisation trajectories envisaged by 2050 Net-Zero scenarios, evaluating potential purchase of carbon credits for the remainder of emissions.</li> </ul>
		<ul style="list-style-type: none"> <li>■ <b>Adopt a responsible and conscious approach to the management of natural resources</b> (e.g. water consumption, etc.), encouraging process efficiency, promoting the use of certified and low-impact materials and their reuse, recycling and recovery, and supporting proper waste management (e.g. environmental certification).</li> </ul>

Material Topics - Double Materiality Analysis	Sustainability Plan: ESG Area	Commitments in the Sustainability Plan
S1 - Own workforce	People	<ul style="list-style-type: none"> <li>■ <b>Enhance ESG expertise</b> by establishing specialised training programmes tailored to the needs of different company departments.</li> </ul>
		<ul style="list-style-type: none"> <li>■ <b>Develop an inclusive environment and improve people's well-being</b> through work-life balance programmes and acquirement of gender equality certifications.</li> </ul>
		<ul style="list-style-type: none"> <li>■ <b>Ensure a safe working environment for employees</b> by enhancing the safety culture through achievement of Health and Safety system certification.</li> </ul>
S3 - Affected communities	Community and Members	<ul style="list-style-type: none"> <li>■ <b>Enhance specific cooperative characteristics</b> by facilitating the entry of new young members and promoting financial education.</li> </ul>
		<ul style="list-style-type: none"> <li>■ <b>Mitigate environmental and social impacts of the value chain</b> through the evaluation, selection and monitoring of suppliers with ESG criteria.</li> </ul>
S4 - Consumers and end-users	Customers	<ul style="list-style-type: none"> <li>■ <b>Support the energy transition of companies and individuals through:</b> <ol style="list-style-type: none"> <li>a. specific loans targeting sectors included in the EU Taxonomy, projects linked to the NRRP or granted to counterparties that make commitments to specific sustainability performance improvement targets;</li> <li>b. provision of services aimed at matching supply and demand for green/sustainable loans;</li> <li>c. specialised financing for green mortgage loans or unsecured loans;</li> <li>d. strengthening of process for granting, pricing and monitoring loans to assess the sustainability profile of counterparties.</li> </ol> </li> </ul>
		<ul style="list-style-type: none"> <li>■ <b>Promote and orient investment choices towards sustainability (sustainable asset-management strategy)</b>, in terms of efforts to increase AUM, which, unlike traditional management, involves:           <ol style="list-style-type: none"> <li>a. designing a new advisory service that integrates clients' sustainability preferences;</li> <li>b. launch of an ESG investment awareness campaign to steer choices towards sustainable financial products;</li> <li>c. increasing the offer of sustainable investment products by improving the sustainability features of asset-management and NEAM products;</li> <li>d. developing solutions to protect against physical climate risks and expanding the range with sustainable bancassurance products.</li> </ol> </li> </ul>
G1 - Business conduct	ESG Governance	<ul style="list-style-type: none"> <li>■ <b>Strengthen sustainability governance</b> through remuneration policies linked to the Group's ESG performance.</li> </ul>
		<ul style="list-style-type: none"> <li>■ <b>Support projects with a social and environmental purpose (sustainable funding strategy)</b>, i.e. by issuing retail or wholesale Green, Social, Sustainability (GSS) bonds, which unlike traditional bonds require:           <ol style="list-style-type: none"> <li>a. identification of the loans, projects, investments to which proceeds of the bonds issued are to be allocated;</li> <li>b. establishment of a management and control system that certifies the allocation of inflows to sustainable loans;</li> <li>c. preparation of a prospectus and second-party opinion;</li> <li>d. development of tools for evaluating, monitoring and reporting on the impact of proceeds.</li> </ol> </li> </ul>

The Planning Department is responsible for coordinating the definition and monitoring of the Multi-Year Strategic Plan and the Annual Operating Plan, for the Group and the Parent Company. This process takes into account the relevant sustainability goals identified in the Sustainability Plan, integrating the results of specific ESG analyses into planning activities. Within the Planning Department, the Budget & Planning Service ensures complete alignment of objectives set and the risk-management and capital-allocation policies laid down in the strategic and operational plans, including the strategic sustainability objectives set out in the Sustainability Plan.

Coinciding with publication of this document, the 2025-2027 Sustainability Plan will also be approved. This will confirm some of the goals already defined, introduce new projects and update the targets of initiatives already under way, further strengthening the Group's commitment to a sustainable transition, in line with regulatory changes and the emerging needs of the socio-economic context.

### 1.4.3 Consolidated Sustainability Statement obligations

[ESRS 2 IRO-2]

Following the Double Materiality analysis, the Cassa Centrale Group has identified the disclosure obligations fulfilled with this Sustainability Report. The list includes the mandatory disclosures of ESRS 2 - General Disclosures and the material topics identified, with associated sub-topics and Disclosure Requirements (DR). For each DR, the reference paragraph has been indicated or, in the case of omission, the reasons for such omission.

The analysis revealed that a number of issues under the topic-specific ESRS, including Pollution, Water and Marine Resources, Biodiversity and Ecosystems, Resource Use and Circular Economy, and Workers in the Value Chain, did not exceed the established materiality threshold and were therefore excluded from reporting. For further details on the Double Materiality Analysis process, please refer to the “1. General Disclosures” section, Chapter 1.4 “Managing impacts, risks and opportunities”, paragraph 1.4.1 “Double Materiality Analysis process”.

In preparing the Report, the Group considered the guidance of ESRS 2, applying MDR-P for policies, MDR-A for actions, MDR-T for targets and MDR-M for metrics.

Topics	Sub-topics	Sub-sub-topics	Associated disclosure requirements	Associated paragraphs/notes
ESRS 2 - General Disclosures			BP-1 General basis for preparation of sustainability statements	1.1.1 General Criteria for Consolidated Sustainability Reporting
			BP-2 Disclosures in relation to specific circumstances	1.1.2 Disclosures in relation to specific circumstances
			GOV-1 The role of the administrative, management and supervisory bodies	1.2.1 Administrative, management and supervisory bodies
			GOV-2 Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies	1.2.2 Information provided to and sustainability matters addressed by the undertaking’s administrative, management and supervisory bodies
			GOV-3 Integration of sustainability-related performance in incentive schemes	1.2.3 Integration of sustainability-related performance in incentive schemes
			GOV-4 Statement on due diligence	1.2.4 Statement on due diligence
			GOV-5 Risk management and internal controls over sustainability reporting	1.2.5 Risk management and internal controls over sustainability reporting
			SBM-1 Strategy, business model and value chain	1.3.1 Strategy, business model and value chain
			SBM-2 Interests and views of stakeholders	1.3.2 Interests and views of stakeholders
			SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	1.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model
			IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities	1.4.1 Double materiality analysis process
			IRO-2 Disclosure requirements in ESRS covered by the undertaking’s sustainability statement	1.4.3 Consolidated Sustainability Statement obligations
			MDR-P Policies adopted to manage material sustainability matters	1.2.6 The Group regulatory system

Topics	Sub-topics	Sub-sub-topics	Associated disclosure requirements	Associated paragraphs/notes	
E1 - Climate Change	Climate change mitigation		ESRS 2 GOV-3 Integration of sustainability-related performance in incentive schemes	2.2.1 Governance	
			E1-1 Transition plan for climate change mitigation	2.2.2.1 Transition plan for climate change mitigation	
			ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	2.2.2.2 Material impacts, risks and opportunities and their interaction with strategy and business model	
			ESRS 2 IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities	2.2.3 Management of impacts, risks and opportunities	
			E1-2 Policies related to climate change mitigation and adaptation	2.2.3.1 Environmental policy	
			E1-3 Actions and resources in relation to climate change policies	2.2.3.2 Actions and initiatives	
			E1-4 Targets related to climate change mitigation and adaptation	2.2.5 Targets related to climate change mitigation and adaptation	
			E1-5 Energy consumption and mix	2.2.4.1 Energy consumption and mix	
			E1-6 Gross Scopes 1, 2, 3 and Total GHG emissions	2.2.4.2 Direct and indirect emissions	
			E1-7 GHG removals and GHG mitigation projects financed through carbon credits	E1-7 not reported because GHG absorption and storage plans and purchases of carbon credit are not implemented	
			E1-8 Internal carbon pricing	E1-8 not reported because there are no internal carbon pricing systems in place	
			E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	DR subject to phase-in/not mandatory	
			Entity-specific metrics: Products and services with environmental aims	2.2.3.2 Actions and initiatives	
	Climate change adaptation			ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	2.2.2.2 Material impacts, risks and opportunities and their interaction with strategy and business model
				ESRS 2 IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities	2.2.3 Management of impacts, risks and opportunities
				E1-2 Policies related to climate change mitigation and adaptation	2.2.3.1 Environmental policy
				E1-3 Actions and resources in relation to climate change policies	2.2.3.2 Actions and initiatives
				E1-4 Targets related to climate change mitigation and adaptation	2.2.3 Management of impacts, risks and opportunities
				E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	DR subject to phase-in/not mandatory

Topics	Sub-topics	Sub-sub-topics	Associated disclosure requirements	Associated paragraphs/notes
E1 - Climate Change	Energy		ESRS 2 SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model	2.2.2.2 Material impacts, risks and opportunities and their interaction with strategy and business model
			ESRS 2 IRO-1 Description of the processes to identify and assess material impacts, risks and opportunities	2.2.3 Management of impacts, risks and opportunities
			E1-2 Policies related to climate change mitigation and adaptation	2.2.3.1 Environmental policy
			E1-3 Actions and resources in relation to climate change policies	2.2.3.2 Actions and initiatives
			E1-4 Targets related to climate change mitigation and adaptation	2.2.3 Management of impacts, risks and opportunities
			E1-5 Energy consumption and mix	2.2.4.1 Energy consumption and mix
			E1-9 Anticipated financial effects from material physical and transition risks and potential climate-related opportunities	DR subject to phase-in/not mandatory
S1 - Own workforce	Working conditions Equal treatment and opportunities for all Other work-related rights	Secure employment Working time Adequate wages Social dialogue Freedom of association, existence of works councils and workers' rights to information, consultation and participation Collective bargaining, including the percentage of workers covered by collective agreements Work-life balance Health and safety Gender equality and equal pay for work of equal value Training and skills development Employment and inclusion of persons with disabilities Measures against violence and harassment in the workplace Diversity Confidentiality	S1-1 Policies related to own workforce	3.1.2.1 Policies related to own workforce
			S1-2 Processes for engaging with own workers and workers' representatives about impacts	3.1.2.2 Processes for engaging with own workers
			S1-3 Processes to remediate negative impacts and channels for own workers to raise concerns	3.1.2.3 Impacts and reporting channels
			S1-4 Taking action on material impacts and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions and approaches	3.1.3 Workforce composition and attraction of group personnel 3.1.5 Worker welfare
			S1-5 Targets related to managing negative material impacts, advancing positive impacts, as well as to material risks and opportunities	3.1.6 Workforce targets
			S1-6 Characteristics of the undertaking's employees	3.1.3 Workforce composition and attraction of group personnel
			S1-7 Characteristics of non-employee workers in the undertaking's own workforce	3.1.3 Workforce composition and attraction of group personnel
			S1-17 Incidents, complaints and severe human rights impacts	3.1.3 Workforce composition and attraction of group personnel

Topics	Sub-topics	Sub-sub-topics	Associated disclosure requirements	Associated paragraphs/notes
S1 - Own workforce	Working conditions	Secure employment	S1-11 Social protection	3.1.5 Worker welfare
		Working time	S1-6 Characteristics of the undertaking's employees	3.1.3 Workforce composition and attraction of group personnel
		Adequate wages	S1-10 Adequate wages	3.1.5 Worker welfare
		Social dialogue	S1-8 Collective bargaining coverage and social dialogue	3.1.5 Worker welfare
		Freedom of association, existence of works councils and workers' rights to information, consultation and participation	S1-8 Collective bargaining coverage and social dialogue	3.1.5 Worker welfare
		Collective bargaining, including the percentage of workers covered by collective agreements	S1-8 Collective bargaining coverage and social dialogue	3.1.5 Worker welfare
		Work-life balance	S1-15 Work-life balance indicators	3.1.5 Worker welfare
		Health and safety	S1-14 Health and safety indicators	3.1.5 Worker welfare
	Equal treatment and opportunities for all	Gender equality and equal pay for work of equal value	S1-16 Compensation indicators (pay gap and total compensation)	3.1.3 Workforce composition and attraction of group personnel
		Training and skills development	S1-13 Training and skills development indicators	3.1.4 Training and skills development
		Employment and inclusion of persons with disabilities	S1-12 Persons with disabilities	3.1.3 Workforce composition and attraction of group personnel
		Measures against violence and harassment in the workplace	S1-17 Incidents, complaints and severe human rights impacts	3.1.3 Workforce composition and attraction of group personnel
		Diversity	S1-9 Diversity indicators	3.1.3 Workforce composition and attraction of group personnel
Other work-related rights	Confidentiality	Entity-specific metrics: reference to data breach cases reported in ESRS S4		
S3 - Affected communities	Economic, social and cultural rights of communities Civil and political rights of communities	Impacts in local area Security-related impacts Freedom of expression Freedom of association	S3-1 Policies related to affected communities	3.2.2.1 Policies related to affected communities
			S3-2 Processes for engaging with affected communities about impacts	3.2.2.2 Processes for engaging with affected communities
			S3-3 Processes to remediate negative impacts and channels for affected communities to raise concerns	3.2.2.3 Impacts and reporting channels
			S3-4 Taking action on material impacts and approaches to mitigating material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions and approaches	3.2.3 Actions and initiatives on affected communities
			S3-5 Targets related to managing negative material impacts, advancing positive impacts, as well as to material risks and opportunities	3.2.4 Targets on affected communities

Topics	Sub-topics	Sub-sub-topics	Associated disclosure requirements	Associated paragraphs/notes
S3 - Affected communities	Economic, social and cultural rights of communities	Impacts in local area	Entity-specific metrics: Community initiatives Financial education initiatives Community initiatives Group presence in the area/Number of branches	3.2.3 Actions and initiatives on affected communities
		Security-related impacts		Reporting only of policies, actions and targets
	Civil and political rights of communities	Freedom of expression		Reporting only of policies, actions and targets
		Freedom of association		Reporting only of policies, actions and targets
S4 - Consumers and end-users	Information-related impacts for consumers and/or end-users Personal safety of consumers and/or end users Social inclusion of consumers and/or end-users	Confidentiality Freedom of expression Access to (quality) information Personal safety Non-discrimination Access to products and services Responsible business practices	S4-1 Policies related to consumers and end-users	3.3.4 Confidentiality 3.3.5 Access to quality information and responsible business practices
			S4-2 Processes for engaging with consumers and end-users about impacts	3.3.1 Strategy: Impacts, risks and opportunities
			S4-3 Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	3.3.2 Impacts and reporting channels
			S4-4 Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	3.3.3 Access to products and services 3.3.4 Confidentiality 3.3.6 Social-purpose loans 3.3.7 Responsible finance
			S4-5 Targets related to managing negative material impacts, advancing positive impacts, as well as to material risks and opportunities	3.3.8 Targets on members and customers
	Information-related impacts for consumers and/or end-users	Confidentiality	Entity-specific metrics: Number of data breaches	3.3.4 Confidentiality
		Freedom of expression	Entity-specific metrics: Complaints	3.3.2 Impacts and reporting channels
		Access to (quality) information		Reporting only of policies, actions and targets
	Personal safety of consumers and/or end users	Personal safety		Reporting only of policies, actions and targets
	Social inclusion of consumers and/or end-users	Non-discrimination	Entity-specific Metrics: refer to whistleblowing reports in ESRS G1	3.3.2 Impacts and reporting channels
		Access to products and services		Reporting only of policies, actions and targets
		Responsible business practices	Entity-specific metrics: cooperative members Customers Products and services with social and sustainable-finance purpose Loans backed by guarantees and counter-guarantees	3.3.1 Strategy: Impacts, risks and opportunities 3.3.6 Social-purpose loans 3.3.7 Responsible finance

Topics	Sub-topics	Sub-sub-topics	Associated disclosure requirements	Associated paragraphs/notes
<b>G1 - Business conduct</b>	Corporate culture		G1-1 Corporate culture and business conduct policies Entity-specific metrics: Cases of non-compliance and penalties	4.1.2.2 Corporate culture and business conduct policies
	Protection of whistleblowers		G1-1 Corporate culture and business conduct policies	4.1.2.2 Corporate culture and business conduct policies
	Political engagement and lobbying		G1-1 Corporate culture and business conduct policies	4.1.2.2 Corporate culture and business conduct policies
			G1-5 Political influence and lobbying	4.1.3.2 Political influence and lobbying
	Management of relationships with suppliers, including payment practices		G1-1 Corporate culture and business conduct policies	4.1.2.2 Corporate culture and business conduct policies
			G1-2 Management of relationships with suppliers	4.1.4 Management of relationships with suppliers
			G1-6 Payment practices	4.1.4.1 Payment practices
	Corruption and bribery	Prevention and detection including training, incidents	G1-1 Corporate culture and business conduct policies	4.1.2.2 Corporate culture and business conduct policies
			G1-3 Prevention and detection of corruption or bribery	4.1.3.1 Prevention and detection of corruption and bribery
			G1-4 Incidents of bribery or corruption	4.1.3.1 Prevention and detection of corruption and bribery

[ESRS 2 Appendix B - List of datapoints in cross-cutting and topical standards that derive from other EU legislation]

The table below illustrates the datapoints of ESRS 2 and topic-specific ESRS derived from other EU legislative deeds.

Duty of disclosure and corresponding datapoint	SFDR Reference	Third-Pillar Reference	Benchmark ratios regulation reference	EU climate-law reference	Reference section
ESRS 2 GOV-1 Gender diversity of the board, paragraph 21, letter d)	Annex I, Table 1, Indicator No. 13		Commission Delegated Regulation (EU) 2020/1816, Annex II		1.2.1 Administrative, management and supervisory bodies
ESRS 2 GOV-1 Percentage of independent members of the Board of Directors, paragraph 21, letter e)			Commission Delegated Regulation (EU) 2020/1816, Annex II		1.2.1 Administrative, management and supervisory bodies
ESRS 2 GOV-4 Statement on due diligence, para. 30	Annex I, Table 3, Indicator No. 10				1.2.4 Statement on due diligence

Duty of disclosure and corresponding datapoint	SFDR Reference	Third-Pillar Reference	Benchmark ratios regulation reference	EU climate-law reference	Reference section
ESRS 2 SBM-1 Involvement in activities related to fossil fuel activities, para. 40, letter d), point i)	Annex I, Table 1, Indicator No. 4	Article 449 bis of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453, Table 1 - Qualitative Information on Environmental Risk and Table 2 - Qualitative Information on Social Risk	Commission Delegated Regulation (EU) 2020/1816, Annex II		Not applicable to the business of the Cassa Centrale Group
ESRS 2 SBM-1 Involvement in activities related to chemical production, para. 40, letter d), point ii)	Annex I, Table 2, Indicator No. 9		Commission Delegated Regulation (EU) 2020/1816, Annex II		Not applicable to the business of the Cassa Centrale Group
ESRS 2 SBM-1 Involvement in activities related to controversial weapons, paragraph 40, letter d), point iii)	Annex I, Table 1, Indicator No. 14		Article 12, para. 1 of Delegated Regulation (EU) 2020/1818 and Annex II of Delegated Regulation (EU) 2020/1816		1.3.1 Strategy, business model and value chain
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco, para. 40, letter d), point iv)			Article 12, para. 1 of Delegated Regulation (EU) 2020/1818 and Annex II of Delegated Regulation (EU) 2020/1816		Not applicable to the business of the Cassa Centrale Group
ESRS E1-1 Transition plan to reach climate neutrality by 2050, para. 14				Article 2, para. 1 of Regulation (EU) 2021/1119	2.2.2.1 Transition plan for climate change mitigation
ESRS E1-1 Undertakings excluded from Paris-aligned benchmarks, para. 16, letter g)		Article 449 bis of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking book - Indicators of potential climate-change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Article 12, para. 1, letter d) to g), and para. 2 of Delegated Regulation (EU) 2020/1818		2.2.2.1 Transition plan for climate change mitigation

Duty of disclosure and corresponding datapoint	SFDR Reference	Third-Pillar Reference	Benchmark ratios regulation reference	EU climate-law reference	Reference section
ESRS E1-4 GHG emission reduction targets, para. 34	Annex I, Table 2, Indicator No. 4	Article 449 bis of Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3: Banking book - Indicators of potential climate-change transition risk: alignment metrics	Article 6 of Delegated Regulation (EU) 2020/1818		2.2.5 Targets related to climate change mitigation and adaptation
ESRS E1-5 Energy consumption from non-renewable sources disaggregated by sources (only high climate impact sectors), para. 38	Annex I, Table 1, Indicator No. 5 and Annex I, Table 2, Indicator No. 5				2.2.4.1 Energy consumption and mix
ESRS E1-5 Energy consumption and mix, para. 37	Annex I, Table 1, Indicator No. 5				2.2.4.1 Energy consumption and mix
ESRS E1-5 Energy intensity associated with activities in high climate impact sectors, paras. 40 to 43	Annex I, Table 1, Indicator No. 6				2.2.4.1 Energy consumption and mix
ESRS E1-6 Gross Scope 1, 2, 3 and Total GHG emissions, para. 44	Annex I, Table 1, Indicators No. 1 and 2	Article 449 bis of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking book - Indicators of potential climate-change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Articles 5, para. 1, Article 6 and Article 8, para. 1 of Delegated Regulation (EU) 2020/1818		2.2.4.2 Direct and indirect emissions
ESRS E1-6 Gross GHG emissions intensity, paras. 53 to 55	Annex I, Table 1, Indicator No. 3	Article 449 bis of Regulation (EU) No. 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3: Banking book - Indicators of potential climate-change transition risk: alignment metrics	Article 8, para. 1 of Delegated Regulation (EU) 2020/1818		2.2.4.2 Direct and indirect emissions
ESRS E1-7 GHG removals and carbon credits, para. 56				Article 2, para. 1 of Regulation (EU) 2021/1119	Data not present for 2024

Duty of disclosure and corresponding datapoint	SFDR Reference	Third-Pillar Reference	Benchmark ratios regulation reference	EU climate-law reference	Reference section
ESRS E1-9 Exposure of the benchmark portfolio to climate-related physical risks, para. 66			Annex II of Delegated Regulation (EU) 2020/1818 and Annex II of Delegated Regulation (EU) 2020/1816		Phase-in
ESRS E1-5 Energy consumption and mix, para. 37	Annex I, Table 1, Indicator No. 5				2.2.4.1 Energy consumption and mix
ESRS E1-9 Disaggregation of monetary amounts by acute and chronic physical risk, para. 66, letter a) ESRS E1-9 Location of significant assets at material physical risk, para. 66, letter c)		Article 449 bis of Regulation (EU) No 575/2013; Points 46 and 47 of Commission Implementing Regulation (EU) 2022/2453, Template 5: Banking book – Indicators of potential climate-change physical risk: exposures subject to physical risk			Phase-in
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes, para. 67, letter c)		Article 449 bis of Regulation (EU) No 575/2013; Point 34 of Commission Implementing Regulation (EU) 2022/2453, Template 2: Banking book - Indicators of potential climate-change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral			Phase-in
ESRS E1-9 Degree of exposure of the portfolio to climate-related opportunities, para. 69			Annex II, Delegated Regulation (EU) 2020/1818		Phase-in
ESRS E2-4 Amount of each pollutant listed in Annex II of E-PRTR (European Pollutant Release and Transfer Register) emitted into air, water and land, para. 28	Annex I, Table 1, Indicator No. 8; Annex I, Table 2, Indicator No. 2; Annex 1, Table 2, Indicator No. 1; Annex I, Table 2, Indicator No. 3				Not material
ESRS E3-1 Water and marine resources, para. 9	Annex I, Table 2, Indicator No. 7				Not material
ESRS E3-1 Dedicated policy, para. 13	Annex I, Table 2, Indicator No. 8				Not material
ESRS E3-1 Sustainable oceans and seas, para. 14	Annex I, Table 2, Indicator No. 12				Not material
ESRS E3-4 Total water recycled and reused, para. 28, letter c)	Annex I, Table 2, Indicator No. 6.2				Not material
ESRS E3-4 Total water consumption in m <sup>3</sup> per net revenue on own operations, para. 29	Annex I, Table 2, Indicator No. 6.1				Not material

Duty of disclosure and corresponding datapoint	SFDR Reference	Third-Pillar Reference	Benchmark ratios regulation reference	EU climate-law reference	Reference section
ESRS 2 SBM-3 - E4 para. 16, letter a), point i)	Annex I, Table 1, Indicator No. 7				Not material
ESRS 2 SBM-3 - E4 para. 16, letter b)	Annex I, Table 2, Indicator No. 10				Not material
ESRS 2 SBM-3 - E4 para. 16, letter c)	Annex I, Table 2, Indicator No. 14				Not material
ESRS E4-2 Sustainable land/agriculture practices or policies, para. 24, letter b)	Annex I, Table 2, Indicator No. 11				Not material
ESRS E4-2 Sustainable oceans/seas practices or policies, para. 24, letter c)	Annex I, Table 2, Indicator No. 12				Not material
ESRS E4-2 Policies to address deforestation, para. 24, letter d)	Annex I, Table 2, Indicator No. 15				Not material
ESRS E5-5 Non-recycled waste, para. 37, letter d)	Annex I, Table 2, Indicator No. 13				Not material
ESRS E5-5 Hazardous waste and radioactive waste, para. 39	Annex I, Table 1, Indicator No. 9				Not material
ESRS 2 - SBM3 - S1 Risk of incidents of forced labour, para. 14, letter f)	Annex I, Table 3, Indicator No. 13				3.1.1 Strategy: Impacts, risks and opportunities
ESRS 2 - SBM3 - S1 Risk of incidents of child labour, para. 14, letter g)	Annex I, Table 3, Indicator No. 12				3.1.1 Strategy: Impacts, risks and opportunities
ESRS S1-1 Human rights policy commitments, para. 20	Annex I, Table 3, Indicator No. 9 and Annex I, Table 1, Indicator No. 11				3.1.2.1 Policies related to own workforce
ESRS S1-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, para. 21			Commission Delegated Regulation (EU) 2020/1816, Annex II		3.1.2.1 Policies related to own workforce
ESRS S1-1 processes and measures for preventing trafficking in human beings, para. 22	Annex I, Table 3, Indicator No. 11				3.1.2.1 Policies related to own workforce
ESRS S1-1 Workplace accident prevention policy or management system, para. 23	Annex I, Table 3, Indicator No. 1				3.1.2.1 Policies related to own workforce
ESRS S1-3 Grievance/complaints handling mechanisms, para. 32, letter c)	Annex I, Table 3, Indicator No. 5				3.1.2.3 Impacts and reporting channels
ESRS S1-14 Number of fatalities and number and rate of work-related accidents, para. 88, letters b) and c)	Annex I, Table 3, Indicator No. 2		Commission Delegated Regulation (EU) 2020/1816, Annex II		3.1.5 Worker welfare
ESRS S1-14 Number of days lost to injuries, accidents, fatalities or illness, para. 88, letter e)	Annex I, Table 3, Indicator No. 3				3.1.5 Worker welfare

Duty of disclosure and corresponding datapoint	SFDR Reference	Third-Pillar Reference	Benchmark ratios regulation reference	EU climate-law reference	Reference section
ESRS S1-16 Unadjusted gender pay gap and weighted average gender pay gap, para. 97, letter a)	Annex I, Table 1, Indicator No. 12		Commission Delegated Regulation (EU) 2020/1816, Annex II		3.1.5 Worker welfare
ESRS S1-16 Excessive CEO pay ratio, para. 97, letter b)	Annex I, Table 3, Indicator No. 8				3.1.5 Worker welfare
ESRS S1-17 Incidents of discrimination, para. 103, letter a)	Annex I, Table 3, Indicator No. 7				3.1.5 Worker welfare
ESR S1-17 Violations of UN Guiding Principles on Business and Human Rights and OECD guidelines, para. 104, letter a)	Annex I, Table 1, Indicator No. 10 and Annex I, Table 3, Indicator No. 14		Annex II of Delegated Regulation (EU) 2020/1816 and Article 12, para. 1 of Delegated Regulation (EU) 2020/1818		3.1.5 Worker welfare
ESRS 2 SBM-3 - S2 Significant risk of child labour or forced labour in the value chain, para. 11, letter b)	Annex I, Table 3, Indicators No. 12 and 13				Not material
ESRS S2-1 Human rights policy commitments, para. 17	Annex I, Table 3, Indicator No. 9 and Annex I, Table 1, Indicator No. 11				Not material
ESRS S2-1 Policies related to value-chain workers, para. 18	Annex I, Table 3, Indicators No. 11 and 4				Not material
ESRS S2-1 Violations of UN Guiding Principles on Business and Human Rights and OECD guidelines, para. 19	Annex I, Table 1, Indicator No. 10		Annex II of Delegated Regulation (EU) 2020/1816 and Article 12, para. 1 of Delegated Regulation (EU) 2020/1818		Not material
ESRS S2-1 Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, para. 19			Commission Delegated Regulation (EU) 2020/1816, Annex II		Not material
ESRS S2-4 Human rights issues and incidents connected to its upstream and downstream value chain, para. 36	Annex I, Table 3, Indicator No. 14				Not material
ESRS S3-1 Human rights policy commitments, para. 16	Annex I, Table 3, Indicator No. 9 and Annex I, Table 1, Indicator No. 11				3.2.2.1 Policies related to affected communities
ESRS S3-1 Violations of UN Guiding Principles on Business and Human Rights, ILO principles and OECD guidelines, para. 17	Annex I, Table 1, Indicator No. 10		Annex II of Delegated Regulation (EU) 2020/1816 and Article 12, para. 1 of Delegated Regulation (EU) 2020/1818		3.2.2.1 Policies related to affected communities
ESRS S3-4 Human rights issues and incidents, para. 36	Annex I, Table 3, Indicator No. 14				3.2.3 Actions and initiatives on affected communities

Duty of disclosure and corresponding datapoint	SFDR Reference	Third-Pillar Reference	Benchmark ratios regulation reference	EU climate-law reference	Reference section
ESRS S4-1 Policies related to consumers and end-users, para. 16	Annex I, Table 3, Indicator No. 9 and Annex I, Table 1, Indicator No. 11				3.3.4 Confidentiality 3.3.5 Access to quality information and responsible business practices
ESRS S4-1 Violations of UN Guiding Principles on Business and Human Rights and OECD guidelines, para. 17	Annex I, Table 1, Indicator No. 10		Annex II of Delegated Regulation (EU) 2020/1816 and Article 12, para. 1 of Delegated Regulation (EU) 2020/1818		3.3.5 Access to quality information and responsible business practices
ESRS S4-4 Human rights issues and incidents, para. 35	Annex I, Table 3, Indicator No. 14				3.3.2 Impacts and reporting channels
ESRS G1-1 United Nations convention against corruption, para. 10, letter b)	Annex I, Table 3, Indicator No. 15				4.1.2.2 Corporate culture and business conduct policies
ESRS G1-1 Protection of whistleblowers, para. 10, letter d)	Annex I, Table 3, Indicator No. 6				4.1.2.2 Corporate culture and business conduct policies
ESRS G1-4 Fines for violations of anti-corruption and anti-bribery laws, para. 24, letter a)	Annex I, Table 3, Indicator No. 17		Annex II, Delegated Regulation (EU) 2020/1816		4.1.3.1 Prevention and detection of corruption and bribery
ESRS G1-4 Rules for the prevention of corruption or bribery, para. 24, letter b)	Annex I, Table 3, Indicator No. 16				4.1.3.1 Prevention and detection of corruption and bribery

The following chapters report on the topic-specific standards ESRS E1 (Climate Change), ESRS S1 (Own Workforce), ESRS S3 (Affected Communities), ESRS S4 (Consumers and End-Users) and ESRS G1 (Business Conduct).

# 2. Environmental Information

## 2.1 European taxonomy

### 2.1.1 Qualitative information

In June 2020, the European Commission issued Regulation (EU) 2020/852 with the aim of steering capital towards a more environmentally sustainable economy, in line with the EU's 2030 climate and energy targets, by establishing a corresponding classification system for these activities. In particular, this regulation defines activity as "environmentally sustainable" if it contributes substantially to at least one of the following environmental objectives, provided that it does not significantly interfere with any of the other environmental objectives and that it is carried out in compliance with minimum safeguards<sup>14</sup>:

1. climate change mitigation;
2. climate change adaptation;
3. sustainable use and protection of water and marine resources;
4. transition to a circular economy;
5. pollution prevention and control;
6. protection and restoration of biodiversity and ecosystems.

In light of this regulatory framework, accompanied by the clarifications and interpretations on the implementation of the disclosure obligations published progressively by the European Commission, as well as following the publication on 21 December 2023 of additional FAQs by the European Commission, the Cassa Centrale Group has analysed the provisions of these specific clarifications, defining the actions necessary to adhere to the latter's indications on the basis of a best-effort approach, also in consideration of the time frames and data available.

For the third year, the Cassa Centrale Group presents reporting on the KPIs (Key Performance Indicators) required by EU Delegated Regulation 2021/2178 (Disclosures Delegated Act) supplementing the EU Taxonomy Regulation (EU Regulation 2020/852) and, above all regarding the Green Asset Ratio (GAR), which considers exposure to taxonomy-aligned assets against total assets within the reporting scope.

The criteria of Commission Delegated Regulation (EU) 2021/2139 (Climate Delegated Act) were followed when verifying compliance with the "climate change mitigation" and "climate change adaptation" objectives.

The reporting and specific tables and templates with which it is structured, developed in line with the templates provided for in Article 8 of EU Delegated Act 2021/2178 (Disclosures Delegated Act), contain the reporting requirements for both financial and non-financial corporations, i.e., requiring financial corporations to report key performance indicators (KPIs) of suitability and alignment, for the financial year 2024.

According to Article 8 of Regulation (EU) 2020/852, "any undertaking which is subject to an obligation to publish non-financial information pursuant to Article 19 bis or Article 29 bis of Directive 2013/34/EU shall include in its Sustainability Report, indication (using specific KPIs) of the:

- proportion of their turnover derived from products or services associated with economic activities that qualify as environmentally sustainable under the Taxonomy;

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<sup>14</sup> The term "minimum safeguards" refers to the procedures implemented by a company to ensure that its activity is aligned with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights, including the principles and rights set out in the eight core conventions identified in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work and the International Bill of Human Rights.

- proportion of their capital expenditure and proportion of their operating expenditure related to assets or processes associated with economic activities that qualify as environmentally sustainable.

In accordance with templates provided by the Regulation, for the calculation of GAR KPIs, the portfolio was differentiated by type of assets and different calculation approaches were applied, where applicable. In this respect, only companies subject to the non-financial disclosure requirement (NFRD) were considered, excluding exposures to central governments, Central Banks and supranational issuers and information on the use of proceeds.

For the assessment of taxonomy-related KPIs such as eligibility and alignment, the use of actual data declared by the counterparties in their official disclosure available in 2024 (NFS relating to the year 2023) for financial and non-financial corporations is essential. In this regard, it should be noted that the collection of the non-financial statement (NFS) information was carried out with the support of an external provider; this was followed by a verification of the overall information published directly within the respective non-financial disclosure documents available and adequate data quality activities necessary for the use of the information collected through info providers. In this regard, it is specified that:

- for identification of counterparties subject to the non-financial disclosure requirement, companies that directly or indirectly meet the mandatory NFRD requirements were included. In this sense, if a counterparty contributes to the Parent Company's NFRD KPIs, it is weighted using the Parent Company's KPIs;
- In the event that a counterparty under NFRD obligation did not report the breakdown of taxonomy KPIs amongst the various taxonomy targets in its reporting, the value was attributed to the first taxonomy target (CCM), ensuring perfect alignment with the total KPIs reported by the counterparty.

The **Green Asset Ratio (GAR)** for the resulting stock, based on **turnover**, is **1.26% of total GAR assets** (approximately EUR 57 billion) and is almost entirely explained by exposures to households contributing to the climate change mitigation objective (1.19%), with exposures to corporates subject to the NFRD being insignificant (0.06%).

The **Green Asset Ratio (GAR)** for the resulting stock, based on the **capital expenditure** of the counterparty, with the exception of lending where for general lending the KPI related to turnover is used, is **1.31% of total GAR assets** (approximately EUR 57 billion), almost entirely explained by exposures to households contributing to the climate change mitigation objective (1.19%), with exposures to corporates subject to the NFRD being insignificant (0.11%).

The GAR indicator for the stock shows an increase (+29%) compared to the year ended 31 December 2023, attributable almost exclusively to the component of loans to Households secured by residential real estate (note the contribution – albeit limited – resulting from the alignment of exposures to financial counterparties, which are reported in the numerator of the GAR for the first time in the current year).

Generally speaking, the limited availability of precise information on eligibility in relation to the four taxonomy objectives, “sustainable use and protection of water and marine resources”, “Transition to a circular economy”, “Pollution prevention and control”, and “Protection and restoration of ecosystems and biodiversity”, represented – like last year – a limitation in overall disclosure, reducing the Group's eligibility/alignment percentage and making it unrepresentative of the Group's overall transition efforts.

For a better reading of the data reported, we summarise below the calculation approach adopted and some considerations for interpreting the data:

- For those counterparties that did not report the breakdown amongst the different targets in their mandatory non-financial reports, the overall share declared as eligible and aligned was attributed to the CCM target;
- households: for the eligibility KPIs, the entire portfolio of mortgages was considered with respect to real estate for which detailed energy performance certifications are available. For the alignment KPIs on the household portfolio, the focus was on the scope “of which loans collateralised by residential immovable property” (in terms of “purchase and ownership of buildings” exposures, referred to in technical screening criterion 7.7 of Delegated Regulation (EU) 2021/2139). It should be noted that the exposures aligned with the “climate change mitigation” objective were identified by investigating the energy characteristics of the underlying guarantees – in terms of precisely measured energy class – while verifying compliance with the criteria of substantial contribution and vulnerability of said guarantees to certain physical climate risks in order to verify compliance with the DNSH criteria (i.e. exposures guaranteed by residential buildings of APE class A or, alternatively, that fall within the first 15% of the national housing stock, built before 31 December 2020,

as collateral for mortgages that, based on the assessment of a physical risk engine, had a “non-material” vulnerability rating based on a set of material physical risk events). With regard to line item 25 “Households - of which: loans secured by residential real estate”, it should be noted that the counter-value of the exposure eligible for the Taxonomy is EUR 16,469.58 million, which is lower than the value of the gross accounting exposure (equal to EUR 19,497.34 million), since – with a view to conservatism and prudence – it was considered appropriate to represent as eligible for the EU Taxonomy only those exposures guaranteed by residential property recorded in the Group’s information systems with purpose and financing destination codes relating to those considered eligible by the EU Taxonomy (i.e. financing purposes relating to the purchase of homes for Households or other parties, excluding exposures not clearly attributable to similar purposes). As for Taxonomy activity “7.2. Renovation of existing buildings” it was also not possible to conduct an assessment of alignment with the EU Taxonomy, as not all the information needed to assess compliance with regulatory requirements was available in Group information systems. Again, due to the lack of specific reliable information needed, it was not possible to identify the alignment value for “Motor vehicle loans”, with consideration instead only of the entire portfolio of loans granted for the purchase of motor vehicles with regard to eligibility;

- off-balance sheet exposures: only companies within the NFRD scope were considered, excluding exposures to central governments, Central Banks and supranational issuers. The scope of Assets Under Management includes collective investment funds, pension products and asset management. Aggregated portfolio KPIs, the result of calculations performed on actual KPIs available from the funds’ underlying counterparties, were collected through an external provider;
- Model 4 “GAR KPI (flow)” contains evidence of the % values for GAR on the flow of new exposures on the balance sheet, with total assets covered as at the date taken as the denominator (same denominator as stock GAR). Specifically, i) with regard to corporate and family loans, the figure for flows was calculated by analysing new exposures arising during 2024, taking into account the value of the ratio at the reference date; ii) with regard to debt and equity instruments, purchases of securities made during 2024 were analysed.

Finally, it should be noted that, with reference to financial year 2024, the regulations require credit institutions to represent key performance indicators in a tabular format, using the templates set out in Annex VI of Commission Delegated Regulation (EU) 2021/2178, and in particular:

- Template 0 – Summary of KPIs: to be completed with evidence of the main KPIs in millions of EUR and the % values for the main KPI and the additional KPIs that credit institutions report pursuant to Article 8 of the Taxonomy Regulation;
- Template 1 – Assets for the calculation of GAR: to be completed with evidence of the on-balance sheet and off-balance sheet exposure values in millions of EUR as at 31/12/2024;
- Template 2 GAR – Sector information: the table contains evidence of exposures (overall and green) to non-financial corporations, broken down according to the prevalent NACE of those counterparties;
- Template 3 GAR KPI (Stock): % values for GAR on the stock of on-balance sheet exposures calculated using the information in Template 1;
- Template 4 GAR KPI (Flow): % values for the GAR on the flow of on-balance sheet exposures;
- Template 5 – KPI for off-balance sheet exposures: % values for the KPI on the stock and flow of off-balance sheet exposures. With regard to the stock figure on KPIs for off-balance sheet exposures, the % values are calculated using the information in Template 1.

For a complete overview of these statements, see Section 2.1.2 Disclosure pursuant to Annex VI of Delegated Regulation 2021/2178.

With reference to the additional information required pursuant to Annex XII of the EU Delegated Regulation 2022/1214 on nuclear-energy and fossil-gas, the following is a list of templates for product disclosure:

- Template 1 - Nuclear and fossil gas related activities;
- Template 2 - Taxonomy-aligned economic activities (denominator);
- Template 3 - Taxonomy-aligned economic activities (numerator);
- Template 4 - Taxonomy-eligible but not taxonomy-aligned economic activities;
- Template 5 - Taxonomy non-eligible economic activities.

For the full view of these prospectuses, please refer to Section 2.1.3 Additional disclosure on nuclear energy and fossil gas activities pursuant to Annex XII of Delegated Regulation 2022/1214.

## 2.1.2 Disclosure pursuant to Annex VI of Commission Delegated Regulation (EU) 2021/2178

(figures expressed in millions of euro)

### Template 0 – Summary of KPIs to be reported by credit institutions pursuant to Article 8 of the Taxonomy Regulation (Annex VI Reg 2178)

		Total environmentally sustainable assets (Turnover)	KPI****	KPI*****	% Coverage (over total assets)***	% of assets excluded from the numerator of the GAR (Article 7, paras. 2 and 3, and point 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7, para. 1, and point 1.2.4 of Annex V)
Main KPI	GAR (green asset ratio) stock	716.218	1.26%	1.31%	63.92%	40.27%	36.08%

		Total environmentally sustainable assets (Turnover)	KPI	KPI	% of assets covered (over bank's total assets)	% of assets excluded from the numerator of the GAR (Article 7, paras. 2 and 3, and point 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7, para. 1, and point 1.2.4 of Annex V)
Additional KPIs	GAR (flow)	163.108	1.78%	1.93%	49.51%	32.98%	50.49%
	Trading book*	-	-	-			
	Financial guarantees	0.073	44.37%	19.55%			
	Assets under management	73.969	12.17%	19.53%			
	Fees and commissions income**	-	-	-			

\* For credit institutions that do not meet the conditions of Article 94, para. 1 of the CRR or the conditions set out in Article 325 bis, para. 1. of the CRR. The KPIs for trading portfolio (sheet 7) only apply as of 2026. The inclusion of SMEs in these KPIs will be subject to the positive outcome of an impact assessment.

\*\* Fees and commissions income from services other than lending and AuM.

Institutions shall disclose forward-looking information for these KPIs, including information in terms of targets, together with relevant explanations of the methodology applied. The KPIs for commissions and fees (sheet 6) only apply from 2026. The inclusion of SMEs in these KPIs will be subject to the positive outcome of an impact assessment.

\*\*\* % of assets covered by the KPI over bank's total assets.

\*\*\*\* based on the Turnover KPI of the counterparty.

\*\*\*\*\* based on the Capex KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used.

# Turnover KPI

## Template 1 - Assets for GAR calculation (Annex VI Reg 2178) - Turnover KPI – Stock 2024

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae				
Total (gross carrying amount)	2024 disclosure reference data																																		
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)					Circular economy (CE)					Pollution (PPC)					Biodiversity and ecosystems (BIO)					TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Of which towards taxonomy relevant sectors (taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)									
	Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)									
	Of which specialised lending		Of which transitional	Of which enabling	Of which specialised lending		Of which transitional	Of which enabling	Of which specialised lending		Of which transitional	Of which enabling	Of which specialised lending		Of which transitional	Of which enabling	Of which specialised lending		Of which transitional	Of which enabling	Of which specialised lending		Of which transitional	Of which enabling	Of which specialised lending		Of which transitional	Of which enabling	Of which specialised lending		Of which transitional	Of which enabling			
<b>GAR - Covered assets in both numerator and denominator</b>																																			
1 Loans and advances, debt securities and equity instruments not HTI eligible for GAR calculation	21,052.454	17,400.323	711.097	-	1.799	10.886	0.960	0.028	-	0.039	0.371	0.104	-	-	0.744	0.262	-	-	0.012	0.000	-	-	0.020	-	-	-	-	17,402.429	711.491	-	1.799	10.925			
2 <b>Financial corporations</b>	511.877	93.318	10.801	-	0.825	1.090	0.850	0.025	-	0.036	0.045	-	-	0.289	0.036	-	-	0.009	-	-	-	0.018	-	-	-	-	94.529	10.862	-	0.825	1.126				
3 Credit institutions	333.113	72.271	5.855	-	0.750	0.804	0.018	0.010	-	-	-	-	-	0.002	-	-	-	-	-	-	-	-	-	-	-	-	72.291	5.865	-	0.750	0.804				
4 Loans and advances	21.886	4.830	0.265	-	0.003	0.006	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4.830	0.265	-	0.003	0.006					
5 Debt securities, including UoP	301.545	65.221	5.449	-	0.742	0.789	0.018	0.010	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	65.239	5.459	-	0.742	0.789					
6 Equity instruments	9.682	2.220	0.141	-	0.005	0.009	0.000	0.000	-	-	-	-	-	0.002	-	-	-	-	-	-	-	-	-	-	-	2.222	0.141	-	0.005	0.009					
7 Other financial corporations	178.764	21.047	4.946	-	0.075	0.286	0.832	0.015	-	0.036	0.045	-	-	0.287	0.036	-	-	0.009	-	-	-	0.018	-	-	-	22.238	4.997	-	0.075	0.322					
8 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-			
9 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-			
10 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-			
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-			
12 of which management companies	5.947	0.023	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.023	-	-	-	-	-			
13 Loans and advances	5.947	0.023	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.023	-	-	-	-	-			
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-			
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-			
16 of which insurance companies	46.225	8.633	1.538	-	0.002	0.277	0.006	0.006	-	0.019	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	8.639	1.543	-	0.002	0.295					
17 Loans and advances	42.564	8.005	1.460	-	0.002	0.268	0.003	0.003	-	0.018	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	8.008	1.463	-	0.002	0.286					
18 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-			
19 Equity instruments	3.661	0.629	0.078	-	0.001	0.008	0.002	0.002	-	0.001	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.631	0.080	-	0.001	0.009					
20 <b>Non-financial corporations</b>	165.476	52.921	20.482	-	0.975	9.796	0.109	0.003	-	0.003	0.326	0.104	-	0.455	0.226	-	-	0.003	0.000	-	-	0.002	-	-	-	53.816	20.815	-	0.975	9.799					
21 Loans and advances	125.822	38.119	11.315	-	0.000	4.683	0.003	0.000	-	0.000	0.210	0.003	-	0.267	0.129	-	-	0.000	0.000	-	-	0.002	-	-	-	38.601	11.446	-	0.000	4.683					
22 Debt securities, including UoP	33.275	13.096	8.290	-	0.956	4.545	0.100	0.003	-	0.003	0.015	0.015	-	0.031	0.001	-	-	0.002	0.000	-	-	-	-	-	-	13.244	8.309	-	0.956	4.548					
23 Equity instruments	6.379	1.706	0.877	-	0.019	0.568	0.007	0.000	-	0.000	0.100	0.086	-	0.157	0.097	-	-	0.000	-	-	-	-	-	-	-	1.970	1.060	-	0.019	0.568					
24 <b>Households</b>	20,271.135	17,243.379	679.814	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	17,243.379	679.814	-	-	-	-	-			
25 of which loans collateralised by residential immovable property	19,497.339	16,469.583	679.814	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	16,469.583	679.814	-	-	-	-	-			
26 of which building renovation loans	714.718	714.718	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	714.718	-	-	-	-	-	-			
27 of which motor vehicle loans	59.078	59.078	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	59.078	-	-	-	-	-	-			

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae					
2024 disclosure reference data																																				
Total (gross) carrying amount	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)											
	Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)											
	Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)											
	Of which specialised lending	Of which transitional	Of which enabling		Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling					
28 Local governments financing	103.965	10.706	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	10.706	-	-	-
29 Construction loans		10.706	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	10.706	-	-	-
30 Other local government financing	93.259	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
31 Collateral obtained by taking possession: residential and non-residential immovable properties	41.481	41.481	4.727	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	41.481	4.727	-	-	
32 Other assets excluded from the numerator for GAR calculation (covered in the denominator)	35,911.152	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
33 Financial and non-financial corporations	24,795.976	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	24,769.043	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
35 Loans and advances	24,199.155	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
36 of which loans collateralised by commercial immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
37 of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
38 Debt securities	326.493	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
39 Equity instruments	243.395	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
40 Non-EU counterparties not subject to NFRD disclosure obligations	26.933	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
41 Loans and advances	7.309	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
42 Debt securities	16.417	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
43 Equity instruments	3.208	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
44 Derivatives	69.517	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
45 On demand interbank loans	102.869	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
46 Cash and cash-related assets	602.292	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
47 Other assets (e.g. goodwill, commodities, etc.)	10,340.497	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
48 Total GAR assets	57,005.087	17,441.804	715.824	-	1.799	10.886	0.960	0.028	-	0.039	0.371	0.104	-	-	0.744	0.262	-	-	0.012	0.000	-	-	0.020	-	-	-	-	-	-	-	17,443.910	716.218	-	1.799	10.925	
49 Asset not covered for GAR calculation	32,178.309	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
50 Sovereigns	31,506.437	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
51 Central Banks exposure	665.907	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
52 Trading book	5.964	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
53 Total assets	89,183.396	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
Off-balance sheet exposures - Corporates subject to Non-Financial Reporting Directive (NFRD) disclosure obligations																																				
54 Financial guarantees	0.165	0.103	0.073	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.103	0.073	-	-		
55 Assets under management	607.607	149.722	71.283	-	4.807	39.904	0.808	0.025	-	0.012	2.904	2.555	-	-	0.790	0.054	-	-	0.577	0.052	-	-	0.006	-	-	-	-	-	154.807	73.969	-	4.807	39.916			
56 Of which debt securities	408.717	103.766	51.653	-	3.203	27.301	0.468	0.012	-	0.003	2.461	2.165	-	-	0.608	0.048	-	-	0.090	0.012	-	-	0.006	-	-	-	-	-	107.400	53.890	-	3.203	27.304			
57 Of which equity instruments	198.889	45.955	19.631	-	1.604	12.603	0.340	0.013	-	0.009	0.442	0.390	-	-	0.182	0.006	-	-	0.487	0.040	-	-	-	-	-	-	-	-	47.407	20.079	-	1.604	12.612			

Template 1 - Assets for GAR calculation (Annex VI Reg 2178) - Turnover KPI - Stock 2023

	ag	ah	ai	aj	ak	al	am	an	ao	ap	aq	ar	as	at	au	av	aw	ax	ay	az	ba	bb	bc	bd	be	bf	bg	bh	bi	bj	bk						
2023 disclosure reference data																																					
Total (gross) carrying amount	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)			Water and marine resources (WTR)		Circular economy (CE)		Pollution (PPC)		Biodiversity and ecosystems (BIO)		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)																			
	Of which towards taxonomy relevant sectors (taxonomy-eligible)						Of which towards taxonomy relevant sectors (taxonomy-eligible)			Of which towards taxonomy relevant sectors (taxonomy-eligible)		Of which towards taxonomy relevant sectors (taxonomy-eligible)		Of which towards taxonomy relevant sectors (taxonomy-eligible)		Of which towards taxonomy relevant sectors (taxonomy-eligible)		Of which towards taxonomy relevant sectors (taxonomy-eligible)																			
	Of which environmentally sustainable (taxonomy-aligned)						Of which environmentally sustainable (taxonomy-aligned)			Of which environmentally sustainable (taxonomy-aligned)		Of which environmentally sustainable (taxonomy-aligned)		Of which environmentally sustainable (taxonomy-aligned)		Of which environmentally sustainable (taxonomy-aligned)		Of which environmentally sustainable (taxonomy-aligned)																			
	Of which specialised lending		Of which transitional		Of which enabling		Of which specialised lending	Of which enabling		Of which specialised lending	Of which enabling	Of which specialised lending	Of which enabling	Of which specialised lending	Of which enabling	Of which specialised lending	Of which enabling	Of which specialised lending	Of which enabling	Of which specialised lending	Of which transitional	Of which enabling															
<b>GAR - Covered assets in both numerator and denominator</b>																																					
1	Loans and advances, debt securities and equity instruments not HT eligible for GAR calculation	26,371.953	2,803.857	245.672	-	8.196	7.039	13,579.329	310.332	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	16,383.186	556.004	-	8.196	7.039	
2	Financial corporations	389.595	65.440	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	65.440	-	-	-	
3	Credit institutions	231.784	60.171	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	60.171	-	-	-		
4	Loans and advances	18.165	4.108	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4.108	-	-	-	
5	Debt securities, including UoP	205.573	53.884	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	53.884	-	-	-		
6	Equity instruments	8.046	2.179	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.179	-	-	-		
7	Other financial corporations	157.811	5.269	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5.269	-	-	-		
8	of which investment firms	1.734	0.387	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.387	-	-	-		
9	Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
10	Debt securities, including UoP	1.494	0.333	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.333	-	-	-		
11	Equity instruments	0.239	0.053	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.053	-	-	-		
12	of which management companies	94.454	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
13	Loans and advances	71.073	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
14	Debt securities, including UoP	23.381	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
15	Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
16	of which insurance companies	38.548	4.857	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4.857	-	-	-	
17	Loans and advances	36.874	4.646	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4.646	-	-	-		
18	Debt securities, including UoP	0.519	0.065	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.065	-	-	-		
19	Equity instruments	1.155	0.146	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.146	-	-	-		
20	Non-financial corporations	180.221	41.675	22.025	-	8.196	7.039	0.055	0.000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	41.731	22.025	-	8.196	7.039	
21	Loans and advances	141.036	32.620	16.645	-	8.135	4.284	0.014	0.000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	32.633	16.645	-	8.135	4.284	
22	Debt securities, including UoP	32.576	7.959	4.727	-	0.061	2.390	0.039	0.000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	7.998	4.727	-	0.061	2.390	
23	Equity instruments	6.609	1.096	0.653	-	0.364	0.003	0.000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.099	0.653	-	-	0.364	
24	Households	25,688.441	2,672.949	223.647	-	-	-	13,579.011	310.110	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	16,251.959	533.756	-	-	-
25	of which loans collateralised by residential immovable property	18,798.210	1,967.273	223.647	-	-	-	13,579.011	310.110	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	15,546.283	533.756	-	-	-
26	of which building renovation loans	697.226	697.226	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	697.226	-	-	-	-
27	of which motor vehicle loans	8.450	8.450	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	8.450	-	-	-	-	
28	Local governments financing	113.433	23.793	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	23.793	-	-	-	
29	Construction loans	0.125	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
30	Other local government financing	113.308	23.793	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	23.793	-	-	-	

	ag	ah	ai	aj	ak	al	am	an	ao	ap	aq	ar	as	at	au	av	aw	ax	ay	az	ba	bb	bc	bd	be	bf	bg	bh	bi	bj	bk				
2023 disclosure reference data																																			
Total (gross) carrying amount	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)			Water and marine resources (WTR)		Circular economy (CE)		Pollution (PPC)		Biodiversity and ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)																
	Of which towards taxonomy relevant sectors (taxonomy-eligible)						Of which towards taxonomy relevant sectors (taxonomy-eligible)			Of which towards taxonomy relevant sectors (taxonomy-eligible)		Of which towards taxonomy relevant sectors (taxonomy-eligible)		Of which towards taxonomy relevant sectors (taxonomy-eligible)		Of which towards taxonomy relevant sectors (taxonomy-eligible)			Of which towards taxonomy relevant sectors (taxonomy-eligible)																
	Of which environmentally sustainable (taxonomy-aligned)						Of which environmentally sustainable (taxonomy-aligned)			Of which environmentally sustainable (taxonomy-aligned)		Of which environmentally sustainable (taxonomy-aligned)		Of which environmentally sustainable (taxonomy-aligned)		Of which environmentally sustainable (taxonomy-aligned)			Of which environmentally sustainable (taxonomy-aligned)																
31 Collateral obtained by taking possession: residential and non-residential immovable properties	0.263	-	-	-	-	-	0.263	0.223	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.263	0.223	-	-
32 Assets excluded from the numerator for GAR calculation (covered in the denominator)	30,374.094	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
33 Financial and non-financial corporations	24,985.026	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	24,961.420	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
35 Loans and advances	24,378.263	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
36 of which loans collateralised by commercial immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
37 of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
38 Debt securities	347.775	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
39 Equity instruments	235.383	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
40 Non-EU counterparties not subject to NFRD disclosure obligations	23.606	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
41 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
42 Debt securities	21.054	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
43 Equity instruments	2.552	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
44 Derivatives	84.294	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
45 On demand interbank loans	151.577	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
46 Cash and cash-related assets	579.331	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
47 Other assets (e.g. goodwill, commodities, etc.)	4,573.866	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
48 Total GAR assets	56,746.047	2,803.857	245.672	-	8.196	7.039	13,579.329	310.332	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	16,383.186	556.004	-	8.196	7.039
49 Asset not covered for GAR calculation	35,379.804	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
50 Sovereigns	34,798.299	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
51 Central Banks exposure	576.057	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
52 Trading book	5.447	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
53 Total assets	92,125.850	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
Off-balance sheet exposures - Corporates subject to Non-Financial Reporting Directive (NFRD) disclosure obligations																																			
54 Financial guarantees	0.365	0.354	0.140	-	0.140	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.354	0.140	-	0.140	-	
55 Assets under management	519.838	140.326	42.999	-	0.469	22.624	0.002	0.000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	140.328	42.999	-	0.469	22.624	-	
56 Of which debt securities	369.294	104.990	31.521	-	0.333	16.252	0.001	0.000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	104.991	31.521	-	0.333	16.252	-	
57 Of which equity instruments	150.544	35.336	11.478	-	0.136	6.372	0.001	0.000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	35.337	11.478	-	0.136	6.372	-	

Template 1 - Assets for GAR calculation (Annex VI Reg 2178) - Turnover KPI - Flow 2024

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae		
2024 disclosure reference data																																	
Total (gross) carrying amount	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)			Water and marine resources (WTR)			Circular economy (CE)			Pollution (PPC)			Biodiversity and ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)											
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)											
	Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)											
	Of which specialised lending		Of which transitional		Of which enabling		Of which specialised lending		Of which enabling	Of which specialised lending		Of which enabling	Of which specialised lending		Of which enabling	Of which specialised lending		Of which enabling	Of which specialised lending		Of which enabling	Of which specialised lending		Of which enabling	Of which specialised lending		Of which transitional		Of which enabling				
<b>GAR - Covered assets in both numerator and denominator</b>																																	
1 Loans and advances, debt securities and equity instruments not HTT eligible for GAR calculation	3,068.073	2,558.908	163.062	-	1.464	4.040	0.052	0.009	-	0.002	0.002	0.000	-	-	0.072	0.002	-	-	0.000	0.000	-	-	0.002	-	-	-	2,559.037	163.072	-	1.464	4.041		
2 <b>Financial corporations</b>	226.132	47.046	3.887	-	0.636	0.567	0.051	0.009	-	0.002	0.002	-	-	-	0.013	0.002	-	-	0.000	-	-	-	0.001	-	-	-	47.113	3.898	-	0.636	0.569		
3 Credit institutions	221.999	46.593	3.742	-	0.633	0.567	0.015	0.009	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	46.607	3.751	-	0.633	0.567		
4 Loans and advances	4.022	0.924	0.081	-	0.003	0.006	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.924	0.081	-	0.003	0.006		
5 Debt securities, including UoP	217.977	45.668	3.661	-	0.630	0.560	0.015	0.009	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	45.683	3.670	-	0.630	0.560		
6 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7 Other financial corporations	4.133	0.453	0.145	-	0.003	0.001	0.036	0.000	-	0.002	0.002	-	-	-	0.013	0.002	-	-	0.000	-	-	-	0.001	-	-	-	0.505	0.147	-	0.003	0.003		
8 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
12 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
13 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
16 of which insurance companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
18 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
20 <b>Non-financial corporations</b>	56.012	13.948	10.520	-	0.828	3.472	0.002	0.000	-	0.000	0.000	0.000	-	-	0.059	0.000	-	-	0.000	0.000	-	-	0.002	-	-	-	14.011	10.520	-	0.828	3.472		
21 Loans and advances	47.387	8.425	8.144	-	0.000	2.043	0.000	-	-	-	0.000	0.000	-	-	0.059	0.000	-	-	0.000	0.000	-	-	0.002	-	-	-	8.486	8.144	-	0.000	2.043		
22 Debt securities, including UoP	8.301	5.313	2.282	-	0.828	1.336	0.001	0.000	-	0.000	-	-	-	-	0.000	-	-	-	-	-	-	-	-	-	-	-	5.314	2.282	-	0.828	1.336		
23 Equity instruments	0.324	0.210	0.093	-	-	0.093	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.210	0.093	-	-	0.093		
24 <b>Households</b>	2,775.616	2,497.523	148.655	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2,497.523	148.655	-	-	-		
25 of which loans collateralised by residential immovable property	2,595.295	2,317.201	148.655	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2,317.201	148.655	-	-	-		
26 of which building renovation loans	139.379	139.379	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	139.379	-	-	-	-		
27 of which motor vehicle loans	40.942	40.942	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40.942	-	-	-	-		
28 <b>Local governments financing</b>	10.313	0.392	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.392	-	-	-	-		
29 Construction loans	0.392	0.392	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.392	-	-	-	-		
30 Other local government financing	9.921	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae					
2024 disclosure reference data																																				
Total (gross) carrying amount	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)			Water and marine resources (WTR)			Circular economy (CE)			Pollution (PPC)			Biodiversity and ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)														
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)														
	Of which environmentally sustainable (Taxonomy-aligned)						Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)														
	Of which specialised lending		Of which transitional		Of which enabling		Of which specialised lending	Of which enabling		Of which specialised lending	Of which enabling		Of which specialised lending	Of which enabling		Of which specialised lending	Of which enabling		Of which specialised lending	Of which enabling		Of which specialised lending	Of which enabling		Of which specialised lending	Of which enabling		Of which specialised lending	Of which enabling							
31 Collateral obtained by taking possession: residential and non-residential immovable properties	0.262	0.262	0.036	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.262	0.036	-	-	-
32 Other assets excluded from the numerator for GAR calculation (covered in the denominator)	6,120.590	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
33 Financial and non-financial corporations	4,829.064	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	4,825.677	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
35 Loans and advances	4,738.059	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
36 of which loans collateralised by commercial immovable property	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
37 of which building renovation loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
38 Debt securities	60.414	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
39 Equity instruments	27.204	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
40 Non-EU counterparties not subject to NFRD disclosure obligations	3.387	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
41 Loans and advances	1.586	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
42 Debt securities	1.801	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
43 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
44 Derivatives	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
45 On demand interbank loans	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
46 Cash and cash-related assets	22.962	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
47 Other assets (e.g. goodwill, commodities, etc.)	1,268.565	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
48 Total GAR assets	9,188.926	2,559.170	163.097	-	1.464	4.040	0.052	0.009	-	0.002	0.002	0.000	-	-	0.072	0.002	-	-	0.000	0.000	-	-	0.002	-	-	-	-	-	-	-	2,559.300	163.108	-	1.464	4.041	
49 Asset not covered for GAR calculation	9,370.513	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
50 Sovereigns	9,303.896	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
51 Central Banks exposure	66.100	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
52 Trading book	0.517	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
53 Total assets	18,559.439	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Off-balance sheet exposures - Corporates subject to Non-Financial Reporting Directive (NFRD) disclosure obligations																																				
54 Financial guarantees	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
55 Assets under management	108.634	29.049	14.059	-	1.447	6.681	0.070	0.034	-	0.025	0.186	0.175	-	-	0.115	0.013	-	-	0.028	0.004	-	-	0.001	-	-	-	-	-	-	29.449	14.285	-	1.447	6.706		
56 Of which debt securities	96.332	27.083	13.508	-	1.433	6.437	0.069	0.034	-	0.025	0.085	0.078	-	-	0.072	0.008	-	-	0.012	0.002	-	-	0.001	-	-	-	-	-	27.322	13.629	-	1.433	6.462			
57 Of which equity instruments	12.302	1.966	0.551	-	0.014	0.244	0.000	-	-	-	0.101	0.097	-	-	0.044	0.006	-	-	0.016	0.002	-	-	-	-	-	-	-	-	2.127	0.656	-	0.014	0.244			

Template 2 - GAR - Sector Information (Annex VI Reg 2178) - Turnover KPI – 2024

Breakdown by sector – 4-digit NACE level (code and brand)	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab
	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
	Other non-financial corporations (subject to the NFRD)		SMEs and other non-financial corporations not subject to the NFRD		Other non-financial corporations (subject to the NFRD)		SMEs and other non-financial corporations not subject to the NFRD		Other non-financial corporations (subject to the NFRD)		SMEs and other non-financial corporations not subject to the NFRD		Other non-financial corporations (subject to the NFRD)		SMEs and other non-financial corporations not subject to the NFRD		Other non-financial corporations (subject to the NFRD)		SMEs and other non-financial corporations not subject to the NFRD		Other non-financial corporations (subject to the NFRD)		SMEs and other non-financial corporations not subject to the NFRD		Other non-financial corporations (subject to the NFRD)		SMEs and other non-financial corporations not subject to the NFRD	
	Book value (gross)		Book value (gross)		Book value (gross)		Book value (gross)		Book value (gross)		Book value (gross)		Book value (gross)		Book value (gross)		Book value (gross)		Book value (gross)		Book value (gross)		Book value (gross)		Book value (gross)		Book value (gross)	
Of which eligible (CCM)	Of which environmentally sustainable (CCM)	Of which eligible (CCM)	Of which environmentally sustainable (CCM)	Of which eligible (CCA)	Of which environmentally sustainable (CCA)	Of which eligible (CCA)	Of which environmentally sustainable (CCA)	Of which eligible (WTR)	Of which environmentally sustainable (WTR)	Of which eligible (WTR)	Of which environmentally sustainable (WTR)	Of which eligible (CE)	Of which environmentally sustainable (CE)	Of which eligible (CE)	Of which environmentally sustainable (CE)	Of which eligible (PPC)	Of which environmentally sustainable (PPC)	Of which eligible (PPC)	Of which environmentally sustainable (PPC)	Of which eligible (BIO)	Of which environmentally sustainable (BIO)	Of which eligible (BIO)	Of which environmentally sustainable (BIO)	Of which eligible (CCM + CCA + WTR + CE + PPC + BIO)	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Of which eligible (CCM + CCA + WTR + CE + PPC + BIO)	Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO)	
1	0111 - Growing of cereals (except rice), grain legumes and oilseeds	0.000	-	-	-	0.000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.002	-	0.003	-
2	0610 - Extraction of crude petroleum	0.183	0.033	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.183	0.033
3	1413 - Manufacture of other outerwear	0.003	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.003	-
4	2060 - Manufacture of man-made fibres	1.073	0.220	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.073	0.220
5	2223 - Manufacture of builders' ware of plastic	0.041	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.041	-
6	2512 - Manufacture of metal doors and windows	0.059	0.011	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.059	0.011
7	2562 - General mechanical work	0.010	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.010	-
8	2573 - Manufacture of tools	0.037	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.037	-
9	2611 - Manufacture of electronic components	0.337	0.248	-	-	-	-	-	-	-	-	-	0.059	-	-	-	-	-	-	-	-	-	-	-	-	-	0.396	0.248
10	2821 - Manufacture of ovens, furnaces and heating systems	0.016	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.016	-
11	2893 - Manufacture of machinery for food, beverage and tobacco processing	0.199	0.037	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.199	0.037
12	2910 - Manufacture of motor vehicles	0.648	0.648	-	-	-	-	0.207	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.855	0.648
13	3011 - Building of ships and floating structures	2.886	0.719	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.886	0.719
14	3030 - Manufacture of air and spacecraft and related machinery	-	-	-	-	0.063	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.063	-
15	3091 - Manufacture of motorcycles	0.182	0.013	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.182	0.013
16	3511 - Production of electricity	8.568	8.151	-	-	-	-	0.100	0.086	-	-	0.000	-	-	-	-	0.000	-	-	-	-	-	-	-	-	-	8.669	8.237
17	3512 - Transmission of electricity	0.179	0.171	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.179	0.171
18	3522 - Distribution of gaseous fuels through mains	0.026	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.026	-
19	3600 - Water collection, treatment and supply	0.045	0.042	-	-	-	-	0.018	0.017	-	-	0.001	0.001	-	-	-	0.002	0.000	-	-	-	-	-	-	-	-	0.066	0.061
20	3832 - Recovery of sorted materials	0.000	0.000	-	-	-	-	0.000	0.000	-	-	0.000	-	-	-	-	0.000	-	-	-	-	-	-	-	-	-	0.001	0.000
21	4212 - Construction of railways and underground railways	0.313	0.145	-	-	0.006	0.002	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.319	0.148
22	4322 - Plumbing, heat and air-conditioning installation	0.003	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.003	-
23	4642 - Wholesale of clothing and footwear	0.001	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.001	-
24	4931 - Urban and suburban passenger land transport	2.028	1.312	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.028	1.312
25	5221 - Service activities incidental to land transportation	0.000	0.000	-	-	-	-	-	-	-	-	0.002	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.002	0.000
26	5310 - Postal activities under universal service obligation	0.272	0.027	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.272	0.027
27	6110 - Wired telecommunications activities	0.117	-	-	-	0.035	0.001	-	-	-	-	0.001	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.153	0.001
28	7010 - Activities of head offices	34.376	8.024	-	-	-	-	-	-	-	-	0.028	-	-	-	-	0.000	-	-	-	-	-	-	-	-	-	34.404	8.024
29	7739 - Renting of other machinery, equipment and tangible goods n.e.c.	0.165	-	-	-	0.002	-	-	-	-	-	0.208	0.128	-	-	-	-	-	-	-	-	-	-	-	-	-	0.375	0.128
30	8230 - Organisation of conventions and trade shows	0.124	-	-	-	0.002	-	-	-	-	-	0.156	0.097	-	-	-	-	-	-	-	-	-	-	-	-	-	0.282	0.097
31	8622 - Specialist medical practice services	0.006	0.006	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.006	0.006
...		1.026	0.676	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.026	0.676





Template 4 - GAR KPI (flow) - (Annex VI Reg 2178) - Turnover KPI - 2024

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae		
	2024 disclosure reference data																																
	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + PPC + BIO)					Proportion of total assets covered			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)								
Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)									
% (compared to total covered assets in the denominator)	Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which transitional	Of which enabling
GAR - Covered assets in both numerator and denominator																																	
1 Loans and advances, debt securities and equity instruments not HIT eligible for GAR calculation	27.85%	1.77%	0.00%	0.02%	0.04%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	27.85%	1.77%	0.00%	0.02%	0.04%	16.53%
2 Financial corporations	0.51%	0.04%	0.00%	0.01%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.51%	0.04%	0.00%	0.01%	0.01%	1.22%
3 Credit institutions	0.51%	0.04%	0.00%	0.01%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.51%	0.04%	0.00%	0.01%	0.01%	1.20%
4 Loans and advances	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%	0.02%
5 Debt securities, including UoP	0.50%	0.04%	0.00%	0.01%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.50%	0.04%	0.00%	0.01%	0.01%	1.17%
6 Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
7 Other financial corporations	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%	0.02%
8 of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11 Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
12 of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15 Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
16 of which insurance companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19 Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
20 Non-financial corporations	0.15%	0.11%	0.00%	0.01%	0.04%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.15%	0.11%	0.00%	0.01%	0.04%	0.30%
21 Loans and advances	0.09%	0.09%	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.09%	0.09%	0.00%	0.00%	0.02%	0.26%
22 Debt securities, including UoP	0.06%	0.02%	0.00%	0.01%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.06%	0.02%	0.00%	0.01%	0.01%	0.04%	
23 Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
24 Households	27.18%	1.62%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	27.18%	1.62%	0.00%	0.00%	0.00%	14.96%	
25 of which loans collateralised by residential immovable property	25.22%	1.62%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	25.22%	1.62%	0.00%	0.00%	0.00%	13.98%	
26 of which building renovation loans	1.52%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.52%	0.00%	0.00%	0.00%	0.00%	0.75%	
27 of which motor vehicle loans	0.45%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.45%	0.00%	0.00%	0.00%	0.00%	0.22%	
28 Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.06%	
29 Construction loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
30 Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.05%	
31 Collateral obtained by taking possession: residential and non-residential immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	
32 Total GAR assets	27.85%	1.77%	0.00%	0.02%	0.04%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	27.85%	1.78%	0.00%	0.02%	0.04%	49.51%	

Template 5 - KPIs for off-balance sheet exposures (Annex VI Reg 2178) - Turnover KPI - 2024 and 2023

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad		
% (compared to total covered assets in the denominator)	<b>Disclosure reference data - 31.12.2024 Stock</b>																															
	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)							
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)							
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
1 Financial guarantees (FinGuar KPI)	62.44%	44.37%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	62.44%	44.37%	0.00%	0.00%	0.00%	
2 Assets under management (AuM KPI)	24.64%	11.73%	0.00%	0.79%	6.57%	0.13%	0.00%	0.00%	0.00%	0.48%	0.42%	0.00%	0.00%	0.13%	0.01%	0.00%	0.00%	0.10%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	25.48%	12.17%	0.00%	0.79%	6.57%		

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad		
% (compared to total covered assets in the denominator)	<b>Disclosure reference data - 31.12.2023 Stock</b>																															
	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)							
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)							
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
1 Financial guarantees (FinGuar KPI)	96.99%	38.36%	0.00%	38.36%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	96.99%	38.36%	0.00%	38.36%	0.00%		
2 Assets under management (AuM KPI)	26.99%	8.27%	0.00%	0.09%	4.35%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	26.99%	8.27%	0.00%	0.09%	4.35%		

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad		
% (compared to total covered assets in the denominator)	<b>2024 disclosure reference data - Flow</b>																															
	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)							
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)							
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)							
1 Financial guarantees (FinGuar KPI)																																
2 Assets under management (AuM KPI)	26.74%	12.94%	0.00%	1.33%	6.15%	0.06%	0.03%	0.00%	0.02%	0.17%	0.16%	0.00%	0.00%	0.11%	0.01%	0.00%	0.00%	0.03%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	27.11%	13.15%	0.00%	1.33%	6.17%		

## Capital Expenditure KPI

### Template 1 - Assets for GAR calculation (Annex VI Reg 2178) - Capex KPI - Stock 2024

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae		
Total (gross) carrying amount	2024 disclosure reference data																																
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			Circular economy (CE)			Pollution (PPC)			Biodiversity and ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)											
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)											
	Of which environmentally sustainable (taxonomy-aligned)					Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)			Of which environmentally sustainable (taxonomy-aligned)			Of which environmentally sustainable (taxonomy-aligned)			Of which environmentally sustainable (taxonomy-aligned)			Of which environmentally sustainable (taxonomy-aligned)											
	Of which specialised lending		Of which transitional	Of which enabling	Of which specialised lending		Of which enabling	Of which specialised lending		Of which enabling	Of which specialised lending		Of which enabling	Of which specialised lending		Of which enabling	Of which specialised lending		Of which enabling	Of which specialised lending		Of which enabling	Of which specialised lending		Of which transitional	Of which enabling	Of which specialised lending		Of which transitional	Of which enabling			
<b>GAR - Covered assets in both numerator and denominator</b>																																	
1 Loans and advances, debt securities and equity instruments not HTI eligible for GAR calculation	21,052.454	17,440.382	742.802	-	1.552	32.231	2.738	0.184	-	0.008	0.354	0.241	-	-	0.550	0.146	-	-	0.025	0.008	-	-	0.036	-	-	-	17,444.085	743.382	-	1.552	32.239		
2 <b>Financial corporations</b>	511.877	100.313	16.240	-	1.348	2.478	2.482	0.112	-	0.007	0.045	-	-	-	0.235	-	-	-	0.009	-	-	-	0.018	-	-	-	103.101	16.351	-	1.348	2.486		
3 Credit institutions	333.113	73.248	7.574	-	0.715	1.842	0.054	0.045	-	-	-	-	-	-	0.002	-	-	-	-	-	-	-	-	-	-	-	73.303	7.619	-	0.715	1.842		
4 Loans and advances	21.886	4.931	0.371	-	0.002	0.103	0.001	0.001	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4.932	0.372	-	0.002	0.103		
5 Debt securities, including UoP	301.545	66.107	7.057	-	0.707	1.721	0.052	0.043	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	66.159	7.100	-	0.707	1.721		
6 Equity instruments	9.682	2.211	0.147	-	0.005	0.018	0.001	0.000	-	-	-	-	-	-	0.002	-	-	-	-	-	-	-	-	-	-	-	2.213	0.147	-	0.005	0.018		
7 Other financial corporations	178.764	27.064	8.666	-	0.633	0.636	2.428	0.067	-	0.007	0.045	-	-	-	0.233	-	-	-	0.009	-	-	-	0.018	-	-	-	29.798	8.732	-	0.633	0.643		
8 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
12 of which management companies	5.947	0.009	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.009	-	-	-	-	-	
13 Loans and advances	5.947	0.009	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.009	-	-	-	-	-	
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
16 of which insurance companies	46.225	8.498	2.054	-	0.044	0.513	0.040	0.040	-	0.007	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	8.538	2.094	-	0.044	0.520		
17 Loans and advances	42.564	8.198	1.947	-	0.041	0.497	0.038	0.038	-	0.004	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	8.236	1.985	-	0.041	0.502		
18 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19 Equity instruments	3.661	0.300	0.107	-	0.002	0.015	0.002	0.002	-	0.003	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.302	0.109	-	0.002	0.018		
20 <b>Non-financial corporations</b>	165.476	85.985	46.749	-	0.204	29.753	0.257	0.073	-	0.000	0.309	0.241	-	-	0.315	0.146	-	-	0.016	0.008	-	-	0.018	-	-	-	86.899	47.217	-	0.204	29.754		
21 Loans and advances	125.822	63.912	28.612	-	0.001	18.245	0.041	0.000	-	0.000	0.053	0.013	-	-	0.145	0.082	-	-	0.007	0.001	-	-	0.018	-	-	-	64.175	28.708	-	0.001	18.245		
22 Debt securities, including UoP	33.275	19.142	15.826	-	0.169	10.131	0.215	0.073	-	0.000	0.077	0.074	-	-	0.084	0.003	-	-	0.009	0.007	-	-	-	-	-	-	19.528	15.983	-	0.169	10.131		
23 Equity instruments	6.379	2.931	2.311	-	0.034	1.377	0.001	0.000	-	0.000	0.178	0.154	-	-	0.086	0.061	-	-	-	-	-	-	-	-	-	-	3.196	2.526	-	0.034	1.377		
24 <b>Households</b>	20,271.135	17,243.379	679.814	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	17,243.379	679.814	-	-	-		
25 of which loans collateralised by residential immovable property	19,497.339	16,469.583	679.814	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	16,469.583	679.814	-	-	-		
26 of which building renovation loans	714.718	714.718	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	714.718	-	-	-	-		
27 of which motor vehicle loans	59.078	59.078	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	59.078	-	-	-	-		
28 <b>Local governments financing</b>	103.965	10.706	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	10.706	-	-	-	-		

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae							
2024 disclosure reference data																																						
Total (gross) carrying amount	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)											
	Of which towards taxonomy relevant sectors (taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)															
	Of which environmentally sustainable (taxonomy-aligned)						Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)															
	Of which specialised lending		Of which transitional		Of which enabling		Of which specialised lending		Of which enabling		Of which specialised lending		Of which enabling		Of which specialised lending		Of which enabling		Of which specialised lending		Of which enabling		Of which specialised lending		Of which enabling		Of which specialised lending		Of which enabling									
29 Construction loans	10.706	10.706	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
30 Other local government financing	93.259	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
31 Collateral obtained by taking possession: residential and non-residential immovable properties	41.481	41.481	4.727	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
32 Other assets excluded from the numerator for GAR calculation (covered in the denominator)	35,911.152	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
33 Financial and non-financial corporations	24,795.976																																					
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	24,769.043																																					
35 Loans and advances	24,199.155																																					
36 of which loans collateralised by commercial immovable property	-																																					
37 of which building renovation loans	-																																					
38 Debt securities	326.493																																					
39 Equity instruments	243.395																																					
40 Non-EU counterparties not subject to NFRD disclosure obligations	26.933																																					
41 Loans and advances	7.309																																					
42 Debt securities	16.417																																					
43 Equity instruments	3.208																																					
44 Derivatives	69.517																																					
45 On demand interbank loans	102.869																																					
46 Cash and cash-related assets	602.292																																					
47 Other assets (e.g. goodwill, commodities, etc.)	10,340.497																																					
48 Total GAR assets	57,005.087	17,481.862	747.529	-	1.552	32.231	2.738	0.184	-	0.008	0.354	0.241	-	-	0.550	0.146	-	-	0.025	0.008	-	-	0.036	-	-	-	-	17,485.566	748.109	-	1.552	32.239						
49 Asset not covered for GAR calculation	32,178.309																																					
50 Sovereigns	31,506.437																																					
51 Central Banks exposure	665.907																																					
52 Trading book	5.964																																					
53 Total assets	89,183.396																																					
Off-balance sheet exposures - Corporates subject to Non-Financial Reporting Directive (NFRD) disclosure obligations																																						
54 Financial guarantees	0.165	0.092	0.032	-	0.000	0.000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.092	0.032	-	0.000	0.000						
55 Assets under management	607.607	193.069	110.972	-	2.821	65.313	6.538	0.382	-	0.003	7.510	6.817	-	-	1.578	0.129	-	-	0.516	0.343	-	-	0.006	-	-	-	209.217	118.645	-	2.821	65.317							
56 Of which debt securities	408.717	125.242	72.796	-	1.273	41.180	6.183	0.267	-	0.001	6.393	5.810	-	-	1.409	0.112	-	-	0.349	0.296	-	-	0.006	-	-	-	139.581	79.281	-	1.273	41.181							
57 Of which equity instruments	198.889	67.827	38.176	-	1.548	24.134	0.355	0.115	-	0.002	1.118	1.008	-	-	0.169	0.018	-	-	0.168	0.047	-	-	-	-	-	-	69.636	39.364	-	1.548	24.136							



	ag	ah	ai	aj	ak	al	am	an	ao	ap	aq	ar	as	at	au	av	aw	ax	ay	az	ba	bb	bc	bd	be	bf	bg	bh	bi	bj	bk						
2023 disclosure reference data																																					
Total (gross) carrying amount	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)			Water and marine resources (WTR)			Circular economy (CE)			Pollution (PPC)			Biodiversity and ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)															
	Of which towards taxonomy relevant sectors (taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (taxonomy-eligible)															
	Of which environmentally sustainable (taxonomy-aligned)						Of which environmentally sustainable (taxonomy-aligned)			Of which environmentally sustainable (taxonomy-aligned)			Of which environmentally sustainable (taxonomy-aligned)			Of which environmentally sustainable (taxonomy-aligned)			Of which environmentally sustainable (taxonomy-aligned)			Of which environmentally sustainable (taxonomy-aligned)															
	Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which transitional	Of which enabling	Of which specialised lending	Of which enabling	Of which specialised lending	Of which enabling	Of which specialised lending	Of which enabling	Of which specialised lending	Of which enabling	Of which specialised lending	Of which enabling	Of which specialised lending	Of which enabling	Of which specialised lending	Of which enabling	Of which specialised lending	Of which enabling	Of which specialised lending	Of which enabling	Of which specialised lending	Of which enabling	Of which specialised lending	Of which transitional	Of which enabling								
30 Other local government financing	113.308	23.793	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	23.793	-	-	-	-	
31 Collateral obtained by taking possession: residential and non-residential immovable properties	0.263	-	-	-	-	-	0.263	0.223	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.263	0.223	-	-	-	-	
32 Other assets excluded from the numerator for GAR calculation (covered in the denominator)	30,374.094	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
33 Financial and non-financial corporations	24,985.026																																				
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	24,961.420																																				
35 Loans and advances	24,378.263																																				
36 of which loans collateralised by commercial immovable property	-																																				
37 of which building renovation loans	-																																				
38 Debt securities	347.775																																				
39 Equity instruments	235.383																																				
40 Non-EU counterparties not subject to NFRD disclosure obligations	23.606																																				
41 Loans and advances	-																																				
42 Debt securities	21.054																																				
43 Equity instruments	2.552																																				
44 Derivatives	84.294																																				
45 On demand interbank loans	151.577																																				
46 Cash and cash-related assets	579.331																																				
47 Other assets (e.g. goodwill, commodities, etc.)	4,573.866																																				
48 Total GAR assets	56,746.047	2,815.247	256.607	-	8.179	10.714	13,579.540	310.454	-	0.001	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	16,394.787	567.061	-	8.179	10.715		
49 Asset not covered for GAR calculation	35,379.804																																				
50 Sovereigns	34,798.299																																				
51 Central Banks exposure	576.057																																				
52 Trading book	5.447																																				
53 Total assets	92,125.850																																				
Off-balance sheet exposures - Corporates subject to Non-Financial Reporting Directive (NFRD) disclosure obligations																																					
54 Financial guarantees	0.365	0.354	0.186	-	0.186	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.354	0.186	-	0.186	-		
55 Assets under management	519.838	178.801	80.095	-	1.137	35.346	10.862	9.564	-	0.004	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	189.663	89.659	-	1.137	35.350		
56 Of which debt securities	369.294	127.226	52.079	-	0.101	24.435	8.250	8.093	-	0.003	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	135.476	60.173	-	0.101	24.437			
57 Of which equity instruments	150.544	51.575	28.016	-	1.036	10.911	2.612	1.471	-	0.001	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	54.187	29.486	-	1.036	10.913			

Template 1 - Assets for GAR calculation (Annex VI Reg 2178) - Capex KPI - Flow 2024

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae		
2024 disclosure reference data																																	
Total (gross) carrying amount	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)				Water and marine resources (WTR)			Circular economy (CE)			Pollution (PPC)			Biodiversity and ecosystems (BIO)			TOTAL (CCM + CCA + WTR + CE + PPC + BIO)										
	Of which towards taxonomy relevant sectors (taxonomy-eligible)						Of which towards taxonomy relevant sectors (taxonomy-eligible)				Of which towards taxonomy relevant sectors (taxonomy-eligible)			Of which towards taxonomy relevant sectors (taxonomy-eligible)			Of which towards taxonomy relevant sectors (taxonomy-eligible)			Of which towards taxonomy relevant sectors (taxonomy-eligible)			Of which towards taxonomy relevant sectors (taxonomy-eligible)										
	Of which environmentally sustainable (taxonomy-aligned)						Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)			Of which environmentally sustainable (taxonomy-aligned)			Of which environmentally sustainable (taxonomy-aligned)			Of which environmentally sustainable (taxonomy-aligned)			Of which environmentally sustainable (taxonomy-aligned)										
	Of which specialised lending		Of which transitional		Of which enabling		Of which specialised lending		Of which enabling		Of which specialised lending	Of which enabling		Of which specialised lending	Of which enabling		Of which specialised lending	Of which enabling		Of which specialised lending	Of which enabling		Of which specialised lending	Of which enabling		Of which specialised lending		Of which transitional		Of which enabling			
<b>GAR - Covered assets in both numerator and denominator</b>																																	
1 Loans and advances, debt securities and equity instruments not HTI eligible for GAR calculation	3,068.073	2,577.329	177.675	-	0.671	20.165	0.175	0.036	-	0.000	0.041	0.000	-	-	0.040	0.000	-	-	0.005	0.000	-	-	0.014	-	-	-	2,577.604	177.711	-	0.671	20.165		
2 <b>Financial corporations</b>	226.132	47.914	5.185	-	0.626	1.235	0.146	0.036	-	-	0.002	-	-	-	0.010	-	-	-	0.000	-	-	-	0.001	-	-	-	48.074	5.221	-	0.626	1.235		
3 Credit institutions	221.999	47.340	4.928	-	0.602	1.229	0.041	0.035	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	47.382	4.963	-	0.602	1.229		
4 Loans and advances	4.022	0.927	0.090	-	0.002	0.006	0.001	0.001	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.928	0.092	-	0.002	0.006		
5 Debt securities, including UoP	217.977	46.414	4.837	-	0.600	1.223	0.040	0.034	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	46.454	4.871	-	0.600	1.223		
6 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
7 Other financial corporations	4.133	0.574	0.257	-	0.024	0.006	0.105	0.001	-	-	0.002	-	-	-	0.010	-	-	-	0.000	-	-	-	0.001	-	-	-	0.692	0.258	-	0.024	0.006		
8 of which investment firms	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
9 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
10 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
11 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
12 of which management companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
13 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
14 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
15 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
16 of which insurance companies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
17 Loans and advances	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
18 Debt securities, including UoP	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
19 Equity instruments	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
20 <b>Non-financial corporations</b>	56.012	31.501	23.836	-	0.046	18.930	0.029	0.000	-	0.000	0.039	0.000	-	-	0.030	0.000	-	-	0.004	0.000	-	-	0.013	-	-	-	31.616	23.836	-	0.046	18.930		
21 Loans and advances	47.387	26.911	21.027	-	0.000	16.367	0.028	-	-	-	0.039	0.000	-	-	0.030	0.000	-	-	0.004	0.000	-	-	0.013	-	-	-	27.025	21.027	-	0.000	16.367		
22 Debt securities, including UoP	8.301	4.318	2.601	-	0.046	2.355	0.000	0.000	-	0.000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	4.318	2.601	-	0.046	2.355		
23 Equity instruments	0.324	0.273	0.208	-	-	0.208	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.273	0.208	-	-	0.208		
24 <b>Households</b>	2,775.616	2,497.523	148.655	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2,497.523	148.655	-	-	-		
25 of which loans collateralised by residential immovable property	2,595.295	2,317.201	148.655	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2,317.201	148.655	-	-	-		
26 of which building renovation loans	139.379	139.379	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	139.379	-	-	-	-		
27 of which motor vehicle loans	40.942	40.942	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	40.942	-	-	-	-		
28 <b>Local governments financing</b>	10.313	0.392	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.392	-	-	-	-		
29 Construction loans	0.392	0.392	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.392	-	-	-	-		

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae				
2024 disclosure reference data																																			
Total (gross) carrying amount	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)								
	Of which towards taxonomy relevant sectors (taxonomy-eligible)						Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)								
	Of which environmentally sustainable (taxonomy-aligned)						Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)				Of which environmentally sustainable (taxonomy-aligned)								
			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling	
30	Other local government financing	9,921	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
31	Collateral obtained by taking possession: residential and non-residential immovable properties	0.262	0.262	0.036	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.262	0.036	-	-	
32	<u>Other assets excluded from the numerator for GAR calculation (covered in the denominator)</u>	6,138.888	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-		
33	Financial and non-financial corporations	4,829.064																																	
34	SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	4,825.677																																	
35	Loans and advances	4,738.059																																	
36	of which loans collateralised by commercial immovable property	-																																	
37	of which building renovation loans	-																																	
38	Debt securities	60.414																																	
39	Equity instruments	27.204																																	
40	Non-EU counterparties not subject to NFRD disclosure obligations	3.387																																	
41	Loans and advances	1.586																																	
42	Debt securities	1.801																																	
43	Equity instruments	-																																	
44	Derivatives	-																																	
45	On demand interbank loans	-																																	
46	Cash and cash-related assets	22.962																																	
47	Other assets (e.g. goodwill, commodities, etc.)	1,286.862																																	
48	<b>Total GAR assets</b>	9,207.223	2,577.592	177.711	-	0.671	20.165	0.175	0.036	-	0.000	0.041	0.000	-	-	0.040	0.000	-	-	0.005	0.000	-	-	0.014	-	-	-	-	-	2,577.866	177.747	-	0.671	20.165	
49	<b>Asset not covered for GAR calculation</b>	9,370.513																																	
50	Sovereigns	9,303.896																																	
51	Central Banks exposure	66.100																																	
52	Trading book	0.517																																	
53	<b>Total assets</b>	18,577.736																																	
<b>Off-balance sheet exposures - Corporates subject to Non-Financial Reporting Directive (NFRD) disclosure obligations</b>																																			
54	Financial guarantees	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	
55	Assets under management	108.634	39.362	22.493	-	0.301	11.362	1.050	0.034	-	0.000	0.915	0.876	-	-	0.178	0.032	-	-	0.103	0.086	-	-	0.001	-	-	-	-	-	41.609	23.520	-	0.301	11.362	
56	Of which debt securities	96.332	35.832	21.475	-	0.275	11.147	1.050	0.034	-	0.000	0.412	0.392	-	-	0.140	0.014	-	-	0.046	0.038	-	-	0.001	-	-	-	-	-	37.480	21.954	-	0.275	11.147	
57	Of which equity instruments	12.302	3.530	1.018	-	0.026	0.216	0.000	-	-	-	0.504	0.484	-	-	0.038	0.018	-	-	0.057	0.047	-	-	-	-	-	-	-	-	4.129	1.567	-	0.026	0.216	

## Template 2 - GAR - Sector Information (Annex VI Reg 2178) - Capx KPI – 2024

Breakdown by sector – 4-digit NACE level (code and brand)	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab
	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)			
	Other non-financial corporations (subject to the NFRD)		SMEs and other non-financial corporations not subject to the NFRD		Other non-financial corporations (subject to the NFRD)		SMEs and other non-financial corporations not subject to the NFRD		Other non-financial corporations (subject to the NFRD)		SMEs and other non-financial corporations not subject to the NFRD		Other non-financial corporations (subject to the NFRD)		SMEs and other non-financial corporations not subject to the NFRD		Other non-financial corporations (subject to the NFRD)		SMEs and other non-financial corporations not subject to the NFRD		Other non-financial corporations (subject to the NFRD)		SMEs and other non-financial corporations not subject to the NFRD		Other non-financial corporations (subject to the NFRD)		SMEs and other non-financial corporations not subject to the NFRD	
	Book value (gross)		Book value (gross)		Book value (gross)		Book value (gross)		Book value (gross)		Book value (gross)		Book value (gross)		Book value (gross)		Book value (gross)		Book value (gross)		Book value (gross)		Book value (gross)		Book value (gross)		Book value (gross)	
Of which eligible (CCM)	Of which environmental-ly sustainable (CCM)	Of which eligible (CCM)	Of which environmental-ly sustainable (CCM)	Of which eligible (CCA)	Of which environmental-ly sustainable (CCA)	Of which eligible (CCA)	Of which environmental-ly sustainable (CCA)	Of which eligible (WTR)	Of which environmental-ly sustainable (WTR)	Of which eligible (WTR)	Of which environmental-ly sustainable (WTR)	Of which eligible (CE)	Of which environmental-ly sustainable (CE)	Of which eligible (CE)	Of which environmental-ly sustainable (CE)	Of which eligible (PPC)	Of which environmental-ly sustainable (PPC)	Of which eligible (PPC)	Of which environmental-ly sustainable (PPC)	Of which eligible (BIO)	Of which environmental-ly sustainable (BIO)	Of which eligible (BIO)	Of which environmental-ly sustainable (BIO)	Of which eligible (CCM + CCA + WTR + CE + PPC + BIO)	Of which environmental-ly sustainable (CCM + CCA + WTR + CE + PPC + BIO)	Of which eligible (CCM + CCA + WTR + CE + PPC + BIO)	Of which environmental-ly sustainable (CCM + CCA + WTR + CE + PPC + BIO)	
1	0111 - Growing of cereals (except rice), grain legumes and oilseeds	0.236	-	-	-	0.041	-	-	-	-	-	-	-	-	-	-	0.006	-	-	-	0.018	-	-	-	0.301	-	-	-
2	0610 - Extraction of crude petroleum	0.474	0.400	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.474	0.400	-	-
3	1051 - Manufacture of milk products	0.000	0.000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.000	0.000	-	-
4	1413 - Manufacture of other outerwear	0.173	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.173	-	-	-
5	2060 - Manufacture of man-made fibres	2.889	2.201	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.889	2.201	-	-
6	2223 - Manufacture of builders' ware of plastic	0.004	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.004	-	-	-
7	2512 - Manufacture of metal doors and windows	0.027	0.003	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.027	0.003	-	-
8	2562 - General mechanical work	0.004	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.004	-	-	-
9	2573 - Manufacture of tools	0.113	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.113	-	-	-
10	2611 - Manufacture of electronic components	0.262	0.202	-	-	-	-	-	-	-	-	-	0.030	-	-	-	-	-	-	-	-	-	-	-	0.292	0.202	-	-
11	2821 - Manufacture of ovens, furnaces and heating systems	0.006	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.006	-	-	-
12	2893 - Manufacture of machinery for food, beverage and tobacco processing	0.093	0.009	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.093	0.009	-	-
13	2910 - Manufacture of motor vehicles	1.361	1.239	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.361	1.239	-	-
14	3011 - Building of ships and floating structures	1.719	0.136	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.719	0.136	-	-
15	3030 - Manufacture of air and spacecraft and related machinery	0.043	0.042	-	-	0.020	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.063	0.042	-	-
16	3091 - Manufacture of motorcycles	0.188	0.031	-	-	-	-	0.000	-	-	-	0.000	-	-	-	0.001	-	-	-	-	-	-	-	-	0.189	0.031	-	-
17	3511 - Production of electricity	22.104	21.693	-	-	-	-	0.218	0.154	-	-	0.000	0.000	-	-	-	-	-	-	-	-	-	-	-	22.322	21.847	-	-
18	3512 - Transmission of electricity	0.200	0.200	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.200	0.200	-	-
19	3522 - Distribution of gaseous fuels through mains	0.027	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.027	-	-	-
20	3600 - Water collection, treatment and supply	0.110	0.098	-	-	-	-	0.090	0.087	-	-	0.003	0.003	-	-	0.010	0.008	-	-	-	-	-	-	-	0.213	0.196	-	-
21	3832 - Recovery of sorted materials	0.000	0.000	-	-	-	-	0.001	0.001	-	-	0.000	0.000	-	-	-	-	-	-	-	-	-	-	-	0.001	0.001	-	-
22	4212 - Construction of railways and underground railways	0.229	0.202	-	-	0.062	0.035	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.290	0.237	-	-
23	4322 - Plumbing, heat and air-conditioning installation	0.001	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.001	-	-	-
24	4639 - Non-specialised wholesale of food, beverages and tobacco	5.582	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	5.582	-	-	-
25	4642 - Wholesale of clothing and footwear	0.066	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.066	-	-	-
26	4931 - Urban and suburban passenger land transport	2.028	2.028	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	2.028	2.028	-	-
27	5221 - Service activities incidental to land transportation	0.001	0.001	-	-	0.045	-	-	-	-	-	0.001	-	-	-	-	-	-	-	-	-	-	-	-	0.048	0.001	-	-
28	5310 - Postal activities under universal service obligation	0.159	0.126	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.159	0.126	-	-
29	6110 - Wired telecommunications activities	0.148	-	-	-	0.008	0.000	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.156	0.000	-	-
30	7010 - Activities of head offices	45.863	16.945	-	-	0.080	0.037	-	-	-	-	0.080	-	-	-	-	-	-	-	-	-	-	-	-	46.024	16.982	-	-
31	7739 - Renting of other machinery, equipment and tangible goods n.e.c.	0.137	0.015	-	-	-	-	-	-	-	-	0.114	0.082	-	-	-	-	-	-	-	-	-	-	-	0.251	0.097	-	-
32	8230 - Organisation of conventions and trade shows	0.103	0.011	-	-	-	-	-	-	-	-	0.086	0.061	-	-	-	-	-	-	-	-	-	-	-	0.189	0.073	-	-
33	8622 - Specialist medical practice services	0.037	0.014	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	0.037	0.014	-	-
...		1.596	1.153	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	1.596	1.153	-	-

Template 3 - GAR KPI (stock) - (Annex VI Reg 2178) - Capex KPI - 2024

		a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae	
		2024 disclosure reference data																															
% (compared to total covered assets in the denominator)	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				Proportion of total assets covered				
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)												
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)												
		Of which specialised lending		Of which transitional		Of which enabling		Of which specialised lending		Of which enabling		Of which specialised lending		Of which enabling		Of which specialised lending		Of which enabling		Of which specialised lending		Of which enabling		Of which specialised lending		Of which transitional		Of which enabling					
GAR - Covered assets in both numerator and denominator																																	
1	Loans and advances, debt securities and equity instruments not HTF eligible for GAR calculation	30.59%	1.30%	0.00%	0.00%	0.06%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	30.60%	1.30%	0.00%	0.00%	0.06%	23.61%
2	Financial corporations	0.18%	0.03%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.18%	0.03%	0.00%	0.00%	0.00%	0.57%
3	Credit institutions	0.13%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.13%	0.01%	0.00%	0.00%	0.00%	0.37%
4	Loans and advances	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%	0.02%
5	Debt securities, including UoP	0.12%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.12%	0.01%	0.00%	0.00%	0.00%	0.34%
6	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01%	
7	Other financial corporations	0.05%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.05%	0.02%	0.00%	0.00%	0.00%	0.20%
8	of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
12	of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01%
13	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01%
14	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
16	of which insurance companies	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.05%
17	Loans and advances	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%	0.05%
18	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
20	Non-financial corporations	0.15%	0.08%	0.00%	0.00%	0.05%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.15%	0.08%	0.00%	0.00%	0.05%	0.19%
21	Loans and advances	0.11%	0.05%	0.00%	0.00%	0.03%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.11%	0.05%	0.00%	0.00%	0.03%	0.14%
22	Debt securities, including UoP	0.03%	0.03%	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.03%	0.03%	0.00%	0.00%	0.02%	0.04%
23	Equity instruments	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.01%	0.01%
24	Households	30.25%	1.19%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	30.25%	1.19%	0.00%	0.00%	0.00%	22.73%
25	of which loans collateralised by residential immovable property	28.89%	1.19%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	28.89%	1.19%	0.00%	0.00%	0.00%	21.86%
26	of which building renovation loans	1.25%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.25%	0.00%	0.00%	0.00%	0.00%	0.80%
27	of which motor vehicle loans	0.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.10%	0.00%	0.00%	0.00%	0.00%	0.07%
28	Local governments financing	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	0.00%	0.12%	
29	Construction loans	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	0.00%	0.01%	
30	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.10%	
31	Collateral obtained by taking possession: residential and non-residential immovable properties	0.07%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.07%	0.01%	0.00%	0.00%	0.00%	0.05%
32	Total GAR assets	30.67%	1.31%	0.00%	0.00%	0.06%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	30.67%	1.31%	0.00%	0.00%	0.06%	63.92%	

Template 3 - GAR KPI (stock) - (Annex VI Reg 2178) - Capex KPI - 2023

	af	ag	ah	at	aj	ak	al	am	an	ao	ap	aq	ar	as	at	au	av	aw	ax	ay	az	ba	bb	bc	bd	be	bf	bg	bh	bi	bj	
% (compared to total covered assets in the denominator)	2023 disclosure reference data																															
	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				Proportion of total assets covered			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)											
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)											
Of which specialised lending	Of which transitional	Of which enabling		Of which specialised lending	Of which transitional	Of which enabling		Of which specialised lending	Of which transitional	Of which enabling		Of which specialised lending	Of which transitional	Of which enabling		Of which specialised lending	Of which transitional	Of which enabling		Of which specialised lending	Of which transitional	Of which enabling		Of which specialised lending	Of which transitional	Of which enabling		Of which specialised lending		Of which transitional	Of which enabling	
<b>GAR - Covered assets in both numerator and denominator</b>																																
1 Loans and advances, debt securities and equity instruments not HIT eligible for GAR calculation	10.68%	0.97%	0.00%	0.03%	0.04%	51.49%	1.18%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	62.17%	2.15%	0.00%	0.03%	0.04%	46.47%
2 Financial corporations	16.84%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	16.84%	0.00%	0.00%	0.00%	0.00%	0.69%
3 Credit institutions	25.77%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	25.77%	0.00%	0.00%	0.00%	0.00%	0.41%
4 Loans and advances	22.61%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	22.61%	0.00%	0.00%	0.00%	0.00%	0.03%
5 Debt securities, including UoP	26.03%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	26.03%	0.00%	0.00%	0.00%	0.00%	0.36%
6 Equity instruments	26.22%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	26.22%	0.00%	0.00%	0.00%	0.00%	0.01%
7 Other financial corporations	3.73%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.73%	0.00%	0.00%	0.00%	0.00%	0.28%
8 of which investment firms	23.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	23.50%	0.00%	0.00%	0.00%	0.00%	0.00%
9 Loans and advances																																0.00%
10 Debt securities, including UoP	23.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	23.50%	0.00%	0.00%	0.00%	0.00%	0.00%
11 Equity instruments	23.50%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	23.50%	0.00%	0.00%	0.00%	0.00%	0.00%
12 of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.17%
13 Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.13%
14 Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.04%
15 Equity instruments																																0.00%
16 of which insurance companies	12.65%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	12.65%	0.00%	0.00%	0.00%	0.00%	0.07%
17 Loans and advances	12.60%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	12.60%	0.00%	0.00%	0.00%	0.00%	0.06%
18 Debt securities, including UoP	13.70%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	13.70%	0.00%	0.00%	0.00%	0.00%	0.00%
19 Equity instruments	13.70%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	13.70%	0.00%	0.00%	0.00%	0.00%	0.00%
20 Non-financial corporations	29.35%	18.29%	0.00%	4.54%	5.95%	0.15%	0.07%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	29.50%	18.36%	0.00%	4.54%	5.95%	0.32%
21 Loans and advances	23.13%	11.80%	0.00%	5.77%	3.04%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	23.14%	11.80%	0.00%	5.77%	3.04%	0.25%
22 Debt securities, including UoP	52.54%	42.11%	0.00%	0.04%	16.88%	0.47%	0.37%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	53.01%	42.48%	0.00%	0.04%	16.88%	0.06%
23 Equity instruments	47.76%	39.31%	0.00%	0.47%	14.11%	1.49%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	49.25%	39.31%	0.00%	0.47%	14.11%	0.01%
24 Households	10.41%	0.87%	0.00%	0.00%	0.00%	52.86%	1.21%	0.00%	0.00%					0.00%	0.00%	0.00%	0.00%									63.27%	2.08%	0.00%	0.00%	0.00%	0.00%	45.27%
25 of which loans collateralised by residential immovable property	10.47%	1.19%	0.00%	0.00%	0.00%	72.24%	1.65%	0.00%	0.00%					0.00%	0.00%	0.00%	0.00%									82.70%	2.84%	0.00%	0.00%	0.00%	0.00%	33.13%
26 of which building renovation loans	100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					0.00%	0.00%	0.00%	0.00%									100.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.23%
27 of which motor vehicle loans	100.00%	0.00%	0.00%	0.00%	0.00%																											
28 Local governments financing	20.98%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	20.98%	0.00%	0.00%	0.00%	0.00%	0.20%
29 Construction loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30 Other local government financing	21.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	21.00%	0.00%	0.00%	0.00%	0.00%	0.20%
31 Collateral obtained by taking possession: residential and non-residential immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	84.69%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	84.69%	0.00%	0.00%	0.00%	0.00%
32 Total GAR assets	4.96%	0.45%	0.00%	0.01%	0.02%	23.93%	0.55%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	28.89%	1.00%	0.00%	0.01%	0.02%	100.00%

Template 4 - GAR KPI (flow) - (Annex VI Reg 2178) - Capex KPI - 2024

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad	ae							
	2024 disclosure reference data																																					
	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)				Circular economy (CE)				Pollution (PPC)				Biodiversity and ecosystems (BIO)				TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				Proportion of total assets covered									
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)																	
Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)																		
		Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling			Of which specialised lending	Of which transitional	Of which enabling									
GAR - Covered assets in both numerator and denominator																																						
1	Loans and advances, debt securities and equity instruments not HIT eligible for GAR calculation	27.99%	1.93%	0.00%	0.01%	0.22%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	28.00%	1.93%	0.00%	0.01%	0.22%	16.51%
2	Financial corporations	0.52%	0.06%	0.00%	0.01%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.52%	0.06%	0.00%	0.01%	0.01%	1.22%
3	Credit institutions	0.51%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.51%	0.05%	0.00%	0.01%	0.01%	1.19%
4	Loans and advances	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%	0.02%
5	Debt securities, including UoP	0.50%	0.05%	0.00%	0.01%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.50%	0.05%	0.00%	0.01%	0.01%	1.17%
6	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
7	Other financial corporations	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%	0.02%
8	of which investment firms	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
9	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
10	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
11	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
12	of which management companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
13	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
14	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
15	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
16	of which insurance companies	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
17	Loans and advances	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
18	Debt securities, including UoP	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
19	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
20	Non-financial corporations	0.34%	0.26%	0.00%	0.00%	0.21%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.34%	0.26%	0.00%	0.00%	0.21%	0.30%
21	Loans and advances	0.29%	0.23%	0.00%	0.00%	0.18%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.29%	0.23%	0.00%	0.00%	0.18%	0.26%
22	Debt securities, including UoP	0.05%	0.03%	0.00%	0.00%	0.03%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.05%	0.03%	0.00%	0.00%	0.03%	0.04%
23	Equity instruments	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
24	Households	27.13%	1.61%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	27.13%	1.61%	0.00%	0.00%	0.00%	14.94%
25	of which loans collateralised by residential immovable property	25.17%	1.61%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	25.17%	1.61%	0.00%	0.00%	0.00%	13.97%
26	of which building renovation loans	1.51%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	1.51%	0.00%	0.00%	0.00%	0.00%	0.75%
27	of which motor vehicle loans	0.44%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.44%	0.00%	0.00%	0.00%	0.00%	0.22%
28	Local governments financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.06%
29	Construction loans	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
30	Other local government financing	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.05%
31	Collateral obtained by taking possession: residential and non-residential immovable properties	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
32	Total GAR assets	28.00%	1.93%	0.00%	0																																	

Template 5 - KPIs for off-balance sheet exposures (Annex VI Reg 2178) - Capex KPI - 2024 and 2023

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad				
	<b>Disclosure reference data - 31.12.2024 Stock</b>																																	
	<b>Climate Change Mitigation (CCM)</b>				<b>Climate Change Adaptation (CCA)</b>				<b>Water and marine resources (WTR)</b>				<b>Circular economy (CE)</b>				<b>Pollution (PPC)</b>				<b>Biodiversity and ecosystems (BIO)</b>				<b>TOTAL (CCM + CCA + WTR + CE + PPC + BIO)</b>									
% (compared to total covered assets in the denominator)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)									
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)									
	Of which specialised lending		Of which transitional		Of which enabling		Of which specialised lending		Of which enabling		Of which specialised lending		Of which enabling		Of which specialised lending		Of which enabling		Of which specialised lending		Of which enabling		Of which specialised lending		Of which enabling		Of which specialised lending		Of which transitional		Of which enabling			
1 Financial guarantees (FinGuar KPI)	55.63%	19.55%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	55.63%	19.55%	0.00%	0.00%	0.00%
2 Assets under management (AuM KPI)	31.78%	18.26%	0.00%	0.46%	10.75%	1.08%	0.06%	0.00%	0.00%	1.24%	1.12%	0.00%	0.00%	0.26%	0.02%	0.00%	0.00%	0.08%	0.06%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	34.43%	19.53%	0.00%	0.46%	10.75%

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad				
	<b>Disclosure reference data - 31.12.2023 Stock</b>																																	
	<b>Climate Change Mitigation (CCM)</b>				<b>Climate Change Adaptation (CCA)</b>				<b>Water and marine resources (WTR)</b>				<b>Circular economy (CE)</b>				<b>Pollution (PPC)</b>				<b>Biodiversity and ecosystems (BIO)</b>				<b>TOTAL (CCM + CCA + WTR + CE + PPC + BIO)</b>									
% (compared to total covered assets in the denominator)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)									
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)									
	Of which specialised lending		Of which transitional		Of which enabling		Of which specialised lending		Of which enabling		Of which specialised lending		Of which enabling		Of which specialised lending		Of which enabling		Of which specialised lending		Of which enabling		Of which specialised lending		Of which enabling		Of which specialised lending		Of which transitional		Of which enabling			
1 Financial guarantees (FinGuar KPI)	96.99%	50.82%	0.00%	50.82%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	96.99%	50.82%	0.00%	50.82%	0.00%
2 Assets under management (AuM KPI)	34.40%	15.41%	0.00%	0.22%	6.80%	2.09%	1.84%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	36.48%	17.25%	0.00%	0.22%	6.80%

	a	b	c	d	e	f	g	h	i	j	k	l	m	n	o	p	q	r	s	t	u	v	w	x	y	z	aa	ab	ac	ad				
	<b>2024 disclosure reference data - Flow</b>																																	
	<b>Climate Change Mitigation (CCM)</b>				<b>Climate Change Adaptation (CCA)</b>				<b>Water and marine resources (WTR)</b>				<b>Circular economy (CE)</b>				<b>Pollution (PPC)</b>				<b>Biodiversity and ecosystems (BIO)</b>				<b>TOTAL (CCM + CCA + WTR + CE + PPC + BIO)</b>									
% (compared to total covered assets in the denominator)	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)									
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)									
	Of which specialised lending		Of which transitional		Of which enabling		Of which specialised lending		Of which enabling		Of which specialised lending		Of which enabling		Of which specialised lending		Of which enabling		Of which specialised lending		Of which enabling		Of which specialised lending		Of which enabling		Of which specialised lending		Of which transitional		Of which enabling			
1 Financial guarantees (FinGuar KPI)																																		
2 Assets under management (AuM KPI)	36.23%	20.70%	0.00%	0.28%	10.46%	0.97%	0.03%	0.00%	0.00%	0.84%	0.81%	0.00%	0.00%	0.16%	0.03%	0.00%	0.00%	0.09%	0.08%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	38.30%	21.65%	0.00%	0.28%	10.46%

## 2.1.3 Additional disclosure on nuclear energy and fossil gas activities pursuant to Annex XII of Delegated Regulation 2022/1214

(figures expressed in millions of euro)

### Stock – On-balance

#### Template 1 – Nuclear and fossil gas related activities

Row	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	YES
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	YES
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	YES
Fossil gas related activities		
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	YES
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	YES
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	YES

#### Template 2 - Taxonomy-aligned economic activities (denominator) - Turnover KPI

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.080	0.00%	0.080	0.00%	-	0.00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	710.616	1.25%	710.594	1.25%	0.022	0.00%
8.	<b>Total applicable KPI</b>	710.696	1.25%	710.673	1.25%	0.022	0.00%

**Template 2 – Taxonomy-aligned economic activities (denominator) - Capital Expenditure KPI**

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.000	0.00%	0.000	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.043	0.00%	0.043	0.00%	-	0.00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	747.709	1.31%	747.525	1.31%	0.183	0.00%
8.	<b>Total applicable KPI</b>	747.752	1.31%	747.568	1.31%	0.183	0.00%

**Template 3 - Taxonomy-aligned economic activities (numerator) - Turnover KPI**

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	3.488	0.49%	3.488	0.49%	-	0.00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	707.208	99.51%	707.185	99.51%	0.022	0.00%
8.	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	710.696	100.00%	710.673	100.00%	0.022	0.00%

**Template 3 – Taxonomy-aligned economic activities (numerator) - Capital Expenditure KPI**

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.033	0.00%	0.033	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.229	0.03%	0.229	0.03%	-	0.00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	747.490	99.96%	747.306	99.94%	0.183	0.03%
8.	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	747.752	100.00%	747.568	99.98%	0.183	0.03%

**Template 4 – Taxonomy-eligible but not taxonomy-aligned economic activities - Turnover KPI**

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.928	0.00%	0.928	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	2.473	0.00%	2.473	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.078	0.00%	0.078	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	16,684	29.27%	16,683	29.27%	0.931	0.00%
8.	<b>Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the applicable KPI</b>	16,688	29.27%	16,686	29.27%	0.931	0.00%

**Template 4 – Taxonomy-eligible but not taxonomy-aligned economic activities - Capital Expenditure KPI**

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.451	0.00%	0.451	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	2.037	0.00%	2.037	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.001	0.00%	0.001	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	16,692	29.95%	16,690	29.94%	2.541	0.00%
8.	<b>Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the applicable KPI</b>	16,695	29.90%	16,692	29.90%	2.541	0.00%

### Template 5 – Taxonomy non-eligible economic activities - Turnover KPI

Row	Economic activities	Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	0.000	0.00%
2.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
3.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	0.193	0.00%
4.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
5.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
6.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	0.000	0.00%
7.	<b>Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	39,606	69.48%
8.	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	39,606	69.48%

### Template 5 – Taxonomy non-eligible economic activities - Capital Expenditure KPI

Row	Economic activities	Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
2.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	0.001	0.00%
3.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	0.157	0.00%
4.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
5.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
6.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
7.	<b>Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	39,562	69.40%
8.	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	39,562	69.40%

## Stock – Off-balance-sheet financial guarantees

### Template 1 – Nuclear and fossil gas related activities

Row	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
Fossil gas related activities		
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

### Template 2 - Taxonomy-aligned economic activities (denominator) - Turnover KPI

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	0.073	44.37%	0.073	44.37%	-	0.00%
8.	<b>Total applicable KPI</b>	0.073	44.37%	0.073	44.37%	-	0.00%

## Template 2 – Taxonomy-aligned economic activities (denominator) - Capital Expenditure KPI

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	0.0323	19.55%	0.0323	19.55%	-	0.00%
8.	<b>Total applicable KPI</b>	0.0323	19.55%	0.0323	19.55%	-	0.00%

## Template 3 - Taxonomy-aligned economic activities (numerator) - Turnover KPI

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	0.0732	100.00%	0.0732	100.00%	-	0.00%
8.	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	0.0732	100.00%	0.0732	100.00%	-	0.00%

**Template 3 – Taxonomy-aligned economic activities (numerator) - Capital Expenditure KPI**

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	0.0323	100.00%	0.0323	100.00%	-	0.00%
8.	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	0.0323	100.00%	0.0323	100.00%	-	0.00%

**Template 4 – Taxonomy-eligible but not taxonomy-aligned economic activities - Turnover KPI**

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	0.030	18.07%	0.030	18.07%	-	0.00%
8.	<b>Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the applicable KPI</b>	0.030	18.07%	0.030	18.07%	-	0.00%

**Template 4 – Taxonomy-eligible but not taxonomy-aligned economic activities - Capital Expenditure KPI**

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	0.060	36.07%	0.060	36.07%	-	0.00%
8.	<b>Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the applicable KPI</b>	0.060	36.07%	0.060	36.07%	-	0.00%

### Template 5 – Taxonomy non-eligible economic activities - Turnover KPI

Row	Economic activities	Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
2.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
3.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
4.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
5.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
6.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
7.	<b>Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	0.062	37.56%
8.	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	0.062	37.56%

### Model 5 – Taxonomy non-eligible economic activities - Capital Expenditure KPI

Row	Economic activities	Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
2.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
3.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
4.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
5.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
6.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
7.	<b>Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	0.073	44.37%
8.	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	0.073	44.37%

## Stock – Off-balance-sheet financial assets under management

### Template 1 – Nuclear and fossil gas related activities

Row	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	YES
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	YES
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	YES
Fossil gas related activities		
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	YES
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	YES
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	YES

### Template 2 - Taxonomy-aligned economic activities (denominator) - Turnover KPI

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.102	0.02%	0.102	0.02%	-	0.00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	70.945	11.68%	70.920	11.67%	0.024	0.00%
8.	<b>Total applicable KPI</b>	71.047	11.69%	71.022	11.69%	0.024	0.00%

## Template 2 – Taxonomy-aligned economic activities (denominator) - Capital Expenditure KPI

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.0003	0.00%	0.0003	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.0525	0.01%	0.0525	0.01%	-	0.00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	111.0341	18.27%	110.6517	18.21%	0.3825	0.06%
8.	<b>Total applicable KPI</b>	111.0870	18.28%	110.7045	0.00%	0.3825	0.00%

## Template 3 - Taxonomy-aligned economic activities (numerator) - Turnover KPI

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	4.257	5.99%	4.257	5.99%	-	0.00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.000	0.00%	0.000	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	66.789	94.01%	66.765	93.97%	0.024	0.03%
8.	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	71.047	100.00%	71.022	99.97%	0.024	0.03%

**Template 3 – Taxonomy-aligned economic activities (numerator) - Capital Expenditure KPI**

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.019	0.02%	0.019	0.02%	-	0.00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.119	0.11%	0.119	0.11%	-	0.00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	110.949	99.88%	110.567	99.53%	0.382	0.34%
8.	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	111.087	100.00%	110.705	99.66%	0.382	0.34%

**Template 4 – Taxonomy-eligible but not taxonomy-aligned economic activities - Turnover KPI**

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	1.545	0.25%	1.545	0.25%	-	0.00%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	4.485	0.74%	4.485	0.74%	-	0.00%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.100	0.02%	0.100	0.02%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	79.876	13.15%	79.095	13.02%	0.781	0.13%
8.	<b>Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the applicable KPI</b>	86.007	14.15%	85.226	14.03%	0.781	0.13%

**Template 4 – Taxonomy-eligible but not taxonomy-aligned economic activities - Capital Expenditure KPI**

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.8279	0.14%	0.8279	0.14%	-	0.00%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	2.8947	0.48%	2.8947	0.48%	-	0.00%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.0004	0.00%	0.0004	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	92.2079	15.18%	86.0555	14.16%	6.1523	1.01%
8.	<b>Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the applicable KPI</b>	95.9308	15.79%	89.7785	14.78%	6.1523	1.01%

### Template 5 – Taxonomy non-eligible economic activities - Turnover KPI

Row	Economic activities	Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	0.004	0.00%
2.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
3.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	0.423	0.07%
4.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
5.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
6.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	0.004	0.00%
7.	<b>Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	450.122	74.08%
8.	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	450.553	74.15%

### Template 5 – Taxonomy non-eligible economic activities - Capital Expenditure KPI

Row	Economic activities	Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	0.007	0.00%
2.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
3.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	0.341	0.06%
4.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
5.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
6.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
7.	<b>Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	400.240	65.87%
8.	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	400.589	65.93%

## Flow – On-balance

### Template 1 – Nuclear and fossil gas related activities

Row	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	YES
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	YES
Fossil gas related activities		
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	YES
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	YES
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	YES

### Template 2 - Taxonomy-aligned economic activities (denominator) - Turnover KPI

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.000	0.00%	0.000	0.00%	-	0.00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	162.933	1.77%	162.924	1.77%	0.009	0.00%
8.	<b>Total applicable KPI</b>	162.933	1.77%	162.924	1.77%	0.009	0.00%

## Template 2 – Taxonomy-aligned economic activities (denominator) - Capital Expenditure KPI

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.000	0.00%	0.000	0.00%	-	0.00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	567.061	1.00%	256.606	0.45%	310.454	0.55%
8.	<b>Total applicable KPI</b>	567.061	1.00%	256.607	0.45%	310.454	0.55%

## Template 3 - Taxonomy-aligned economic activities (numerator) - Turnover KPI

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.051	0.03%	0.051	0.03%	-	0.00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	162.882	99.97%	162.873	99.96%	0.009	0.01%
8.	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	162.933	100.00%	162.924	99.99%	0.009	0.01%

**Template 3 – Taxonomy-aligned economic activities (numerator) - Capital Expenditure KPI**

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.007	0.00%	0.007	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.042	0.01%	0.042	0.01%	-	0.00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	567.011	99.99%	256.557	45.24%	310.454	54.75%
8.	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	567.061	100.00%	256.607	45.25%	310.454	54.75%

**Template 4 – Taxonomy-eligible but not taxonomy-aligned economic activities - Turnover KPI**

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.058	0.00%	0.058	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.546	0.01%	0.546	0.01%	-	0.00%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.000	0.00%	0.000	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	2,394	26.01%	2,395	26.01%	0.043	0.00%
8.	<b>Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI</b>	2,395	26.02%	2,395	26.02%	0.043	0.00%

**Template 4 – Taxonomy-eligible but not taxonomy-aligned economic activities - Capital Expenditure KPI**

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.003	0.00%	0.003	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.461	0.00%	0.461	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	15,827	27.89%	2,558	4.51%	13,269	23.38%
8.	<b>Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the applicable KPI</b>	15,827	27.89%	2,558	4.51%	13,269	23.38%

### Template 5 – Taxonomy non-eligible economic activities - Turnover KPI

Row	Economic activities	Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
2.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
3.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	0.000	0.00%
4.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
5.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
6.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
7.	<b>Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	6,648	72.21%
8.	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	6,648	72.21%

### Model 5 – Taxonomy non-eligible economic activities - Capital Expenditure KPI

Row	Economic activities	Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
2.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
3.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	0.000	0.00%
4.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
5.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
6.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
7.	<b>Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	9	0.02%
8.	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	40,351	71.11%

## Flow – Off-balance-sheet financial guarantees

### Template 1 – Nuclear and fossil gas related activities

Row	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	NO
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	NO
Fossil gas related activities		
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	NO
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	NO
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	NO

### Template 2 - Taxonomy-aligned economic activities (denominator) - Turnover KPI

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	-	0.00%	-	0.00%	-	0.00%
8.	<b>Total applicable KPI</b>	-	0.00%	-	0.00%	-	0.00%

## Template 2 – Taxonomy-aligned economic activities (denominator) - Capital Expenditure KPI

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	-	0.00%	-	0.00%	-	0.00%
8.	<b>Total applicable KPI</b>	-	0.00%	-	0.00%	-	0.00%

## Template 3 - Taxonomy-aligned economic activities (numerator) - Turnover KPI

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	-	0.00%	-	0.00%	-	0.00%
8.	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	-	0.00%	-	0.00%	-	0.00%

**Template 3 – Taxonomy-aligned economic activities (numerator) - Capital Expenditure KPI**

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	-	0.00%	-	0.00%	-	0.00%
8.	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	-	0.00%	-	0.00%	-	0.00%

**Template 4 – Taxonomy-eligible but not taxonomy-aligned economic activities - Turnover KPI**

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	-	0.00%	-	0.00%	-	0.00%
8.	<b>Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the applicable KPI</b>	-	0.00%	-	0.00%	-	0.00%

**Template 4 – Taxonomy-eligible but not taxonomy-aligned economic activities - Capital Expenditure KPI**

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	-	0.00%	-	0.00%	-	0.00%
8.	<b>Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the applicable KPI</b>	-	0.00%	-	0.00%	-	0.00%

### Template 5 – Taxonomy non-eligible economic activities - Turnover KPI

Row	Economic activities	Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
2.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
3.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
4.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
5.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
6.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
7.	<b>Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	-	0.00%
8.	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	-	0.00%

### Template 5 – Taxonomy non-eligible economic activities - Capital Expenditure KPI

Row	Economic activities	Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
2.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
3.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
4.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
5.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
6.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
7.	<b>Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	-	0.00%
8.	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	-	0.00%

## Flow – Off-balance-sheet financial assets under management

### Template 1 – Nuclear and fossil gas related activities

Row	Nuclear energy related activities	
1.	The undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from the fuel cycle.	NO
2.	The undertaking carries out, funds or has exposures to construction and safe operation of new nuclear installations to produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	YES
3.	The undertaking carries out, funds or has exposures to safe operation of existing nuclear installations that produce electricity or process heat, including for the purposes of district heating or industrial processes such as hydrogen production from nuclear energy, as well as their safety upgrades.	YES
Fossil gas related activities		
4.	The undertaking carries out, funds or has exposures to construction or operation of electricity generation facilities that produce electricity using fossil gaseous fuels.	YES
5.	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil gaseous fuels.	YES
6.	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil gaseous fuels.	YES

### Template 2 - Taxonomy-aligned economic activities (denominator) - Turnover KPI

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.013	0.01%	0.013	0.01%	-	0.00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	22.321	20.55%	22.288	20.52%	0.034	0.03%
8.	<b>Total applicable KPI</b>	22.335	20.56%	22.301	20.53%	0.034	0.03%

## Template 2 – Taxonomy-aligned economic activities (denominator) - Capital Expenditure KPI

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.000	0.00%	0.000	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.008	0.01%	0.008	0.01%	-	0.00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	22.326	20.55%	22.293	20.52%	0.034	0.03%
8.	<b>Total applicable KPI</b>	22.335	20.56%	22.301	20.53%	0.034	0.03%

## Template 3 - Taxonomy-aligned economic activities (numerator) - Turnover KPI

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.539	3.88%	0.539	3.88%	-	0.00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	13.370	96.12%	13.336	95.88%	0.034	0.24%
8.	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	13.909	100.00%	13.875	99.76%	0.034	0.24%

**Template 3 – Taxonomy-aligned economic activities (numerator) - Capital Expenditure KPI**

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	0.539	2.41%	0.539	2.41%	-	0.00%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	21.796	97.59%	21.762	97.44%	0.034	0.15%
8.	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	22.335	100.00%	22.301	99.85%	0.034	0.15%

**Template 4 – Taxonomy-eligible but not taxonomy-aligned economic activities - Turnover KPI**

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.147	0.14%	0.147	0.14%	-	0.00%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.167	0.15%	0.167	0.15%	-	0.00%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.012	0.01%	0.012	0.01%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	14.126	13.00%	14.091	12.97%	0.035	0.03%
8.	<b>Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the applicable KPI</b>	14.452	13.30%	14.417	13.27%	0.035	0.03%

**Template 4 – Taxonomy-eligible but not taxonomy-aligned economic activities - Capital Expenditure KPI**

Row	Economic activities	Amount and proportion					
		CCM + CCA		Climate Change Mitigation (CCM)		Climate Change Adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
2.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
3.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
4.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.077	0.07%	0.077	0.07%	-	0.00%
5.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	0.072	0.07%	0.072	0.07%	-	0.00%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%
7.	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	17.294	15.92%	16.279	14.99%	1.015	0.93%
8.	<b>Total amount and proportion of taxonomy eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI</b>	17.442	16.06%	16.428	15.12%	1.015	0.93%

### Template 5 – Taxonomy non-eligible economic activities - Turnover KPI

Row	Economic activities	Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
2.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
3.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	0.037	0.03%
4.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
5.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
6.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	0.000	0.00%
7.	<b>Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	80.253	73.87%
8.	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	80.290	73.91%

### Template 5 – Taxonomy non-eligible economic activities - Capital Expenditure KPI

Row	Economic activities	Amount	%
1.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.26 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
2.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.27 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
3.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.28 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	0.032	0.03%
4.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.29 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
5.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.30 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
6.	Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy-non-eligible in accordance with Section 4.31 of Annexes I and II to Commission Delegated Regulation (EU) 021/2139 in the denominator of the applicable KPI	-	0.00%
7.	<b>Amount and proportion of other taxonomy-non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	80.258	73.88%
8.	<b>Total amount and proportion of taxonomy-non-eligible economic activities in the denominator of the applicable KPI</b>	80.290	73.91%

## 2.2 Climate Change

ESRS E1

### 2.2.1 Governance

[ESRS E1 GOV-3]

The Group's Remuneration Policy is closely aligned with the long-term corporate strategy and the pursuit of sustainability goals, with a particular focus on environmental indicators. The incentive scheme, aimed at the material risk takers at the consolidated level, incorporates ESG indicators, linking a portion of variable remuneration to the achievement of specific sustainability targets. These include the procurement of an increasing percentage of electricity from renewable sources and achievement of milestones planned for 2024 following receipt of the ECB Combined Decision on climate and environmental risks. ESG goals will be revised for 2025, ensuring constant adaptation to ecological transition strategies and regulatory developments.

For more details on Remuneration Policies and incentives linked to ESG goals, please refer to the Report on Operations and the section "1. General Disclosures", chapter "1.2 Governance", para. "1.2.3 Integration of sustainability-related performance in incentive schemes".

### 2.2.2 Strategy

#### 2.2.2.1 Transition plan for climate change mitigation

[ESRS E1 E1-1]

With the Group's 2024-2027 Strategic Plan, for the first time incorporating the objectives of the Sustainability Plan, the Cassa Centrale Group approved its climate strategy, with reference to direct and indirect GHG emissions, leveraging the distinctive characteristics of Cooperative Credit and setting itself the goal of guiding its customers and the communities in which it operates through environmental and social transition.

The climate strategy primarily includes a plan to quantify and reduce own financed emissions (Scope 3 GHG emissions, Category 15 "Investments"), reduce own energy consumption and/or own direct GHG emissions, and the design and development of "green products" for customers to support the ecological transition.

In this context, the Group has been working on mapping out the path to decarbonisation targets for financed emissions by 2025, with reference to its own credit exposures, which represent the most significant emission category for the Group, as a credit institution. Following definition of the decarbonisation targets, during 2026 the Group will work on the definition and adoption of a transition plan aimed at mitigating climate change impacts. Specifically, the Plan will be based on decarbonisation targets, identification of mitigation actions to support achievement of these targets, leveraging the actions the Group is already taking, and a robust investment plan to engage decarbonisation levers.

In 2024, the Group focused on calculating its emissions (Scope 1, Scope 2 and Scope 3) and preparing a decarbonisation strategy especially for the loans portfolio. More information on emissions generated by the Group can be found in section "2.2.4 Emissions generated and energy consumption", in this chapter. Data relating to monetary resources used for capital expenditure and operating expenses for the implementation of the environmental impact reduction programme, such as specialist consultancy, have not been included in this statement as, based on the analysis carried out, the amounts were not considered significant.

### 2.2.2.2 Material impacts, risks and opportunities and their interaction with strategy and business model

The Cassa Centrale Group has identified and assessed material impacts, risks and opportunities in relation to climate change through its double materiality analysis and climate and environmental risk assessment. With regard to this information, please refer to section “1 General Information”, chapter “1.4 Management of Impacts, Risks and Opportunities”, para. “1.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model”.

## 2.2.3 Management of impacts, risks and opportunities

### 2.2.3.1 Environmental policy

[ESRS E1 E1-2]

[ESRS 2 MDR-P]

Protecting and respecting the environment and combating climate change is a global priority, and there is increasing focus on reducing the impact of human activities in relation to extreme weather events, biodiversity loss, water depletion and pollution. In accordance with the principles set out in the Code of Ethics, the Group has established its commitment to transition of the social and economic context in which it operates, adopting all necessary measures to minimise the environmental impacts of its operations and offering the products and services developed by Affiliated Banks and the Parent Company to guide customers and members through the transition process. In addition to the responsible management of its Operations, the Group promotes a culture of sustainability, raising awareness and involving all stakeholders in the adoption of eco-friendly practices and behaviour, in line with current environmental regulations.

The Group’s commitment to management of environmental issues and risks has been formalised in with an Environmental Policy, which is being updated to incorporate issues identified as significant on the basis of stakeholder-engagement activity and analysis of impacts, risks and opportunities. The updated Policy was approved by the Board of Directors of the Parent Company in February 2025. The Policy defines the principles and actions required to reduce direct and indirect impacts of the Group’s operations on the environment. In particular, the Group is committed to promoting and supporting the energy transition, adopting a responsible and conscious approach to management of natural resources (e.g. energy, water consumption, etc.), promoting a sustainable and resilient supply chain, supporting cooperation and continuous innovation, directing investment and lending choices towards initiatives that create long-term sustainable value for stakeholders, promoting sustainable mobility and protecting ecosystems in all areas of the Group’s operations. The Policy also addresses issues related to climate change mitigation and adaptation and provides for specific risk-management procedures. The Policy has been implemented by all Group companies, consolidating a uniform and structured approach to the management of environmental sustainability.

The Group’s commitment to this Policy is based on international conventions, standards and guidelines. Specifically, it is inspired by:

- Legislative Decree 231/2001;
- Legislative Decree 152/2006 “Environmental Regulations” as amended;
- UNI EN ISO 14001 standard on environmental management systems;
- UNEP UNEP Statement by Banks on the Environment and Sustainable Development.

For further information and a detailed description of the policy, please refer to the document “Environmental Policy” available on the Cassa Centrale Banca website at the address [www.cassacentrale.it](http://www.cassacentrale.it), in the Sustainability section.

### The ISO 14001:2015 certified environmental management system of Allitude

For the physical offices in Padua and Bari, Allitude is certified in accordance with ISO 14001:2015 in relation to the field of application "Provision of organisational, operational and administrative services and solutions" for Banks. In 2024, preliminary activities were completed for the environmental analysis with respect to the new scope of the environmental management system at the Trento Data Centre, with a positive outcome of the initial environmental analysis.

#### 2.2.3.2 Actions and initiatives

[ESRS E1 E1-3]

[ESRS 2 MDR-A]

##### Actions regarding own operations

During 2024, the Group continued to implement initiatives to reduce the environmental impact of its activities. These steps mainly targeted energy efficiency, sustainable mobility, the adoption of ESG (environmental, social and governance) practices in negotiations, and the integration of digital solutions to support sustainability.

##### Energy Efficiency

Cassa Centrale Banca has maintained the best practice of installing LED lamps during renovations and in new offices, as well as the replacement of obsolete lighting with new low-emission models. Special attention has been paid to the installation of presence sensors in spaces such as meeting rooms and common areas, in order to optimise energy consumption. In addition, the Parent Company has planned to install high-efficiency heat pumps cooled using groundwater. Finally, measures have been implemented to reduce overheating through the installation of sun-control film at critical points and raise awareness among landlords regarding improving of the thermal comfort of buildings.

In order to comply with Legislative Decree 102/2014, energy diagnostics were carried out with a major energy supplier by analysing a sample of instrumental real estate sites representative of the entire Group. This activity was also aimed at promoting energy efficiency measures to reduce and optimise consumption, which will then be reported annually to Enea (Italian National Agency for New Technologies, Energy and Sustainable Economic Development). In 2024, the Cassa Centrale Group continued its commitment to energy efficiency by upgrading buildings<sup>15</sup>.

Specifically, 38 Affiliated Banks and 2 Companies started or completed redevelopment works on 73 buildings, including offices and branches. Works included insulation of the building envelope, replacement of external windows and doors, installation and/or renewal of air-conditioning systems, and introduction of photovoltaic systems. At the end of 2024, 134 properties were equipped with photovoltaic systems. Finally, Cassa Centrale Banca launched the design and implementation of an ISO 50001 energy management system, with the aim of obtaining certification by 2025 for some of its offices, in line with the Group's sustainability goals. This will be rolled out to other subsidiaries, starting with Allitude.

With reference to direct GHG Scope 1 emissions, mainly associated with the heating of owned properties and the company car fleet, the Group will take steps to identify potential reduction actions within the scope of its decarbonisation strategy.

<sup>15</sup> The data was gathered from the Best Practices Questionnaire in cooperation with Euricse. Please refer to section "1. General Disclosures", chapter "1.3 Strategy", para. "1.3.2 Interests and views of stakeholders".

## Purchasing “Green” Energy

For 2024, a new Group agreement was signed with a specialised supplier for the supply of electricity at competitive economic conditions. In addition to the certification of energy from renewable sources (“green energy”), the agreement also provides for a one-off bonus on electric transport infrastructure, which is an incentive for the use of facilities to reduce CO<sub>2</sub> emissions; 2025 supply was also negotiated, again with the provision of GO certificates.

### Etika project

Etika is a project with a positive social-environmental impact, founded on a memorandum of understanding between Casse Rurali Trentine banks, several local cooperatives and the Dolomiti Energia Group, with the support of Cassa Centrale Banca. The initiative allows the establishment of contracts for electricity and gas utilities with special terms, and offering important added value in terms of environmental and social sustainability.

The Etika offer has three key distinguishing features:

- **ECONOMIC:** customers pay the wholesale electricity and gas fee, with a discount on commercial costs and a welcome bonus;
- **ECOLOGICAL:** energy supplied comes exclusively from Italian renewable sources, certified by Gestore dei Servizi Energetici (GSE) through Guarantees of Origin;
- **SUPPORTIVE:** for each contract activated, Dolomiti Energia pays EUR 10 to the Charity Fund (EUR 20 for those entering into contracts for both electricity and gas), destined to finance research and the creation of housing solutions for people with disabilities in the context of the “Dopo di Noi” project, involving families and the community.

As at 31 December 2024, the Etika project had 71,319 active contracts, broken down as follows:

- Electricity: 43,008 contracts;
- Gas: 28,311 contracts.

The initiative has a significant environmental impact:

- 136,851 tonnes of CO<sub>2</sub> saved through use of certified renewable energy;
- 105,937 tonnes of CO<sub>2</sub> offset through the offsetting mechanism for gas supplied;
- Total CO<sub>2</sub> avoided and offset: 242,788 tonnes.

This quantity of emissions corresponds, in terms of natural absorption, to approximately 5,380,352 trees (estimating the average absorption capacity of 40 kg of CO<sub>2</sub> per tree in a forest with an age of 25 years).

## ESG in group negotiations

The Group incorporated ESG criteria into all significant negotiations in 2024. Specifically, for the procurement of paper resources, only FSC-certified paper was requested, and specific environmental certifications were required for printers. The ESG

commitment also extended to the supply of vending machines, cleaning, furniture and other goods and services, favouring the use of environmentally friendly products with a reduced environmental impact.

### Digitisation and electronic signatures

In 2024, the Group continued to promote the digitalisation of business processes by implementing an advanced electronic signature format. This technology enabled around 10 million documents to be digitised, up 9% compared to the previous year, significantly contributing to the dematerialisation of paper documents and improving operational efficiency.

### Sustainable mobility

The corporate fleet of Affiliated Banks and Group companies comprises a total of 655 vehicles<sup>16</sup>, including owned and long-term leased vehicles. Of these, 617 fall into the Euro 6, electric or hybrid categories, highlighting a gradual transition towards more sustainable mobility.

The Group has also invested in the installation of electric-vehicle and electric-bicycle charging points to encourage employees to use low-impact means of transport. By the end of 2024, 30 Affiliated Banks and 5 Companies had installed a total of 114 car charging points; 92 at offices and branches and 22 at other locations. With regard to bicycle charging points, 8 Affiliated Banks installed 100 units, 25 distributed across offices and branches and 75 at other locations.

#### Allitude and sustainable mobility

In 2024, Allitude strengthened its commitment to sustainable mobility by joining several initiatives aimed at reducing the use of private vehicles and encouraging environmentally friendly mobility.

Key steps include the signing, in December 2023, of an agreement with the Municipality of Trento, signed by Cassa Centrale Banca and Allitude, with the aim of steering employee mobility towards more sustainable solutions. This agreement aims at a structural and permanent reduction of vehicular traffic in the Trento urban area and, consequently, a decrease in greenhouse gas emissions. As part of this collaboration, the “Emma” mobility management platform was adopted in 2024 to support the company’s mobility managers in drafting the Commuting Plan, which is currently being validated before submission to the Municipality of Trento.

In 2024, the Plan was also extended to the Cuneo office, with the aim of actively involving the local community. In this regard, discussions are planned with the area mobility manager for 2025, to evaluate strengthening local public transport services at peak times.

Allitude has also joined initiatives of the Municipality of Trento, including:

- **“Biking to work”**, organised during European Mobility Week, which saw the active participation of employees from the Trento office and led Allitude to rank among the top 10 most virtuous companies out of 48 participants for improving commuter mobility;
- **Programmes to encourage the use of public transport**, including a discount for employees on the purchase of season tickets.

Participation continued in the Affiliation Agreement with the Municipality of Trento, which will also allow access to possible funding and contributions related to employee mobility (documentation approved, signed and sent on 27/12/2023 to the Municipality of Trento). In addition to actions related to individual mobility, Allitude invested in renewal of the company car fleet, introducing full-electric and hybrid vehicles and installing electric-vehicle charging points at the Trento headquarters.

<sup>16</sup> The data was gathered from the Best Practices Questionnaire in cooperation with Euricse. Please refer to section “1. General Disclosures”, chapter “1.3 Strategy”, para. “1.3.2 Interests and views of stakeholders”.

## Reforestation projects

In 2024, Cassa Centrale Banca and its Affiliated Banks actively contributed to reforestation, planting a total of 12,000 trees<sup>17</sup> to offset CO<sub>2</sub> emissions and promote environmental sustainability.

In particular, Cassa Centrale Banca ran a major reforestation project at the Redebus Pass (TN), where 7,000 trees were planted in September 2024 to offset the CO<sub>2</sub> emissions generated by the 2023 Lisbon Convention, which saw a total of 663 participants. The project, organised in collaboration with VAIA, will have a significant environmental impact, with estimated capture of 307,975 tonnes of CO<sub>2</sub> over the next 13 years (equivalent to an average of 23.7 tCO<sub>2</sub> per year). This initiative is part of the Group's broader commitment to protecting the environment and mitigating the effects of climate change.

### 3Bee partnership

The "Cassa Centrale - Credito Cooperativo Italiano Group Oases" are here. These protected areas are a tangible demonstration of the Group's commitment to the environment and biodiversity. Beehives for honey production will be introduced in the "oases". The Biodiversity Oases now feature 350 melliferous plants and 12 biomonitoring hives. Using 3Bee Hive-Tech, environmental parameters are monitored to analyse the surrounding biodiversity and the health of pollinators and enable statistical observation of the health status of more than 3,600,000 bees.

For this initiative, the Group joined forces with 3Bee, a climate-tech company specialising in regenerative projects based on advanced technologies, activating the "Adopt a Melliferous Wood" and "Adopt a Beehive" programmes. Thanks to funds from the Cassa Centrale Group, 3Bee will plant melliferous trees throughout Italy, contributing not only to the absorption of CO<sub>2</sub>, but also supporting bee pollination, which is essential for the balance of natural ecosystems.

## Credit actions

### Emission of green bonds

In October 2024, Cassa Centrale Banca issued its first EUR 100 million Green Bond for Group customers. Proceeds from the sale of Green Bonds will be used to finance sustainable building projects, including the construction and renovation of energy-efficient buildings.

### Green mortgage loans

In order to facilitate the path of support for the ecological transition, the Cassa Centrale Group, starting in 2023, has added to its commercial offer with the "Mutuo Privati Green" personal mortgage loan, aimed at purchases of energy class "A" or "B" properties with special terms, incentivising the purchase of energy-efficient properties.

Consistent with its strategy of accompanying customers through the process of transition, in 2024 the Cassa Centrale Group introduced its "Next Green" product. This represents an evolution of the Mutuo Green Mortgage Loan for families and businesses, aimed at incentivising the energy upgrading of buildings by including, among the uses of the loan, renovation (in the case of: i) improvement of at least two energy classes; ii) more than 30% improvement in the energy performance of the building) and the construction of residential property units with a high energy class. The product establishes a bonus on the rate applied in the event of achievement of the objectives/alignment of the investment goals.

<sup>17</sup> The data was gathered from the Best Practices Questionnaire in cooperation with Euricse. Please refer to section "1. General Disclosures", chapter "1.3 Strategy", para. "1.3.2 Interests and views of stakeholders".

Several commercial initiatives are already in place within the Group to support the offer of loans for the creation of photovoltaic systems for self-generation of electricity by households and businesses. In addition, 13 ESG-linked loans<sup>18</sup> were signed in 2024 (of which: 11 pooled with certain Affiliated Banks), incentivising the financed companies to achieve sustainable goals, such as increasing self-produced and/or purchased renewable energy, and decreasing Scope 1 and Scope 2 emissions or carbon intensity. Furthermore, the offer from individual Affiliated Banks includes products designed to support the energy requalification of buildings or other investments, including small ones, that contribute in various ways to reducing emissions or to actions with a social purpose.

The most significant activities in this direction concern the preparation and implementation of ESG KPI Linked Loan and Mutui Green Mortgage Loan products, issuing a total of EUR 650 million to families and businesses.

### Environmental products and services by segment – Newly originated loans for the year

ENVIRONMENTAL PRODUCTS AND SERVICES BY SEGMENT NEW LOANS IN THE YEAR	31/12/2024				
	UoM	Number of transactions no.	Amount disbursed for environmental products and services Euro	Total amount disbursed in the segment Euro	% of segment total %
<b>Households</b>		<b>2,740</b>	<b>437,043,958</b>	<b>3,213,706,583</b>	<b>13.6%</b>
Property loans		2,646	435,219,013	-	13.5%
Loans linked to sustainable mobility		30	487,011	-	0.0%
Loans for installation of renewable-energy generation systems		64	1,337,934	-	0.0%
<b>Businesses, craftspeople and sole proprietors</b>		<b>172</b>	<b>213,156,211</b>	<b>4,714,221,160</b>	<b>4.5%</b>
Property loans		90	74,498,946	-	1.6%
Loans linked to sustainable mobility		7	223,500	-	0.0%
Loans for construction/installation of renewable-energy generation systems		46	15,824,765	-	0.3%
KPI ESG Linked loans		29	122,609,000	-	2.6%
<b>Organisations, associations and committees</b>		<b>1</b>	<b>515,000</b>	<b>37,080,363</b>	<b>1.4%</b>
Property loans		1	515,000	-	1.4%
<b>Total</b>		<b>2,913</b>	<b>650,715,169</b>	<b>7,965,008,106</b>	<b>8.2%</b>

<sup>18</sup> ESG-linked loans aim to encourage corporate clients to commit to the achieving specific sustainability targets (Sustainability Performance Targets – SPTs), monitored with specific indicators (Key Performance Indicators – ESG KPIs).

## Metrics

The data in the tables are based on information in the Group's management systems and refer to the number of operations with environmental purposes broken down by segment out of total operations as at 31 December 2024. Only operational mortgages as at 31 December 2024 and not other loans were included. Specifically, refinancing, loans to counterparties other than families, companies and organisations/associations were excluded. For loans with both green and social purposes, priority was given to green aspects.

"Property loans" includes products with a green classification and those for renovating or purchase of properties with energy classes A, B and C.

The number of operations is expressed as an absolute value. In the case of pooled loans, the individual shares were counted. The amounts shown are those granted and becoming operational during the year, expressed in Euro.

Newly originated loans for the year are included in the balances as at 31 December 2024, as shown in the section "Operating performance of the Cassa Centrale Group" in the Report on Operations, namely in the table "Customer loans".

## SACE Green Guarantee

To encourage and accelerate the ecological transition of companies, Cassa Centrale Banca has renewed its collaboration with SACE, supporting their investments aimed at reducing the environmental impacts of their activities. The renewed collaboration allows the Affiliated Banks to provide businesses operating in their territories with the SACE guarantee, to support and facilitate investments in: climate change mitigation and adaptation, prevention and reduction of polluting activities, protection of water and marine resources, safeguarding and restoration of biodiversity and ecosystems, sustainable mobility and circular economy, in line with the Green New Deal and with the taxonomy defined by the European Union. Corporations with a turnover of up to EUR 500 million, will be able to benefit from SACE's 80% Green Guarantee, issued at market conditions, through a fully standardised and digitalised process. To ensure the Green Guarantee instrument is as accessible as possible, SACE has simplified and further digitalised the process, improving the customer experience with a dedicated portal. New features include greater flexibility of financing, including the option of multiple disbursements. The new methods of access to the Green Guarantee represent a further step forward on SACE's digital transformation path, consistent with the strategy and objectives of the INSIEME2025 Business Plan, facilitating and accelerating signing of new green agreements. For more information on the agreement with SACE and the results achieved, please refer to the section on "3. Social Information", chapter "3.3 Consumers and End-Users", para. "3.3.6 Loans with social purposes".

The year 2025 will therefore mark the gradual introduction of the range of loans with specific ESG characteristics, starting with the definition of Green, Social and Sustainable Loan projects aimed at retail customers (e.g., personal loans and equipment leases) with favourable terms compared to standard market rates.

By constantly involving stakeholders in the process to monitor and evaluate Responsible Lending Policies, the Group is able to identify opportunities for improvement and ensure that the Policies always align with stakeholders' needs and expectations. Moreover, this approach also serves to create sustainable and shared solutions and increase transparency and trust in the Group.

## Finance actions

Since 2021, the Group has adopted the Financial Services Sustainability Policy, updated in 2023, to comply with EU regulations (SFDR and Taxonomy Regulation). This policy defines measures for the integration of sustainability risks into investments and financial services, the classification of ESG products and transparent sharing of information.

In particular, the NEF Ethical Global Trends SDG fund is classified as an Article 9 SFDR fund, while another three NEF Ethical sub-funds fall under Article 8 funds.

For more details, see the section on responsible finance products in the chapter on consumers and end-users. Please refer to section "3. Social Information", chapter "3.3 Consumers and End-Users", para. "3.3.7 Responsible finance".

## 2.2.4 Emissions generated and energy consumption

### 2.2.4.1 Energy consumption and mix

[ESRS E1 E1-5]

[ESRS 2 MDR-M]

The Group continues to monitor and implement strategies to improve its energy efficiency and reduce the environmental impact of its operations, with an increasing commitment to greater use of renewable energy and reduced dependence on fossil fuels.

The majority of the Group's consumption derives from the use of air conditioning, heating and cooling systems in buildings, as well as lighting and company mobility.

In 2024, the Group's total consumption amounted to 89,850 MWh and was divided into:

- 40.8% of total energy consumption from fossil fuels;
- 59.2% of total energy consumption from renewable sources.

The table below shows the composition of the Group's energy mix, with details of the different sources of supply and their relative amounts in relation to overall energy consumption.

#### Total energy consumption in MWh of the company's own operations

ENERGY CONSUMPTION AND ENERGY MIX	UoM	31.12.2024
<b>Total energy consumption</b>		<b>89,850</b>
<b>Total energy consumption from fossil fuels</b>		<b>36,616</b>
consumption of coal fuels and coal products		-
consumption of fuels from crude oil and petroleum products		9,733
		7,500
	of which: corporate fleet	
	of which: heating and other	2,233
fuel consumption from natural gas		24,483
		33
	of which: corporate fleet	
	of which: heating and other	24,450
fuel consumption from other fossil sources		-
consumption for electricity, heat, steam or cooling from fossil fuels, purchased or acquired		2,400
<i>Fossil energy as a percentage of total energy consumption</i>	%	40.8%
<b>Total energy consumption from nuclear sources</b>	<b>MWh</b>	<b>-</b>
<i>Percentage of total energy consumption from nuclear sources</i>	%	-
<b>Total energy consumption from renewable sources</b>		<b>53,234</b>
consumption of fuels from renewable sources		149
consumption for electricity, heat, steam or cooling from renewable sources, purchased or acquired	<b>MWh</b>	51,362
consumption of self-generated renewable energy without using fuels		1,723
<i>Percentage of total energy consumption from renewable sources</i>	%	59.2%

## Metrics

The consumption values include bills from suppliers for real estate and actual consumption for the company car fleet (owned and long-term rental vehicles). For mixed-use vehicles, only 70% of consumption was taken into account. It is noted that for one company, the consumption of cars assigned to employees was estimated on the basis of the contractual mileage and consumption declared by the car manufacturer.

Included within the scope of Sustainability Reporting, there are legal entities operating in sector A - Agriculture, Forestry and Fishing (1 entity) and sector L - Real Estate (8 entities), falling within the high-climate-impact sectors, as defined in Sections A to H and Section L of Annex I of Regulation (EC) 1893/2006 of the European Parliament and of the Council (as defined in Commission Delegated Regulation (EU) 2022/1288). However, since the sub-topic Energy was not material, no distinction was made between the energy of high-climate-impact entities and the others, and energy intensity was not reported.

**Conversion factors:** DEFRA, UK Government GHG Conversion Factors for Company Reporting (2024), factors in megawatt hours (MWh) in net calorific value.

## Total energy production in MWh

TOTAL ENERGY PRODUCTION	UoM	2024
Total energy production		2,255
Energy production from non-renewable sources		19
Energy production from renewable sources	MWh	2,236
of which self-consumed		1,723
of which fed into the grid		513

## Metrics

Energy from renewable sources: energy production from renewable sources includes energy produced by the installation of photovoltaic panels.

Energy from non-renewable sources: energy production from non-renewable sources includes micro co-generators powered by natural gas.

Purchased and self-produced electricity, on the other hand, amounts to **51,957 MWh**. Of this, more than 97% of the electricity used comes from renewable sources, in line with the goals of the Sustainability Plan. Of the total electricity purchased, 95.8% was purchased with Guarantees of Origin in Italy and 1.6% was purchased with attributes related to energy production.

## Contractual instruments used for purchase and sale of electricity

CONTRACTUAL INSTRUMENTS USED FOR PURCHASE AND SALE OF ELECTRICITY	UoM	2024
<b>Total electricity purchased</b>	<b>MWh</b>	<b>51,957</b>
Contractual instruments used for the purchase and sale of energy with energy-production attributes	MWh	840
Contractual instruments used for the purchase and sale of stand-alone energy-attribute declarations	MWh	49,775
Percentage of contractual instruments used for the purchase and sale of energy with energy-production attributes	%	1.6%
Percentage of contractual instruments used for the purchase and sale of stand-alone energy-attribute declarations	%	95.8%
<b>Total energy from contractual instruments</b>	<b>%</b>	<b>97.4%</b>

### 2.2.4.2 Direct and indirect emissions

[ESRS E1 E1-6]

[ESRS 2 MDR-M]

#### Greenhouse Gas Emissions - Scope 1, Scope 2 and Scope 3

In 2024, the Group expanded the reach of its emissions calculations and particularly Scope 3 emissions, including category "15 - Investments", identified as the most significant by Industry Guidelines, category "2 - Capital goods" and category "7 - Employee commuting". Finally, the categories reported in the past have been retained, specifically category "1 - Purchased goods and services", supplemented by the calculation of emissions generated by purchased services, and category "6 - Business travel".

The remaining categories were considered "non-material" after materiality analysis, as they are not applicable to the banking sector or do not contribute to the Group's exposure to climate change-related risks. In particular:

- **Category 3 - Fuel and energy-related activities:** in the banking sector, emissions generated for this category are insignificant compared to total Scope 3 emissions;
- **Category 4 - Upstream transportation and distribution:** emissions for this category are included in Category 1 - Services, with inclusion of the item "cash-in-transit" under "Other administrative expenses" on the Income Statement. Furthermore, the category is not identified as significant in terms of total emissions;
- **Category 5 - Waste generated in operations:** emissions generated are not significant as waste is not material for the banking sector;
- **Category 8 - Upstream leased assets:** emissions associated with leased properties are already measured and accounted for within Scope 1 and Scope 2;
- **Category 3 - Downstream transportation and distribution:** in the banking sector, emissions generated for this category are insignificant compared to total Scope 3 emissions;
- **Category 10 - Processing of sold products:** this category is not applicable to the Group, since the core business is not the sale of physical products, but the provision of financial, insurance and investment services. These services are already accounted for in Category 1 - Services;
- **Category 11 - Use of sold products:** not applicable for the banking sector;
- **Category 12 - End-of-life treatment of sold products:** not applicable for the banking sector;
- **Category 13 - Downstream leased assets:** emissions related to leased properties are already measured and accounted for within Scope 1 and Scope 2;
- **Category 14 - Franchises:** not applicable, as the Group has no franchising activities in its business model.

## Gross Scope 1, 2 and 3 GHG emissions and total emissions

GROSS SCOPE 1, 2 AND 3 GHG EMISSIONS AND TOTAL GHG EMISSIONS		UoM	31/12/2024
<b>Gross GHG emissions - Scope 1 - Consolidated accounting group</b>			
Gross GHG emissions - Scope 1	tCO <sub>2</sub> eq		7,360
Percentage of Scope 1 GHG emissions covered by regulated emissions trading schemes	%		-
<b>Gross GHG emissions - Scope 1 - Companies with operational control</b>			
Gross GHG emissions - Scope 1	tCO <sub>2</sub> eq		14
Percentage of Scope 1 GHG emissions covered by regulated emissions trading schemes	%		-
<b>Gross GHG emissions - Scope 1 - Total</b>			
Gross GHG emissions - Scope 1	tCO <sub>2</sub> eq		7,374
Percentage of Scope 1 GHG emissions covered by regulated emissions trading schemes	%		-
<b>Gross GHG emissions - Scope 2 - Consolidated accounting group</b>			
Gross GHG emissions - Scope 2 - location based	tCO <sub>2</sub> eq		14,575
Gross GHG emissions - Scope 2 - market based	tCO <sub>2</sub> eq		866
<b>Gross GHG emissions - Scope 2 - Companies with operational control</b>			
Gross GHG emissions - Scope 2 - location based	tCO <sub>2</sub> eq		15
Gross GHG emissions - Scope 2 - market based	tCO <sub>2</sub> eq		2
<b>Gross GHG emissions - Scope 2 - Total</b>			
Gross GHG emissions - Scope 2 - location based	tCO <sub>2</sub> eq		14,591
Gross GHG emissions - Scope 2 - market based	tCO <sub>2</sub> eq		868
<b>Significant Scope 3 GHG emissions - Total</b>			
<b>Total gross indirect GHG emissions (Scope 3)</b>			<b>30,774,638</b>
1 Purchased goods and services			87,349
2 Capital Goods			46,044
3 Fuel and energy-related activities (not included in Scope 1 or 2)			
4 Upstream transportation and distribution			
5 Waste generated in operations			
6 Business travel			2,109
7 Employee commuting	tCO <sub>2</sub> eq		14,991
8 Upstream leased assets			
9 Downstream transportation and distribution			
10 Processing of sold products			
11 Use of sold products			
12 End-of-life treatment of sold products			
13 Downstream leased assets			
14 Franchises			
15 Investments			30,624,145
<b>Total gross GHG emissions</b>			
<b>Total GHG emissions (location-based)</b>	tCO <sub>2</sub> eq		<b>30,796,602</b>
<b>Total GHG emissions (market-based)</b>	tCO <sub>2</sub> eq		<b>30,782,880</b>

Gross biogenic emissions - out of scope	UoM	2024
Scope 1		
Gross biogenic emissions - Out of Scope - Consolidated accounting group	tCO <sub>2</sub> eq	205
Gross biogenic emissions - Out of Scope - Operational control	tCO <sub>2</sub> eq	-
Scope 2		
Gross biogenic emissions - Out of Scope - Consolidated accounting group	tCO <sub>2</sub> eq	-
Gross biogenic emissions - Out of Scope - Operational control	tCO <sub>2</sub> eq	-

## Metrics

The methodology for calculation of Scope 1 and Scope 2 emissions was based on the guidelines of the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard (2004 version).

Emissions were calculated from energy consumption. More specifically, they include emissions from fuel consumption and electricity consumed for all owned and leased buildings within the Group's scope.

### Scope 1

For calculation of Scope 1 emissions, in addition to fossil energy related to heating and the company car fleet, emissions from refrigerant gas leaks were also included.

For all companies and Banks, emissions were calculated based on supplier bills. Where consumables are included in the lease, consumption was included for the relevant share.

Calculation of vehicle-fleet emissions for the purposes of Scope 1 considered cars used for business and mixed use. For the latter, only 70% of consumption was taken into account as the Banks only have partial influence over the emissions of these vehicles, as they cannot control personal use.

It is noted that for one company, the consumption of cars assigned to employees was estimated on the basis of the contractual mileage and consumption declared by the car manufacturer.

DEFRA, UK Government GHG Conversion Factors for Company Reporting (2024) were used for the calculation of stationary combustion, car-fleet utilisation, refrigerant gas losses and out-of-scope biogenic emissions.

### Scope 2

For all companies and Banks, emissions were calculated based on supplier bills. Where consumables are included in the lease, consumption was included for the relevant share. Energy consumed by one company was excluded, for which consumption was estimated using the CURB database and on the basis of the square-metage of the plant.

The CURB database (Climate Action for Urban Sustainability) is a tool designed to help cities evaluate and plan strategic actions to increase sustainability and reduce greenhouse gas emissions. Specifically, it provides information to estimate current and future urban greenhouse gas emissions through energy consumption in different areas, such as energy consumption per unit area of buildings (e.g. kWh per square metre).

The emission factors used are:

- ISPRA - Report published in 2024, for purchased electricity consumption of the Italian business, adopting the location-based methodology;
- Association of Issuing Bodies (AIB), 2023 European Residual Mixes, V.1.0 (2024), for electricity consumption, market-based methodology, using the specific factor for Italy and Luxembourg. AIB does not report emission factors for gases other than CO<sub>2</sub>; therefore, the relevant Scope 2 market-based emissions are expressed in tonnes of CO<sub>2</sub>. In any case, the proportion of methane and nitrous oxide has a negligible effect on total greenhouse gas emissions (CO<sub>2</sub> equivalent), as inferred from the relevant technical literature.
- Biogenic emissions: biogenic CO<sub>2</sub> emissions from the combustion or biodegradation of biomass, biofuels, biogas or other bioenergy sources in Scope 2 have not been calculated as the emission factors applied do not distinguish the percentage of biomass or biogenic CO<sub>2</sub>.

The Group used secondary data for calculation of Scope 3 emissions. Specifically, it sourced emission factors from publicly available documents or third-party databases. Therefore, 0% of emissions are calculated from primary data obtained from suppliers and/or other partners along the value chain.

Details on the reported Scope 3 categories are provided below.

### Focus on purchased goods and services

Scope 3 emissions category 1 includes all upstream emissions from the production of goods and services purchased by the company in the reporting year.

### Focus: SCOPE 3 - CAT.1 PURCHASED GOODS

CAT. 1 PURCHASED GOODS	31.12.2024		
	UoM	Total Material Used kg	Emissions for Purchased goods tCO <sub>2</sub> eq
Office paper - certified virgin		736,926	987
Office paper - non-certified virgin		15,701	21
Office paper - certified recycled		106,247	111
Office paper - non-certified recycled		-	-
<b>Total office paper</b>		<b>858,875</b>	<b>1,119</b>
Original toner cartridges		10,708	75
Remanufactured toner cartridges		2,684	19
<b>Total toner cartridges</b>		<b>13,392</b>	<b>94</b>
<b>% Recycled office paper</b>		<b>12.4%</b>	
<b>% Certified office paper</b>		<b>98.2%</b>	
<b>% Remanufactured toner cartridges</b>		<b>20.0%</b>	
<b>Total emissions for Purchased goods</b>			<b>1,213</b>

## Focus: SCOPE 3 - CAT. 1 PURCHASED SERVICES

CAT. 1 PURCHASED SERVICES	31/12/2024	
	UoM	tCO <sub>2</sub> eq
ICT expenses		22,244
Consultancy and professional services		23,309
Advertising, marketing and communication		4,077
Expenses related to credit risk		1,173
Expenses related to real-estate operations		3,476
Other administrative expenses		31,859
<b>Total emissions for purchased services</b>		<b>86,136</b>

### Metrics

The methodology for calculation of Scope 3 emissions was based on the guidelines of the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard (2004 version).

This category includes all upstream (cradle-to-gate) emissions for the production of products purchased or acquired by the reporting company in the reporting year. Products include both goods (tangible) and services (intangible). Although emissions associated with the consumption of office paper are not significant for the Cassa Centrale Group, this source was nevertheless included in continuity with the GHG emissions inventory of previous years.

Therefore, category 1 consists of:

- **tangible products:** consumption of office paper and toner cartridges for which the average-data method was applied, with data requested directly from Companies within the reporting scope. In particular, purchase invoices were consulted to calculate the weight in kg of materials. The source of emission factors was DEFRA 2024 for certified/non-certified virgin/recycled paper and Ecoinvent v 3.9.1 for certified/non-certified original or remanufactured toner cartridges;
- **intangible products:** purchased ICT services, consultancy and professional services, advertising, marketing and communication, expenses related to credit risk, expenses related to real estate, and other administrative expenses, excluding the sub-items Electricity, Heating, Taxes and Fees, Business Travel Expenses (mileage/toll/fuel reimbursements), and Contributions to Associations and Contribution to the National Resolution Fund and to the Deposit Guarantee Scheme. Data was extracted from the Consolidated Financial Statements, in particular from the item "Other Administrative Expenses" (Table 12.5 of the Explanatory Notes) in the Income Statement. For the individual Affiliated Banks, the sub-items to be excluded were extracted centrally. Requests were made directly to other fully consolidated companies for the sub-items to be excluded. Requests were made to Companies Consolidated with the Equity Method for details of the cost items to be included.

Estimates were calculated using the spend-based method and DEFRA, UK Government GHG Conversion factors by SIC code (2021), to which the annual inflation rate from 31/12/2021 to 2024 was applied.

### Focus: capital goods

Scope 3 emissions category 2 includes all upstream emissions from production of capital goods purchased or acquired by the Group in the reporting year. Emissions cover the entire production cycle of capital goods through to delivery.

In contrast with financial accounting, where capital assets are depreciated over their useful life, the Scope 3 calculation of emissions requires that the emissions associated with their production are fully accounted for in the year of acquisition, without any discounting or amortisation mechanism.

#### Focus: SCOPE 3 - CAT. 2 CAPITAL GOODS

CAT. 2 CAPITAL GOODS	31.12.2024	
	Emissions related to capital goods	
	UoM	tCO <sub>2</sub> eq
Tangible fixed assets		38,790
Intangible fixed assets		7,254
<b>Total emissions related to capital goods</b>		<b>46,044</b>

#### Metrics

This category includes all upstream (cradle-to-gate) emissions for the production of capital goods purchased or acquired by the reporting company in the reporting year. The methodological approach adopted follows the Greenhouse Gas Protocol guidelines.

For data collection purposes, each Bank and Company extracted the value of new fixed assets during the year from the Fixed asset register/Accounts.

The spend-based method was used to calculate emissions. The source of the emission factor was EUROSTAT - Environmental statistics and accounts; sustainable development (Consumption-based accounting tool 2023).

#### Focus: Business travel

Scope 3 emissions category 6 includes indirect emissions from business travel by company personnel.

#### Focus: SCOPE 3 - CAT. 6 BUSINESS TRAVEL

CAT. 6 BUSINESS TRAVEL	31/12/2024	
	Business trip emissions	
	UoM	tCO <sub>2</sub> eq
Cars		1,524
Train		108
Taxi or car with driver		3
Aeroplane		475
<b>Total emissions for Business travel</b>		<b>2,109</b>

### Metrics

This category includes emissions from the transport of employees and corporate executives for company business in vehicles owned or operated by third parties.

For preparation of the data, company management systems and any travel agencies managing trips for Affiliated Banks and Subsidiaries were consulted. Emissions were calculated applying the distance-based method and DEFRA UK Government GHG Conversion Factors for Company Reporting (2024) were used, based on:

- car, considering size and fuel;
- train, both for national and international rail travel;
- taxis/car with driver;
- aircraft, by class of travel and distance range (short-haul, medium-haul and long-haul).

### Focus on employee commuting

Between October and November 2024, the Group submitted a questionnaire to all employees within the reporting scope, with the aim of calculating emissions generated by commuting. The survey gathered data on the habits of Group employees, including the means of transport used to get to work, average distances travelled and frequency of travel. A total of 9,791 responses were received, considered valid, out of a total of 12,284 employees as at 31 December 2024, with a response rate of 79.7%, disregarding questionnaires considered invalid. The data was used to calculate emissions associated with each type of travel, in order to monitor and reduce the Group's environmental impact in relation to daily travel of its employees.

### Focus: SCOPE 3 - CAT. 7 EMPLOYEE COMMUTING

CAT. 7 EMPLOYEE COMMUTING	31/12/2024	
	Emissions from Employee commuting	
	UoM	tCO <sub>2</sub> eq
Emissions from employee commuting		14,991

### Metrics

This category includes Scope 3 emissions related to employee travel between home and the workplace in vehicles not owned or operated by the reporting company.

It was decided to apply the distance-based method, which requires use of precise data on the distance travelled by employees, distinguished by means of transport used (car, motorbike, bus/tram, metro, train, bicycle/on foot/electric scooter).

The data used were directly requested via an employee questionnaire. This survey also gathered information on days worked from home and weeks of extended absence, in addition to ordinary holidays during the year.

For employees who did not respond to the survey or for whom the responses were not considered valid, an estimate was made from the average per Bank/Company of emissions generated by each employee.

The emission factors used are indicated below.

- For cars: Ispra 2022 Database of average emission factors for road transport; Medium Segment, specific to different fuel types and Euro categories (Euro 1 to Euro 6).
- For public transport and other vehicles, such as motorbikes, bus/tram, metro and train: DEFRA 2024 Business travel-land.
- Homeworking: DEFRA 2024 Homeworking.

## Focus: Investments

### Focus: SCOPE 3 - CAT. 15 INVESTMENTS

CAT. 15 INVESTMENTS	31/12/2024	
	Emissions for Investments	
	UoM	tCO <sub>2</sub> eq
Credit exposures		27,389,340
Own securities portfolio		3,234,708
Equity investments in companies held as investments		97
<b>Total emissions for Investments</b>		<b>30,624,145</b>

## Metrics

This category includes Scope 3 emissions associated with the reporting company's investments and loans in the reporting year, not included under Scope 1 and Scope 2 emissions.

The calculation was made following the methodology outlined in the Global GHG Accounting and Reporting Standard for the Financial Industry, developed by the Partnership for Carbon Accounting Financials (PCAF). This standard provides detailed guidance for the calculation of financed emissions, based on the availability and quality of data. In addition, the PCAF sets out calculation methodologies for seven financial asset classes (Listed equity & Corporate bonds, Business loans and unlisted equity, Project finance, Commercial real estate, Mortgages, Motor vehicle loans and Sovereign debt).

The Group has quantified its financed emissions by collecting information on its own loans and investments, using both data from internal management systems and external suppliers, where necessary.

For each category of loans and investments included under Scope 3 category 15, the table below shows the reporting scope and the percentage of coverage of returned data with respect to the Gross Carrying Amount (GCA).

Group investment category	Reporting scope	Coverage of reported data [%]
<b>Credit exposures</b> (Loans to customers measured at amortised cost)	Parent Company	Loans to corporate counterparties with unknown use of proceeds (General Purpose) <b>48%</b>
	Affiliated Banks	Loans to individuals/companies for purchase of residential or commercial real estate (Commercial and Residential Real Estate) <b>66%</b>
<b>Own securities portfolio</b> (Securities not held for sale)	Parent Company	
	Affiliated Banks	<b>99%</b>
	Allitude	
Equity investments in companies held as investments <b>(Equity investments in associates consolidated with equity method)</b>	Associates over which the Group does not exercise operational control (see Reporting scope in section "1. General Disclosures")	<b>100%</b>

With regard to credit exposures, in accordance with the PCAF reference methodology and taking into account any exclusions reported, as well as limitations arising from the availability of data, the calculation was performed considering the following aspects:

- only on-balance-sheet exposures are taken into account;
- loans with "known use of proceeds", other than Commercial Real Estate and Residential Real Estate (attributable to the PCAF asset classes "Motor Vehicle Loans" and "Project Financing") have been excluded from calculation of financed emissions as specific and reliable emission data relating to the assets/project associated with the loan are unavailable;
- calculation of the emissions of loans for some subsidiaries is not currently performed due to the lack of specific data required. These companies provide consumer financing (i.e. motor-vehicle purchases, real-estate leasing, etc.) for which the PCAF methodology requires detailed data and technical information on the assets underlying the finance, currently unavailable to the Group.

For emissions related to the own securities portfolio, in line with the PCAF methodology, exposures with the following characteristics were excluded from calculation:

- indirect investments (i.e. investments in funds);
- off-balance-sheet exposures, as the standard requires inclusion of financial assets reported in the balance sheet and not held for sale;
- derivative products;
- securities issued by financial institutions to Central Banks (i.e. deposits, derivative transactions, repos).

The Group will continue its efforts to improve coverage of its various exposures, increasing dialogue with Banks and counterparties, while continuing to refine estimation and calculation methods.

### Emission intensity

[ESRS E1 E1-6]

[ESRS 2 MDR-M]

The table below shows the emission intensity values calculated with location-based and market-based methods.

#### Emission intensities against net revenues

EMISSION INTENSITY	UoM	31/12/2024
Total location-based emissions against Net revenues	tCO <sub>2</sub> eq/EUR million	7,225
Total market-based emissions against Net revenues	tCO <sub>2</sub> eq/EUR million	7,222

To ensure transparency and traceability of information, the value of net revenues used in calculation of emission intensity was reconciled with the corresponding items in the Group's financial statements.

#### Reconciliation of net revenues

REVENUES	UoM	31/12/2024		Total
		Consolidated accounting group	Companies consolidated with equity method	
Net revenues used to calculate emission intensity		4,257	6	4,263
Net revenues (other)	EUR million	160	-	160
<b>Total net revenues (in financial statements)</b>		<b>4,417</b>	<b>6</b>	<b>4,422</b>

#### Metrics

Net revenues were considered as positive income components in the consolidated financial statements, in accordance with Article 43, para. 2, letter c) of Council Directive 86/635/EEC of 8 December 1986 (Article 1, para. 2, letter c). Revenues from companies consolidated with the equity method were added to these items.

[E1-7,E1-8]

The Cassa Centrale Group has no data to report on GHG removals and residual GHG mitigation projects financed with carbon credits. Furthermore, the Group has not currently established any internal carbon pricing process.

## 2.2.5 Targets related to climate change mitigation and adaptation

[ESRS E1 E1-4]

[ESRS 2 MDR-T]

In line with the ambitions outlined in the 2024-2027 Strategic Plan, the Group is committed to establishing an internal process to support efforts to set short-, medium- and long-term decarbonisation targets.

In line with the sustainability goals defined in the Sustainability Plan and the principles in the Group's Environmental Policy, the Group incorporates environmental sustainability into its strategy, actively contributing to ecological transition and the reduction of climate impacts.

In relation to the management and mitigation of energy consumption, a goal has been set to purchase 100% of electricity under direct management from certified renewable sources in Italy by 2025. This initiative contributes to the progressive reduction, down to zero, of indirect GHG Scope 2 emissions, calculated according with market-based approach. In addition, by 2026, the Group aims to obtain UNI CEI EN ISO 50001:2018 certification for its Energy Management System, starting with the Offices of the Parent Company.

The Group is working on the following strategic objectives related to climate change mitigation:

- setting its first Net-Zero targets for financed emissions from its own credit exposures (General Purpose and Commercial and Residential Real-Estate loans) by 2025;
- definition and adoption of a Transition Plan by 2026, based on the Group's decarbonisation targets, identified mitigation actions and a robust investment plan to engage decarbonisation levers;
- offsetting residual direct Scope 1 and indirect Scope 2 emissions through a gradual and progressive process implemented across the Group's consolidation scope.

Regarding management of environmental issues, the Group plans to extend UNI CEI EN ISO 14001 certification for the Environmental Management System, currently in place for some Allitude operational offices, to the Parent Company offices by 2026. More information on the 2024-2027 Sustainability Plan can be found in the section "1. General Disclosures", chapter "1.4 Management of Impacts, Risks and Opportunities", para. "1.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model".

# 3. Social Information

## 3.1 Own Workforce

ESRS S1

### 3.1.1 Strategy: Impacts, risks and opportunities

[ESRS S1 SBM-3]

Through its double materiality analysis, the Cassa Centrale Group has identified material positive impacts and opportunities on its workforce, without reference to specific categories of workers. All own employees on which the Group could have a material impact are included in the scope of disclosure pursuant to ESRS2. Specifically, as at 31 December 2024 the workforce consisted of 12,284 employees, with 1.6% executives, 29.1% middle managers and 69.3% office staff. 44% of total employees are female. In addition, the Group also relies on the cooperation of 245.4 workers who are not employees (calculated as the average number of people employed at the end of each month), including temporary workers, extracurricular interns, freelance consultants or agents with VAT number.

The analysis did not reveal any negative impacts or risks. In particular, no transactions were identified as posing a serious risk of forced or compulsory labour, as the controls provided for by current banking regulations ensure high standards of transparency and compliance, significantly reducing the possibility of illegal practices. Moreover, the Group's supervisory mechanisms and internal policies ensure operations are constantly monitored, preventing exploitation and violations of workers' fundamental rights. Furthermore, no material impacts related to actions to reduce negative environmental impacts have been identified and there is currently no transition plan.

The nature of the Group, rooted in the principles of Cooperative Credit, is intrinsically oriented towards a sustainable, inclusive business model and towards the common good. In particular, promotion of human capital, a safe working environment and constant development of professional skills are key components of the company's strategy, in line with the governance principles and the goals of the 2024-2027 Strategic Plan. The human resources strategy enables improvement in levels of employee knowledge regarding Cooperative Credit, improvement in welfare programmes and the provision of targeted professional training that take into account the personal and professional development of all employees. This inclusive and stimulating working environment is also reflected for workers who are not employees, e.g. With implementation of accident and injury management systems.

The positive impacts for employees can bring opportunities in terms of increased productivity and reduced operating costs, reflected in relationships with potential future employees. Furthermore, improvement in the specific skills and performance of personnel results in an overall enhancement of Group performance.

For further details on IROs, please refer to the section "1. General Disclosures", chapter "1.4 Management of Impacts, Risks and Opportunities", paragraph "1.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model".

## 3.1.2 Management of impacts, risks and opportunities

### 3.1.2.1 Policies related to own workforce

[ESRS S1 S1-1]

[ESRS 2 MDR-P]

The Cassa Centrale Group has adopted a structured system of policies in the social sphere, aimed at ensuring fair working conditions, protecting workers' rights, promoting an inclusive environment and guaranteeing health and safety.

The Group has established employee welfare policies to guarantee respect for diversity and equal opportunities, and respect for human rights. The Group also has a Group Occupational Health and Safety Policy and Remuneration and Incentive Policies.

The Board of Directors of the Parent Company is ultimately responsible for implementation of all Group-wide policies.

With regard to safeguarding employee confidentiality, on the other hand, the Group has adopted dedicated procedures to manage data breaches, with the aim of ensuring data protection and IT security. These aspects are discussed in more detail in the section "3. Social Information", chapter "3.3 Consumers and End-Users", paragraph "3.3.2 Impacts and reporting channels".

#### Diversity Policy

[ESRS S1 S1-1]

[ESRS 2 MDR-P]

The Diversity Policy, approved by the Board of Directors on 6 February 2019, was adopted by the Cassa Centrale Group with the intention of providing a preventive framework to guide, regulate and monitor the conduct to which all recipients are bound with respect to diversity, inclusion and equal opportunities in the workplace. Aspects covered by the Policy include: social dialogue, freedom of association, the existence of works councils and the right to information, consultation and participation of workers, collective bargaining, work-life balance, gender equality and equal pay for work of equal value, employment and inclusion of persons with disabilities, measures against violence and harassment in the workplace, and diversity.

The Policy applies to all Group Companies. Specifically, it addresses corporate bodies, executives, financial advisers, employees and other personnel and all those who operate under the control of Group Companies or are involved in the provision of investment services and activities. This also includes all natural persons involved in outsourcing agreements for the provision of services. The Policy also extends to persons representing the Group with entities, bodies and investee companies, as well as all third parties with which the Group has relations, in compliance with current legislation and existing agreements. Suppliers of goods and services for use by the Group are also required to comply with the principles established.

This Policy is based on internationally accepted declarations, conventions, standards, principles, guidelines and recommendations and is applied together with other existing Group procedures and guidelines such as the Human Rights Policy, the Organisation, Management and Control Model and the Code of Ethics. In particular, the Diversity Policy draws on:

- the European Convention on Human Rights;
- the United Nations International Bill of Human Rights, including the UN Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights;
- the Declaration on Fundamental Principles and Rights at Work of the International Labour Organisation (ILO) and related Conventions;
- the United Nations Global Compact;
- the United Nations Convention on the Rights of the Child.

The organisation has made a concrete commitment to support inclusion, taking specific measures to benefit persons from particularly vulnerable groups within its workforce, including:

- diversity and inclusion policies;
- support for employees with disabilities;
- gender equity initiatives such as UNI Pdr 125:2022 Gender Equality Certification;
- support for ethnic and cultural groups.

For further information and a detailed description of the policies, please refer to the document “Diversity Policy” available on the Cassa Centrale Banca website at the address [www.cassacentrale.it](http://www.cassacentrale.it), in the “Sustainability” section.

Respect for human rights is integrated and monitored by the respective Group Human Rights Policy, described in section “4. Information on Governance”, chapter “4.1 Business Conduct”, paragraph “4.1.2.2 Corporate culture and business conduct policies”. Included in this policy are issues such as respect for fundamental human rights, issues of safe employment, adequate working hours, training and skills development, protection of minors and repression of exploitative behaviour of any kind. The Cassa Centrale Group also rejects all forms of forced, compulsory or bonded labour, and discriminatory or harmful attitudes or behaviour.

### **Group Occupational Health and Safety Policy**

[ESRS S1 S1-1]

[ESRS 2 MDR-P]

In 2024, the Board of Directors approved the update of the Group’s Occupational Health and Safety Policy, which lays down the commitment of all Group Companies, the principles and the general objectives regarding proper management of health and safety in the workplace, preventing accident risks. To this end, technical planning of workplaces, equipment and processes must be guided by the strictest level of compliance with current occupational safety and hygiene regulations, ensuring that all employees strictly observe safety and prevention measures. Each employee is required to pay maximum attention when carrying out their duties, strictly complying with all safety and prevention measures established in order to avoid every possible risk to themselves or colleagues. In this respect, the general goals identified at Group level are aimed at protecting both internal company personnel, external personnel and customers, who have a right to safe environments and buildings.

The Policy has a broad scope of application, covering persons involved in the activities of the Cassa Centrale Group, and specifically corporate bodies, executives, employees and external personnel, persons involved in the provision of services and activities offered by the Group, and individuals involved in outsourcing agreements for the provision of services. The policy is also addressed to all third parties with whom the Group has relations, in accordance with the law and agreements entered into by individual Companies.

The Group drafted the Policy drawing on an including the provisions of Legislative Decree no. 231/2001 and Legislative Decree 81/2008 “Consolidated Occupational Health and Safety Act”, and the requirements of the UNI EN ISO 45001 Standard on Occupational Health and Safety Management Systems and the UNI INAIL 2001 Guidelines.

For Cassa Centrale Banca, oversight of health and safety is assigned to the Workplace Prevention and Protection Office, which is tasked with supporting the Safety, Prevention and Protection Service Manager (the “RSPP”) in order to guarantee effective management of risk-oversight mechanisms with regard to occupational health and safety. They meet periodically to discuss the Parent Company’s management of occupational health and safety.

The Cassa Centrale Group recognises the provision of information and training to employees as fundamental tools for implementation of the key occupational health and safety objectives and for recognition of the potential risks. The Parent Company is in the process of planning training courses together with the Prevention and Protection Service Manager and the Human Resources Department.

For further information and a detailed description of the policies, please refer to the document “Group Occupational Health and Safety Policy” available on the Cassa Centrale Banca website at the address [www.cassacentrale.it](http://www.cassacentrale.it), in the “Sustainability” section.

## Group remuneration and incentive policies

[ESRS 2 MDR-P]

The Group has adopted the Remuneration and Incentive Policies with the aim of developing consistent remuneration systems and guaranteeing wages aligned the Group's values and mutual goals of the Affiliated Banks. The Parent Company's Remuneration Policy is approved annually by the Board of Directors of the Parent Company and subsequently adopted by the Cassa Centrale Banca Annual General Meeting. Affiliated Banks transpose Group Policies and adopt their own, in compliance with Parent Company guidelines on remuneration, while Other Group Companies are responsible for compliance with the regulations directly applicable to them and for the proper implementation of Parent Company guidelines.

Specifically, the Group monitors any observations raised by the Affiliated Banks during the process to define and manage the Remuneration Policy through direct contact, training initiatives and surveys.

The Policies have been defined on the basis of the 37th update of 24 November 2021 of the Bank of Italy Regulatory Provisions on "Remuneration and Incentive Policies and Practices" and Commission Delegated Regulation (EU) no. 923/2021 of 25 March 2021, with regard to regulatory technical standards setting out the criteria to define managerial responsibility, control functions, material business units and a significant impact on a material business unit's risk profile, and setting out qualitative and quantitative criteria able to identify staff members or categories of staff whose professional activities have an impact on the institution's risk profile that is comparably as material as that of staff members or categories of staff referred to in Article 92(3) of the CRD. The Guidelines on Sound Remuneration Policies under Directive 2013/36/EU, issued by the EBA on 2 July 2021, were also considered.

The Policies also comply with the Provisions on "Transparency of banking and financial transactions and services"; appropriateness of relations between intermediaries and customers, updated by the Bank of Italy on 19 March 2019, align national provisions with the Guidelines on remuneration policies and practices relating to the sale and supply of retail banking products and services issued by EBA in December 2016.

Furthermore, the Policies include information on their consistency with the integration of sustainability risks, in compliance with the provisions of Article 5 - Transparency of remuneration policies in relation to the integration of sustainability risks of Regulation (EU) no. 2019/2088.

The Policies describe in an organic manner: the principles on which the Cassa Centrale Group's remuneration and incentive system is based; the roles, timing and activities that define the governance of the process of drafting, reviewing and adopting Group remuneration and incentive policies; the remuneration and incentive system to be adopted in 2024 by the Group for all employees, including the most important personnel, as well as for the members of corporate bodies.

The aim is to implement remuneration systems consistent with the Group's values and the shared aims of the Affiliated Banks to support the interest of all stakeholders. The remuneration policies support the Group's long-term strategy and the achievement of its corporate objectives, including sustainable finance, taking ESG factors into account. They are defined in accordance with the Group's prudent risk management policies, including strategies for monitoring and managing impaired loans, as defined under the current provisions on the prudential control process.

Personnel covered by the Remuneration and Incentive Policies include all Group employees, members of corporate bodies and all Group Companies, which are required to implement and apply the Policies according to the applicable regulations.

The remuneration of the Group's employees consists of a fixed component and a variable component. The fixed component is based on the contractual situation, the role held, the responsibilities assigned, and the specific experience and expertise of the employee, while the variable component is performance based and linked to the results actually achieved and the risks prudently assumed. The fairness and competitiveness of the Group's total personnel remuneration and the weighting of its various components are also monitored through continuous internal and external comparison with the labour market in the banking sector. Please refer to the section on "1. General Disclosures", chapter "1.2 Governance", paragraph "1.2.3 Integration of sustainability-related performance in incentive schemes" for further details on the remuneration mix in terms of fixed and variable components.

For further information and a detailed description of the policies in place, please refer to the document “2024 Group remuneration and incentive policies” available on the Cassa Centrale Banca website at the address [www.cassacentrale.it](http://www.cassacentrale.it), in the “Governance” section.

### 3.1.2.2 Processes for engaging with own workers

[ESRS S1 S1-2]

In the cooperative credit model on which the Cassa Centrale Group is founded, people sit at the heart of a system based on participation, promotion of human capital and creation of shared long-term value.

**Art. 1 of the Charter of Values for Cooperative Credit** celebrates the “central importance of the person” as “Cooperative Credit is a system of Banks consisting of people who work for people” and “invests in human capital to stably enhance it”. Indeed, the Group values initiative, promotes flexibility and fosters growth opportunities through appropriate professional-development pathways and support for active participation in projects.

The Cassa Centrale Group values the well-being of its employees, promoting a working environment based on listening and dialogue, essential in definition of a corporate strategy that is aligned with employees’ needs. For further details, please refer to section “1. General Disclosures”, chapter “1.3 Strategy”, paragraph “1.3.2 Interests and views of stakeholders”.

Ongoing, transparent dialogue with employees is managed through dedicated tools, including email, internal communication platforms and circulars, which are regularly used to provide updates and insights on issues of collective interest, in line with employees’ information needs.

The added value of the integrated use of innovative technological systems to enable and facilitate interaction between people is confirmed. The online communities tool is increasingly being used by the various Services of the Parent Company to engage with those operating at the Banks who deal with certain issues. The communities are above all spaces for discussion and growth, but also represent smart and efficient tools for conveying practices and behaviours that support the sharing of Group-wide policies and regulations.

In the process of engagement with its own workforce, the Group monitors the perspectives of particularly vulnerable workers, such as women and those with disabilities.

Programmes and initiatives aimed at development and training have been launched, with a particular focus on female empowerment and the promotion of female leadership, through courses that alternate training sessions with individual coaching sessions, in order to encourage listening, awareness and the activation of strategic levers for the optimisation of personal and professional development.

The consulting and support activities provided by the Parent Company consist of dedicated assistance throughout the process of obtaining UNI/PdR 125:2022 gender equality certification, through the mapping of needs, timely intervention during the certification process and support in defining and implementing training plans aimed at the female population.

Internal communication platforms also present projects and initiatives dedicated to people, with a focus on sustainability and DE&I issues. In 2024, a section dedicated to ESG issues was created and training activities organised.

Alongside this, the relationship with trade-union representatives is founded on open and constructive dialogue. Trade-union representatives participate in industry assemblies, conferences and meetings with the aim of protecting and improving workers’ rights, with a focus on the specific characteristics of the banking sector.

Responsibility for ensuring effective employee engagement and monitoring of specific human resources requests and needs lies with the Parent Company’s Human Resources Department and, where present, the Human Resources Offices of Affiliated Banks and Subsidiaries.

## Worker engagement at Allitude

Allitude employee engagement relies primarily on dialogue with **company trade-union representatives**, especially in the case of organisational, technological or operational changes that may have a direct impact on the workforce. Depending on the scope of changes introduced, the company utilises various consultation methods to ensure transparent and constructive dialogue:

- in the case of **small or moderate changes**, such as procedural updates or minor organisational adjustments, the company informs trade union representatives;
- in the case of **significant or material changes**, such as large-scale technological innovations or substantial changes in work processes, dedicated live or remote meetings are organised with trade-union representatives and/or directly with workers, to ensure more thorough discussion.

These meetings do not follow a predefined schedule, but are convened according to the importance and urgency of the topics discussed.

Operational responsibility for employee engagement lies with the Chief Executive Officer of Allitude, supported by the Personnel Management Department. The latter coordinates and manages labour relations, monitoring the effectiveness of dialogue through analysis of participation in the meetings organised by trade-union representatives.

In 2024, as in the previous year, the company conducted a new edition of its People Survey. This internal survey gathers employee feedback, monitoring the company climate and identifying possible areas for improvement. Surveys are anonymous and voluntary. The results are an essential tool for promoting organisational well-being and identifying any signs of dissatisfaction at an early stage.

### 3.1.2.3 Impacts and reporting channels

[ESRS S1 S1-3]

The Cassa Centrale Group guarantees transparency and respect for workers' fundamental rights, ensuring that all employees are informed and trained on company policies and documents protecting organisational well-being. Group Policies are public and accessible. Specific training programmes are planned to promote an inclusive, fair and safe working environment. Freedom of expression and the possibility for employees to report any misconduct or violations of the Code of Ethics, company policies or human rights, with particular attention to diversity, equal opportunities and occupational health and safety, is also guaranteed.

To facilitate whistleblowing, the Group has set up several dedicated channels, accessible to both employees and external stakeholders, in line with the Group's internal whistleblowing regulations. This makes it possible to report breaches in a secure and confidential manner, guaranteeing the reporting party is protected. The Whistleblowing system is integrated with the regulatory framework of reference, including the Code of Ethics, the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001 and Diversity & Inclusion policies. For further details on the Whistleblowing channel made available by the Group and on complaint-handling mechanisms, please refer to the section "4. Information on Governance", chapter "4.1 Business Conduct", paragraph "4.1.2.2 Corporate culture and business conduct policies". In addition to the Whistleblowing channel, employees can contact Workers' Safety Representatives (*RLS*) directly. These representatives offer an additional platform for listening and support, maintaining constant dialogue with the Employer through the Prevention and Protection Service Manager (*RSPP*). The Cassa Centrale Group actively encourages the use of these channels to foster a working environment based on transparency, accountability and respect for ethical values, while ensuring the protection and respect of all those involved. Currently, there is no structured procedure to monitor the effectiveness of reporting channels.

### 3.1.3 Workforce composition and attraction of group personnel

#### Breakdown of employees and non-employees

[ESRS S1 S1-6]

[ESRS S1 S1-7]

[ESRS 2 MDR-A]

[ESRS 2 MDR-M]

The total workforce of the Cassa Centrale Group as at 31 December 2024 stood at 12,284 employees, compared to 12,016 as at 31 December 2023 (+2.2%).

#### Total employees by number of persons and breakdown by gender and country

NUMBER OF EMPLOYEES BY COUNTRY	31/12/2024	%
Italy	12,266	99.9%
Luxembourg	18	0.1%
<b>Total</b>	<b>12,284</b>	<b>100.0%</b>

NUMBER OF EMPLOYEES BY GENDER	31/12/2024	%
Men	6,882	56.0%
Women	5,402	44.0%
Other	-	-
Not specified	-	-
<b>Total</b>	<b>12,284</b>	<b>100.0%</b>

Below are figures for the workforce, detailing the number of employees by region, gender and hours (full-time or part-time).

#### Full-time and part-time employees and breakdown by gender and region

NUMBER OF EMPLOYEES BY WORKING HOURS, GENDER AND REGION	31/12/2024													
	Full-Time				Part-time				Full-Time	Part-time	Total	Full-Time %	% Part-time	
	Men	Women	Other	Not specified	Men	Women	Other	Not specified	Total	Total				
Trentino-Alto Adige	1,576	898	-	-	35	424	-	-	2,474	459	2,933	84.4%	15.6%	
North East	1,446	1,058	-	-	25	221	-	-	2,504	246	2,750	91.1%	8.9%	
North West	1,589	926	-	-	14	202	-	-	2,515	216	2,731	92.1%	7.9%	
Central	1,440	980	-	-	16	183	-	-	2,420	199	2,619	92.4%	7.6%	
South	726	486	-	-	6	15	-	-	1,212	21	1,233	98.3%	1.7%	
Foreign	9	8	-	-	-	1	-	-	17	1	18	94.4%	5.6%	
<b>Total</b>	<b>6,786</b>	<b>4,356</b>	<b>-</b>	<b>-</b>	<b>96</b>	<b>1,046</b>	<b>-</b>	<b>-</b>	<b>11,142</b>	<b>1,142</b>	<b>12,284</b>	<b>90.7%</b>	<b>9.3%</b>	

For details on cross-referenced data for number of employees by gender and country and the most representative figure in the financial statements, please refer to Chapter 7. Human Resources in the Report on Consolidated Operations.

The Cassa Centrale Group favours an organisation of work that is attentive to the needs of its employees. Part-time work and possible return to full-time employment are managed taking into account employees' requests, while temporary contracts are established with a maximum duration of 12 months, in order to allow a gradual and clearly defined on-boarding period for junior and untrained employees, supporting them on the path towards possible permanent employment. In addition, wherever

possible, candidates' internship requests are aligned with the organisational needs of Management, offering an initial approach to the world of work in a structured context.

The Group's commitment to stable and lasting employment relationships is confirmed by the percentage of employees on permanent contracts, amounting to 97% of the total, in line with previous years. The distribution of employees by region, by gender and by contract type (permanent, temporary or non-guaranteed hours) is shown below.

### Total employees by number of persons and gender breakdown for permanent, temporary and non-guaranteed hours contract

EMPLOYEES BY TYPE OF CONTRACT AND GENDER	31/12/2024								
	Men	Women	Other	Not specified	Total	% Men	% Women	% Other	% Not specified
<b>Employees on permanent contract</b>	<b>6,706</b>	<b>5,208</b>	-	-	<b>11,914</b>	<b>56.3%</b>	<b>43.7%</b>	-	-
Trentino-Alto Adige	1,553	1,255	-	-	<b>2,808</b>	55.3%	44.7%	-	-
North East	1,438	1,243	-	-	<b>2,681</b>	53.6%	46.4%	-	-
North West	1,562	1,091	-	-	<b>2,653</b>	58.9%	41.1%	-	-
Central	1,429	1,125	-	-	<b>2,554</b>	56.0%	44.0%	-	-
South	715	485	-	-	<b>1,200</b>	59.6%	40.4%	-	-
Foreign	9	9	-	-	<b>18</b>	50.0%	50.0%	-	-
<b>Employees on temporary contract</b>	<b>176</b>	<b>194</b>	-	-	<b>370</b>	<b>47.6%</b>	<b>52.4%</b>	-	-
Trentino-Alto Adige	58	67	-	-	<b>125</b>	46.4%	53.6%	-	-
North East	33	36	-	-	<b>69</b>	47.8%	52.2%	-	-
North West	41	37	-	-	<b>78</b>	52.6%	47.4%	-	-
Central	27	38	-	-	<b>65</b>	41.5%	58.5%	-	-
South	17	16	-	-	<b>33</b>	51.5%	48.5%	-	-
Foreign	-	-	-	-	-	-	-	-	-
<b>Employees on non-guaranteed hours contract</b>	-	-	-	-	-	-	-	-	-
Trentino-Alto Adige	-	-	-	-	-	-	-	-	-
North East	-	-	-	-	-	-	-	-	-
North West	-	-	-	-	-	-	-	-	-
Central	-	-	-	-	-	-	-	-	-
South	-	-	-	-	-	-	-	-	-
Foreign	-	-	-	-	-	-	-	-	-
<b>Total</b>	<b>6,882</b>	<b>5,402</b>	-	-	<b>12,284</b>	<b>56.0%</b>	<b>44.0%</b>	-	-
<b>% of total employees on permanent contract</b>	<b>97.4%</b>	<b>96.4%</b>			<b>97.0%</b>				

## Metrics

**Number of employees:** the number of persons employed as at 31 December of the reporting period. The following types of employment are included: permanent, temporary and non-guaranteed hours contracts. Employees are broken down by geographical area, region and gender. Workers whose employment ends on 31 December are considered within the workforce on that date.

**Gender distribution of employees:** the total number of employees is divided amongst male, female, other and not specified, and the respective ratios are also shown.

**Distribution of employees by country:** the total number of employees is broken down by the Group's countries of operation: Italy and Luxembourg.

## Number of workers who are not employees in the undertaking's own workforce

AVERAGE NUMBER OF WORKERS WHO ARE NOT EMPLOYEES (INDIVIDUALS) IN OWN WORKFORCE	31/12/2024
Temporary workers	133.0
Extra-curricular interns (paid)	46.3
Freelance consultants or agents with VAT number	66.1
<b>Total</b>	<b>245.4</b>

## Metrics

**Number of workers who are not employees:** the figures for workers who are not employees are to be understood as average values recorded during the year, averaging the number of persons in the workforce at the end of each month. Temporary workers who are not employees, extracurricular interns and freelance consultants or agents with VAT numbers (who work exclusively or predominantly or otherwise on a permanent basis with the Group) are considered.

## Attraction and retention of Group personnel

In an increasingly competitive and complex labour market, the Cassa Centrale Group considers personnel search and recruitment a key factor in supporting continuous growth and building an organisation capable of responding promptly to new challenges.

This process integrates Employer Branding initiatives with efforts to attract skilled and high-potential personnel and actions aimed at reinforcing personnel loyalty and re-engagement, effectively meeting the current needs of the Group and anticipating future challenges and complexity.

On this basis, from 2023, and continuing in 2024, a review of the organisational structure was launched, previously dedicated exclusively to the selection of personnel, to reinforce the connection between the recruiting process and personnel management. The aim is to optimise management of the entire life cycle of company personnel, generating greater value for the Group.

In selecting and managing its human resources, the Group adopts criteria of merit, skills and appraisal of individual capacity and potential. In line with the Code of Ethics, candidacy and personnel selection are performed on the basis of corporate needs and the professional profiles sought, eliminating the risk of discrimination in the recruitment, management and remuneration of personnel.

The system is based on clear methodologies (assessment, structured interviews, psychological aptitude tests), scientific tools and customised phases. It begins with assessment of CVs, continues with detailed examination of personal and aptitude characteristics and ensures that assessment is as objective and fair as possible. A review was launched of Employer Branding processes, with the aim of strengthening partnerships with universities.

With this in mind, relations with the University of Trento and Job Guidance have been intensified. These partnerships offer important opportunities for discussion and help to improve selection processes and strengthen the Group's brand. The constant commitment to attracting young new talent was implemented through the organisation of two fundamental events for the creation of a significant and innovative network: Career Fair and Open Day.

In the context of the selection process, the Group also values local ties, favouring the recruitment of local resources to support the economic development of communities in which it operates. Hiring staff rooted in the local area also promotes greater proximity to members and customers, thus improving service quality and responsiveness to local needs.

Alongside this, an onboarding programme was introduced designed to provide new colleagues with the tools needed to better understand the corporate context and internal procedures and processes. Having completed this phase, one-to-one meetings were planned aimed at gathering experiences and feedback from the initial six months with the Group.

Recruiting activity continues to be conducted with the support of the SAP SuccessFactors platform, LinkedIn Recruiter and, where necessary, head-hunting agencies.

Of new recruits, 50.1% are in the under-30 age range, 42.9% are in the middle range (30-50) and 7.1% are over 50.

The Group pays particular attention to dialogue with employees, in order to support them in their professional development and act swiftly to prevent any risk of them leaving the company. In addition, resignations are monitored through interviews with managers in order to understand the reasons and, if necessary, implement corrective actions at organisational or individual level.

2024 also saw the departure of 634 members of personnel, 44.8% through voluntary resignation, 31.2% through retirement and the remaining 24.0% through dismissal or for other reasons. Of the personnel leaving the Group, 20.8% were in the under-30 age range and 31.2% in the middle range (30-50); the remaining 47.9% were over 50 and include retirements or early retirements in agreement with the company.

**Total number of employees who left the company during reporting period and employee turnover rate during the same period**

EMPLOYEES HIRED AND DEPARTURES BY GENDER	31/12/2024				Total
	Men	Women	Other	Not specified	
Employees hired	474	429	-	-	903
Employee departures	402	232	-	-	634
<b>Net balance</b>	<b>72</b>	<b>197</b>	<b>-</b>	<b>-</b>	<b>269</b>

EMPLOYEES HIRED AND DEPARTURES BY AGE RANGE	31/12/2024			
	Under 30 years	30-50 years	Over 50 years	Total
Employees hired	452	387	64	903
Employee departures	132	198	304	634
<b>Net balance</b>	<b>320</b>	<b>189</b>	<b>(240)</b>	<b>269</b>

TURNOVER RATE BY GENDER	31/12/2024				
	Men	Women	Other	Not specified	Total
Employees hired	474	429	-	-	903
Total employees at year-end	6,882	5,402	-	-	12,284
<b>Incoming turnover rate</b>	<b>6.9%</b>	<b>7.9%</b>	-	-	<b>7.4%</b>
Employee departures	402	232	-	-	634
Total employees at year-end	6,882	5,402	-	-	12,284
<b>Outgoing turnover rate</b>	<b>5.8%</b>	<b>4.3%</b>	-	-	<b>5.2%</b>

TURNOVER RATE BY AGE GROUP	31/12/2024			
	Under 30 years	30-50 years	Over 50 years	Total
Employees hired	452	387	64	903
Total employees at year-end	1,196	6,836	4,252	12,284
<b>Incoming turnover rate</b>	<b>37.8%</b>	<b>5.7%</b>	<b>1.5%</b>	<b>7.4%</b>
Employee departures	132	198	304	634
Total employees at year-end	1,196	6,836	4,252	12,284
<b>Outgoing turnover rate</b>	<b>11.0%</b>	<b>2.9%</b>	<b>7.1%</b>	<b>5.2%</b>

CAUSES OF TERMINATION OF EMPLOYMENT	31/12/2024				
	Men	Women	Other	Not specified	Total
Volunteer	168	116	-	-	284
Dismissal	9	3	-	-	12
Retirement	144	54	-	-	198
Death in service	-	-	-	-	-
Other	81	59	-	-	140
<b>Total</b>	<b>402</b>	<b>232</b>	-	-	<b>634</b>

## Metrics

**Employees who left the Group:** total departures include both voluntary and involuntary departures. The departure quota for the year is calculated by dividing the number of voluntary and involuntary departures, respectively, by the total number of staff in the workforce as at 31 December 2024.

**Turnover of incoming employees:** the incoming turnover rate is calculated as the ratio of employees who were hired by the Group during the year to the total workforce as at 31 December 2024, expressed as a percentage.

**Turnover of outgoing employees:** the outgoing turnover rate is calculated as the ratio of employees who left the Group during the year to the total workforce as at 31 December 2024, expressed as a percentage.

**Causes of termination of employment:** the "Other" category includes employees who did not successfully complete the probationary period, cases of non-renewal of temporary contracts and deaths not in service. There were no cases of "Death in service", i.e. during work.

## Personnel attraction and development at Allitude

Allitude's interest in and commitment to attracting new resources, both young and highly skilled, and succeeding in retaining and increasing the loyalty of existing employees, continued in 2024.

In May 2024 Allitude participated in the Career Day at the University of Trento to reinforce its presence in the territory, especially in Trentino where approximately 50% of the company's population works, and to attract new resources. Allitude's onboarding process has also been updated. Newly hired employees immediately begin a year-long induction process, during which on-the-job training is alternated with discussions with Human Resources to monitor their path within the company.

In order to encourage generational turnover, the Solidarity Fund, activated in 2022, brought with it numerous redundancies that took effect in 2023 and in 2024, along with new hires and early retirements, from which interviews and surveys were taken to gather qualitative and quantitative information on the (outgoing) employee's career path and life within the organisation. In addition to young staff, the female recruitment rate has also increased in recent years, from 33% in 2022 to 43% in 2023 and around 50% in 2024.

The "All4ideas" project continued, a programme designed to foster, develop and support internal employee projects, contributing to the development of internal skills and the growth and identification of talent.

## Diversity, inclusion and gender equality

[ESRS S1 S1-4]

[ESRS S1 S1-9]

[ESRS 2 MDR-A]

[ESRS 2 MDR-M]

### Parent Company's UNI PDR 125:2022 certification for gender equality

Cassa Centrale Banca sets itself up as a model for its Subsidiaries and Affiliated Banks, committing itself to promoting its best practices within the Group through concrete and continuous training and awareness actions on gender equality and female empowerment at every level of the Organisation. In this regard, the Group relied on its partnership with Valore D, a historic association of Italian companies working to promote gender balance and an inclusive culture in organisations. Together with Valore D, several training schemes were designed for top management and Group employees alike, also to support the commitments set out for UNI/PdR 125:2022 Gender Equality Certification.

The Parent Company, together with the Gender Equality Steering Committee, has enshrined its commitments around diversity and inclusion, through the drafting of a DE&I strategic plan. In 2024, the Parent Company gained Gender Equality Certification – UNI/PDR 125:2022. By gaining this certification, Cassa Centrale Banca demonstrated its commitment to the promotion of inclusive working environments, capable of enhancing the unique nature of each individual, strengthening mechanisms to promote equal opportunities throughout the Group.

Certification has enabled the Parent Company to equip itself with a gender equality management system capable of measuring and enhancing the company's gender equality levels. The guided Certification process had three phases:

- planning, creation and implementation of a gender-equality management system in accordance with UNI/PdR 125:2022;
- preparatory activity for certification;
- assistance during auditing by the Certification Body.

Considering that the Reference Practices of UNI/PdR 125:2022 require precise measurement of key performance indicators for organisations and formalisation of gender-equality policies, planning, implementation, monitoring and management in line with a specific systematic methodology, the process is structured according to the methods indicated below.

- **development of the system:** the process included the identification and preparation of KPIs, definition and appointment of the Steering Committee, assignment of roles and responsibilities and drafting of the Management System Manual. The Manual defines the scope of application, internal and external communication methods, goals and review of Management, in addition to gender-equality policies. Activities also include implementation of the strategic plan, creation of the necessary procedures, definition of communication documents and awareness-raising amongst all employees through a specific gender equality training plan. Finally, preparation and implementation of an internal survey with questionnaires and in-depth analysis is planned;
- **preparatory activity for certification:** performance of internal audits in compliance with PdR 125, analysis and resolution of any critical issues identified during audits, support for review and assistance in the management of relations with the Certification Body;
- **certification assistance,** including support during audits and management of actions to resolve issues identified during auditing;
- **project planning, coordination and monitoring.**

UNI/PdR 125:2022 Gender Equality Certification with the Certifying Body Bureau Veritas, and the establishment of a Steering Committee and approval of specific policies on diversity, equity and inclusion topics, including the Policy in support of “active parenthood” and the “Diversity and inclusion policy”, demonstrate the high level of attention paid to gender equality (and beyond), with a sincere focus on all aspects demanding ever greater awareness to guarantee diversity and inclusion.

As part of the certification process, awareness programmes were set up to educate employees on the importance of diversity, inclusion and gender equality through regular training on internal regulations. An information and sharing channel was established for all employees on Diversity, Equity and Inclusion Policies. In the second half of the year, various courses were introduced in this regard, including “Women’s Empowerment: promoting female leadership” aimed at Affiliated Banks, and an edition dedicated to Cassa Centrale Banca. In addition, careful work was carried out regarding Unconscious Bias, with courses for HR Recruiters and line managers of Cassa Centrale Banca and of the Affiliated Banks, with an edition reserved specifically for Allitude. All of these initiatives were aimed at supporting and promoting the development of female leadership, promoting greater awareness on correct behaviour in this regard.

In November 2024, Cassa Centrale Banks and Allitude held the “Femminile Plurale” event, organised with the Teatro delle Quisquillie theatre in Trento, presenting four plays prompting reflection on the theme of gender equality. These performances were open to the public, with the aim of raising awareness across the local area of the importance of recognising and understanding gender stereotypes and bias.

The Parent Company has issued the “**Policy in Support of Active Parenthood**” to help employees with dependent children to balance their private and working lives and achieve personal and professional goals. In this context, Cassa Centrale Banca launched the “We Are Back Programme”, featuring group workshops and individual coaching sessions, aimed at facilitating the return of new parents to work.

### Allitude and the Gender Equality Certification

Allitude also embarked on the process to obtain UNI PdR 125:2022 Gender Equality Certification, aligning itself with the ESG path already initiated by the Cassa Centrale Group. Certification was gained in February 2025.

The Group actively supports the companies within its consolidation scope and Affiliated Banks in achieving gender equality certification, providing its expertise and promoting ongoing dialogue. In this regard, two communications were sent to Affiliated Banks during the year to promote the support and consultancy service dedicated to Uni/PdR 125 certification. Moreover, various essential training initiatives were defined, planned and provided to combat gender inequality and unconscious bias, promoting an inclusive and merit-based organisational culture. Investment in this training aims to build greater awareness and improve decision-making processes, with tangible benefits for individual and collective performance and for the corporate image.

The Group is committed to sharing best practices, organising concrete action and training and awareness initiatives on gender equality and women’s empowerment, across all levels of the organisation.

The Group’s commitment to gender equality and inclusion is also reflected in the composition of its workforce and corporate leadership. Monitoring and analysing the gender distribution among members of top management and the breakdown of employees by age group makes it possible to assess the effectiveness of policies and identify possible areas for improvement.

Data as at 31 December 2024 on the composition of the Group with reference to diversity metrics is presented below.

### Gender distribution by number and percentage at top-management level; distribution by professional category of employees

TOP MANAGEMENT BY GENDER	2024	
	no.	%
Men	13	76.5%
Women	4	23.5%
Other	-	-
Not specified	-	-
<b>Total</b>	<b>17</b>	<b>100.0%</b>

EMPLOYEES BY GENDER AND PROFESSIONAL CATEGORY	31/12/2024									
	Men	Women	Other	Not specified	Total	% Men	% Women	% Other	% Not specified	% Total
Executives	172	21	-	-	193	89.1%	10.9%	-	-	1.6%
Middle managers	2,601	977	-	-	3,578	72.7%	27.3%	-	-	29.1%
Office staff	4,109	4,404	-	-	8,513	48.3%	51.7%	-	-	69.3%
<b>Total</b>	<b>6,882</b>	<b>5,402</b>	<b>-</b>	<b>-</b>	<b>12,284</b>	<b>56.0%</b>	<b>44.0%</b>	<b>-</b>	<b>-</b>	<b>100.0%</b>

The proportion of female employees increased by 3.8% compared to the previous year's total female employees. Specifically, there is an increase of 40% among female executives, 12% among female middle managers and 2% among female office staff compared to 2023.

The average age of the Group's workforce is in the 30-50 bracket, with 55.7% of employees falling into this category, although this percentage is down on the previous year.

### Distribution of employees by age group

EMPLOYEES BY AGE GROUP AND CATEGORY	31/12/2024								
	Executives	Middle managers	Office staff	Total	% Executives	Middle managers %	% Office staff	% Total	
Under 30 years	-	1	1,195	1,196	-	0.0%	14.0%	9.7%	
Between 30 and 50 years	45	1,681	5,110	6,836	23.3%	47.0%	60.0%	55.7%	
Beyond 50 years	148	1,896	2,208	4,252	76.7%	53.0%	25.9%	34.6%	
<b>Total</b>	<b>193</b>	<b>3,578</b>	<b>8,513</b>	<b>12,284</b>	<b>1.6%</b>	<b>29.1%</b>	<b>69.3%</b>	<b>100.0%</b>	

#### Metrics

The number of personnel in active service as at 31 December of the reporting period is considered.

**Top management by gender:** the definition of Cassa Centrale Group Top Management includes the Chief Executive Officer/General Manager, the Deputy General Manager and the top-level managers (Chief Officers) of the Parent Company.

## Persons with disabilities

[ESRS S1 S1-12]

[ESRS 2 MDR-M]

The Cassa Centrale Group's commitment to people also involves inclusion in employment of people with disabilities, in compliance with current legislation

The Group is committed to measures that foster an inclusive and accessible work environment, recognising the value of diversity and integration.

Persons with disabilities represent 5.5% of the total workforce as at 31 December 2024.

### Percentage of persons with disabilities among employees

NUMBER OF EMPLOYEES WITH DISABILITIES BY GENDER	31/12/2024	%
Men	365	54.0%
Women	311	46.0%
Other	-	-
Not specified	-	-
<b>Total</b>	<b>676</b>	<b>100.0%</b>

#### Metrics

**Number of persons with disabilities:** the number of persons with disabilities, as defined by ESRS, at the end of the reporting period.

## Pay gap

[ESRS S1 S1-16]

[ESRS 2 MDR-M]

The Group is committed to ensuring gender-neutral remuneration and guaranteeing that all personnel receive equal pay for equal work. As part of the periodic review of its Policies, the Parent Company's Board of Directors, supported by the Remuneration Committee and consulting with the Risk and Sustainability Committee, analyses the neutrality of the remuneration policy and evaluates the Gender Pay Gap and its evolution over time at both Group and Parent Company level, documenting the reasons for the gap, where relevant, and taking appropriate corrective measures. This activity is also carried out by the Boards of Directors of Subsidiaries and Affiliated Banks.

The table below shows the gender pay gap calculated as the difference between overall average pay levels paid to female and male workers, expressed as a percentage of the overall average pay level of male workers.

The pay gap calculated refers primarily to the total of all personnel within the scope of consolidation. This figure does not reflect the principle of "equal pay for equal work" as expressed by current regulatory developments, as it provides an average comparison of employees with different contractual statuses and roles within the organisation. For this reason, the decision was made to supplement this data with comparisons of overall average wages by gender for the various professional categories, which currently correspond approximately to the above-mentioned principle.

## Gender pay gap: total and by professional category

GENDER PAY GAP (%)		31/12/2024
Gender pay gap		17.5%

GENDER PAY GAP BY PROFESSIONAL CATEGORY (%)		2024
Executives		6.5%
Middle managers - Level 4		7.3%
Middle managers - Level 3		2.1%
Middle managers - Level 2		2.6%
Middle managers - Level 1		0.8%
3 Professional area		3.6%
2 Professional area		4.1%
1 Professional area		-3.6%

Below is a presentation of the total remuneration rate, i.e. the annual total remuneration ratio of the highest paid person to the median annual total remuneration for all employees (excluding the highest paid individual).

### Annual total remuneration ratio of the highest paid individual to the median annual total remuneration for all employees (excluding the highest paid individual)

TOTAL REMUNERATION RATE		31/12/2024
Total remuneration rate		17.1

#### Metrics

**Gender pay gap:** the average gender pay gap calculated as the difference between the gross hourly wages (including variable components) of women and men. The calculation subtracts the average gross hourly wage of female employees from that of male employees. This is then divided by the average gross hourly wage of men and then multiplied by 100. The pay gap was calculated and broken down by professional category.

**Remuneration ratio:** the total remuneration ratio is determined by dividing the annual total remuneration of the highest paid individual, i.e. the Parent Company's Chief Executive Officer, by the median remuneration of all employees, excluding the highest paid individual. Full-time equivalent rates of pay were used for each part-time employee. The types of remuneration included are: fixed remuneration, any emoluments, benefits, performance-based variable remuneration and other forms of variable remuneration (e.g. non-competition agreement, retention bonus, one-off bonuses).

The scope of reporting includes all Group Banks and Subsidiaries based in Italy.

## Safeguarding human rights

[ESRS S1 S1-17]

[ESRS 2 MDR-M]

The safeguarding of human rights is a priority for the Cassa Centrale Group, guaranteed by the Human Rights Policy, as well as the Group's Charter of Values and Code of Ethics. These instruments strictly regulate business practices, ensuring alignment with international standards and UN and OECD guidelines on human rights.

The Group is also committed to monitoring and preventing serious human rights incidents, identifying potential issues at an early stage and taking corrective action where necessary. Regarding cases of alleged discrimination, it should be noted that:

- one case, an anonymous report, was investigated in accordance with the internal procedures adopted by the Bank and found to be unfounded;
- in a second case, internal investigations confirmed the veracity of the claim, and the person involved was pulled up and immediately transferred due to environmental incompatibility. Thanks to the measures adopted by the Bank, there were no further incidents of discrimination.

The complaint filed is a complaint pursuant to Article 414 of the Code of Civil Procedure by an employee of an Affiliated Bank claiming compensation, the risk associated with which, as at the date of preparation of this Statement, cannot be quantified. The Banks, however, analysed the reference context, gathered the necessary information and managed the critical issue according to the internal procedures and information flows, having concluded that it could exclude any unlawful conduct and/or conduct detrimental to the rights of the employee in question.

### Total number of incidents of discrimination, including harassment, reported during the reporting period and number of complaints made through the channels set up for the company's own workers to raise concerns (including grievance-handling mechanisms) and, where appropriate, national channels for OECD multinationals

INCIDENTS, COMPLAINTS AND SEVERE HUMAN RIGHTS IMPACTS	UoM	2024
Total number of incidents of discrimination, including harassment		2
Number of complaints submitted through the channels set up for the company's own workers to raise concerns (including grievance-handling mechanisms)	no.	1
Amount of fines, penalties and damages resulting from discrimination incidents, including harassment and complaints filed	EUR	-

INCIDENTS, COMPLAINTS AND SEVERE HUMAN RIGHTS IMPACTS	UoM	2024
Number of serious human rights problems and incidents related to own workforce		-
Number of serious human rights problems and incidents related to own workforce that are cases of non-compliance with the UN Guiding Principles and the OECD Guidelines for Multinational Enterprises	no.	-
Amount of fines, penalties and compensation for serious human rights problems and incidents related to own workforce	EUR	-

### 3.1.4 Training and skills development

[ESRS S1 S1-4]

[ESRS S1 S1-13]

[ESRS 2 MDR-A]

[ESRS 2 MDR-M]

Adequate training and development of employees is essential to ensure that all people are able to perform their tasks effectively and address customer needs competently. To ensure access to training and the development of expertise, the Group:

- plans activities for the entire training cycle;
- monitors the context and regulatory developments;
- gathers information on training needs;
- designs and plans customised and standard training courses;
- manages training courses;
- monitors training;
- analyses results.

By listening to the needs of Affiliated Banks and working closely with internal departments and Group strategies, the Cassa Centrale Group outlines and delivers training proposals that respond to regulatory requirements and support the development of soft skills required by employees to perform their duties.

The Group's Banking Care Academy is responsible for the design, promotion and implementation of training courses for the Cassa Centrale Group, with training programmes reaching all employees through the SAP SuccessFactors LMS Learning Management System platform.

The Group has expanded its training offerings by providing both lectures and meetings in person and via the e-learning platform. The Group's e-learning offerings are composed of multimedia content, monitoring systems and control of users during online certification examinations to verify skills for professional training pathways (proctoring model). The platform also ensures interaction and use of gamification and game-design techniques in learning contexts. The training offer evolves during the year to adapt to regulatory updates and the Regulations and Policies issued by the Parent Company, also based on input from Parent Company Departments and Affiliated Banks.

To ensure the effectiveness of training, each online course includes a final learning test. Much of the classroom training, on the other hand, and particularly high-level training courses, involves both intermediate and final examinations.

Training and development initiatives include listening and follow-up with a dedicated survey, to measure the level of satisfaction and/or collect feedback.

An overall report on all training provided by the Parent Company, extracted from the Learning Management System, is shared by the first half of January of the following year. This report covers training for employees of the Parent Company, Affiliated Banks and Group Companies, as well as the Corporate Executives of these companies.

The average number of training hours per employee, by gender, is shown below.

### Average number of training hours per employee and by gender

AVERAGE NUMBER OF TRAINING HOURS PER EMPLOYEE, BY GENDER	31/12/2024				Total
	Men	Women	Other	Not specified	
Number of training hours	404,172	311,697	-	-	715,869
Total employees	6,882	5,402	-	-	12,284
<b>Average number of training hours</b>	<b>58.7</b>	<b>57.7</b>	-	-	<b>58.3</b>

Training initiatives focused on technical and specialised courses (74.3%), followed by training on ESG topics (10.5%) and management training (6.2%). Health and safety courses (2.8%) and onboarding or induction training (1.7%) were held on a residual basis, while the category "Other" (4.5%) includes courses as wide ranging as soft skills and language courses.

### Number of training hours per employee by gender and type

NUMBER OF TRAINING HOURS PER EMPLOYEE BY GENDER AND TYPE	31/12/2024				Total
	Men	Women	Other	Not specified	
Managerial	27,071	17,563	-	-	44,635
Technical-specialised	300,753	231,314	-	-	532,067
Onboarding or induction training	5,228	6,811	-	-	12,039
Health and safety	12,426	7,451	-	-	19,877
ESG topics	41,720	33,274	-	-	74,994
Other	16,973	15,283	-	-	32,256
<b>Total</b>	<b>404,172</b>	<b>311,697</b>	-	-	<b>715,869</b>

#### Metrics

This includes hours of training provided to all employees during the year, including those referring to employees who have left the Group.

Specifically, the training provided regarded the following areas:

## HIGH-LEVEL TRAINING

2024 also saw the launch of “HR BUSINESS LEADERS. Guiding organisational changes and entrenching them in business strategy”, an advanced programme created in partnership with POLIMI – Graduate School of Management, with the aim of integrating banking skills and the world of HR.

The “Fit4Future: building the future of the Group” training programme was also inaugurated, aimed at future managers of the Group. Learning activity for this course will continue in 2025 and will be provided in collaboration with the Politecnico di Milano University.

The consolidated “Executive in Banking Management” courses with SDA Bocconi aimed at the Group’s Top Management also continued. Given the success of the first two editions, the Group also launched the third edition of the course “Cassa Centrale Group Middle Managers: Leadership and team management” was launched. This provided the opportunity to develop the necessary strategic and management skills required to face current and future challenges, cementing the central role of Middle Managers as a point of reference in leadership and effective management of teams within the Banks and the Group.

The first edition of the advanced Wealth Management course in collaboration with SDA Bocconi university also began, providing essential tools and skills for effective interaction with companies, particularly family-run businesses.

During 2024, biweekly meetings with the Corporate Representatives continued, with seminars envisaged by their dedicated training plan and designed for their ongoing development.

The “CCB in Training – Learning Programme” also continued. This project involves topic-specific seminars and courses for managers at Cassa Centrale.

## SUSTAINABILITY

Activities for the entire Group to raise awareness and improve understanding of ESG issues also continue. Workshops, seminars, and communities of practice for experts aim to involve bank and company employees at various levels to encourage them to take responsibility for Environmental, Social and Governance impacts. The Group’s Corporate Academy devotes an entire section to the topic of Sustainability, with various specific training activities aimed at personnel of the Affiliated Banks, as well as the Boards of Directors and corporate officers of the Affiliated Banks. A strong focus on ESG is ensured and, thanks to cooperation with Abi Formazione and close collaboration with the External Relations and Sustainability Service, the “ESG in Action Masterclass” and “New ESG Representatives” courses were created to support ESG Experts in the challenges posed by the Strategic Plan. Both of these activities were designed to meet the need to provide knowledge and expertise to oversee the integration of ESG factors and engage expertly in relations, including in relation to requests from the ECB.

## SOFT SKILLS

In the second half of 2024, various training initiatives were run aimed at strengthening skills, nurturing innovation and improving colleague performance.

The Group recognises the importance of incorporating specific technical skills (hard skills) with managerial and relational skills ("soft skills"), aimed at the professional and personal development of employees.

A new project was introduced called "NEW CAMERA. New outlooks for new skills" programme created in partnership with Talent Garden, the largest European operator of Digital Education, and the largest community in Europe of tech ecosystem innovators.

In the second half of 2024, a strategic partnership was consolidated with POLIMI GSOM. This collaboration represents a crucial opportunity for the Group, enabling access to observatories, research projects and high-level advisory services, essential sources of learning excellence that facilitate quality growth. The partnership also offers privileged access to advanced expertise in the field of digital transformation, providing a detailed perspective of emerging issues and trends.

The School of Management Faculty of the Politecnico di Milano University adds further value. In recent years, it has introduced significant innovations to products, teaching methods and approaches to the provision of services. Through a process of constant learning, the Faculty has established specific expertise including advanced teaching capability in the digital and hybrid fields, growing international exposure and continuous investment in research. This approach effectively balances research with teaching activity, ensuring cutting-edge materials and learning of the highest quality.

The partnership with CeTif, the Research Centre for Technology, Innovation and Financial Services of the Sacred Heart Catholic University, continues to bring expertise to the Group's Banking Care Academy, particularly in digital banking, digital HR, digital compliance and cyber security.

## DIVERSITY AND INCLUSION

Also in light of the Sustainable Development Goals of the 2030 Agenda, the Cassa Centrale Group confirmed its commitment to promote an inclusive organisational culture that values diversity in its 2024-2027 Sustainability Plan, building a healthy work environment that is free of discrimination. To this end, several training activities were organised involving individuals from various levels across the company population. Training ranged from topics such as women's empowerment issues, with several editions of a high-level course which many of the Group's employees were involved in, to topics tied to governance and the need to balance the presence and commitment of women in order to reduce the gender gap currently found in all sectors, including cooperative credit. In particular, the focus of training was on inclusive language through seminars and workshops, which led to the promotion of a manifesto, which resulted in practical guidelines for the dissemination of virtuous conduct in everyday life within the Affiliated Banks. A major Digital Role Play project was launched which uses artificial intelligence to help people to better navigate critical conversations on Diversity & Inclusion. Finally, the Women's Empowerment course for the Group's Banks and Companies started, with a strong focus on female leadership and managerial issues.

## TECHNICAL TRAINING: LOANS AND FINANCE AREA

For inter-company training on Credit, in 2024, in addition to the ongoing collaborations with several companies already present in previous years, new training proposals were added with new collaborations, such as the development of the PEF project, with training for Buddy Trainers and the first webinars to prepare for the upcoming releases to the Affiliated Banks. In addition, following on from what was provided in the first quarter ("Basic" and "Intermediate" courses), three "Advanced" courses were organised, focused on financial-report analysis, financial planning and analysis of case studies, and ESG-Loans courses on "Sustainable development and new regulatory scenarios" were repeated.

In the finance area, during the second half of 2024, ESMA training courses began on investments and basic finance, offered to Affiliated Banks with high or growing numbers of requests. October saw conclusion of the "Financial and Insurance Advice - Advanced Executive Programme" course, involving 17 days on area-specific topics and a final exam passed by all participants.

In addition to the various multi-company training proposals, several in-house courses were activated, in some cases also managing the Fon.Coop. funding.

In close collaboration with the AML Function, AML initiatives were launched, planned for 2024 in line with the provisions of the training plan. The valuable and mutual collaboration with ABIFormazione continues, enhanced by important and complex projects for strategic ESG training for the Group and new professional courses on Anti-Money Laundering.

In the bancassurance sphere, too, various training initiatives were launched. A series of sessions were organised to support the professional development of colleagues and update the knowledge of personnel in the insurance sector with regard to new regulations, tools and best practices.

### Insurance financial consulting

For those working in the Group and providing financial and insurance advisory services, the Group provides specialised training as part of periodic meetings held with the involvement of participating Affiliated Banks. These training sessions, enhanced with input from Bank specialists, aim to update and further technical and regulatory skills, ensuring an increasingly qualified and market-oriented consultancy service.

### The focus on training at Prestipay

For Prestipay, employee training plays a key role in the development of its business. In 2024, Prestipay joined the free online training course of the Cassa Centrale Group called "Get on board", dedicated to new employees, while annually preparing the employee training plan approved by the Board of Directors.

In order to enhance the potential of its employees, the Company also continued its internal management training initiative called "Prestipay Academy". As part of this training, specific courses were held to enhance the soft skills of the Company's employees. Employees were also involved in team building initiatives.

Finally, an online course dedicated to the distribution of the Company's commercial partners' salary and pension backed loan product was prepared and made available to the Group's Banks, as well as all Company regulations already in the company repository.

There is currently no standardised performance management process at Group level. It is envisaged that this will be implemented in the future with a dedicated process aimed at identifying development needs, promoting continuous improvement of skills and increasing people's involvement.

### 3.1.5 Worker welfare

#### Welfare and trade-union relations

[ESRS S1 S1-4]

[ESRS S1 S1-8]

[ESRS 2 MDR-A]

[ESRS 2 MDR-M]

All employees of the Group's Italian offices are covered by collective bargaining agreements. For the subsidiary NEAM, the banking agreement in force in Luxembourg applies to all personnel.

#### Percentage of total employees covered by collective agreements

EMPLOYEES COVERED BY COLLECTIVE AGREEMENTS	31/12/2024		
	Italy	Luxembourg	Total
Number of employees covered	12,266	18	12,284
Total employees	12,266	18	12,284
% coverage	100.0%	100.0%	100.0%

#### Employees covered by employment contracts within the European Economic Area

EMPLOYEES COVERED BY EMPLOYMENT CONTRACTS WITHIN THE EUROPEAN ECONOMIC AREA	31/12/2024		
	Italy	Luxembourg	Total
Number of employees covered	12,266	18	12,284
Total employees	12,266	18	12,284
% coverage	100.0%	100.0%	100.0%

#### Metrics

The percentage is calculated as the number of employees covered by collective agreements out of the total number of employees as at 31 December 2024.

In recent years, the Group has entered discussions with trade unions and workers' representatives to improve the working conditions of its employees through supplementary agreements, and to guarantee remuneration commensurate with duties and skills for executives and staff in professional areas.

The first half of 2024 saw the Welfare, Trade Union Relations and Labour Regulations Service working to define the National Labour Agreement, to negotiate with the Group Delegation on the Corporate Productivity Value (CPV) and the procedures pursuant to art. 22 of the CCNL.

At Group level, on 10 June 2024, during the meeting of the Group's Trade Union Committee, two agreements were submitted for signature by the Group's Trade Unions:

- an agreement with which the parties acknowledge the correct amount of the calculations of the CPV paid in 2024;
- an agreement confirming the agreed methods for calculating the CPV, applied on a trial basis for the year 2023/24, in the agreement dated 1 June 2023 and, at the same time, to merge the North East with Trentino-Alto Adige, starting from the CPV to be paid in 2025 using the 2024 budgets. The bundling in question has become necessary because, following recent mergers, the number of Banks present in the North East has fallen below the minimum limit of 10 Banks approved by the CCNL for the North East to continue to be defined as an area in its own right.

Regarding Group trade-union negotiations pursuant to Article 22 of the CCNL agreement, in the first half of 2024 activity was focused on discussions regarding the two business combinations between Affiliated Banks in 2024, as detailed in paragraph 3.1 “Business combinations between Affiliated Banks” of the Report on Operations.

Furthermore, regarding the merger in 2023 that led to the creation of Banca 360 Credito Cooperativo Friuli-Venezia Giulia, negotiations continued supplementing agreements defined on 4 April 2024, expanding the number of beneficiaries of the extraordinary allowance of the Solidarity Fund.

The second half of 2024 saw the Service working on definition of the National Labour Agreement, on discussions with the Group delegation on the development of personnel, on passage of Assicura Agenzia S.r.l. And Assicura Broker S.r.l. to CCNL Federcasse, on negotiations regarding required availability at Allitude, on further implementation of the Group welfare measures with the Banks and on the procedures pursuant to Article 22 of the CCNL for personnel access to the Redundancy Fund.

Throughout 2024, employment law support continued to be provided to the Banks, both with regard to specific activities and more generally to the drafting of opinions, preparation of contracts, out-of-court assistance, operational support, interpretative advice on labour law and assistance in relations with their company Trade Union Representatives.

In July 2024, the renewed National Collective Labour Agreement for Middle Managers and Staff of the Professional Areas of Cooperative Credit Banks – Rural and Artisan Banks was signed.

In addition, there is a Group Supplementary Agreement establishing protections mainly in the areas of:

- training, professional development and appraisal of personnel, new professional profiles for new activities and new organisational structures and related category, regulation of the Corporate Productivity Value;
- meal tickets;
- all-round welfare (remote working, right to disconnect, additional welfare, leave and work-life balance, mortgages and insurance coverage) and territorial mobility;
- quality of work, life and health and safety (business climate, work-related stress, business pressures, and health and safety).

In addition to welfare measures and company benefits, the Group promotes freedom of association and manages relations with trade unions in a responsible way, fostering constructive dialogue and a climate of mutual trust. Furthermore, it promotes active participation of employees in decision-making processes concerning working conditions, corporate welfare and the protection of rights.

Group employees covered by representatives are listed below.

**Overall percentage of employees covered by workers’ representatives, indicated at country level for each EEA country where the undertaking has a significant level of employment**

EMPLOYEES COVERED BY WORKERS’ REPRESENTATIVES	31/12/2024		
	Italy	Luxembourg	Total
Number of employees covered	9,287	-	9,287
Total employees	12,266	18	12,284
% coverage	75.7%	-	75.6%

**Metrics**

The percentage is calculated as the number of employees covered by workers’ representatives out of the total number of employees as at 31 December 2024.

## Care for employees at Allitude

Discussions were conducted with the trade-union representatives of Cassa Centrale Banca and Allitude S.p.A. on various issues, including signing of two agreements on flexibility of working hours and video surveillance and logistical security systems. In particular, Allitude established an agile-working agreement, for a maximum of ten days per month, with no end date.

In September 2024, Allitude introduced reservable workstations in the Trento office and in the newly opened Milan office. At the second Milan office, AllSpace was introduced. This is a new branch concept, in which spaces are geared towards collaboration and socialisation without forgetting comfort, privacy or concentration. Features of the new branch include:

- no assigned desks, instead providing workstations that can be reserved;
- presence of comfortable and reserved spaces for taking calls and holding discussions;
- soundproofed environments that facilitate coexistence within spaces;
- modern, fully equipped meeting rooms;
- large refreshment area and spaces for socialising.

Furthermore, by accessing the CGMoving platform, employees were able to apply for vouchers that could be spent at physical or virtual shops, rather than requesting reimbursements for specific services such as vouchers for school-age children.

Statistics on the use of the platform are periodically provided by the supplier company for the configuration of services, in order to flag any critical issues or areas for improvement.

## Work-life balance

[ESRS S1 S1-4]

[ESRS S1 S1-15]

[ESRS 2 MDR-A]

[ESRS 2 MDR-M]

With the signing of the Group's Supplementary Agreement, work-life balance protections were broadened, including granting of intra-day flexibility in working hours to meet particular needs related to personal/family requirements.

In addition, two working days of paid leave per year were recognised for particular needs related to care in the event of hospitalisation or surgery of a spouse/relative or related person in addition to those already provided for by law and by the supplementary company/territorial agreements in application of Article 54 of the National Labour Agreement. The subsidiary NEAM also has policies to help balance the personal and working lives of its employees, in line with principles and guidelines defined at Group level. In this respect, NEAM has adopted a flexi-time policy and offers the option of regular and occasional homeworking, in line with Luxembourg law.

In addition to the provisions on rest periods and the right to disconnect provided for by law and employment contracts, the disconnection period was defined from 18:00 to 8:00 and for the entire day on Saturdays and Sundays, in addition to justified absences (for example: part time, holidays, public holidays, leave/recovery, illness, flexible return to work, etc.). It was also stipulated that during the rest and disconnection period, Employees cannot be required to work, allowing them to switch off all company devices used.

In addition, the renewal agreement of the CCNL of 9 July 2024 provides for a reduction in hours as of 1 July 2025 from the current 37.5 hours to 37 hours (reduction of 0.5 hours).

In order to ensure effective implementation of these measures and respond promptly to any requirements or critical issues, employees can raise issues to be handled by Human Resources, as well as contribute to continuous improvement of work-life balance.

As part of the Group's Supplementary Agreement, a document was signed for the definition of "agile work", giving priority to workers who are recipients, for themselves or for family members, of the leave provided for under Law 104/1992 and to workers with disabled children or children up to 12 years of age.

Employees were provided with regulatory and operational guidance on access to parental leave through internal circulars. All male and female employees of the Cassa Centrale Group are entitled to family leave, and the table below shows the number of employees who took this type of leave in 2024.

**Percentage of employees entitled to family leave; percentage of eligible employees who took family leave, and a breakdown by gender**

WORK-LIFE BALANCE	31/12/2024				Total
	Men	Women	Other	Not specified	
Total employees	6,882	5,402	-	-	12,284
Number of employees entitled to family leave	6,882	5,402	-	-	12,284
<b>Percentage of employees entitled to family leave</b>	<b>100.0%</b>	<b>100.0%</b>	-	-	<b>100.0%</b>
Number of eligible employees who took family leave	997	1,314	-	-	2,311
<b>Percentage of eligible employees who took family leave</b>	<b>14.5%</b>	<b>24.3%</b>	-	-	<b>18.8%</b>

**Social protection**

[ESRS S1 S1-11]

All employees of the Cassa Centrale Group are covered by social protection instruments under national social programmes against loss of income due to illness, unemployment, occupational injury, acquired disability, parental leave and retirement.

**Adequate wages and remuneration**

[ESRS S1 S1-4]

[ESRS S1 S1-10]

[ESRS 2 MDR-A]

The Cassa Centrale Group offers its employees a remuneration package that includes a wide range of benefits, differentiated based on their roles in the organisation, without distinction between full-time and part-time or temporary employees. With reference to the benefits recognised to employees, the framework is varied and complex. These include:

- supplementary pension - Cooperative Credit Pension Funds;
- supplementary health cover - Cooperative Credit Mutual Funds;
- insurance cover in addition to that required under the National Labour Agreement;
- scheme for subsidised loans and mortgages;
- company car assigned for personal use (for executives or employees with specific assignments for travel purposes);
- meal vouchers/canteen facilities for the various contractual categories (in line with provisions defined in the National Labour Agreement).

Within the Cassa Centrale Group, all employees receive an appropriate salary according to the applicable parameters, as identified in the relevant CCNL collective labour agreement. For further details on the Group's remuneration policies, please refer to section "3. Social Information", chapter "3.1 Own Workforce", paragraph "3.1.2.1 Policies related to own workforce".

## Health and safety

[ESRS S1 S1-2]

[ESRS S1 S1-4]

[ESRS S1 S1-14]

[ESRS 2 MDR-A]

[ESRS 2 MDR-M]

As a result of its business activities, the Cassa Centrale Group did not identify any negative impacts and material risks related to employee health and safety. The health and well-being of employees are nevertheless central issues. The Group implements all necessary preventive actions to ensure safe working environments and compliance with health and safety regulations.

The Group Occupational Health and Safety Policy (please refer to section “Group Occupational Health and Safety Policy”) is the reference document on which Cassa Centrale Banca implemented its Health and Safety Management System certified in December 2024, which also feeds into the Organisation, Management and Control Model pursuant to Legislative Decree no. 231/2001.

Cassa Centrale Banca has clearly defined health and safety roles and responsibilities by creating and regularly updating the Safety Organisational Chart. This document also includes the Workers’ Safety Representatives (*RLS*), who play a key role in terms of dialogue between workers and management on occupational safety issues. The *RLS*s are regularly consulted and involved through regular meetings or other informal contact. There is at least one appointment per year, to be formalised within the framework of the periodic meeting provided for in Article 35 of Legislative Decree no. 81/08. Additionally, Cassa Centrale Banca regularly organises discussion meetings with all figures involved in management of health and safety within the company.

Alongside this, on-site activity is constantly monitored through inspections, either scheduled or unannounced (e.g. following reports by the *RLS*s), and through specific assessments. To ensure continuous improvement, targeted actions are agreed with all company figures involved following these audit and assessment activities.

Worker health surveillance has been outsourced to an organisation specialised in Occupational Medicine, which coordinates the work of the Company Doctors operating in the Parent Company’s various regional offices and evaluates the aggregate data at the periodic meeting, called pursuant to Article 35 of Legislative Decree no. 81/2008. For Affiliated Banks, the organisational structure is defined according to the specific needs and characteristics of each entity. Company Doctors are also involved in risk assessments, enabling them to provide specific recommendations for necessary prevention and protection measures. Workers are summoned for periodic examinations, as set out in the health protocol. However, they also have the option of requesting non-routine appointments with the Company Doctor, should they deem it necessary in critical situations.

Within Cassa Centrale Banca, too, most office tasks are not associated with serious or immediate risks. Critical situations may arise in relation to workspaces; therefore, procedures for the management of any emergencies and specific evacuation maps, complete with all required information, have been prepared and affixed in various places in the buildings. A noteworthy initiative in this regard was the introduction of AEDs (automated external defibrillators) at the company from 2022, with all Cassa Centrale Banca branches being equipped with these devices and colleagues being trained in their use.

Thanks to implementation of an organic occupational health and safety management system in compliance with the standards, in December 2024 Cassa Centrale Banca passed an inspection by the IMQ certification body to gain UNI EN ISO 45001:2023 certification for “Occupational Health and Safety Management Systems”, in line with the objectives of the Sustainability Plan. During 2024, the Parent Company continued initiatives to promote the physical and psychological well-being of employees. A partnership with a specialised supplier has been consolidated to encourage adoption of healthier lifestyles, including through increased attention to behaviour in the office. For example, courses were organised on correct posture to adopt when working at screens, as well as seminars on managing stress and sleep.

During the year, safe driving courses were offered to staff who use their cars most frequently for work. Courses included a four-hour theory component and a practical session at a safe driving centre with professional instructors.

Well-being at the company remains a pillar in the strategy to build the Group's corporate culture, which is why the psychological well-being awareness project continued in the second half of 2024.

The psychological well-being project, supported by a network of specialised professionals partnering in these initiatives, continues to be highly appreciated and widely used, including for personal growth plans thanks to the commitment of expert coaches.

In this context, the Human Resources Department supported the "Mindwork" programme, a project providing access to initial psychological support with psychologists and other specialists. The programme is anonymous and access is completely free of charge. Moreover, also in 2024 the Cassa Centrale Group again continues to promote the "Manifesto for psychological well-being at work", created by the Mental Well-being Council of which the Group is a member. The Manifesto seeks to shape the future of the human dimension at work. It promotes an organisational culture inclusive of mental health through alignment of values, sharing of intentions and tangible and widespread commitment among the signatory companies. In tandem, it strives to be an opportunity for exchange and mutual growth, offering indications and best practices that are useful for achieving the goal of complete psychological well-being. Partnerships also continued with Eukinetica, a company specialising in corporate wellness.

**Percentage of own employees covered by the company's health and safety management system according to legal requirements and/or recognised standards or guidelines; number of deaths due to work-related injuries and illnesses; number and rate of recordable work-related injuries; in the case of the company's employees, the number of cases of recordable work-related illnesses, subject to legal restrictions on data collection; in the case of the company's employees, the number of days lost due to work-related injuries and deaths due to work-related injuries, work-related illness and deaths due to illness**

HEALTH AND SAFETY INDICATORS	31/12/2024		
	OWN WORKFORCE - EMPLOYEES	OWN WORKFORCE - NON-EMPLOYEES	Workers in the value chain
Number of workers covered by company Health and Safety Management System	12,284	227.0	n/a
Total workers	12,284	245.4	n/a
<b>Percentage of workers covered by Health and Safety Management System</b>	<b>100.0%</b>	<b>92.5%</b>	<b>n/a</b>
<b>Number of deaths due to work-related injuries and illnesses</b>	-	-	-
of which: accidents at work	-	-	-
of which: work-related ill health	-	-	-
<b>Number of recordable work-related injuries</b>	<b>82</b>	<b>2</b>	<b>n/a</b>
Total number of hours worked	19,159,298	399,347	n/a
<b>Rate of work-related injuries</b>	<b>4.3%</b>	<b>5.0%</b>	<b>n/a</b>
<b>Number of recordable cases of work-related diseases</b>	-	n/a	n/a

## Metrics

For employees covered by the company's health and safety operations system, the number of workers at 31 December 2024 is considered, while for non-employees, average values recorded during the year are considered, averaging the number of persons in service at the end of each month.

A certified health and safety management system covers all employees of Cassa Centrale Banca; in Other Banks and Group Companies, the principles referred to in the Group Occupational Health and Safety Policy apply.

**Rate of work-related injuries for employees and workers who are not employees:** the rate of work-related injuries is calculated as the ratio of the number of recordable work-related injuries to the total number of hours worked, multiplied by 1,000,000.

Work-related injuries recorded during the year are not related to safety issues in the working environment. Moreover, none of them had serious consequences, resulting in a zero rate of work-related injuries with serious consequences (excluding fatalities) for the three-year period 2022-2024. Analyses conducted on the Group's Loss Data Collection Database confirm the absence of material impacts on occupational health and safety.

With regard to reputational risk in 2024, there were no significant losses in the Group's Loss Data Collection Database for the event category "Employment Relationships and Workplace Safety" or for the area of working conditions, equal treatment, equal opportunities and other work-related rights that have had or could generate a reputational impact on the Group. In addition to this analysis, considering the findings of the Group's Reputational Risk Assessment, taking into account the Reputational Risk Sources "Management and Internal Communication" and "Occupational Health and Safety", no relevant Residual Risks were identified.

The Group continues to consolidate activities related to the adequacy profile of suppliers involved in tasks that could have health and safety implications. As part of the supplier-selection process, based on the specific conditions, fulfilment of health and safety requirements in the workplace are assessed, including the presence of the Risk Assessment Document and training of those in charge, and insurance cover to protect against possible accidents.

Data on resources dedicated to the management of relevant impacts related to the Group's Own workforce have not been included in this statement as, based on the analysis performed, the amounts were not significant.

## Attention to health and safety within Allitude through the adoption of a Health and Safety system

In line with the arrangements put into place by Parent Company, in recent years, Allitude embarked upon a path to develop a Health and Safety Organisation and Management system. To further increase the protection of workers, a working group was set up with specialised expertise to ensure continuity and evaluation from a range of perspectives in Allitude's different areas of action.

In addition, in 2024 Allitude adopted an "Occupational Health and Safety Training Plan". This defines overall training activities in implementation of the provisions of internal regulations and in line with the 231 Organisational Model.

As part of the "Corporate wellness - the wellness month" project, courses were offered in July 2024 on topics such as "Stress management", "Personal motivation: how to achieve more in private and professional life", "Food As Medicine: how nutrients can support the immune system" and "How to adopt correct posture and the benefits of stretching". In addition, weekly courses were organised in October 2024, with an average attendance of 200 people per session.

### 3.1.6 Workforce targets

[ESRS S1 S1-5]

[ESRS 2 MDR-T]

Within the framework of the Cassa Centrale Group’s Sustainability Plan, a number of key objectives were defined in line with the vision of a responsible, inclusive and welfare-oriented organisation. These objectives are broken down into several areas, including work-life balance, occupational health and safety, gender equality, and skills development, and are planned over the period up to 2027. For the definition of ESG goals, the process establishes direct and continuous dialogue between Human Resources and the ESG structure, for the elements included in the Sustainability Plan.

The table below shows the Group’s targets related to its own workforce.

Description of the actions	Objective	Target year	Base year	Base value	Intermediate target	Description of the relationship between the objective and policy objectives
<b>ESG training hours for employees</b>	225,000 hours of total ESG training at Group level	2027	2023	44,000 hours of ESG training	165,000 total ESG training hours by 2026 (training programmes to be planned according to evolution of the context and corporate strategy)	Linked to the principles of the following policies: (i) Anti-Corruption Policy, (ii) Environmental Policy, (iii) Human Rights Policy, (iv) Diversity Policy, (v) Occupational Health and Safety Policy
<b>ESG training programme for corporate executives</b>	70% of corporate executives participating in Parent Company ESG training during the year	2027	2023	30% of corporate executives participating in ESG training	60% of corporate executives participating in ESG training by 2026	This objective is linked to the principles of the “Cooperative Credit Charter of Values” and the values set out in the Code of Ethics
<b>ESG training programme for employees</b>	70% of employees participating in Parent Company ESG training during the year	2027	2023	25% of employees participating in ESG training	60% of employees participating in ESG training by 2026	This objective is linked to the principles of the “Cooperative Credit Charter of Values” and the values set out in the Code of Ethics
<b>Achievement of UNI PDR 125:2022 certification on Gender Equality at Group level</b>	40% Banks/ Companies certified in accordance with UNI/ PdR 125:2022	2026	2023	UNI/PdR 125:2022 Gender Equality Certification gained by the Parent Company and 3 Banks	25% Banks/ Companies certified by 2025 40% Banks/ Companies certified by 2026	This objective is linked to the core principles of the “Diversity Policy”: (i) avoidance of discriminatory practices, (ii) guarantee of equal opportunities, (ii) promotion of inclusion and (iv) respect for a healthy work-life balance.
<b>Work-life balance projects for employees</b>	Implement 4 projects to strengthen work-life balance measures. Projects to be planned according to evolving circumstances and needs	2027	2023	Collective bargaining has had effects at various levels in this regard, introducing up to 10 days of homeworking and various permits to support parenting, frail individuals and caregivers	Implement 2 work-life-balance-oriented projects by 2025	This objective is associated with the values set out in the Code of Ethics and the principles of the “Diversity, Equity and Inclusion Policy”.

Cassa Centrale Banca’s occupational health and safety objectives are set and periodically reviewed during Top Management Review of the Health and Safety Management System or the Periodic Meeting (Art. 35 of Legislative Decree. 81/08). In addition to constantly reducing accidents and offering supplementary courses, including those on driving safety, the Group has set the following objective:

Description of the actions	Objective	Target year	Base year	Base value	Intermediate target	Description of the relationship between the objective and policy objectives
Health and safety certification	Extension of the scope of ISO 45001 “Health and Safety Management System” certification	2027	2023	No certification	Certification in accordance with ISO 45001 “Health and Safety Management System” at Parent Company in 2025	The goal is linked to the principles of the “Group Occupational Health and Safety Policy”.

More information on the Group’s 2024-2027 Sustainability Plan can be found in section “1. General Disclosures”, chapter “1.4 Management of Impacts, Risks and Opportunities”, paragraph “1.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model”.

## 3.2 Affected Communities

ESRS S3

### 3.2.1 Strategy: Impacts, risks and opportunities

[ESRS S3 SBM-3]

Through its double materiality analysis, the Cassa Centrale Group has identified and assessed material impacts and opportunities in relation to affected communities. For further details, please refer to section “1. General Disclosures”, chapter “1.4 Management of Impacts, Risks and Opportunities”, paragraph “1.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model”.

The predominantly mutual co-operative nature of the Group’s Affiliated Cooperative Credit Banks determines strong ties with local areas, resulting in a direct and constant relationship with communities. This intrinsic link reduces the risk of significant negative impacts and strengthens the role of Affiliated Banks in promoting the welfare and development of areas in which they operate. This focus is further reinforced by the sense of responsibility associated with being an example of “banking biodiversity” with a strong profile in the various communities in which it operates. Regional dynamics may influence the operations of individual Affiliated Banks, but do not represent a significant ESG risk for the Group or local communities.

Whilst the Group does not currently have a structured model for measurement of economic and social benefits and knock-on effects on affected communities, implementation of the principles of cooperation, mutuality and localism ensures a positive impact. Evidence of this can be seen in a series of distinctive features, set out in section “1. General Disclosures”, in chapter “1.3 Strategy”, paragraph “1.3.1 Strategy, business model and value chain”.

Thanks to its widespread presence across Italy, the Group serves as a point of reference for the communities in which it operates. Affected communities include:

- the **local communities in the areas where Affiliated Banks are based**, which benefit from the economic and social support of the Banks’ activities and initiatives supporting local areas;
- **suppliers and local companies operating along the value chain**, for which the Group provides ESG selection and monitoring criteria and which are located in Italy;
- **public institutions and local associations**, with which the Group collaborates on social and economic development initiatives;
- **retail investors**, due to distribution of the NEF fund, managed by the NEAM, the Group’s asset-management company. This locally networked model translates into proximity and day-to-day relations with the financial community, making it possible to identify and often anticipate its needs.

Finally, there are a number of initiatives with a positive impact on international communities, including Microfinance Campesina, which supports Ecuadorian economic development, and the support of social projects abroad through charitable initiatives, including the Group’s Christmas initiative.

## 3.2.2 Management of impacts, risks and opportunities

### 3.2.2.1 Policies related to affected communities

[ESRS S3 S3-1]

[ESRS 2 MDR-P]

The Cassa Centrale Group bases its operations on a solid foundation of values and regulations, guiding Affiliated Banks and Subsidiaries in compliance with the principles of Cooperative Credit. This commitment is realised through governance geared towards building the common good, with a business model centred around community, participation and sustainability.

The Group's operations are firmly anchored in the defining principles of mutual cooperative credit, expressed in the twelve values of the **Cooperative Credit Charter of Values**. These values are clearly consistent with the Sustainable Development Goals of the 2030 Agenda, as described in section "1. General Disclosures", in chapter "1.3 Strategy", paragraph "1.3.1 Strategy, business model and value chain". In particular, **Article 7** of the Cooperative Credit Charter of Values underlines the importance of "Promoting local development" and highlights the strong link between Cooperative Credit Bank lending activities and local communities, emphasising promotion of local development also through the annual allocation of a portion of profits to such efforts. This principle is further enshrined in the Parent Company's Articles of Association. **Article 4.2** reaffirms the mutualist vocation and role of Affiliated Banks in promoting the economic, cultural and social wellbeing of the communities in which they operate, and **Article 4.3** establishes the aim of enhancing the unique linguistic and cultural profiles of the Affiliated Banks' local areas.

The **Code of Ethics**, adopted by the Group Companies, is a further tool offering guidance to ensure transparency, integrity and accountability in the Group's activities. In particular, there is a section in the Code on "Relations with Communities". Discussed in more detail in section "4. Information on Governance", chapter "4.1 Business Conduct", paragraph "4.1.2.2 Corporate culture and business conduct policies", the Code defines the principles of fairness and inclusivity, guiding business decisions in an ethical and responsible manner.

The Group is therefore distinguished by its social orientation, focusing on the active participation of Affiliated Banks, which enjoy operational independence, allowing them to adapt strategies and actions to the specific local contexts. This approach makes it possible to maintain constant dialogue with communities, public authorities, small businesses and local associations, ensuring concrete support for local needs.

The Group ensures respect for human rights in all of its operations, avoiding discrimination based on gender, age, ethnicity or other personal qualities in the provision of credit and financial services. This commitment is enshrined in the **Human Rights Policy**, covered in section "4. Information on Governance", chapter "4.1 Business Conduct", paragraph "4.1.2.2 Corporate culture and business conduct policies". In 2024, no human rights problems and incidents were reported in relation to the affected communities.

In management of relations with affected communities and respect for their rights, the Group observes internationally recognised standards. These include the United Nations Guiding Principles on Business and Human Rights, and, more recently, the **UN Global Compact**, since the company joined this voluntary initiative promoting sustainable and responsible business practices, in 2023. In line with this initiative, the Group ensures transparent reporting by regularly publishing information on its alignment with the ten principles of the Global Compact and its progress in this regard. Furthermore, during 2024, no cases of non-compliance with the UN Guiding Principles on Business and Human Rights or the ILO Declaration on Fundamental Principles and Rights at Work involving affected communities were reported in own operations or upstream and downstream in the value chain.

Social responsibility and community support is regulated at statutory and regulatory level, for which the Group does not currently consider it necessary to adopt a specific policy. The Group's actions are rooted in its cooperative identity and regulatory framework, ensuring ethical and responsible actions that go beyond the adoption of formal guidelines.

### 3.2.2.2 Processes for engaging with affected communities

[ESRS S3 S3-2]

By its very nature, Cooperative Credit is deeply rooted in local areas and oriented towards serving local communities, acting as a point of reference for citizens, enterprises and public authorities. The widespread presence of Affiliated Banks makes it possible to offer essential services, guaranteeing a stable point of contact for the social and economic fabric of the local area. Through a network of bank branches spread across different Italian municipalities, the Group promotes financial inclusion and support for local economies, actively contributing to the community wellbeing.

Engagement with affected communities involves meetings with representatives of institutions and non-profit organisations, participation in teams, working groups and technical committees and events in the area open to the public. For further details, please refer to section "1. General Disclosures", chapter "1.3 Strategy", paragraph "1.3.2 Interests and views of stakeholders".

In a banking sector which has seen a progressive reduction in the number of physical branches in recent years, the Cassa Centrale Group has reaffirmed its commitment to ensuring access to financial services even in less densely populated areas, with 370 active branches in municipalities where it is the only bank present. Furthermore, this strong local presence translates into a direct and ongoing relationship with communities, facilitating dialogue with local administrative bodies, which often consult Cooperative Credit Banks regarding requests for essential banking services, such as the installation of ATMs in areas which are unserved, maintenance of physical access points and support for local initiatives, including sponsorship of cultural, sporting and social events.

#### Branches in municipalities by population bracket

BRANCHES BY MUNICIPALITY	31/12/2024	
	Number of branches	%
Number of branches in municipalities with up to 3,000 inhabitants	293	19.7%
Number of branches in municipalities with over 3,000 inhabitants	1,198	80.3%
<b>Total</b>	<b>1,491</b>	<b>100.0%</b>

#### Group presence in municipalities across Italy

GROUP PRESENCE	31/12/2024
Number of municipalities where the CCB Group is the only bank	329
Number of municipalities in which the CCB Group is present	1,086

Of the 329 municipalities in which the Group is the only bank present, 227 have fewer than 3,000 inhabitants.

For more information on the areas in which the Affiliated Banks and branches of the Cassa Centrale Group are located, please consult the Report on Operations or the Parent Company website.

At Group level, dialogue with affected communities and other stakeholders is coordinated by the External Relations and Sustainability Service function, which manages the Group's institutional relations and communication.

Through its channels of dialogue with affected communities, the Group also pays attention to reports from those considered vulnerable or from specific groups such as women and young people/students.

### 3.2.2.3 Impacts and reporting channels

[ESRS S3 S3-3]

The Cassa Centrale Group promotes direct and continuous dialogue with local communities by guaranteeing accessible channels for reporting problems or requesting assistance. Reports are currently made primarily through direct contact with Affiliated Banks, through informal reports or by contacting branches.

At Group level a structured whistleblowing system has also been implemented, serving all Affiliated Banks and Subsidiaries. This is accessible both internally and externally through a dedicated platform on the Parent Company's website. The reporting and monitoring of the issues raised are discussed in more detail in section "4. Information on Governance", chapter "4.1 Business Conduct", paragraph "4.1.2.2 Corporate culture and business conduct policies".

Through the use of press releases, publication of news on the Parent Company and Affiliated Banks' websites, and the "Cassa Centrale Group" LinkedIn page, the External Relations and Sustainability Service ensures transparency and active engagement of stakeholders, providing information on local development, sustainability and cooperation initiatives. Further strengthening its consultation and engagement initiatives, the Parent Company is revising the Sustainability section of its website ([www.cassacentrale.it](http://www.cassacentrale.it)), with addition of a new section entitled "Dialogue with Affected Communities" and a form for affected communities to report issues, offering an additional structured and easily accessible tool for dialogue.

### 3.2.3 Actions and initiatives on affected communities

[ESRS S3 S3-4]

[ESRS 2 MDR-A]

[ESRS 2 MDR-M]

Mutual cooperative credit represents an original formula in the banking sphere, characterised by a strong local vocation and genuine proximity to communities. The Group supports local areas by providing products and services that meet the needs of local people and businesses, and by supporting initiatives with social-welfare, cultural, educational and local-development purposes.

The widespread presence of Affiliated Banks enables strategic choices to be calibrated to the specific economic, social and cultural characteristics of each area. Decisions guiding commercial products and services are geared to respond not only to the immediate needs of Affiliated Banks' customers and members, but also to broader community needs.

In 2024, the Cassa Centrale Group continued to support economic and social development, including through the use of state guarantees and social loans to facilitate access to credit for businesses, stimulate investment in strategic sectors and encourage job creation. For further information on social loans, please refer to section "3. Social Information", chapter "3.3 Consumers and End-Users", paragraph "3.3.6 Social Loans".

Over the past year, the Group made more than 20 thousand contributions throughout Italy, for a total of more than EUR 52 million. The decision to support initiatives is made independently by Affiliated Banks and Subsidiaries, which carefully assess the needs of the communities in which they operate. Initiatives on which the Group focuses include:

- social/assistance activities;
- culture, training and research;
- promotion of the local area and the economic entities;
- sport, recreation and aggregation;
- support for third-sector entities;
- investments and infrastructure services for the benefit of the public;
- financial education;
- policies and measures adopted in relation to arms.

The initiatives achieved in 2024 are listed below.

### Community initiatives – Charity and sponsorship

COMMUNITY INITIATIVES	31/12/2024	
	No. of initiatives by area of action	Total amount in Euro
Social and assistance activities	2,899	7,152,657
Culture, training and research activities	6,405	10,596,541
Promotion of the local area and the economic entities	2,785	12,262,162
Sport, recreation and aggregation	8,137	16,395,032
Foundations (founded or invested in by the Bank/Company)	40	6,149,538
<b>Total</b>	<b>20,266</b>	<b>52,555,930</b>

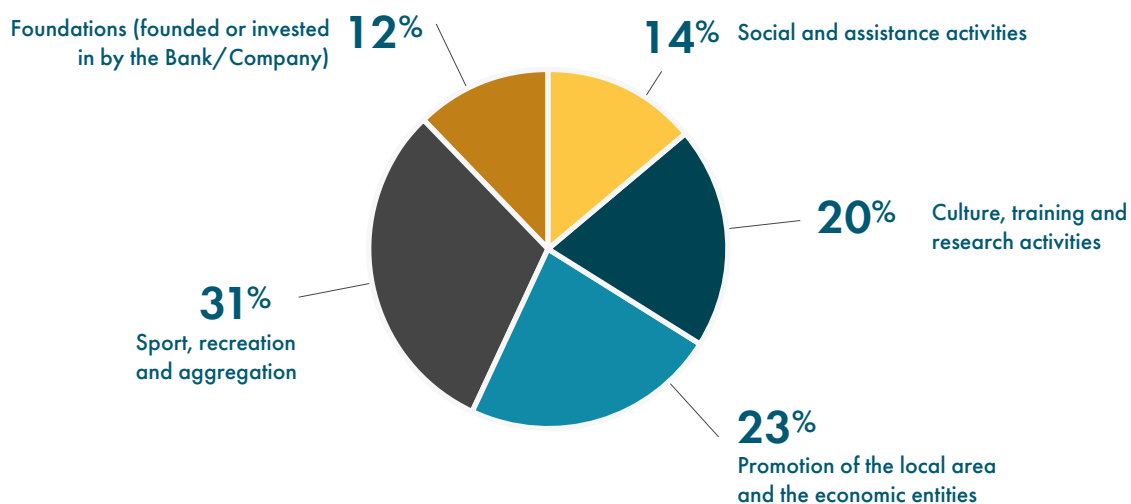
#### Metrics

**Number of initiatives by type:** total number of individual initiatives completed in 2024, segmented by type of activity. This includes the initiatives of companies within the scope of consolidation.

**Total amount:** total expenditure in Euro incurred in 2024, grouped by type of activity. The total expenditure incurred is made up of EUR 32 million for the Provision for charity and EUR 20.5 million for the Expenses on the income statement (i.e. sponsorships).

Amounts for community interventions are included:

- in the changes (utilisation) of the Provision for charity during the year, the balance of which as at 31 December 2024 is shown in the Consolidated Explanatory Notes under Section 10 of Liabilities in Part B “Information on the consolidated balance sheet”, in the table “10.6 Other Provisions for Risks and Charges”;
- in Other administrative expenses reported in the Consolidated explanatory notes under Section 12 of Part C “Information on the consolidated income statement”, in the table “12.3 Other administrative expenses: breakdown” and specifically within the items “Advertising and entertainment expenses” and “Other administrative expenses – Other”.



## Social and assistance activities

[ESRS S3 S3-4]

[ESRS 2 MDR-A]

The Banks of the Group pay particular attention to the issue of health, providing initiatives such as discounts for medical examinations and diagnostic tests, supplementary health services and free preventive health checks for members and customers.

21 Banks and one Company<sup>19</sup> also promote financial inclusion through initiatives aimed at facilitating access to financial services for individuals not yet fully integrated into the ordinary financial system, both through training activities and introduction of dedicated products.

In 2024, 2,899 initiatives were promoted for a total of EUR 7.2 million. In particular, 57% of the amounts disbursed in the socio-welfare field were for assistance, solidarity and voluntary work (amounting to over EUR 4 million for 1,907 initiatives), 23% to the health sector (amounting to EUR 1.6 million for 283 initiatives), 10% to support for civil protection (for almost EUR 750 thousand and 361 initiatives), 5% to solidarity initiatives towards developing countries (for an amount of approximately EUR 390 thousand and 151 initiatives), while the remainder refers to other initiatives (for an amount of approximately EUR 296 thousand and 197 initiatives). These include, for example, projects aimed at improving safety and quality of life in nursing homes in the target areas. This included use of smart devices and sensors, which are able to remotely detect useful information in real time, ensuring quick, more responsive and resident-friendly care. Another initiative involved support to associations dedicated to training and development for people with disabilities.

In 2024, the Cassa Centrale Group strengthened its charity commitment, with significant donations to provide aid in emergency situations, particularly in response to natural disasters. One example was the support offered to populations affected by flooding in June 2024 in Valle d'Aosta and other areas of northern Italy. The Group has provided economic support to local communities, allocating approximately EUR 100,000 to families and small businesses in Italy, contributing to the recovery and reconstruction of the worst-hit areas. This includes restoration of a river park in Emilia-Romagna following serious flooding that affected the area.

### Initiatives supported by Prestipay

In 2024, Prestipay confirmed its social commitment by supporting various non-profit organisations and associations with a total contribution of EUR 75,000. In particular, donations were made to:

- the "Arte e Libro Società Cooperativa Sociale" Association, which has been working for over 40 years to promote inclusion of disabled and disadvantaged people in the world of work, offering customised courses adapted to individual abilities. Training helps each individual to be more independent and to be an active part of the community;
- the "Insieme Si Può" Association, which provides assistance to people with disabilities in the area. Its mission is to overcome social and labour marginalisation, making personal fulfilment and community engagement possible for people with disabilities;
- the "Ernesto Balducci" Centre for Reception and Cultural Promotion, which has been working in the field of reception and cultural promotion for more than 30 years, looking after those who are socially marginalised, such as foreign citizens, refugees, beneficiaries of humanitarian protection and asylum seekers. Its work has a particular focus on families with children;

<sup>19</sup> The indicated data was gathered from the Best Practices questionnaire, run in cooperation with Euricse. Please refer to section "1. General Disclosures", chapter "1.3 Strategy", paragraph "1.3.2 Interests and views of stakeholders".

- “Dinsi Une Man Soc. Coop. Sociale a r.l.”, which aims to fill the gap left by inadequate transport services, avoiding processes of exclusion and marginalisation of persons with disabilities. The organisation provides daily specialised transport to hundreds of users with a range of differing needs.

### Initiatives supported by Allitude

In 2024 Allitude reaffirmed its commitment to social sustainability and support for local communities. Solidarity initiatives **confirmed** the company’s attention to local organisations, with a focus on charity work and direct involvement of employees.

One highlight was the traditional “Christmas Charity Initiative” in December 2024. Through this programme, Allitude donated a total of EUR 150,000 to 107 non-profit organisations and associations, allocating funds that would previously have been used for Christmas presents to employees. The choice of beneficiary associations was entrusted to employees, who had the opportunity to directly indicate the projects and causes they felt closest to, ensuring targeted and heartfelt support.

The projects funded were spread across several areas, demonstrating the broad spectrum of the company’s charity efforts:

- 48 projects for **assistance and voluntary work** initiatives, with a focus on supporting the most vulnerable sections of the population;
- 3 projects dedicated to **recreational activities**, aimed at promoting social interaction and leisure;
- 2 initiatives to support **religious activities**;
- 1 project focused on the **promotion of culture and art**, with the aim of enhancing local cultural heritage;
- 5 projects in the field of **scientific research**, aimed at supporting studies and innovations in areas crucial to society;
- 5 initiatives related to **school and training**, with the aim of ensuring access to education and enhancing learning opportunities;
- 5 projects supporting **sports activities**, with the aim of promoting health and physical well-being;
- 8 **health initiatives**, supporting public health facilities and projects;
- 26 projects dedicated to **charity work with developing countries**, focusing on humanitarian aid and working to improve living conditions;
- 4 projects related to **civil protection**, supporting emergency and disaster-prevention activity.

## Culture, training and research activities

[ESRS S3 S3-4]

[ESRS 2 MDR-A]

The Cassa Centrale Group has always been active in the cultural sphere and through partnerships with education and research institutions. In 2024, 6,405 initiatives were promoted for a total amount of over EUR 10.5 million, 51% of which were attributable to support for events promoting culture and art (over EUR 5.4 million for 2,491 initiatives), 20% to grants for schools and training activities (over EUR 2.1 million for 1,141 initiatives), 19% to scholarships (over EUR 2 million and 2,378 initiatives), 4% to initiatives supporting scientific research (over EUR 430 thousand and 79 initiatives) and the remainder for other initiatives (EUR 540 thousand and 316 initiatives).

Actions benefiting communities include the organisation of training and information meetings and events: 33 Banks and one Company organised meetings on cultural issues, 23 Banks on economic and financial issues, while 21 worked to disseminate and raise awareness of the 2030 Agenda Sustainable Development Goals. 9 Affiliated Banks and the Parent Company ran specific initiatives in 2024 targeted at young people, focusing on the development and support of youth entrepreneurship.<sup>20</sup>

Among the cultural activities supported, Cassa Central Banks and Allitude focused on the theme of gender equality, jointly promoting the press review "Femminile Plurale", conceived in collaboration with the Teatro delle Quisquillie theatre in Trento. This initiative arose from the desire to promote a culture of inclusion within the company and among citizens, organising four evenings dedicated to gender equality issues, illustrating the unique nature of women's different stories. Affiliated Banks also support various women's empowerment activities and projects in their respective areas.

In 2024, the Cassa Centrale Group consolidated its commitment to research and support for Italian universities and research centres. Key initiatives include the partnership with the AIRC Foundation, supporting two different projects. The "My First AIRC Grant" initiative is aimed at young researchers working in Italian facilities of excellence with the aim of supporting scientific research. The second initiative supported the purchase of laboratory equipment for a paediatric cancer research team. Cassa Centrale Banca and Allitude participated in "International Women's Day", supporting the Veronesi Foundation, for a scientific research project into women's cancers. Total contributions amounted to EUR 120 thousand, which fall within the Group's disbursements for culture, training and research activities.

The Cassa Centrale Group takes concrete action to support the right to study through initiatives with universities and financial support for students. Initiatives were run to promote contact between young people and companies, with participation in events such as career days and talent days, creating opportunities for direct engagement with the world of employment.

Another notable example of commitment to the right to education is the five-year agreement with the University of Trento, launched in 2020, which establishes scholarships in memory of Giulia Tita and Luigi Giuriato, two employees of Cassa Centrale Banca who died prematurely. The agreement provides for a total contribution of EUR 150,000 to support deserving or economically disadvantaged university students, with annual calls for applications. For the academic year 2024/2025, two scholarships, worth EUR 7,500 each were awarded to support students on master's degree courses:

- in memory of Giulia Tita, for female students on the Finance Master's at the Department of Economics and Management;
- in memory of Luigi Giuriato, journalist and Cassa Centrale Banca communications officer, for students of the Department of Sociology and Social Research. These students' theses will focus on issues related to internal and external organisational communication in the economic and credit context.

<sup>20</sup> The indicated data was gathered from the Best Practices questionnaire, run in cooperation with Euricse. Please refer to section "1. General Disclosures", chapter "1.3 Strategy", paragraph "1.3.2 Interests and views of stakeholders".

## Promotion of the local area and the economic entities

[ESRS S3 S3-4]

[ESRS 2 MDR-A]

2,785 initiatives were promoted for a total amount of more than EUR 12.3 million, 45% of the amounts disbursed were for initiatives in favour of members (almost EUR 5.5 million for 467 initiatives), approximately 22% to support various bodies for the promotion and development of tourism (for an amount of over EUR 2.6 million and 751 initiatives), 17% to aid for parishes (for more than EUR 2 million and 1,138 initiatives), 9% to initiatives aimed at renovating buildings of public interest (for more than EUR 1.1 million and 126 initiatives) and 8% for maintenance in the local area (EUR 920 thousand and 303 initiatives).

2024 also saw celebration of two important anniversaries: the 50th anniversary of establishment of Cassa Centrale Banca and the fifth of establishment of the Cooperative Banking Group. These were two important milestones, which provided an opportunity, together with citizens and Group colleagues, to confirm the relevance of our original service model founded on a close connection with stakeholders and pursuit of the common good.

From 26 to 29 September 2024, the Group organised days full of fun and engaging free events open to the public, designed to renew the deep-rooted sense of belonging to the community that characterises mutual cooperative credit. The event saw direct involvement of thousands of employees, customers and citizens. The Group organised this initiative to celebrate its successful growth over the years while maintaining a close connection with the areas in which it was founded. Celebrations included:

- **institutional and public events**, including concerts, talks, shows and a charity run, with widespread participation of citizens;
- **targeted communications**, with local advertising campaigns, customised point-of-sale materials and dedicated digital content.

A strong visual identity was established, with the creation of two commemorative logos and a creative concept that transformed the city of Trento into a symbol of cooperation and innovation.

Particularly memorable aspects of the celebrations included the "Together for the Common Good - Happy Family Run" charity event, which was attended by over 1,500 people. On this occasion, the Group made a donation to the AIRC Cancer Research Foundation, focused on women's tumours and supporting the work of young researchers, demonstrating its commitment to the community.

Activities supporting the local area included the commitment of Group Banks to promoting and increasing social interaction: 40 Banks offer own premises on an occasional basis to local organisations and associations and 38 organise recreational events for members and customers. In 6 cases, the Banks provide their own premises for coworking and remote-working activities with a total of 86 available workstations.<sup>21</sup>

## Sport, recreation and aggregation

[ESRS S3 S3-4]

[ESRS 2 MDR-A]

In 2024, the Cassa Centrale Group supported several initiatives dedicated to sport, leisure and social interaction, investing a total of EUR 16.4 million in 8,137 projects. These initiatives aim to strengthen the sense of community, promote healthy lifestyles and encourage citizens' active participation in local activities.

54% of the total amount was allocated to support sports and sports associations, with an investment of EUR 8.9 million to finance 3,827 initiatives. These contributions have supported the development of local sports activities, encouraging amateur and competitive activity.

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<sup>21</sup> The indicated data was gathered from the Best Practices questionnaire, run in cooperation with Euricse. Please refer to section "1. General Disclosures", chapter "1.3 Strategy", paragraph "1.3.2 Interests and views of stakeholders".

20% was allocated to finance the organisation of events, shows and festivals, totalling EUR 3.2 million for 1,689 events. These initiatives generated opportunities for social interaction and cultural exchange, helping to promote the traditions and unique characteristics of local areas.

17% was allocated to supporting recreational and entertainment activities, with an investment of over EUR 2.8 million in 2,124 initiatives, aimed at promoting social cohesion and providing leisure opportunities for local communities. The remainder was allocated to other initiatives, totalling EUR 1.4 million, with 497 initiatives.

Among the different events and initiatives 13 Banks focused on the areas of sports, quality of life and healthy eating. 16 Banks offer discounts to members and customers for sporting activities.<sup>20</sup>

### Third-sector entities

[ESRS S3 S3-4]

[ESRS 2 MDR-A]

The Group has established numerous collaborations with local organisations, reinforcing its commitment to the community and to social welfare. Key partnerships include social cooperatives, Pro Loco and APT local organisations, associations and voluntary groups, municipalities and other local authorities, educational institutions, AVIS blood-donation organisations, parishes and many others from the third sector. These partnerships aim to support cultural, educational, social and health initiatives, fostering sustainable development and social cohesion in the target areas.

A further aspect of social sustainability is represented by establishment of Third-Sector entities within the Banks, with a broad range of missions but united by the goal of increasing social welfare. The social economy encompasses a range of organisations such as associations, cooperatives, mutual funds, foundations and social enterprises, all sharing the priority of pursuing social objectives. These entities work to meet the needs of specific categories of individuals or of the entire community through democratic and participatory governance.

At the end of 2024, the Group Banks had established a total of 42 organisations, the majority of are foundations registered with the Register of Third Sector Entities (RUNTS). Since 2021, 18 new organisations have been set up to promote cultural, recreational and social and health-focused activities. The resources allocated by Affiliated Banks to set up these entities vary, with most investments amounting to EUR 30,000, and in some cases exceeding EUR 500,000<sup>22</sup>. In addition to financial support, the Affiliated Banks also provide non-financial resources, including the provision of land, office technology, use of equipment, qualified personnel and premises for operations.

Looking to the future, several Affiliated Banks are considering increasing their support to local areas in order to offer the community benefits in relation to health services, social services, cultural and recreational activities of social interest, heritage protection and promotion, and education, learning and vocational training.

### Foundations (founded or invested in by the Bank/Company)

In 2024, EUR 6.1 million was disbursed to Foundations where the Bank was also a founding member and/or supporter. They consisted of 40 initiatives, 10 for assets (amounting to EUR 878 thousand) and 30 for operational management (amounting to EUR 5.2 million).

Foundations mainly have the purpose of promoting local areas and cultural activities, but also welfare, solidarity and healthcare.

### Mutual Funds

Mutual Funds are non-profit associations operating on the principle of mutuality. Mutual Funds are set up to provide Cooperative Credit members and customers with economic benefits and health, assistance and welfare services.

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<sup>22</sup> The indicated data was gathered from the Best Practices questionnaire, run in cooperation with Euricse. Please refer to section "1. General Disclosures", chapter "1.3 Strategy", paragraph "1.3.2 Interests and views of stakeholders".

Mutual Funds are available to anyone who becomes a member. Membership is often restricted to customers or members of Affiliated Banks that support or promote the establishment of a Mutual Fund. Mutual Fund members receive a card to access a network of affiliated facilities and a range of health and wellness benefits, including:

- **direct discounts on specialist medical** examinations, diagnostic examinations, therapies and admission to affiliated private facilities;
- **reimbursement** of medical expenses incurred, such as hospital fees or for medical services;
- **additional healthcare benefits;**
- **access to free screening and prevention campaigns** to promote health monitoring and early detection of diseases;
- **integrated health programmes**, which include initiatives for physical, emotional, psychological, nutritional and social well-being;
- **social welfare contributions** such as transport services for medical visits or home care;
- **information and awareness-raising initiatives**, including conferences and meetings on health and wellness issues.

Membership of a Mutual Fund may be through Affiliated Banks or directly with the mutual institution.

### Youth Groups

Over the last 15 years, Cooperative Credit Banks have supported the founding of organisations that reach out to young people (generally under 35 and members), with the aim of transmitting the values and principles of Cooperative Credit to new generations, also contributing to generational turnover and the creation of an informed and conscious social base. There are currently 19 Youth Groups among Affiliated Banks. These fuel participation and dialogue, giving participants a concrete opportunity to contribute to the sustainable growth of their communities and strengthen their sense of belonging to the local area. Through events, training sessions and dedicated projects, Youth Groups foster dialogue around economic, social and environmental issues, offering participants tools to gain knowledge of banking and financial mechanisms, as well as cooperative principles. This initiative also represents a space for innovation and skills development, where young people can network ideas, experiences and suggestions, actively contributing to the development not only of their bank, but of the wider economic and social fabric of their areas. The Youth Groups set up within Affiliated Banks thus serve to promote an inclusive and responsible banking model, capable of meeting the needs of new generations, creating a solid connection between young people and the Cooperative Credit system.

### Initiatives supported by NEAM

In 2024, NEAM confirmed its social commitment by supporting numerous initiatives and charitable organisations, making a total contribution of EUR 65,000. There was a focus on social-inclusion projects, support for scientific research, cultural promotion and assistance to vulnerable groups. Relevant initiatives include:

- **Cooperativa Archè and Gardaseecharter** – Project SAIL ON: both organisations received a contribution of EUR 12,500 each, to support activities aimed at social inclusion of people with disabilities. The funds supported initiatives such as educational projects, adaptive sports and programmes to prevent early school leaving;
- **Coro Piccole Colonne association in Trento** NEAM supported this organisation with a donation of EUR 5,000, enabling participation in the European Children’s Song Festival, a cultural event promoting creativity and artistic expression among young people;

- **Telethon Foundation:** a donation of EUR 10,000 was made to support scientific research into rare genetic diseases, helping to raise funds for innovative projects and the development of advanced therapies;
- **Chernobyl Children's Rights Forum:** NEAM donated EUR 5,000 for renovation of orphaned children's homes and for the purchase of school and health materials, with the aim of improving the living and learning conditions of the young people receiving assistance;
- **Associazione Gast Impresa Sociale - GAST.OUTDOOR Project:** with a donation of EUR 5,000, NEAM supported hiking and mountain-sports activities for people with physical or learning disabilities, promoting accessibility and inclusion through outdoor social experiences;
- **EUBREAST** (European Breast Cancer Research Association of Surgical Trialists): this association, which is committed to research in the fight against breast cancer, received a contribution of EUR 10,000, reinforcing NEAM's focus on women's health and cancer prevention;
- **DEBRA Family:** NEAM has allocated EUR 5,000 towards the organisation EB Camp 2025, an event dedicated to patients suffering from Epidermolysis bullosa, a rare genetic disease. The camp, planned for March 2025, will provide participants with recreation experiences and psychological support.

### List of significant infrastructure investments and services supported that are provided primarily for public benefit

[ESRS S3 S3-4]

[ESRS 2 MDR-A]

The Cassa Centrale Group also contributed to the finalisation of pooled financial transactions that had a significant impact on communities, on local economies and the environment. Transactions finalised in 2024 included three pool-funded projects for a total amount of approximately EUR 44 million.

The first concerned EUR 30 million of pool funding issued with the aim of making transport more efficient in promoting sustainable development of the tourism sector in the Val di Fassa community. The project intends to replace strategic infrastructure connecting the valley with one of the main winter and summer tourism circuits in the area.

The new, technologically advanced infrastructure will significantly increase passenger-transport capacity, reducing waiting times and incentivising use of the funicular as an alternative to road transport. This will help to reduce vehicular traffic, with benefits in terms of lower CO<sub>2</sub> emissions and greater environmental sustainability.

The second project is aimed at revitalising the territory through investments in sustainable infrastructure and digital innovation. The funding is for the construction of new infrastructure that will improve transport capacity and optimise the user experience, significantly reducing waiting and travel times, especially during peak seasons. The project stands out for its strong focus on environmental sustainability, in line with the ESG and NRRP directives, helping to reduce environmental impacts and improve tourist access to the area.

Another initiative involved financing a sustainable logistics project for a consortium of 16 fruit-growing cooperatives. The project is rooted in environmental sustainability and the development of innovative practices (including the storage of apples in underground storage spaces, carved into the rock, reducing environmental impacts and energy consumption). The investment involves construction of a funicular system for the transport of goods, which will connect the processing centres with the underground storage spaces, and which will reduce road transport, lower CO<sub>2</sub> emissions and optimise logistical efficiency, with a positive environmental and economic impact. Furthermore, the consortium uses 100% energy from renewable sources, 11% of which is self-generated by photovoltaic panels, and the rest from hydroelectric power.

## Community financial-education initiatives

[ESRS S3 S3-4]

[ESRS 2 MDR-A]

In the context of its financial education initiatives, the Cassa Centrale Group promotes training sessions for members and customers and others open to citizens and students, spreading awareness and a culture of responsible financial action.

Affiliated Banks organise targeted sessions, adapted to the needs of the areas in which they operate, sometimes involving external trainers, particularly in order to engage younger audiences. These events aim to raise participants' awareness of the principles of sustainable and responsible finance, offering practical tools for a more conscious handling of financial resources, with the aim of fostering informed and sustainable economic decisions.

Cassa Centrale Banca and its Affiliated Banks championed Financial Education Month (Edufin 2024), organising a series of events aimed at schools and local communities. In cooperation with several Affiliated Banks, educational initiatives were organised in high schools, with a specific focus on responsible and sustainable investment. These sessions offered students the opportunity to learn more about issues related to informed management of financial resources, fostering conscious and active involvement. Beyond schools, events were organised for the wider community, with the contribution of the Young Member Groups, which played an active role in promoting financial culture among citizens.

### Financial education initiatives

FINANCIAL EDUCATION	31/12/2024
Number of financial education initiatives/training events organised during the year	331
Number of people involved in such initiatives	23,651

#### Metrics

**Number of financial education initiatives/events:** total number of individual initiatives completed in 2024. The table includes events run with the support of Cassa Centrale Banca and those organised independently by individual Affiliated Banks and Subsidiaries.

**Number of people involved in financial education initiatives:** total number of people who participated in such initiatives in 2024. The figure is based on attendance recorded at the events and, where not available, was estimated on the basis of invitations distributed and sign-ups.

### Bitesize financial education

Through its Affiliated Banks, the Cassa Centrale Group launched the "A buon rendere" initiative, offering targeted financial-education content. Using short videos and detailed analysis, the initiative aims to provide useful tools for a better management of economic resources, raising awareness around financial issues relevant for daily life.

The first instalment, entitled "Saving: learn from your mistakes!", introduces an approach that values errors as part of the learning process in the management of income and expenditure. This project is part of the Cassa Centrale Group's broader commitment to disseminating financial culture.

In this context, the Group has run a series of Direct E-mail Marketing (DEM) campaigns with customers on a monthly basis starting in November and lasting a year. These messages present the different bitesize learning units. Each monthly DEM mail is carefully analysed, with particular attention paid to key metrics such as the open rate and the click-through rate on links to the dedicated landing page. Average time spent on the landing page is also monitored to assess the level of user engagement and interest. Joint analysis of these indicators enables progressive optimisation of the project, refining communication strategies and improving the initiative's effectiveness in disseminating financial culture.

At the end of this first reporting year, the Parent Company's ESG and Institutional Relations Department will launch a Group project on this issue for 2025, involving Affiliated Banks in the development of coordinated and effective actions, aligned with the needs of different areas.

### **Sustainable Finance Forum**

Cassa Centrale Banca also became a member of the Sustainable Finance Forum ("FFS"), a multi-stakeholder non-profit association whose members include operators from the financial sector and other entities affected by the environmental and social effects of financial activities. The FFS mission is to promote awareness and best practices in sustainable investment, with the aim of disseminating the integration of ESG criteria into financial products and processes. This is a significant partnership that enables Cassa Centrale Banca to participate in dedicated forums and webinars and have a direct connection to the changes and implementations relating to this topic over the years, including in terms of trends and policies.

FFS membership confirms the importance the Group attaches to promoting Sustainable and Responsible Finance in an ever more relevant and structured way.

### **Inclusive finance and international cooperation**

Within the framework of international cooperation initiatives and the development of inclusive finance, the training course "Innovation, Leadership and Governance for Cooperatives" was held in Trento, organised by Euricse in collaboration with Finanzas Inclusivas y Gobernanza (FIG) and ICORED, with the support of Cassa Centrale Banca.

The event was attended by representatives of Ecuadorian credit cooperatives, who had the opportunity to learn more about the specifics of the Italian cooperative model, with a focus on governance, innovation and leadership in the cooperative credit sector. The programme included theoretical training sessions with the involvement of academic experts and industry professionals, as well as institutional visits and meetings with Cassa Centrale Banca.

A central component of the course was the comparison between Italian and Ecuadorian cooperative credit models, highlighting best practices and strategies to foster sustainable growth of credit cooperatives in their respective economic and social contexts. The experience strengthened ties between the two entities and promoted international collaboration aimed at spreading cooperative principles and creating new opportunities for local development. This project aims to support cooperative culture at the global level, contributing to the formation of conscious and innovative leadership in socially oriented financial institutions.

### **Arms**

[ESRS S3 S3-4]

[ESRS 2 MDR-P]

The Group has adopted an Arms Policy (hereinafter also the "Policy") with the aim of guiding, regulating and monitoring the types of counterparties, operations and countries with which it is permitted to engage in business relations, thus promoting a responsible approach to the issue of arms. This policy stems from the recognition that investing in the arms sector could indirectly generate significant negative impacts, not only socially, but also environmentally and economically. The Group recognises the potential risk that such investments may generate, albeit indirectly, in relation to conflicts, human rights violations or environmental damage.

Specifically, the Group groups counterparties into the two main categories below, setting specific operating limits for each.

- **Manufacturers of banned and controversial arms** (e.g. weapons of mass destruction, anti-personnel mines, chemical and biological weapons and cluster bombs): no relationship and/or transaction of a commercial nature (direct holding of equity investments, domestic banking transactions, banking transactions in support of the international arms trade) may be entered into in any way with counterparties that are involved in the production, development, marketing and stockpiling of weapons identified as “banned” and/or “controversial”;
- **Manufacturers of arms and weapon systems, small arms, hunting and sporting arms:** direct ownership of shares and stakes is not permitted. Domestic banking operations, on the other hand, are permitted, subject to due diligence — approved by the Board of Directors and repeated at least every five years — aimed at verifying that companies do not produce or market weapons identified as banned and/or controversial. Finally, banking transactions in support of the international arms trade are permitted subject to a request that the counterparties provide documentation enabling the Bank to make the necessary disclosures to the Ministry of Economy and Finance and providing they are made to “countries not subject to assessment”.

The Group’s operations are also governed by a classification of international counterparties with whom it is not possible to enter into business relations. Specifically, this assessment is based on the country of origin, as indicated by the United Nations.

The Arms Policy, and its updates, are approved by the Parent Company’s Board of Directors. The Policy applies to all Group Subsidiaries and Affiliated Banks, which are required to transpose and adopt it.

The Group’s commitment to the Policy is based on compliance with Law No. 185 of 9 July 1990 (as amended) concerning the “New Regulations on the Control of Exports, Imports and Transit of Arms”. Furthermore, in its relations with companies or third-party financiers in the arms industry, civil and military, the Group acts in accordance with its Code of Ethics and its Anti-Money Laundering Regulations. Whilst the Group is aware that it is impossible to completely exclude arms-related operations, especially in view of security and public-order requirements, it is committed to operating with an ethical, responsible and balanced approach.

Cassa Centrale Banca organised working groups involving the functions concerned to update the policy and bring it into line with the provisions of Law 220 of 9 December 2021, which stipulate that — in addition to the ban on direct holdings of equity investments, domestic banking transactions and transactions supporting the international arms trade — no financing transactions may be carried out by companies engaged in the production or sale of anti-personnel mines, cluster munitions and submunitions, of whatever nature or composition, or parts thereof. The Group then updated the Arms Policy, which was approved by the Parent Company’s Board of Directors in February 2025, on the basis of the working groups and regulatory requirements.

The Group’s Arms Policy is available and can be consulted on the corporate website [www.cassacentrale.it](http://www.cassacentrale.it) in the “Sustainability” section, under ESG Policies.

### **ZeroArmi**

The Cassa Centrale Group joined the “ZeroArmi” initiative, which represents the first tool for assessing Italian banking exposure to the arms industry. The initiative is a collaboration between Fondazione Finanza Etica and the Rete Italiana Pace e Disarmo, organisation, with involvement of major Italian Banks. “ZeroArms” assesses Banks’ involvement through a matrix of indicators that consider direct loans, equity investments and logistical support for the export and sale of arms. The initiative emphasised transparency and critical dialogue with banking institutions.

In the publicly available report, the Cassa Centrale Group received one of the highest scores of all participants and demonstrated minimal involvement with regard to exposure in the arms industry. This was made possible by adhering to standards that exceed the minimum requirements of current regulations, as well as by the history of the Group, its strategy and the values and principles on which it is founded.

### 3.2.4 Targets on affected communities

[ESRS S3 S3-5]

[ESRS 2 MDR-T]

The Cassa Centrale Group, as a Cooperative Banking Group, has a defining characteristic that the regulations recognise as essential: the vocation of individual Affiliated Banks to support and enhance the local communities in which they operate. This characteristic allows each Bank to maintain a close link with its local area, promoting initiatives in line with the specific needs of citizens, small businesses, associations and local administrations.

Affiliated Banks engage independently with their communities, adapting their actions to local needs, so as to ensure continuous dialogue and effective support. On this basis, the Parent Company does not define centralised Group objectives, but leaves room for the independence of individual Affiliated Banks so that they can establish their own actions based on local priorities, with specific budgets dedicated both to community support and to the development of local initiatives. Over the years, Affiliated Banks have consolidated a number of activities that are repeated on an annual basis, such as participation in Financial Education Month and support for events for citizens fostering social cohesion and strengthening community relations.

## 3.3 Consumers and End-Users

ESRS S4

### 3.3.1 Strategy: Impacts, risks and opportunities

[ESRS S4 SBM-3]

Through its double materiality analysis, the Cassa Centrale Group has identified and assessed material impacts and opportunities in relation to consumers and end-users. With regard to this information and for further details, please refer to section “1. General Disclosures”, chapter “1.4 Management of Impacts, Risks and Opportunities”, paragraph “1.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model”. The stakeholders subject to impacts and opportunities are all of the members and customers of Affiliated Banks and the customers of Cassa Centrale Banca and the Group’s instrumental companies, who have access to financial and banking products and services requiring specialised advice and access to information. More specifically, these are identified via the MiFID questionnaire, filled out pursuant to current legislation. These issues will be explored further in this chapter.

Customers categories that can benefit most from the positive impacts generated by the Group are:

- those on low incomes and at risk of social and financial exclusion;
- vulnerable individuals (e.g. students, women and the elderly);
- subjects with disabilities;
- micro-entrepreneurs and start-ups;
- social organisations.

#### Risks and opportunities

Due to its cooperative nature, the Cassa Centrale Group does not present significant ESG risks for consumers or end-users.

Local dynamics may influence operations, but do not constitute a direct risk for customers due to the active policies adopted. Client-members of Affiliated Banks’ enjoy preferential conditions and a decisive voice with regard to strategy, thus providing extensive benefits to the community and contributing to the Group’s stability. However, the Group assumes risk by offering loans, particularly with real-estate financing, in situations where customers are unable to meet their payment obligations: a combination of strict legislation and formalised credit-risk management processes ensures that these risks are limited and manageable. For more information on risks related to the Group’s business, please refer to chapter “6. Risk management and internal control system” in the Report on Operations.

On the other hand, the positive impacts generated in relation to consumers and end-users can be translated into opportunities, contributing to consolidation of the Group’s strategic market positioning, thanks to:

- greater credibility in the marketplace, also in relation to security and privacy issues;
- increased revenues driven by greater numbers of customers and new products and services offered;
- strengthening of ownership structure, supported by a stronger brand reputation, better ESG rating results and initiatives aimed at members and customers.

A further tool for engagement is represented by the **Directors’ Committee**, whose task is to share Group management decisions, gather input and proposals and contribute to the implementation of a shared strategy. The Chief Executive Officer chairs the Directors’ Committee, ensuring constant impetus for its work. During 2024, 6 Committee meetings were held, confirming its central role in the Group’s decision-making process.

## Members

Cooperative Credit Banks, Rural Banks and Raiffeisenkassen Affiliated Banks of the Cassa Centrale Group place localism and mutuality at the centre of their operations. Affiliated Banks, as credit cooperatives, do not aim to maximise dividends but to make products and services available to their cooperative members on favourable terms, promoting solidarity and active participation.

This promotes a model of economic democracy rooted in mutuality and deep ties with the local area. The intrinsic social value of this local strategy is embodied in the ongoing support of local communities and commitment to collective well-being, reflecting a determined effort to work towards the common good.

Members are a direct expression of the local area: to be a member, it is essential to reside or continuously carry out one's activities in the area served by the Bank. Each member, in accordance with the principle of one-person-one-vote, has the right to one single vote at the Annual General Meeting, regardless of capital held, which may not in any case exceed EUR 100,000.

The minimum number of cooperative members is set at 500. In addition to benefiting from favourable conditions on banking products and services, cooperative members have access to a set of benefits that has broadened over time other spheres.

The Annual General Meeting represents the key meeting with members. Specific meetings (e.g. pre-meetings, local meetings, and, where present, presentation of the social or alignment report) may be held alongside the Annual General Meeting. These events are held by the Board of Directors of the Affiliated Banks, in particular by the Chairman of the Board of Directors and the Bank Director, and are also attended by the Bank's executive management.

Many Affiliated Banks have developed additional tools for dialogue and interaction with their membership base. One notable example is the commitment of 19 Banks<sup>23</sup> to the younger generation through the establishment of groups aimed at young members. The various sharing mechanisms activated include periodic meetings organised by 12 Banks with small groups of members in preparation for the Annual General Meeting. In other cases, special bodies such as the Members' Council and Local Committees have been set up within the Banks.

As at 31 December 2024, the total number of Affiliated Banks' cooperative members stood at 488,050, with an increase of 13,594 units (+2.87%) compared to 2023. During the year, 25,409 new members were registered, of which 7,186 were under the age of 30.

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<sup>23</sup> The data was gathered from the Best Practices Questionnaire in cooperation with Euricse. Please refer to section "1. General Disclosures", chapter "1.3 Strategy", paragraph "1.3.2 Interests and views of stakeholders".





## Metrics

The data in the tables is based on information drawn from the Parent Company's Commercial Management system and represents the actual number of customers broken down by legal type, gender and age as at 31 December of the reporting year. Methodological limitations may affect the quality and current accuracy of the information provided by the customers themselves.

The categories in the tables follow a clear and agreed classification and customers are grouped by legal type (natural persons, legal persons), by gender and by age category. This enables in-depth analysis of the customer base.

Data is expressed as absolute numbers, representing the actual count of customers in each category. A customer is any individual who holds a current account or savings deposit or an asset-management product.

The Group employs a structured method to monitor and analyse customer needs, starting with the branches and ending with the commercial committees established within the Parent Company. This ensures that the Group's products and services are constantly aligned with the real needs of customers. The customised approach is further enhanced by commercial segmentation and the use of advanced tools such as CRM (Customer Relationship Management) systems for product and service design and development.

The relationship with customers, members and other stakeholders is also developed through innovative digital tools, targeted marketing strategies and social engagement initiatives. In fact, the digital presence is a central pillar in the Group's strategy, complementing the Affiliated Banks' local networked reach. The institutional website [www.cassacentrale.it](http://www.cassacentrale.it) serves as an information hub, presenting the Group's identity and values, directing customers to Affiliated Banks and providing access to product portals. This is complemented by a number of specialised digital platforms, including:

- **Prestipay** for consumer loans ([www.prestipay.it](http://www.prestipay.it));
- **NEF** for management of investments ([www.nef.lu](http://www.nef.lu) and **MyNEF** for monitoring of positions);
- **Assicura** for Insurance products ([www.assicura.si](http://www.assicura.si) and **MyAssicura** for policy management);
- **Claris Leasing and Claris Rent** for leasing and rental solutions ([www.clarisleasing.it](http://www.clarisleasing.it) and [www.clarisrent.it](http://www.clarisrent.it)).

Investment in cutting-edge technology ensures an intuitive and secure digital experience, strengthening the connection with consumers and facilitating access to services.

In addition, an interactive channel for dialogue on the dedicated section of the [www.cassacentrale.it](http://www.cassacentrale.it) website is planned to enable direct communication with stakeholders.

Affiliated Banks, while also utilising centralised communication tools, emphasise their proximity to their areas, using local channels that reflect their personalised approach and focus on direct relations with customers. The management and executive bodies of Affiliated Banks and Subsidiaries are informed regarding key customer concerns and requests to guarantee a swift response.

To ensure high service quality, the effectiveness of actions is monitored by specific indicators, including:

- **waiting times**, measuring the responsiveness of support and assistance provided;
- **customer feedback**, collected through surveys and questionnaires to assess service levels;
- **number of complaints**, with an analysis of the volume of reports received and the time frame for their resolution;
- **use of technological support**, to monitor the use of online banking services and customer satisfaction regarding the quality of digital support;
- **error rate**, to detect the percentage of anomalies in transactions and the speed with which they are corrected.

Stakeholder engagement represents a crucial factor for assessing the actions undertaken and increasing Customer trust in the Group. Of the customer satisfaction indicators, the growth in bank deposits and the increase in loans, despite an economic context characterised by uncertainty, can also be considered a valid measure of customer confidence in the work of the Cassa Centrale Group.

For more information on the involvement of members and customers, please refer to section “3. Social Information”, chapter “3.3 Consumers and End-Users”, paragraph “3.3.3 Access to Products and Services”.

### 3.3.2 Impacts and reporting channels

[ESRS S4 S4-3]

[ESRS S4 S4-4]

The Cassa Centrale Group’s members and customers are protected by the **Code of Ethics** and the **Cooperative Credit Charter of Values**, which enshrine the principles of integrity, transparency and responsibility to which the entire organisation adheres. For further details, please refer to the section on “4. Information on Governance” in chapter “4.1 Business Conduct”, paragraph on policies “4.1.2.2 Corporate culture and business conduct policies”, as well as the full document available on Cassa Centrale Banca’s website at [www.cassacentrale.it](http://www.cassacentrale.it) in the Information on Governance section.

In addition to the Code of Ethics, the Group has developed a set of internal policies for credit management and investment selection, including rigorous procedures for the evaluation of loans and selective investment criteria that prioritise not only economic return, but also social and environmental benefit. Through internal regulations and procedures, the Group ensures that all activities are conducted fairly and transparently, with a strong commitment to ethics, social responsibility and respect for fundamental rights. To strengthen this protection, the Group has implemented a structured complaints management system, providing customers with clear and accessible tools to report any issues.

#### Managing Complaints

The Cassa Centrale Group pays close attention to any reports and complaints it receives, as they represent an opportunity to improve the quality of its products and services. All customers and members have the opportunity to express their opinions and report any critical issues through dedicated and accessible channels. Constant dialogue with Affiliated Banks, their customers and Subsidiaries enables real-time monitoring of their needs and expectations, facilitating an active approach to complaint management.

In order to ensure an effective and structured handling process, the Group has adopted **Group Procedures on the Handling of Complaints** and a related **Operational Procedure**, governing how complaints are received, analysed and responded to. For instances of non-compliance with policies and regulations, a whistleblowing reporting system has also been set up for reports of alleged violations of national and European Union regulations, as well as the principles contained in the Organisational and Management Model adopted pursuant to Legislative Decree No. 231/2001. Implementation and enforcement will be discussed in more detail in section “4. Information on Governance”, chapter “4.1 Business Conduct”, paragraph “4.1.2.2 Corporate culture and business conduct policies”.

Supporting this process, an IT application has been implemented for complaint logging and management, enabling complete traceability and more efficient handling of reports. In addition, a specific procedure is in place for verbal complaints. The model adopted by the Group supports:

- efficient, prompt and uniform management of reports;
- identification of any inefficiencies or anomalies in the activities of the Parent Company, Affiliated Banks and Subsidiaries;
- improvement in the quality of the services offered and relationships with customers;
- prevention of litigation and the mitigation of reputational risks.

The **Complaints Department**, which operates independently of the functions responsible for marketing products and services, is within the General Counsel Department and plays a central role in ensuring effective handling of complaints. Its activity include:

- **supporting Affiliated Banks and Subsidiaries** by providing advice and operational guidance on complaint handling;
- **direct management of complaints within the Parent Company's remit;**
- **actions regarding specific complaints**, according to type and amount, also for Affiliated Banks and Subsidiaries;
- **monitoring and control**, verifying the compliance of complaint management with current regulations;
- **analysing the performance of reports**, with particular attention to the decisions of the Arbitrator for Financial Disputes (ABF), to prevent potential litigation.

The Parent Company's Compliance Department has continuous access to the complaints log and to data on management of reports. In addition to monitoring the complaints received and corresponding responses, the Compliance Department periodically submits a report to corporate bodies on the overall situation of the reports, highlighting any critical issues and proposing corrective actions to mitigate non-compliance risks.

The Group Regulation on Complaints Management stipulates that Affiliated Banks must prepare an annual report on complaints received, while the Parent Company prepares a consolidated Group report. Both reports feed into the Compliance Department's annual report for Affiliated Banks and the Parent Company, respectively. In addition, both Affiliated Banks and the Parent Company transmit their respective reports to corporate bodies through a dedicated information flow.

Finally, the Parent Company's Internal Audit Department periodically verifies proper functioning of the complaints management process, ensuring that the structures in charge of handling complaints operate in compliance with legal and regulatory provisions.

In 2024, there were 1,231 complaints filed by Group customers, with 1,233 processed (via sending of an acknowledgement communication). During the year, 1,206 complaints were resolved/filed, 102 of which received in previous reporting periods. Of all complaints received in 2024, 54.5% regarded banking services (671) while 37.8% regarding credit/loan services (466). The rest referred to investment, insurance and other products.

Complaints are handled according to industry regulations and each Bank must respond to the customer within the prescribed time limits, which are differentiated according to the nature of the complaint. The average resolution time for complaints to Cassa Centrale Banca in 2024 were 29 days for complaints about banking and financial products and services, 8 working days for complaints about payment services, and an average of 13 days for complaints regarding investment services, equating to an overall average of 8 days, which is within regulatory limits.

## Customer complaints

NUMBER OF COMPLAINTS SUBMITTED THROUGH FORMAL COMPLAINTS HANDLING SYSTEMS, CONCERNING ISSUES RELATED TO SOCIAL IMPACTS	UoM	31/12/2024
Received during the reporting period		1,231
Processed during the reporting period		1,233
Filed/resolved during the reporting period		1,206
of which received in previous reporting periods and resolved during the reporting period		102
Number of actions taken or corrective plans by type for cases filed/resolved in the year:		
<i>disciplinary measures pursuant to the national collective bargaining agreement applied or the internal disciplinary system</i>	no.	3
<i>procedures or other organisational measures (e.g. modification of existing procedures and/or processes)</i>		22
<i>other methods (e.g. Repayments to customers)</i>		160
<i>no corrective action or plan as the complaint was rejected or withdrawn</i>		1,021

### Metrics

Complaints are recorded through formal management systems and classified according to the main reasons reported by customers. The analysis considers both complaints received in the reporting period and those received in earlier periods but resolved subsequently. Information includes the number of complaints received, processed and filed/resolved.

Figures are expressed in absolute numbers and represent the actual count of complaints and actions taken, divided by category as at 31 December 2024. Complaints for which an acknowledgement communication was sent are considered as processed.

Again in 2024, no serious human rights problems or incidents related to consumers and/or end users were reported.

### NEAM and the complaints procedure

The information required on impacts and reporting channels can be found in the Complaints Handling Policy document that NEAM has implemented, published and keeps constantly updated. Those who have formally filed a complaint through the procedure described in the Policy have the option of following the out-of-court procedure with the Luxembourg Supervisory Authority. NEAM keeps an up-to-date complaints register with details on the complainants, their complaints, their resolution and measures adopted. This register is kept in protected, electronic format. On an annual basis and no later than 31 May, the Management Company must provide the CSSF directly with a report on the number of complaints handled by the Management Company, as well as an account of complaints, measures taken to handle them and the list of third parties authorised to handle complaints.

### Complaint management at Prestipay

Prestipay adopts a transparency and customer-centric approach, implementing dedicated tools and channels to ensure continuous dialogue with consumers and end-users.

The company constantly monitors the target market, verifying the adequacy of its products and services in relation to customer needs. In addition, it has developed a complaints management system that allows customers to report any issues quickly and efficiently.

To improve the customer experience, Prestipay gather verified online reviews and promotes periodic surveys to assess the fairness of the sales process, including insurance distribution, and levels of customer satisfaction.

Consumers can interact with Prestipay through various channels, including:

- a dedicated telephone number for direct contact with inhouse Customer Services;
- a Customer Reserved Area, featuring a chat service for immediate and personalised communication;
- an insurance survey, to collect feedback useful for continuous improvement of services.

All information on communication channels is available on the Company's websites and included in the contractual and pre-contractual documentation provided to customers, ensuring clear and immediate access to contact and support channels.

### Allitude Quality Management System

Allitude adopts a Quality Management System (QMS) in accordance with UNI EN ISO 9001:2015. The Quality Policy, defined by Allitude's Management, guides the company's commitment to the continuous improvement of company performance, particularly with regard to services offered and its operating context. This policy is based on the fulfilment of regulatory requirements and the satisfaction of customer needs, as outlined in the strategic policy documents.

Cassa Centrale Banca also obtained **UNI EN ISO 9001:2015** certification for its Quality Management System, attesting to its compliance with the highest international standards. The certification covers the design, provision and support associated with treasury services for Public Entities (IAF32) and the design and provision of training services for banks (IAF37), confirming the Bank's commitment to offering its customers efficient and high-quality solutions.

### 3.3.3 Access to products and services

[ESRS S4 S4-4]

[ESRS 2 MDR-A]

The Cassa Centrale Group is committed to ensuring widespread and inclusive access to banking services, combining digital innovation with a physical presence across the areas in which it operates. This makes it possible to meet the needs of a highly varied clientèle, offering flexible solutions to facilitate banking operations, both in urban areas and in areas less comprehensively served by other financial institutions.

The widespread presence of Affiliated Banks guarantees direct and continuous access to financial services, offering a point of reference for citizens, businesses and Public Authorities. Branch staff ensure qualified support, facilitating immediate interaction and access to personalised assistance. Contrary to the prevailing trend in the banking sector, which has seen a reduction in physical access points, the Group has chosen to maintain a solid network of branches, strengthening proximity to customers and ensuring the availability of essential services to those who prefer direct contact for their banking needs.

This proximity has even greater value for people who, for various reasons, do not use digital tools such as Internet banking and prefer to interact directly with bank personnel. For more information on the bank's local presence, please refer to the section "3. Social Information", chapter "3.2 Affected Communities", paragraph "3.2.2.2 Processes for engaging with affected communities".

### **The Inbank platform**

Inbank lies at the heart of the Cassa Centrale Group's commercial evolution, with the possibility to develop customer interaction models based on digital and remote-access logics. This approach overcomes the limitations of an exclusively branch-centred relationship, offering a more flexible and accessible experience.

Following the innovation pathway already established, a dedicated evolution programme, integrated in the Group Strategic Plan, has been defined to ensure constant improvement of digital services and user experience. In addition to the introduction of new features, activity continued to update and support Affiliated Banks in the Digital Banking and Inbank areas. To this end, promotional material and video tutorials were distributed to illustrate key innovations in a simple and immediate manner, helping customers to become more independent in their use of the platform. New videos were introduced in addition to those already produced and shared by all Affiliated Banks on their websites, with the aim of promoting financial education and training.

Accessibility assessments were carried out for both touchpoints (app and web), with the aim of understanding the level of compliance, identifying non-conformities requiring intervention and drafting the document for the Accessibility Statement on official Inbank channels, following the standard and AGID guidelines. They were also carried out to enable optimisation in assessment of the actual effectiveness of remediation actions.

The 2024 Accessibility Assessment for the Inbank App provided relevant data regarding compliance with accessibility standards set out by the Accessibility Act. For iOS, out of 74 criteria considered, 45 were found to be compliant, with an increase of 33.3% in criteria compliant with the EN301549 standard compared to 2023, while non-compliant criteria decreased by 40.8%. For Android, of the 74 criteria considered, 46 were compliant, an increase of 36% of criteria compliant with the standard, while non-compliant criteria decreased by 39%. Standard EN301549, which supports the European Accessibility Act, defines accessibility requirements for ICT products and services, based on international guidelines such as the WCAG (Web Content Accessibility Guidelines). Furthermore, the working group has carried out various activities aimed at ensuring the accessibility of Inbank's digital channels in an increasingly effective and clearly defined way, including:

- technical assessment of digital channels through expert analysis, with updates of accessibility statements;
- migration of almost all Affiliated Banks' institutional sites to MyCMS, allowing centralised control over accessibility standards;
- improvement of accessibility of the Inbank App with new features and the release of an update in November 2024 for automatic font resizing;
- start of activities to improve accessibility of Inbank Web, with analysis of existing barriers and remediation plans;
- official communication of accessibility guidelines to all Affiliated Banks, providing a clear reference for the development of new digital projects;
- participation in multidisciplinary teams (working groups, Italian Banking Association groups) to coordinate activities and share best practices.

## Physical security

Recognising the need to monitor the physical security of people and corporate assets at a centralised level, the Cassa Centrale Group has equipped itself with a Corporate Security Office dedicated to this purpose. This structure has been assigned the task of establishing processes and services aimed at raising the level of protection against physical threats to people, customers and corporate assets.

During the reporting year, this office began the creation of an industry-specific document framework integrating the Group Security Policy and defining security and access-management measures for all Group offices, facilities and buildings in general.

The Policy and its updates are approved by the Parent Company's Board of Directors, on the proposal of the Information Technology and Security Department, and apply to the Parent Company, Affiliated Banks, other Companies of the Banking Group and other Companies of the Corporate Group that provide or use the Group's ICT systems or services.

The Group has also adopted a Group Procedure on Physical Security Measures, which defines physical security standards for the protection of corporate assets, integrated with logical security measures. Key actions include:

- creation of a Group Security Control Room to centrally manage physical security events and to centralise the management of alarms and video-surveillance;
- development of a methodology and creation of a technological tool for security risk assessment and management;
- outlining and initiation of internal security intelligence activities aimed at analysing specific threats.

Finally, it adopted the Group's Physical Access Management Procedure, which regulates modes of access to company premises, ensuring the protection of people, data and tangible assets.

## 3.3.4 Confidentiality

[ESRS S4 S4-4]

[ESRS 2 MDR-A]

### Cybersecurity and business resilience

The Cassa Centrale Group adopts an integrated approach to cybersecurity to ensure the confidentiality, integrity and availability of information, protecting sensitive data and banking systems from cyber threats. Using advanced technologies, structured processes and a team of specialists, both preventive and response-based security measures are implemented, reducing the risk of attacks and ensuring the reliability of financial services.

Alongside this, the Business Resilience Function has developed a Business Resilience Plan, aimed at monitoring and managing potential adverse scenarios that could compromise the provision of services to customers. The plan defines specific response strategies to ensure business continuity, reduce possible disruption and mitigate impacts on consumers. These strategies undergo periodic testing, ensuring constant updates and high responsiveness to potential critical events, with a focus on prevention and prompt intervention.

In addition, in the event of operational, security or ICT incidents related to services provided by the Parent Company, Banks or Affiliated Companies, including those related to instruments such as POS terminals and ATMs, also used by non-customers, the Group adopts a structured procedure to ensure swift and effective management of critical events. The Group's Procedure for the management of such incidents aims to minimise operational impacts, ensure the swift restoration of services and analyse causes in order to prevent recurrence of similar events.

## The Allitude Business Continuity Plan

In accordance with current Group and external regulations, Allitude has implemented a Business Continuity Plan to ensure business resilience in the event of operational disruption. The plan is structured for a quick response to emergency situations, enabling the recovery and restoration of business operations at predefined levels. It covers all resources, services and activities necessary to ensure the continuity of critical organisational functions.

The Business Continuity Plan, together with its Annexes (including the Disaster Recovery Plan), is reviewed and updated annually, ensuring its effectiveness and adaptation to changing business and regulatory requirements. The update in 2024 represented an opportunity to optimise and integrate various aspects, taking into account evolution of the internal and external context, as well as the outcomes of the Business Continuity analyses (Business Impact Analysis - BIA and Risk Impact Analysis - RIA).

Updates to Business Continuity documentation in 2024 are derived from the following inputs:

- update of the Business Continuity Analyses, i.e. the BIA and RIA, conducted in first half of the year. The BIA analysed 104 business processes, identifying 34 critical processes, while the subsequent RIA, carried out with the support of the Risk and Control Office, did not identify any high or critical risks. However, some medium-level risks were identified, mainly related to the unavailability of critical suppliers and the need to strengthen the third-party management process (clauses, risk assessment, etc.). In addition, complete unavailability of personnel was confirmed as a residual risk not managed in the Business Continuity Plan;
- alignment with Parent Company documents currently in force, including the provisions contained in the Group Regulations and the templates of the Business Continuity Plan and Annexes;
- measures based on ECB findings that emerged from the Cyber Resilience Stress Test 2024 (CRST) and the Targeted Review on Cyber Resilience (TRCR), with particular reference to the introduction of cyber attacks among unavailability scenarios in the Business Continuity Plan and Disaster Recovery Plan, as well as strengthening of backup recovery procedures;
- updates to changes in context: both internal (e.g. reorganisation of Allitude's offices, decommissioning of the Cuneo Data Centre) and external (evolution of cyber threats, regulatory updates, etc.).

Key areas of intervention are indicated below.

- Roles and responsibilities: the Emergency and Crisis Committee was restructured to optimise responsibilities in the different cases of application, while the Local Emergency Unit was integrated into the Committee, simplifying management.
- Business Continuity Solutions: the measures in the Plan and Annexes were updated to incorporate the results of BIA/RIA processes, the requests of Process Owners and the results of continuity tests. They were also adapted to recent technological and organisational changes, such as migration to VOIP technology and decommissioning of the Cuneo Data Centre.
- Process optimisation: escalation procedures, stakeholder engagement and operational-impact management were reviewed and simplified, both at Group and non-Group level. The procedures for resuming normal operations and communication were also updated to ensure greater consistency with the new decision-making flows.
- Introduction of cyber attacks as an unavailability scenario: in response to the ECB's findings and current regulations, the Business Continuity Plan and its Annexes now include the scenario of unavailability caused by a cyber attack, reflecting the increase in cyber threats.

- Updating of Annexes: the contents of the Annexes, including contact and distribution lists, the list of critical processes and management of residual risks, were adjusted to reflect changes to the Plan and the results of the preparatory analyses conducted in 2024.

## Privacy and Data Protection

[ESRS S4 S4-1]

[ESRS 2 MDR-P]

[ESRS MDR-A]

[ESRS 2 MDR-M]

The Group adopts a structured data-privacy and security-management system, ensuring compliance with Regulation (EU) 2016/679 (GDPR) and guaranteeing compliant and secure processing of information. Given the highly sensitive nature of data processed in the banking sector, advanced protection measures are implemented to prevent unauthorised access, guarantee the confidentiality of information and ensure customer confidence.

Affiliated Banks and Group Companies process personal data that involve large-scale monitoring and management of highly confidential information. To prevent risks and ensure compliance with regulations, the Group has adopted a **Personal data processing regulation**, which provides instructions for all parties involved in data processing. Compliance with the GDPR is regularly monitored, ensuring that security measures are updated and constantly improved.

To further strengthen security and compliance, the Group has implemented:

- **procedures for selecting and appointing data processors**, ensuring an efficient and transparent process;
- **processes enabling data subjects to exercise their rights**, ensuring simple and uniform access to personal data;
- **management methodologies for Privacy by Design and Privacy by Default**, limiting data accessibility only for strictly necessary purposes;
- **management procedures for data breaches**, with a clear definition of cases requiring reporting to the Data Protection Officer (DPO) and the Data Protection Authority.

The Data Protection Officer (DPO), appointed by the Parent Company, ensures compliance and coordinates compliance activities, supported by a dedicated interdisciplinary team. Each Affiliated Bank has identified the Parent Company's DPO as the appointed data protection contact person and has designated an internal Privacy Contact Person, who liaises with the central structure.

The contact details of the DPO are published on the websites of Affiliated Banks and included in the official documentation, in accordance with the provisions in force.

In 2024, 110 events leading to breaches of customer privacy were recorded. Of these, 107 were events detected by the Organisation, while 3 were identified following reports made by third parties and subsequently confirmed by the Organisation. There were no consequences for the data subjects as a result of these events, and it was not necessary to notify the Data Protection Authority or the data subjects themselves.

## Customer privacy

NUMBER OF SUBSTANTIATED INCIDENTS/COMPLAINTS RECEIVED CONCERNING BREACHES OF CUSTOMER PRIVACY	UoM	31/12/2024
Events identified by the organisation		107
Complaints received from external parties and confirmed by the organisation	no.	3
<b>Total</b>		<b>110</b>

### Privacy at Allitude

Allitude has adopted and implemented a management system for the processing of personal data aimed at controlling risks and, on a case-by-case basis, adopting the security and technical-organisational measures appropriate for the protection of personal data and, consequently, the rights of Data Subjects.

The controls adopted are designed to safeguard, also indirectly, the protection of Allitude personnel and eliminate practices that are generally detrimental to the rights of Data Subjects.

Allitude carries out assessments on a case-by-case basis to evaluate the adequacy of its systems. The Company is subject to audits regarding its processing of personal data and strives, through voluntary certifications, to certify the compliance even of a portion of relevant processes in the handling of personal data (e.g. ISAE 3402 certification).

### Metrics

The detection of privacy violations is carried out via internal monitoring and reporting systems, which include events identified directly by the organisation and complaints received from external parties and subsequently confirmed. Possible methodological limitations may result from the complexity of investigations and the variability of reports.

Data are expressed in absolute numbers, showing the actual count of identified and confirmed violations, divided by identification method, as at 31.12.2024.

### Commitment to fight digital fraud

[ESRS S4 S4-4]

The Cassa Centrale Group adopts a structured approach to the digital security of its customers, combating computer fraud and promoting an informed use of digital tools. To strengthen protection against cyber attacks, the Group has introduced several initiatives in cooperation with specialised bodies and institutions.

One key initiative is its agreement with the **National Cybercrime Centre of the Italian Postal Police Force**, aimed at preventing and countering digital threats, protecting customers and users of online banking services. In addition, the Group is part of the **"I Navigati"** campaign, run by CERTFin in cooperation with the Bank of Italy, ABI, IVASS and the State Police, to raise user awareness of the risks associated with digital fraud and cyber attacks.

## Cassa Centrale Group Cybersecurity Awareness Campaign: “I Navigati” campaign

The Cassa Centrale Group has launched campaigns to raise customer awareness regarding the secure use of digital tools and to increase their knowledge, particularly targeting those over 45, helping them to protect themselves in the face of growing threats. Again in 2024, it confirmed its participation in the communication campaign on cybersecurity run by CERTFin (CERT Finanziario Italiano) in collaboration with the Bank of Italy, ABI, IVASS, and the State Police, and sponsored by the Italian Data Protection Authority and the National Cybersecurity Agency, with the support of Meta.

The third edition of the campaign, entitled “I Navigati”, focused on the target group of retail customers, with a particular focus on issues related to computer fraud. The aim was to educate citizens to recognise online fraud and adopt correct conduct for safe and secure use of the Internet. The campaign ran from October to December 2024, across various platforms, including the dedicated website <https://inavigati.certfin.it>, which pooled information materials on the main cyber threats.

The Cassa Centrale Group’s participation in the campaign was the result of a joint collaboration between the Marketing, Security and Resilience, and Human Resources departments. The campaign was centred around the slogan “I Navigati – Informatica e Sicuri” (where *navigati* is a play words referring both to “browsing” and “being well versed”), with the aim of raising awareness of the importance of online security, i.e. being cybersecurity-savvy and aware.

The focus of the third edition was on threats using impersonation, visually highlighting the figure of the fraudster, with the aim of altering perception of reality with regard to online scams. The phrase, “Scams have a thousand faces. Learn to recognise them”, invites users to become part of an expert cybersecurity “super family”, the “Navigati” family, with the mission of promoting informed and safe use of new technologies and digital channels.

In addition to prevention and training, the Group integrates advanced security systems into its digital offering, with the aim of ensuring secure browsing on Inbank and its other online services. Measures include secure authentication tools, monitoring systems to detect suspicious activity, and continuous updates of IT security protocols.

To reduce the risk of fraud, the Group invites its customers to take several essential precautions:

- never share credentials, PINs or confirmation codes, not even with the bank or customer services;
- avoid clicking on suspicious links received via email, SMS, chat or social media that request the input of personal data;
- protect devices by installing up-to-date software and downloading banking applications only from official sources.

### 3.3.5 Access to quality information and responsible business practices

#### Transparency of banking and financial products and services

[ESRS S4 S4-1]

[ESRS 2 MDR-P]

[ESRS 2 MDR-A]

The Group has adopted the Regulations **on Transparency of Banking and Financial Transactions and Services** which formalises and governs the internal procedures aimed at ensuring, in line with the Bank of Italy Transparency Provisions, that at every stage of the offer of the products, constant and specific attention is paid to the transparency of the contractual terms and conditions, to fair conduct, to the characteristics of the services provided, and to the customers themselves.

Specifically, the Regulations guarantee:

- **the use of Group Templates to present the characteristics of products and contractual conditions**, subject to prior assessment, also with involvement of the control functions, regarding the structure of products in reference to their ease of understanding to customers, and their compliance with laws, regulations and provisions of the competent Supervisory Authorities;
- **quantification of the prices applied to customers**, every time current regulations establish that they cannot exceed or are in any event adequate and proportionate to the costs incurred, are stated in writing and formally approved;
- **a prompt response to requests that could come from customers during relations** (such as access to the updated text of the contract if unilateral amendments have been made, reimbursement of amounts unduly debited, disclosure obligations to customers);
- **Transparency and Fairness standards** when action is taken by parties from outside the organisation in one or more marketing phase;
- **adoption of forms of remuneration and appraisal of sales network staff which do not constitute an incentive to market products not suited to the financial needs of customers.**

The Parent Company and the Affiliated Banks adopt specific Group operating procedures that regulate in detail specific areas covered by the Regulations.

The Regulations and updates thereof are approved by the Parent Company's Board of Directors, on the proposal of the Operations and Human Resources Department and with the opinion of the Compliance Department, and apply to the Parent Company, Affiliated Banks and Group Financial Companies. To supplement the above internal regulations, and in particular as part of the Product Oversight Governance for retail banking, the Group has adopted the "**Group Regulations on New Products**" and subsequent operating procedures governing the development and distribution of new banking products and services, in addition to the launch of new operations, innovative projects and entry into new markets.

The Regulations, approved by the Board of Directors, provide for a methodology that classifies products in terms of risk, complexity and cost, and defines the customer target market in order to ensure that the products offered and sold are aligned with their respective clientèle. To this end, a process has been introduced to gain input from customers on their needs, together with procedures, including IT processes, adopted to identify the customer categories at which products are aimed (positive Target Market) or not aimed (negative Target Market). By identifying the Target Market, the Group meets its obligation to consider the interests, goals and characteristics of this target market, in the product design and commercialisation phases, enabling it to develop and offer products with the appropriate level of complexity, risk and cost for the customer. The Regulation is also drawn up in accordance with the Group's Remuneration and Incentive Policies and ensures compliance with policies and forms of remuneration and incentives for staff and sales network representatives that are consistent with the company's objectives, values and long-term strategies, and that are inspired by criteria of diligence, transparency and propriety in relations with customers.

There is also a **product-testing** and sales monitoring **process** aimed at verifying the need to review products or distribution policies. The Regulation and the operating procedures are designed to ensure that the interests, objectives and characteristics of

customers, the typical risks associated with the products that may penalise customers and possible conflicts of interest are taken into account in the development and offer stages and throughout the life cycle of the products themselves.

Adoption of the procedures developed in the aforementioned documents enables the Group to safeguard against legal and reputational risks and guarantee sound and prudent business management.

### Transparency in investment services

[ESRS S4 S4-1]

[ESRS 2 MDR-P]

The Group adopts **Financial Regulations** and further specific internal policies, which, in compliance with the provisions of Directive (EU) 2014/65 (MiFID II) and its implementing regulations, formalise the rules of conduct that the Parent Company and the Affiliated Banks are required to follow when providing investment services to customers.

The Regulations and updates thereof are approved by the Parent Company's Board of Directors, on the proposal of the Finance Department and apply to the Parent Company and Affiliated Banks.

In this context, the internal regulations referred to set out specific obligations regarding pre-contractual disclosure, periodic disclosure and the preparation of marketing documentation in accordance with the obligations imposed by the MiFID II Directive and its implementing legislation.

Specifically, the Group:

- gathers detailed information on customers through the MiFID questionnaire in order to define their risk profile and level of investment knowledge and experience;
- verifies that the product is consistent with the customer profile, assessing whether they are able to understand the risks involved and whether it meets their financial objectives (Adequacy Test) or verifies whether the customer has the necessary knowledge and experience to understand the risks of the financial product (Appropriateness Test);
- sends detailed and transparent documentation to the customer;
- ensures that information is regularly updated, especially in the event of changes in the financial situation, investment objectives or regulations.

With regard to sustainability reporting to customers, the Parent Company and the Affiliated Banks adopt the **Group Policy on sustainability in the financial services sector**, as mentioned above. Among other things, the Policy governs the safeguards implemented at Group level and in accordance with the provisions of Regulation (EU) 2019/2088 (SFDR) in order to ensure that customers using investment services are adequately informed about:

- the integration of sustainability risks in investment decisions or in consulting on investments or insurance;
- the due diligence policies with regard to the negative effects in investment decisions or consulting on sustainability factors;
- the consistency of the Remuneration Policies with the integration of sustainability risks.

The Policy applies to the Parent Company and Affiliated Banks as participants in financial markets and advisers, regulating portfolio operations and investment advice, including insurance policies, UCITS and pension products, for retail and professional customers.

Implementation of the Policy is assigned to the Wealth Management and ESG Committee, which analyses markets and defines investment strategies, and to the Chief Wealth Management and Treasury Officer (CWMT0), who is responsible for decisions on ESG parameters and actions to mitigate negative sustainability impacts.

Specific information about the sustainability of the financial services provided by the Parent Company and the Affiliated Banks is published on their respective institutional websites.

## Engagement Policy

As part of its strategy of responsible finance and transparency in financial services, the Group has adopted an **Engagement Policy**, compliant with the EU Directive 2017/828 (SHRD2) and the Consolidated Law on Finance (TUF), approved in 2021 by the Board of Directors of Cassa Centrale Banca. This policy defines how the Group, as an asset manager, monitors and interacts with investee companies to promote responsible and sustainable governance. It aims to ensure active and transparent engagement of institutional investors and asset managers in listed companies.

Through this policy, the Group:

- **defines criteria for monitoring and selecting investments**, assessing the size and importance of stakes in listed companies. If the stake exceeds 1% of market capitalisation (Significant Issuers), monitoring is systematic and includes analysis of financial and ESG factors. For lower equity investments, the level of monitoring and involvement is decided on a case-by-case basis, depending on the significance of the investment and the interests of investors;
- **monitors investee companies** in terms of financial, strategic, ESG and risk to ensure transparent and sustainable business practices. The analysis also considers financial statements, sustainability reports, governance reports and other key performance indicators;
- **engages with issuers** to improve their sustainability and governance performance and ensure clear information to investors and consumers. This dialogue may take place through face-to-face meetings, participation in Annual General Meetings or formal requests for clarification;
- **exercises voting rights with responsibility** to influence corporate decisions consistent with social and environmental responsibility criteria;
- **cooperates with other shareholders** to promote best practices in governance and risk management, in compliance with financial market regulations;
- **manages conflicts of interest**, ensuring that decisions are always in the best interests of investors;
- **ensures transparency** by publishing annual information on how the Engagement Policy is implemented.

The Policy and its updates are approved by the Parent Company's Board of Directors, with the favourable opinion of the Compliance Department and following an adequacy test by the Finance Department, and apply to the Parent Company and Affiliated Banks.

## Transparency in insurance services

The Parent Company and the Affiliated Banks have adopted a specific **Group Regulation on insurance distribution**, which governs the rules and models for the distribution of insurance contracts at Group level. Among other things, the Regulation formalises the appropriate disclosure mechanisms for customers, both with reference to the insurance distribution activities carried out by the Parent Company and the Affiliated Banks, and in relation to the products offered. Additional disclosure requirements are defined in the Policies and Regulations governing the product governance of insurance products, including insurance-based investment products (IBIPs).

### 3.3.5.1 Credit management

[ESRS S4 S4-1]

[ESRS 2 MDR-P]

The credit strategy represents the framework for the Group's lending activities, aimed at supporting the local economy and the needs of areas in which the Affiliated Banks operate. In particular, credit for families and small and medium-sized enterprises (SMEs) is favoured, strengthening the role of Cooperative Credit Banks as partners for development of the community.

In line with the goals set out in the Strategic Plan, which also reflect the Group's mutualistic aims, the granting of loans is geared towards meeting the financial needs of communities, ensuring that products offered are consistent with the characteristics and

needs of the local market. Furthermore, the strategy aims to safeguard the assets of the Group's companies, ensuring economic sustainability and capital strength in the provision of loans.

Again in 2024, the focus was on credit quality, sector and area-based diversification and risk fragmentation, with specific measures to strengthen credit management:

- definition of exposure thresholds to ensure a balanced portfolio;
- adoption of a prudent approach to the granting of loans;
- closer collaboration between the Credit Departments of Affiliated Banks and the Parent Company's corporate structures, ensuring strategic and operational alignment and clearly defined exposure thresholds.

In line with its commitment to sustainability and human rights, the Group adopts a principle of non-discrimination in the allocation of credit and the provision of services, ensuring equal access to financial products for all customers, regardless of gender, age, ethnicity or other personal conditions. This commitment is enshrined in the **Human Rights Policy**, which applies not only to employees, but also to customers and all stakeholders with whom the Group interacts. For more information, please consult section "4. Information on Governance", chapter "4.1 Business Conduct", paragraph "4.1.2.2 Corporate culture and business conduct policies".

### The Group Credit Policy guidelines

In the context of its lending activities, in order to ensure consistency of aims and actions, the Group establishes the general principles constituting expression of the criteria and methods of credit assessment and operations that the Parent Company, Affiliated Banks and the Group's Supervised Intermediaries adopt when granting and renewing credit facilities.

One distinctive feature of the Group's credit approach is its direct and detailed knowledge of customers, the group, the local area in which it operates and its overall credit exposure. This enables credit quality assessment that draws on information gleaned through proximity, and ensures adequate fragmentation and diversification of the loan portfolio, reducing risk. Together, these characteristics enable evaluation based on:

- the historical performance of the customer's business;
- family and corporate history;
- the type of investment for which loans are requested or exist.

The creditworthiness assessment must incorporate an examination of the risks associated with ESG factors and, in particular, take into account the counterparty's financial situation, the potential impacts on their financial and capital performance that could arise from current climate trends or specific events, due to the degree of exposure to physical and transition risks. The enhanced ESG sustainability assessment focuses on:

- the business model, market environment, regulatory requirements for the specific sector and potential impacts on the customer's financial position as a result of this new regulation;
- the exposure of the specific business sector to climate and environmental risks, assessing in particular the existence of business plans aimed at progressive diversification or the introduction of adequate control measurements to ensure mitigation of such risks (investments to relocate plants, introduce protective elements or reduce gas emissions).

To reinforce this approach, in December 2024 the Parent Company's Board of Directors approved and adopted the "**Group Policy on ESG aspects in relation to granting of loans**", which regulates the integration of environmental, social and governance factors in financing decisions. This Policy establishes clear criteria for lending to businesses, assessing the associated risks and their impact on the financial viability of counterparties, in line with the Group's commitment to sustainability and responsible finance.

Moreover, the Group is committed to rigorous compliance with money laundering and terrorist financing regulations, paying particular attention to transactions with entities based in countries with restricted assets or privileged tax regimes or operating in controversial sectors and the related negative impacts, especially on the Group's image.

The Policy applies directly to the Parent Company and Affiliated Banks, which must transpose and implement it, and indirectly to the Group's Supervised Intermediaries.

The body responsible for implementing the Policy is the Parent Company's Board of Directors, which approves it on the proposal of the Credit Department, with the opinion of the Compliance Department and the assessment of the Risk Management Department.

### 3.3.6 Social-purpose loans

[ESRS S4 S4-4]

[ESRS 2 MDR-A]

[ESRS 2 MDR-M]

The Cassa Centrale Group's responsible lending policy is also put into action through the provision of financial advisory services and **debt-reduction programmes**, which promote the reduction of consumers' risk of over-indebtedness, improving their long-term financial health, as well as by raising awareness, particularly among the younger generations, of financial issues, in order to foster understanding of investment, protection and retirement instruments.

In the responsible credit segment, the Group's commitment to supporting families and SMEs is reflected in its inclusion of predominantly social products among its various credit instruments. Specifically, social financing is developed, assessed and intermediated by Cassa Centrale Banca through a number of channels, including:

- qualitative assessment of the initiative alongside the quantitative analysis;
- adoption of protocols and conventions with General Governments/trade Associations for subsidised loans, also for business internationalisation purposes;
- group-wide cooperation with the Confidi system;
- development of financial relations with second-level social Cooperation Consortia, as well as through the signing of agreements as representative of the Affiliated Banks with organisations representing Cooperation;
- operations involving public grants to households (e.g. home purchase, unsecured loans, etc.).

In 2024, Cassa Centrale Banca created and released its ESG Portal, a dedicated tool to support customers in the process of ecological transition. The portal helps enterprises and families seize the opportunities of the ecological transition, providing concrete tools for a more sustainable economy, and access to the opportunities of the Industry 5.0 Plan. The portal is accessible at [www.portalesg.cassacentrale.it](http://www.portalesg.cassacentrale.it) and has five sections offering:

7. Informative videos on sustainability;
8. overview of loans and incentives for sustainable growth;
9. customised consultancy services;
10. insurance solutions for the protection of property and assets;
11. sustainable finance options for responsible investment.

The Cassa Centrale Group actively supports families, businesses and the third sector by offering financial products with a social and environmental purpose, fostering financial inclusion and sustainable growth in the areas in which it operates.

For families, the Group provides specific solutions for specific needs, including:

- loans with favourable conditions for young people and students, such as merit-based loans with reduced guarantee requirements;
- mortgage loans guaranteed by the CONSAP Fund, to facilitate access to credit;
- subsidised loans for families affected by natural disasters.

For **enterprises, craftspeople** and **sole proprietors**, the range includes:

- loans dedicated to young entrepreneurs and SACE-guaranteed instruments to facilitate access to credit and business growth;
- microcredit and start-up financing solutions designed to support small or new businesses;
- loans for female entrepreneurship;
- special facilities, such as emergency loans (e.g. to companies affected by natural disasters) and other interventions with a social purpose.

The main Group products with a social purpose are set out below.

### Social products and services by segment - Newly originated loans for the year

SOCIAL PRODUCTS AND SERVICES BY SEGMENT - NEW LOANS IN THE YEAR	31/12/2024				
	UoM	Number of transactions no.	Amount disbursed for social products and services Euro	Total amount disbursed in the segment Euro	% of segment total %
Households		4,197	416,087,342	3,213,706,583	12.9%
Businesses, craftspeople and sole proprietors		4,646	694,493,414	4,714,221,160	14.7%
Organisations, associations and committees		399	36,261,363	37,080,363	97.8%
<b>Total</b>		<b>9,242</b>	<b>1,146,842,119</b>	<b>7,965,008,106</b>	<b>14.4%</b>

#### Metrics

Measurement of products and services with a social purpose is based on the analysis of disbursements during the reporting period, distinguishing between different categories of beneficiaries. Monitoring looks at the number of disbursements during the year, the amount disbursed for products and services with a social purpose, the total amount disbursed in the segment and the ratio of the amount disbursed to the segment total.

Only operational mortgages as at 31 December 2024 and not other loans were included. Specifically, refinancing, loans to counterparties other than families, companies and organisations/associations were excluded. For loans with both green and social purposes, priority was given to green aspects.

The number of operations is expressed as an absolute value. In the case of pooled loans, the individual shares were counted. The amounts shown are those granted and becoming operational during the year, expressed in Euro.

Newly originated loans for the year are included in the balances as at 31 December 2024, as shown in the section "Operating performance of the Cassa Centrale Group" in the Report on Operations, namely in the table "Customer loans".

## Mutuo Prima Casa Giovani

Among the loans aimed at young people, the core product is the “Mutuo Prima Casa Giovani” (First-Time Young Buyer Mortgage) product, which provides access to the “Guarantee Fund for the purchase of first homes” for amounts of up to 80% of the capital of the amount required.

## Agreements and conventions for subsidised loans

In 2024, Cassa Centrale Banca strengthened its commitment to supporting businesses and families, signing a series of agreements and conventions to facilitate access to credit on favourable terms and promote economic growth and sustainability in the areas in which it operates.

### 1. Supporting businesses and local economies

The Group signed a memorandum of understanding with AVEPA (Veneto Agency for Payments in Agriculture) and the main Affiliated Banks operating in Veneto. The agreement enables advance payment of contributions to farms with the right to payment entitlements, through subsidised loans.

A further agreement was signed with the Puglia Region for MiniPia (*Pacchetti Integrati di Agevolazione* - Integrated Subsidy Packages), with the aim of facilitating access to credit for small enterprises, to support the positioning of small Italian and international enterprises and to develop regional employment, including female employment.

The Group has joined Fondo Veneto Competitività – “Transition Section” that supports innovative programmes aimed at introducing technological product and process innovations, to modernise machinery and systems and to accompany company reorganisation and restructuring processes, including from the perspective of the promotion of digitisation and reconversion of production activities towards a model of circular economy and sustainable development.

In order to strengthen its ties with local authorities, the Group signed a memorandum of understanding with ANFIR (National Association of Regional Financial Institutions), with the aim of reinforcing existing collaborations at the local level. The initiative is part of the recent reform of public incentives for companies with the aim of standardising current support instruments. The identification of specific products that meet the needs of the entrepreneurial sphere and work in synergy with instruments managed by the individual Financial Institutions using public funds and Own Funds, may foster cooperation between ANFIR and the Cassa Centrale Group, enhancing and integrating their respective operational capabilities to promote business development.

In the context of emergency management, an agreement was signed with Finanziaria Ligure per lo Sviluppo Economico (F.I.L.S.E.) to support companies affected by the extreme weather events of November 2023.

In order to promote cooperation and facilitate access to loans for local businesses, a Memorandum of Understanding was signed with the Compagnia delle Opere (CDO) Association, aimed at fostering cooperation between local CDO Offices and Affiliated Banks, enabling them to enter into agreements on a regional basis and offer members financial products at favourable terms.

### 2. Microcredit and subsidised loans

The Group strengthened its commitment to microcredit through an Addendum to the Agreement with the Italian National Microcredit Body (ENM). This initiative makes it easier for Affiliated Banks to identify specialised partners for the provision of microcredit ancillary services, ensuring greater support for micro-enterprises and the self-employed in need of dedicated financial solutions.

In 2024, the Cassa Centrale Group continued its commitment to supporting local small and medium-sized enterprises by facilitating access to credit through loans backed by the Public Guarantees. Through the Central Guarantee Fund for SMEs, the Group has made dedicated Financial instruments available, which allow companies to obtain more favourable financing conditions, while reducing the risk for Affiliated Banks. In 2024, the Group continued to broker significant volumes with the Central Guarantee Fund, also availing itself of the guarantee provided by the affiliated Confidi and counter-guaranteed by Mediocredito Centrale.

At the same time, the Group renewed its cooperation with **Cooperfidi** for the Rural Banks of Trentino, aimed at supporting enterprises in the livestock sector and related sectors. This agreement provides for subsidised loans to improve production processes, reduce environmental impacts and encourage generational turnover. The loans are disbursed using subsidised funding, with 36% provided by Cooperfidi and 64% by own funds. The rate applied, fixed or variable, is particularly advantageous, thanks to the weighted average of the bank funding rate and the 0.10% remuneration on Cooperfidi funding. Loans are guaranteed up to 80% of the amount disbursed, with a maximum threshold of up to EUR 1 million (with certain exceptions), to be repaid in six-monthly instalments with a term of up to 20 years. The fund's mechanism allows resources returned by beneficiaries to be progressively reinvested, extending support to others in the sector.

The Group strengthened its range of financial services through a cooperation agreement with **Mediocredito Centrale** in the area of specialised factoring services. This is a significant step to strengthen industrial and strategic relations between the two Italian financial institutions, consolidating their partnership and positioning as key players in the loans market. Specifically, Mediocredito Centrale, through its specialised MCC Factor structure, will offer various services to business clients of the 65 Cooperative Credit Banks, Rural Savings Banks, and Raiffeisenkassen affiliated with the Cassa Centrale Group, including factoring with and without recourse, payment deferral and reverse factoring. The agreement is part of broader cooperation between the two entities, aimed at creating synergies and innovative solutions for client companies, thus promoting the economic growth and sustainable development of the entire national system and its small and medium-sized enterprises. Companies clients of the Cassa Centrale Group will benefit from favourable conditions and specialised support that can guarantee greater flexibility and new financial solutions to help support their growth and competitiveness.

Confirming its commitment to fostering entrepreneurial growth and cooperation, the Group has introduced the "**Promofondo**" financial instrument, relaunching the Revolving Fund dedicated to financing. The maximum amount that can be requested for each individual loan is EUR 1 million with a maximum duration of 15 years.

### 3. Loans for sustainability and innovation

The Cassa Centrale Group offers a range of financial solutions aimed at supporting the energy transition and reducing emissions, promoting environmental sustainability through dedicated instruments for individuals and businesses. These include the "Mutuo Privati Green" personal mortgage loan, the EUR 1.3 Billion Fund to Support Green Mortgage Loans for the period 2024-2027, the EUR 100 Million Green Bond issue, and the Green Agreement with SACE to incentivise sustainable investments in companies. For more details on environmental initiatives and sustainability-related financial products, see the environmental section of this report.

To reinforce the agreement signed with SACE for the Green Guarantee, the Cassa Centrale Group also signed the "Future Guarantee" agreement with the aim of encouraging and supporting growth of companies in Italy and in global markets. This agreement allows Affiliated Banks to make SACE's 70% guarantee available to companies to support operations of strategic importance for the country's economy, in terms of internationalisation, economic security and the launch of production and employment processes in Italy. Loans will be granted for investments, whether already made or yet to be made, or for working-capital requirements, within the macro-categories identified by SACE. These include: infrastructure (priority, energy, water, social or digital), development of economically disadvantaged areas, seismic and hydrogeological risk reduction, strategic supply chains, technological and digital innovation, and female entrepreneurship. The new agreement once again confirms the commitment to finance sustainable transition of companies, innovation, the competitiveness of Italy and Italian companies worldwide, and employment levels through new instruments and an increasingly comprehensive offer. For more information on the agreement for Green Guarantee access, please refer to section "2. Environmental Information", chapter "2.2 Climate Change", paragraph "2.2.3.2 Actions and initiatives".

In 2024, 16,863 new loans were disbursed backed by guarantees/counter-guarantees for a total of EUR 2,400,140,160, guaranteed for EUR 1,751,258,967.

## Loans backed by guarantees and counter-guarantees

LOANS BACKED BY GUARANTEES AND COUNTER-GUARANTEES	31/12/2024		
	New loans in the year	New loans in the year	New loans in the year
	Number of transactions	Total monetary value of loans	Monetary value of the guaranteed amount
UoM	no.	Euro	Euro
National Guarantee Fund	12,285	1,802,486,792	1,359,052,673
Confidi	3,396	267,674,943	175,520,894
Ismea	442	101,004,875	62,402,633
Other public entities	674	80,022,220	45,467,337
Sace	66	148,951,330	108,815,431
Fei	-	-	-
<b>Total</b>	<b>16,863</b>	<b>2,400,140,160</b>	<b>1,751,258,967</b>

LOANS BACKED BY GUARANTEES AND COUNTER-GUARANTEES	31/12/2024		
	Active as at 31/12	Active as at 31/12	Active as at 31/12
	Number of transactions	Total monetary value of loans	Monetary value of the guaranteed amount
UoM	no.	Euro	Euro
National Guarantee Fund	98,446	7,765,159,853	6,362,005,108
Confidi	12,580	966,442,099	573,976,297
Ismea	4,411	475,841,040	329,092,280
Other public entities	5,708	470,083,341	343,246,295
Sace	297	393,375,050	327,026,832
Fei	2	152,377	76,189
<b>Total</b>	<b>121,444</b>	<b>10,071,053,760</b>	<b>7,935,423,001</b>

### Metrics

The data includes the total number of transactions, total monetary value (in Euro) of the financing and the guaranteed value. Assisted loans are broken down by type of public guarantee.

The number of transactions is expressed in absolute terms, while the amounts indicated are those granted and becoming operational during the year, expressed in Euro. Figures refer to values as at 31 December 2024. The table showing new disbursements in the year refers only to new disbursements during 2024.

Where a guarantee covers several relationships, it is counted only once, as is the value of the guaranteed amount.

Newly originated loans for the year and Existing loans as at 31 December 2024 are included in the balances as at 31 December 24, as shown in the section "Operating performance of the Cassa Centrale Group" of the Report on Operations, in the table "Customer loans".

## Evolution of financial services

As part of its financial services innovation strategy, the Cassa Centrale Group signed a strategic partnership with **Worldline [Euronext: WLN]**, a leader in digital payments. This partnership covers the entire value chain of digital payment acceptance and international acquiring for the 1,491 branches of the Group's 65 Affiliated Banks, spread across Italy.

The agreement sets out the supply and management of POS terminals, as well as exclusive agreements for international circuits, with a portfolio of approximately 100 thousand terminals, which generated a total transaction volumes of EUR 9.8 billion in 2024. With this initiative, the Cassa Centrale Group aims to strengthen the quality and competitiveness of the services offered to clients, expanding the offer with innovative and market-friendly solutions. The agreement is part of the Group's strategic initiatives, allowing it to generate medium-term benefits and strengthen its position in the digital payments sector. Worldline's national and international expertise will offer concrete benefits in terms of innovation and product-portfolio evolution, improving the customer experience for Affiliated Bank customers and supporting growth and competitiveness.

### Prestipay credit products

Prestipay is committed to providing families who are customers of Affiliated Banks with loan products designed according to the principles of transparency and sustainability, encouraging a responsible and informed approach to credit, thus limiting over-indebtedness.

The Company identifies the target market for the products and provides guidelines for their correct distribution in compliance with POG regulations.

During 2024, the Company finalised the project to internalise the salary or pension-backed loan product and started distributing it through the branches of Affiliated Banks.

Through its pension-backed loan product, the Company intends to offer customers a personal financing solution that promotes financial inclusion:

- offering a credit opportunity to those who may not have other forms of access to finance, such as persons with limited credit or negative payment history;
- reducing the risk of insolvency thanks to the payment method of direct debit from wages or pension payments;
- extending access to loans also to vulnerable groups, such as pensioners, who often have fewer financing options.

### 3.3.7 Responsible finance

[ESRS S4 S4-4]

[ESRS 2 MDR-A]

In the financial landscape, the Parent Company and its subsidiaries play a strategic role in supporting Affiliated Banks and their customers, ensuring both the operational efficiency of banking services and a diversified offer of investment solutions. Through an integrated model, the Group ensures continuity and quality in its financial intermediation services, allowing Affiliated Banks to propose investment instruments to their clients that are aligned with their different asset and financial-planning needs.

The Group's range includes an array of financial services.

As explained in the section on "Transparency of banking and financial products and services" above, the Group has a Group Policy on Sustainability in the Financial Services Sector that integrates ESG principles into its investment and financial advisory activities.

A further key element concerns the classification of financial products, with clear and structured levels of disclosure in both pre-contractual and periodic reporting, providing customers with greater transparency on the sustainability characteristics of the proposed investment solutions.

Within this framework, **NEAM** (Nord Est Asset Management), the management company of the **NEF Fund**<sup>24</sup>, has adopted a "**Sustainability Risk Policy**" dedicated to the management of sustainability risks related to its sub-funds. This policy includes exclusion measures for specific sectors and activities considered controversial (**Exclusion Policy**), in order to prevent negative impacts on investments and improve the sustainability profile of the portfolio.

Specifically, NEAM totally excludes the following from investments in all NEF sub-funds:

- controversial arms, including anti-personnel mines and cluster munitions;
- companies involved in serious violations of the principles of the UN Global Compact or the OECD Guidelines for Multinational Enterprises.

For NEF sub-funds classified as financial products in accordance with **Articles 8 and 9 of the SFDR**, NEAM applies additional restrictions, excluding investments in Tobacco and related activities and Arms Production, which, although not completely prohibited, is strongly discouraged.

Finally, NEAM ensures that sustainability risks are communicated transparently to investors through NEF's prospectus, providing all relevant information on the environmental and social impacts of investments.

With the conviction that an adequate offering of products and services supports the effectiveness of investment proposals, through NEAM the Cassa Centrale Group has set up a number of NEF sub-funds consistent with the values of sustainable and responsible finance, whose investment decisions take the following criteria into account:

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<sup>24</sup> The NEF Fund is an undertaking for collective investment in transferable securities ("UCITS") under the definition of Council Directive 2009/65/EC, as amended ("UCITS Directive").

Sustainability oversight	Description
Positive screening	<p>Investing mainly in assets selected on the basis of sustainability criteria. Sustainability encompasses environmental (E) and social (S) criteria, as well as good corporate management and governance (G), such as:</p> <ul style="list-style-type: none"> <li>■ the ability of the Company to control its direct and indirect environmental impact by limiting its energy consumption, reducing greenhouse gas emissions, combating resource use and protecting biodiversity;</li> <li>■ the social aspect related to the issuer’s human capital and that related to human rights in general;</li> <li>■ the effective corporate governance structure that ensures the achievement of its long-term objectives.</li> </ul>
Negative screening	<p>Refraining from investment in companies whose main activities are in “controversial” sectors, such as tobacco, pornography, gambling or arms, and/or in countries where serious human-rights violations are carried out or tolerated.</p> <p>Since the prospectus went into effect on 2 December 2024, NEAM has expanded negative screening across the range of sub-funds that promote environmental or social characteristics or have a sustainable objective (classified Art. 8 and Art. 9 under the SFDR) by aligning with the exclusion criteria of the EU Climate Transition Benchmark (CTB)*. The CTB exclusions refer to:</p> <ul style="list-style-type: none"> <li>■ companies involved in any controversial arms-related activities;</li> <li>■ companies involved in tobacco cultivation and production;</li> <li>■ companies deemed in violation of the principles of the United Nations Global Compact (UNGC) or the Organisation for Economic Cooperation and Development (OECD) guidelines on managing economic activity.</li> </ul> <p>NEAM applies point (a) of negative CTB screening to all NEF sub-funds and is not limited to the subject of controversial arms, but also applies a total exclusion upon companies with significant revenues generated by services/products oriented towards arms or war.</p> <p>For sectors that promote environmental or social characteristics or have a sustainable objective (classified Art. 8 and Art. 9 under the SFDR), it is also necessary to further promote ethical activity by excluding other controversial sectors, such as those related to gambling, pornography and fossil fuels. These exclusions/limitations may vary from one sub-fund to another depending on the objective, strategy and investment.</p>

\*CTB exclusions are listed in points (a)-(c) of footnote 4 (Article 12(1)(a)-(c) of Commission Delegated Regulation (EU) 2020/1818).

NEAM verifies the extent to which the PAIs of the companies in the portfolio have improved or worsened compared to the previous year on a consistent basis (e.g. assuming that the actual portfolio has not changed compared to the same period in the previous year). This is to highlight how much of the portfolio consists of companies that are reducing their negative impact year after year.

When there is evidence of a material deterioration in any material PAI, NEAM requires the appointed manager to submit a report explaining the dynamics and actions taken or planned and, where applicable, related engagement activity. This has several purposes:

- to investigate whether PAIs are actually taken into account in the investment management process as agreed in the investment guidelines and pre-contractual documents and as part of the manager's oversight;
- to confirm that the minimum percentage of sustainable investments has actually been reached, to be carried out at least quarterly.

Finally, NEAM is committed to ensuring that its delegated managers adopt a serious and well-structured approach to PAIs. It is considered that the most significant current controls applied to PAIs is determination of whether a company has an improving trend, in order to reduce its negative impacts, or has set absolute thresholds without considering trends. NEAM, as the delegating party, leverages its managers to engage with invested companies to plan implementation activities for better disclosure and management of negative impacts.

The sub-funds that meet these criteria within the NEF range are as follows: NEF Ethical Short Term Bond Euro, NEF Ethical Bond Euro, NEF Ethical Corporate Bond Euro, NEF Ethical Balanced Conservative, NEF Ethical Balanced Dynamic, NEF Risparmio Italia PIR and NEF Ethical Global Trends.

Specifically, the NEF Ethical Short Term Bond Euro, NEF Ethical Bond Euro, NEF Ethical Corporate Bond Euro, NEF Ethical Balanced Conservative, NEF Ethical Balanced Dynamic and NEF Risparmio Italia sub-funds promote several ESG characteristics in compliance with article 8 of the Sustainable Finance Disclosure Regulation ("SFDR") and the relative sustainability risks, while the NEF Ethical Global Trends SDG segment aims for sustainable investments in compliance with article 9 of the same Regulation.

### **Asset management**

In 2021, Cassa Centrale Banca and the Affiliated Banks adopted the "Group Policy on Sustainability in the Financial Services Sector" (updated in March 2023), thus allowing for an adaptation to the new regulations on transparency for financial market participants and financial advisers (see Regulation (EU) 2019/2088, the "Sustainable Finance Disclosure Regulation" or "SFDR" – and EU Regulation 2020/852 – the "Taxonomy Regulation", or "TR").

This Policy identifies and formalises the oversight mechanisms and measures aimed at:

- integrating sustainability risks into decision-making processes relating to investments and consulting on investments or insurance;
- considering the main negative effects on sustainability factors of investment decisions and consulting on investments or insurance;
- classifying financial products and defining the disclosure levels established in pre-contractual and periodic reporting phases.

In the context of Asset Management, Cassa Centrale Banca has also integrated an approach for the selection of investments to offer customers portfolio management lines that are respectful of the environment, human rights and gender diversity, as well as corporate governance best practices.

Specifically, the control measurements adopted to integrate and assess risks and the main negative effects on sustainability factors (Positive screening, Alignment with SFDR/TR, Negative screening) are published on [www.cassacentrale.it](http://www.cassacentrale.it).

In addition, activities concerning the consideration of PAIs, as a participant in the financial markets, were structured at the product level for each asset management line classified under Article 8 of the SFDR. PAIs at product level aim to measure the negative impacts on sustainability factors resulting from the underlying investment decisions of the product itself.

For each product on the basis of its characteristics (e.g. type of underlying elements) are determined:

- whether to consider the negative effects on sustainability factors;
- which PAI indicators to use of those provided for in the Tables of Annex I of the SFDR Delegated Regulation.

The choice of which product-level PAIs to consider and which specific indicators to use is based, for example, on:

- the relevance of PAIs to the type of investments made;
- the level of coverage of PAI data;
- the investment strategy defined for the product;
- specific requirements related to responding to sustainability preferences (as defined by Delegated Regulation (EU) 2021/1253) and the product's target market.

Results of periodic monitoring of the indicators' performance are presented to Cassa Centrale's Wealth Management and ESG Committee in order to identify any actions to reduce the negative effects on sustainability factors, where alerts are present. These actions, in line with the investment strategy adopted by the management lines classified Article 8 under the SFDR, may consist of:

- increases, including progressive increases, in investment with less negative impact (including potential impacts) on sustainability factors;
- promotion of engagement and/or investor relations initiatives (e.g. informal dialogue) with issuers or funds aimed at improving practices and performance with regard to sustainability factors;
- reduction or divestment, also progressively, of investments with a high negative impact (also potential) on sustainability factors.

The oversight mechanisms described have enabled Cassa Centrale Banca to classify the management lines as financial products which promote, inter alia, environmental or social characteristics or a combination of them ("light green" financial products). The high level of personalisation characterising the GP Private lines impacts their classification pursuant to the SFDR based on the breakdown of the percentage weights attributed to each segment.

### **Assicura Agenzia products**

Within the Cassa Centrale Group, Assicura Agenzia plays a central role in supporting Affiliated Banks in defining their insurance and pension offerings, with the aim of guaranteeing high quality, customised solutions for members and customers. Through its subsidiary Assicura Broker, the Group also offers insurance brokerage services, further expanding protection and risk management options for corporate clients.

Bancassurance is a key tool for offering financial assistance and advice, helping customers to protect themselves and their families from life's risks and to make informed choices for their future welfare. The sector continues to perform well, thanks to a diversified product offering designed to meet the needs of different life stages and to promote welfare education among customers.

### **An extensive range and a strong training commitment**

Assicura Agenzia operates through a network of branches open to the public and in agreement with Confartigianato and Concooperative of Friuli Venezia Giulia, guaranteeing direct access to insurance services. Assicura Broker, deals with management and insurance brokerage for Affiliated Banks and their corporate clients, offering tailor-made solutions for the business world.

The Group also invests in training of banking personnel, ensuring compliance with IVASS Regulations and promoting adequate knowledge of insurance products offered to customers.

### An established partnership model

The Group's bancassurance business relies on a renewable five-year partnership agreement with R+V and the Assimoco Group, which serve as the reference partner for the distribution of a wide range of life and non-life insurance products. These products are distributed through Affiliated Banks via Assicura Agenzia, consolidating the Group's commitment to offering integrated and comprehensive financial solutions.

### 3.3.8 Targets on members and customers

[ESRS S4 S4-5]

[ESRS 2 MDR-T]

The Cassa Centrale Group's Sustainability Plan defines the strategic objectives in the environmental, social and governance spheres, with a focus on end consumers, i.e. members and customers. Goals are set based on a structured analysis of market and stakeholder needs, by monitoring trends in the banking sector, comparing them with relevant regulations and directly involving customers and partners. This approach allows the Group to identify priority action areas, set measurable targets and ensure continuous monitoring of performance to adapt strategies to the changing environment and the real needs of customers. The Sustainability Plan, which forms an integral part of Group strategy, is discussed in more detail in section "1. General Disclosures", Chapter 1.3 "Strategy", paragraph 1.3.1 "Strategy, Business Model and Value Chain".

The Group's commitment is reflected in the adoption of specific targets to foster a transition to a low-carbon economy through targeted Financial instruments. To this end, it allocated an amount of **EUR 1.3 billion** for the financing of new green production for the next three years (2024-2027) and **EUR 1 billion** for NRRP-related loans by 2025.

In addition, as part of its Sustainable Funding strategy, Cassa Centrale Banca has set the goal of issuing **EUR 150 million in Green, Social and Sustainability Bonds** by 2027 to support the financing of projects supporting the ecological transition.

The Group pursues the strengthening of sustainable financial product offerings. In particular, it aims to:

- reach at least 80% of customers profiled<sup>25</sup> with reference to sustainability preferences, out of total profiled customers, by 2026;
- ensure that the following thresholds are exceeded by 2027:
  - 90% Sustainable Asset Management (pursuant to Arts 8 and 9 of the SFDR) for all financial years included in plan arc;
  - 65% AUM for Sustainable NEF Funds (pursuant to Arts 8 and 9 of the SFDR) out of total AUM NEF Funds;
  - 65% sustainable IBIPs (pursuant to Articles 8 and 9 of the SFDR) out of total AUM bancassurance products.

For **security and consumer protection** issues, the Group takes a **zero-tolerance approach to fraud**, investing in enhanced IT security measures and data protection. The aim is to ensure **maximum privacy and information security**, protecting customers from operational and IT risks.

The Group promotes **access to quality information**, enabling all customers to make informed decisions about financial services. This commitment is reflected in the adoption of tools and processes to improve transparency and financial education, ensuring clear and accessible information for all users.

Finally, the Group's 2024-2027 Sustainability Plan includes a specific target related to the inclusion and participation of young people in cooperative and local dynamics, setting a target of 23,000 new young members (<30 years) by 2027. This is part of a broader strategy aimed at strengthening the involvement of new generations in the cooperative model to ensure generational turnover and continuity in supporting local communities.

<sup>25</sup> In accordance with MiFID II LG 2023 framework:

# 4. Information on Governance

## 4.1 Business Conduct

ESRS G1

### 4.1.1 Governance

#### The role of the administrative, management and supervisory bodies

[ESRS G1 GOV-1]

The Group's Board of Directors, as the body with strategic oversight functions, is responsible for management of business conduct and the identification, assessment and mitigation of risks, including sustainability risks. The Board defines governance strategies and ensures that the activities of the Parent Company, Affiliated Banks and Subsidiaries are aligned with the regulatory framework, promoting a responsible and sustainable business model. For further details on the role of the governing bodies, please also refer to section "1. General Disclosures" in chapter "1.2 Governance", paragraph "1.2.1 Administrative, management and supervisory bodies".

In support of the Board, various company departments play a crucial role in ensuring compliance with regulations, risk management and control of company procedures. Specifically:

- the **Internal Audit Department** ensures the proper functioning of company processes and internal control systems, verifying compliance with regulations and identifying any areas for improvement;
- the **Risk Management Department** is responsible for corporate risk management, defining the Risk Appetite Framework (RAF) and monitoring exposure to financial, operational and market risks, including ESG risks;
- the **Compliance Department** monitors compliance with applicable regulations, ensuring the correct application of legal provisions and internal governance policies;
- the **Anti-Money Laundering Department** manages the risk of money laundering and terrorist financing by defining procedures for customer verification and the prevention of suspicious transactions.

For further details on the role of Departments, please refer to the Report on Operations in sections "6.7 - Internal Audit Function", "6.8 - Risk Control Function", "6.9 - Compliance Function" and "6.10 Anti-Money Laundering Function".

All control functions report regularly to the Board of Directors, providing analyses and up-to-date information on the status of regulatory compliance, risk management and the adequacy of control strategies. The reports and periodic documentation enable the administrative, management and supervisory bodies to monitor the effectiveness of the strategies adopted, intervene promptly in the event of critical issues and take corrective measures to ensure compliance with governance and sustainability standards.

The governance system of the Cassa Centrale Group is structured to ensure transparency, reliability and integrity, strengthening the trust of members, customers and stakeholders.

In selecting the members of the Board of Directors and other Control Bodies, the Cassa Centrale Group has established specific criteria to ensure a balanced and appropriate composition. To this end, it has defined and approved the "Model for Defining the

Optimum Qualitative and Quantitative Composition of the Board of Directors”, i.e. a theoretical optimal profile for candidates, identifying the skills, experience and characteristics deemed most appropriate for these roles. The Model establishes that the following criteria and/or requirements must be met in the composition of the Board:

- **professionalism and expertise** in a number of appropriately identified areas (e.g. banking and financial markets, organisational and corporate governance structures, regulatory environment, ESG etc.);
- **respectability and fairness;**
- **formal independence and independence of judgement;**
- **availability of time and compliance with the limit on the accumulation of positions;**
- **collective suitability of the body** (e.g. gender diversification).

The objective is to ensure that top-management bodies — both following the appointment process and on an ongoing basis — include individuals who can ensure that the role assigned to them is performed effectively. To do this, it is necessary to clearly define the professional characteristics needed to achieve this result beforehand, and possibly review them over time to take into account any critical issues, and for the candidate selection and appointment process to take this information into account. The Cassa Centrale Group’s strategic supervisory, management and control bodies must operate in full awareness of their powers and obligations, in line with Bank of Italy regulations and European guidelines. For more information on the composition and structure of governance, please refer to section “1. General Disclosures”, chapter “1.2 Governance”, paragraph “1.2.1 Administrative, management and supervisory bodies”. The roles played by the respective bodies are also detailed in the Report on Operations, in paragraph “1.3 Corporate Governance”.

## 4.1.2 Management of impacts, risks and opportunities

### 4.1.2.1 Processes to identify and assess material impacts, risks and opportunities

[ESRS G1 IRO-1]

Through its double materiality analysis, the Cassa Centrale Group has identified and assessed material impacts in relation to business conduct. With regard to this information and for further details, please refer to section “1. General Disclosures”, chapter “1.4 Management of Impacts, Risks and Opportunities”, paragraph “1.4.2 Material impacts, risks and opportunities and their interaction with strategy and business model”.

The Group has not identified any specific risks or opportunities related to business conduct. This is mainly due to the extensive and structured regulation of the sector, which contributes to a clear and structured regulatory framework, reducing uncertainty and limiting the actions available to credit institutions.

### 4.1.2.2 Corporate culture and business conduct policies

[ESRS G1 G1-1]

[ESRS 2 MDR-P]

[ESRS 2 MDR-M]

In carrying out its activities, the Cassa Centrale Group has adopted various instruments and policies to ensure transparent business conduct and, specifically, compliance with the ethical principles and cooperation, which are inherent in its corporate purpose. Specifically, the Code of Ethics is an integral part of the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001, drew up Whistleblowing Regulations and adopted an Anti-Corruption Policy. Affiliated Banks and Subsidiaries have implemented and adopted the same documents and internal regulations as the Parent Company. The Board of Directors is responsible for overseeing the implementation of these policies.

The Cassa Centrale Group aims to contribute to the economic, social and cultural development of local communities and, combining management autonomy and central guidance, bases its activities on the values of Cooperative Credit:



**THE PERSON  
IS KEY AND  
CENTRAL**



**COMMITMENT**



**AUTONOMY**



**PROMOTION OF  
PARTICIPATION**



**COOPERATION**



**USEFULNESS,  
SERVICE AND  
BENEFITS**



**PROMOTION  
OF LOCAL  
DEVELOPMENT**



**PERMANENT  
TRAINING**



**SHAREHOLDERS**



**DIRECTORS**



**EMPLOYEES**



**YOUNG ADULTS**

### Code of Ethics

The Group has equipped itself with a Code of Ethics that sets out the principles and rules of conduct it undertakes to follow in carrying out its activities. Specifically, the Code of Ethics provides guidance to employees, executives, other personnel and partners on how to ensure transparency, integrity and social responsibility in company management. It also guides business decisions in an ethical and responsible manner, preventing misconduct such as corruption, conflicts of interest and discrimination, and promoting trusting relationships with customers, members, suppliers and institutions.

The Code of Ethics is approved by the Parent Company's Board of Directors and adopted by all Affiliated Banks and Subsidiaries. The Code of Ethics is binding for all the companies of the Cassa Centrale Group and for all its corporate executives, employees and collaborators, who are required to comply with its general principles. There are also control mechanisms for which each entity must ensure knowledge and application of the Code. Employees receive a copy of it at the time of employment and compliance is monitored by the relevant company departments. Conduct in breach of the Code may lead to disciplinary measures proportionate to the severity of the violation.

The Code of Ethics of the Cassa Centrale Group is based on a number of key principles, listed below.

- **legality:** always respecting the laws and regulations in force;
- **integrity and transparency:** avoiding conflicts of interest, corruption and malpractice;
- **equity and inclusion:** promoting equal opportunities, avoiding discrimination and harassment, protecting workers' rights and valuing staff;
- **sustainability as a strategic value:** operating responsibly in relation to the environment and society, specifically by developing sustainable financial products;
- **social responsibility:** contributing to the economic and cultural development of local communities.

The Code of Ethics is also taken into account during the implementation of specific agreements, in order to assess alignment of values with other partners.

The Code of Ethics is available for consultation on the Parent Company's website [www.cassacentrale.it](http://www.cassacentrale.it) in the Governance section.

### 231 Model

The Code of Ethics is an integral part of the Organisation, Management and Control Model pursuant to Legislative Decree No. 231/2001 (the "231 Model") adopted by Cassa Centrale Banca in 2008 and constantly updated to take into account legislative changes, changes affecting the organisational structure or the operating context, and any other circumstances in which the Company deems it necessary. The Model defines the control mechanisms aimed at preventing the crimes pursuant to Italian Legislative Decree 231/2001, including those that constitute corruption, and contributes to improving corporate governance and mitigating any reputational or image risks. The main objectives of the Model are to disseminate knowledge of the offences set out in the decree, to strengthen awareness of risks and internal rules, and to ensure correct business conduct. With creation of the Cooperative Banking Group, the Parent Company adapted its Model to respond to the new governance structure. Along with the adoption of the Model, Cassa Centrale Banca assigned the functions of the supervisory body pursuant to Decree 231/2001 to the Board of Statutory Auditors.

The Parent Company has also issued and disseminated to the entire Group the document entitled "Guidelines on the administrative liability of entities within the Group". Among other things, this document requires each Group Company to periodically assess its exposure to the risk of offences being committed. Once risk-assessment activity has been completed, where it emerges that there is a not insignificant risk of any of the offences being committed, the Company itself shall adopt an 231 Organisational Model, in line with the Guidelines. Moreover, Group Companies subject to the oversight of a Supervisory Authority, must adopt their own Management and Control Model and periodically assess the risks of breaches, updating their preventive measures. Each Group Company is required to appoint its own Supervisory Body, which is assigned similar functions.

For further information on the aforementioned Model, please refer to the Report on Operations, paragraph "8.6 Organisation, Management and Control Model" for the purpose of preventing offences pursuant to Legislative Decree No. 231/2001.

### Conflicts of interest

One of the aspects governed by the Code of Ethics and the Organisation, Management and Control Model pursuant to Italian Legislative Decree 231/2001 is conflicts of interest. The regulation of conflicts of interest is of primary importance, both in the exercise of banking activities and in the provision of investment services, and with reference to the governance of the Group and the various situations of interest that may concern Corporate Executives in Group Companies. As such, the Group adopts a prudential approach in managing conflicts of interest that may arise from the presence of representatives of the governance bodies of Affiliated Banks in the bodies of the Parent Company. In fact, the Parent Company, in compliance with the provisions of the Supervisory Provisions for Banks (Bank of Italy Circular 285 of 17 December 2013), has adopted its own Group Regulation for the Management of Conflicts of Interest (updated in 2022), through which it defines the principles for the management of any conflicts of interest that may arise among the various components of the Cooperative Banking Group. This Regulation describes the procedures and organisational measures to manage situations of interest relevant to the Group's governance, including

obligations upon corporate executives pursuant to Art. 136 of the Consolidated Law on Banking (TUB), referring, with regard to the performance of risk-associated activities and other transactions with connected parties and the related obligations, to the Group Regulations on Related Party Transactions. The Group's rules and regulations also govern, through specific policies and regulations, the organisational and control measures to prevent and manage conflicts of interest in the provision of investment services to customers, as well as those that may potentially arise between granting of loans and equity investments.

### **Other policies on business conduct**

The set of guidelines defining the Group's operational conduct in accordance with the spirit of honesty, professionalism and transparency are also summarised in the Anti-corruption Policy adopted by the Group. This policy describes the Group's approaches to inspire, regulate and control the conduct of those covered by the policy, in order to mitigate and prevent the risk of violations of bribery and corruption regulations (see section below "4.1.3.1 Anti-Corruption Policy"). Further policies related to respecting the rights of its stakeholders, privacy and fair business practices, as well as transparency and consistency in the company's activities, have been reported in the topic-specific chapters of the social section.

### **Training on business ethics and conduct**

[ESRS G1 G1-1]

In order to raise awareness and increase understanding of ethical issues, including anti-corruption, Cassa Centrale Banca provides specific training, to all those covered by the policies, on the content of the Code of Ethics and the 231 Model (see paragraph "4.1.3.1 Anti-Corruption Policy" below).

### **Mechanisms for reporting misconduct**

[ESRS G1 G1-1]

The Parent Company has made available channels for reporting possible misconduct and non-compliance with Group policies. These reporting channels are detailed within the social section, in the chapters on "Impacts and reporting channels". The possibility of reporting is available to anyone who is aware of alleged violations and is involved in company activities, whether they are: an employee (even when the legal relationship has not yet begun, if information on violations was acquired during the selection process or in other pre-contractual stages or during the probationary period) or a self-employed person, an individual with a professional collaboration relationship as referred to in Article 409 of the Code of Civil Procedure (e.g. agency relationship) and Art. 2 of Legislative Decree 81/15 (collaborations organised by the principal); a volunteer or trainee (paid and unpaid); a member as a natural person; a person with an administrative, control, supervisory or representative function. For reporting purposes, the legal relationships indicated above must be with Cassa Centrale Banca – Credito Cooperativo Italiano S.p.A..

In order to ensure that the person receiving the report is not hierarchically or functionally subordinate to any reported person, the person making the report must indicate the area of competence of the facts he/she intends to submit a report on. Consequently, the reporting party has the option of using either the ordinary channel or an alternative channel, which is only activated in cases where the alleged perpetrators of the violation are members of the Board of Auditors, the various Heads of Internal Reporting Systems or their collaborators.

Responsibility for managing the reporting channel of each Group Bank or Subsidiary lies with the Head of Internal Reporting Systems of the respective Bank or Company. An IT platform can be used, in accordance with the guidelines provided by the Parent Company and the Group's Bank or Subsidiary. A user manual for reporting is also available from the Parent Company at [www.cassacentrale.it](http://www.cassacentrale.it). The document details how reports can be submitted. Specifically, reports of wrongdoing may be made either in written or oral form, describing in detail the alleged unlawful acts or conduct by filling in a form and answering a series of open and closed-ended questions or by voice recording, respectively. The information requested is initially of a preliminary nature and concerns the reporting party, before subsequently investigating the time and place of the offence and who carried it out. The manual and the computer platform guide the reporting party step by step not only through practical steps of how to carry out the report (e.g. by the choice of response via a drop-down menu) but also by clearly and comprehensively expressing

the subject matter and methods associated with the offence. It is also possible to submit an anti-money laundering report via the dedicated platform.

As regards the handling of internal reports, the Manager sends the reporting party an acknowledgement of receipt and may request further information (except in the case of anonymous reports). The reporting party may also view the information entered or listen to the voice recording and check the status of the report and any messages exchanged with the Head of Internal Reporting Systems who, within 90 days from the date of confirmation of receipt, will provide a response on the report.

The reporting channel for non-compliant actions is detailed in the following section on the Group Whistleblowing Regulations.

Generally speaking, the penalties issued are of minor entity and refer mainly to findings in tax matters and residually to administrative and social security matters.

### Cases of non-compliance occurring during the reporting period

SIGNIFICANT INSTANCES OF NON-COMPLIANCE THAT OCCURRED DURING THE REPORTING PERIOD	UoM	31/12/2024
Cases during the reporting period for which fines were imposed (only those with an amount EUR >1,000)	no.	14
Cases occurring during the reporting period for which non-monetary sanctions were imposed		-
<b>Total</b>		<b>14</b>

### Payments of fines for cases of non-compliance

FINES FOR NON-COMPLIANCE WITH LAWS AND REGULATIONS THAT WERE PAID DURING THE REPORTING PERIOD	UoM	31/12/2024	
		Number	Value
		no.	Euro
Fines for non-compliance occurring during the reporting period		14	37,602
Fines for non-compliance in previous reporting periods		42	443,651
<b>Total</b>		<b>56</b>	<b>481,253</b>

#### Metrics

Penalties/fines in excess of EUR 1,000 referring to the year 2024 were taken into account, divided by accrual period.

Amounts related to monetary sanctions are included in Other administrative expenses reported in the Consolidated Explanatory Notes in Section 12 of Part C "Information on the consolidated income statement", in Table "12.3 Other administrative expenses: breakdown", within the item "Other administrative expenses – Other".

### Group Whistleblowing Regulations and protection of whistleblowers

[ESRS G1 G1-1]

[ESRS 2 MDR-P]

As of 2021, all Affiliated Banks and Subsidiaries of the Cassa Centrale Group have adopted a **Group Whistleblowing Regulations**, with the aim of defining a clear procedure for the handling of internal whistleblowing. In 2023, the Regulation

was updated to incorporate the provisions of Legislative Decree No. 24 of 10 March 2023, which broadened both the scope of reportable violations, including a larger number of additional offences, and the category of persons authorised to report by extending protection to new persons involved in the entity's activities.

The adoption of the Whistleblowing Regulations demonstrates Cassa Centrale Banca's and the Group's commitment to a corporate culture based on integrity and transparency, preventing and countering unlawful conduct that could compromise the Group's stability and reputation, and ensuring an effective system for reporting and handling violations, protecting whistleblowers.

The Regulation provides detailed guidelines for reporting acts, facts or behaviour that may constitute a violation, including:

- **breaches of internal and external rules governing banking, financial or insurance distribution activities**, including related and instrumental activities;
- **breaches of the principles and rules of conduct contained in the Code of Ethics;**
- **breaches of the 231/2001 MOG** (Group Operational Machine) of the respective Company;
- **breaches of anti-money laundering rules**, involving personnel or Corporate Executives in the performance of their professional duties.

The Regulations are binding for all employees, personnel and stakeholders of the Group who are involved in company activities and have knowledge of potential violations. The Rules, therefore, outline the tasks and responsibilities not only of the Parent Company, but also of Affiliated Banks and Subsidiary Companies in reporting operations.

In order to ensure maximum security and confidentiality, the Regulation lays down specific safeguards in favour of both the reporting party and the reported person. First and foremost, confidentiality protection: the information transmitted is treated with the utmost confidentiality and protected by a secure management system. Moreover, it includes protection against retaliation and discrimination: the whistleblower may not be subject to penalisation, demotion, dismissal or other forms of retaliation as a result of their report.

The process, supported by a specific IT procedure which archives data in encrypted and protected form, is broken down into the following phases:

- **entry and sending of the report;**
- **receipt, review and assessment;**
- **definition of intervention measures;**
- **archiving;**
- **management of the Register of reports received;**
- **preparation of the Annual Report.**

The Group Whistleblowing Regulations assign the Head of Internal Reporting Systems with the task of providing clear and immediate information on the channel, procedures and prerequisites for making internal and external reports. The Regulation specifies in particular that the information must be displayed and made easily visible through publication in a dedicated section of the Bank's website. It is also stipulated in the Regulation that training initiatives must be organised for corporate executives and staff on the functioning of the Internal Reporting System.

As mentioned in the previous section, the user manual on sending reports and further information on the Whistleblowing Regulations can be found on the Parent Company's website [www.cassacentrale.it](http://www.cassacentrale.it).

## Human Rights Policy

[ESRS G1 G1-1]

[ESRS 2 MDR-P]

In all of its activities, the Cassa Centrale Group pursues the principles of legality, morality, professionalism, dignity and equality, ensuring respect for fundamental human rights throughout the value chain. The Group has adopted the Human Rights Policy with the intention of providing a preventive framework to guide, regulate and monitor the conduct to which all recipients are bound. Particular reference is made to respect for fundamental human rights, as well as the issues of safe employment, adequate working hours, training and skills development necessary to educate and inform its employees on compliance with the principles of the Policy.

The organisation attaches primary importance to the protection of minors and the repression of exploitative behaviour of any kind towards them, defining the exploitation of minors as well as other classes of workers as “unacceptable”. The Cassa Centrale Group also rejects all forms of forced, compulsory or bonded labour.

In labour relations, within and external to the Group, acts of psychological violence, discriminatory or personally harmful attitudes or behaviour are not permitted, regardless of gender, age, sexual orientation, race, nationality, physical or socio-economic condition, religious belief or political opinions. The appointed corporate functions ensure compliance with the principle of non-discrimination, adopting appropriate measures to prevent any form of favouritism, nepotism or patronage in every stage of the employment relationship. In drafting the Policy, the Group was guided by regulations and high levels of national and international standards on ethics, human rights and social responsibility. Key references include: Legislative Decree 231/2001, EU Regulation 2016/679 (GDPR), the European Convention on Human Rights and the UN International Bill of Human Rights. Furthermore, the Group is guided by the principles of the ILO Declaration on Fundamental Labour Rights, the UN Global Compact and the UN Convention on the Rights of the Child.

Supervisory responsibility for the Human Rights Policy lies with the Board of Directors. The Policy applies to a wide range of entities involved in the activities of the Cassa Centrale Group, including the value chain both upstream and downstream. Specifically, the Policy addresses corporate bodies, executives, employees, financial advisers and other personnel and all those who operate under the control of Group Companies or are involved in the provision of investment services and activities. This includes consultants, suppliers, business partners and natural persons involved in outsourcing arrangements for the provision of such services. The Policy also extends to persons representing the Group with entities, bodies and investee companies, as well as all third parties with which the Group has relations, in compliance with current legislation and existing agreements. Suppliers of goods and services used by the Group are also required to comply with the principles established.

For further information and a detailed description of the policies in place, please refer to the document “2024 Human Rights Policy” available on the Cassa Centrale Banca website at the address [www.cassacentrale.it](http://www.cassacentrale.it), in the Governance section.

## 4.1.3 Business ethics and integrity

### 4.1.3.1 Prevention and detection of corruption and bribery

[ESRS G1 G1-3]

[ESRS 2 MDR-M]

#### **Anti-Corruption Policy and mechanisms for investigating business conduct**

[ESRS G1 G1-1]

[ESRS 2 MDR-P]

The Cassa Centrale Banca Group recognises the importance of pursuing the principles of legality, morality, professionalism, integrity and transparency, in line with its business aims. The Group has also recognised corruption as one of the main obstacles to economic, political and social development in the sphere in which it operates. On this basis, with resolution of the Board of Directors No. 635 of 6 February 2019, the Parent Company approved the Anti-Corruption Policy, which is available on Cassa Centrale Banca's website at [www.cassacentrale.it](http://www.cassacentrale.it) in the "Sustainability" section. The Board of Directors is responsible for supervising the implementation of the Anti-Corruption Policy. The aforementioned document is drawn up by the Group with the intention of providing a preventive framework to guide, regulate and monitor the conduct to which all recipients (e.g. corporate executives, personnel, third parties having relations with the companies) are bound, in order to mitigate the risk of breaches of rules on corruption and prevent such actions.

The Policy applies to all members of the Cassa Centrale Group, including employees, executives, other personnel, suppliers and partners, and has also been adopted by its Subsidiaries and Affiliated Banks. It defines principles and guidelines to prevent the risk of corruption in accordance with regulations such as Legislative Decree no. 231/2001, the ISO 37001:2016 standard "Anti-bribery management systems" and the UN Global Compact.

The Group encourages the introduction of and compliance with the principles in the policy by all recipients. Specifically, these include:

- no tolerance of any form of corruption, whether active or passive, direct or indirect;
- prohibition of gifts and complementary items exceeding EUR 250 and the requirement to report any offers received;
- strict compliance with rules in relations with Public Authorities, prohibiting facilitation payments and corrupt practices;
- transparent management of conflicts of interest, with an obligation to report any situations of risk. For instance, in order to avoid acts of corruption through illicit payments, payments are not made directly by senior figures and/or personnel, but through persons acting on their behalf;
- monitoring of relationships with third parties, including suppliers and consultants, through reputation and legitimacy checks;
- prohibition of political and trade-union funding, except for small donations of modest value such as gifts or invitations, as detailed in section 4.1.3.2 "Political influence and lobbying", below;
- traceability of accounting operations, with the obligation of detailed and verifiable documentation;
- oversight of business travel, with prohibition on the payment of expenses, including those related to business trips, to representatives of public authorities, public officials and public-service employees. Business trips of employees and third parties must comply with the provisions of the Business Travel and Courses Regulations;
- Group commitment to ensuring that its accounting records are accurate and reliable and do not contain false or misleading information;
- adoption by the Group of criteria of merit, competence and evaluation of individual abilities and potential in selection, recruitment and training of personnel.

The Group ensures the prevention, identification and management of any allegations or cases of corruption or bribery through the involvement of the relevant functions. Given the non-material nature of the issue, the Group does not have specific proce-

dures in place to prevent corruption and bribery (in addition to the provisions of the Whistleblowing Regulations), however all internal regulations are structured to prevent such risk.

On the basis of analyses carried out in the sphere of the 231 model to identify risks connected with corruption offences (Arts 318, 319, 319a, 319b, 231 of the Civil Code), corruption between private individuals and instigation of corruption (Arts 2635 and 2635a of the Civil Code) the most at-risk functions in the majority of the companies within the reporting scope were deemed to be those involved in the following processes: credit, collections and payments, marketing and business development, human resources, technical and logistical support to procurement, funding and deposit services, institutional communication and promotion, legal and tax consultancy and support, administration and tax, management of corporate bodies.

The Group carries out numerous activities to support employee training and information for the implementation of this Policy. These include not only communication activities to make all the addressees aware of this document, but also mandatory periodic training activities, ensuring that they understand the issues covered and the risks associated with corruption.

In particular, the Group provided specific training on the Code of Ethics, 231 Model and AML with a focus on anti-corruption. This training was provided to employees according to their role. Training covered the ways in which the Group manages relations with customers and suppliers and the rules and prohibitions when dealing with Public Administrations and Supervisory Authorities. Training was also provided on the new indicators for detecting abnormal transactions among Banks' customers.

**Training on corruption and bribery given to employees in risk and non-risk functions; percentage of risk functions, as described above, covered by training programmes**

PREVENTION OF CORRUPTION AND BRIBERY	31/12/2024	
	Functions at risk	Other employees
Employees	5,480	6,804
Employees receiving anti-corruption and bribery training	3,732	3,951
Total training hours on preventing corruption and bribery	5,469	4,491
% training coverage	68.1%	58.1%

**Training on preventing corruption and bribery provided to members of administrative, management and supervisory bodies**

PREVENTION OF CORRUPTION AND BRIBERY	31/12/2024	
	Parent Company Corporate Executives	Corporate Executives of BCC Banks and Other Group Companies
Corporate Executives	18	824
Recipients of training on prevention of corruption and bribery	-	240
Total training hours on preventing corruption and bribery	-	678
% training coverage	-	29.1%

**Metrics**

The distinction between risk and non-risk functions was assessed by each individual Bank/Group Company.

The hours of training courses containing anti-corruption topics were taken into account as no courses entirely dedicated to the subject were delivered. For example, the subject was addressed in the context of training courses on the 231/01 Organisational Model and anti-money laundering.

Incidents concerning the conduct of the company in relation to non-compliance, critical and undesirable situations or other issues related to anti-corruption may be reported using the same channels governed by the Group Whistleblowing Regulations, as set out in the 231 Models of all Group Companies and the Anti-Corruption Policy.

In compliance with regulatory requirements, Group companies appoint a Head of Internal Reporting Systems with an appropriate degree of independence. The Head is not involved in the adoption of any decision-making measures, which are referred to the competent corporate functions or bodies. Provision is also made to ensure that the person in charge of receiving the report is not hierarchically or functionally subordinate to the reported person, is not himself the alleged perpetrator of the violation and does not have a potential interest related to the report such as to compromise impartiality and independence of judgement. The Chairman of the Board of Directors is responsible for handling reports that identify the Chairman and/or members of the Board of Statutory Auditors as the alleged perpetrator of the violation (and vice versa, in the case of reports referring to the Board of Statutory Auditors).

As discussed in greater detail in the section "4. Information on Governance", chapter "4.1 Business Conduct", paragraph "4.1.2.2 Corporate culture and business conduct policies", which covers whistleblowing, the Head of Internal Reporting Services of Cassa Centrale Banca, Affiliated Banks and Subsidiaries draft an annual report on the proper functioning of the Internal Reporting Systems procedure containing, in anonymous form, aggregated information on the results of activities carried out after reports are received, highlighting the number of investigations performed and the types of measures adopted. The report is approved by 28 February of each year by the Board of Directors and the Board of Statutory Auditors of the individual Bank or Group Company, made available to personnel and promptly forwarded to the Parent Company.

#### **Documented incidents of bribery or corruption**

[ESRS G1 G1-4]  
[ESRS 2 MDR-M]

During 2024, there were no convictions and/or fines for breaches of corruption and bribery laws.

No bribery incidents at the Parent Company or its affiliated companies were documented during the year. In addition, there were no new public prosecutions for active or passive corruption brought against the company and its own employees during the reporting period.

#### **4.1.3.2 Political influence and lobbying**

[ESRS G1 G1-5]  
[ESRS 2 MDR-M]

The Group does not make direct or indirect contributions to political or trade union parties, movements, committees and organisations, or to their representatives and candidates. The Group therefore does not engage in lobbying or financing of political parties. In 2024, a contribution of less than EUR 250 was made for the organisation of a local event, which is not material and does not qualify as lobbying.

Interest representation is delegated to the association component of Cooperative Credit (Federcasse), of the Italian banking system (ABI) and, for matters concerning cooperatives, to the ConfCooperative Representative Organisation.

Furthermore, none of the members of the Board of Directors or Control Bodies is a politically exposed person. Specifically, none of the Board members held significant positions in the two years preceding their appointment (i.e. equivalent to administrative, management and supervisory activities) for Public Authorities.

#### 4.1.4 Management of relationships with suppliers

[ESRS G1 G1-2]

In the Cassa Centrale Group, supplier management plays a strategic role in ensuring the operational efficiency, security and sustainability of the entire banking system. The Group's suppliers include the following key categories:

- **digital services, ICT and security:** include specialised partners for the management and maintenance of ICT systems, including software, hardware, cybersecurity and telecommunication services. Software user licences, digital archiving services and data centre operations also fall into this category;
- **consulting services:** include providers of financial, legal, tax, marketing and strategic consulting services, as well as audit, compliance and risk management activities. They also include debt collection and financial analysis consultants;
- **operational services:** include all activities required for day-to-day operations of Affiliated Banks and the Parent Company, such as facility management services, building work and maintenance of infrastructure. It also includes cleaning and hygiene services for offices;
- **services for procurement of materials, capital goods and logistics:** includes suppliers of consumables such as stationery, printed materials, office equipment, technological devices and capital goods required for banking operations. This also includes cash in transit, warehouse operations and logistics services.

All suppliers are registered in a single Group Supplier Register, on a purchasing management platform, and are classified according to their economic activity and product category. The Supplier Register is managed for the benefit of all Group companies and contains a wide variety of local and national suppliers. Suppliers go through an accreditation process with initial verification of personal, administrative and reputational documents. There is also analysis of the adequacy profiles of suppliers involved in activities that could have health and safety implications.

In order to mitigate possible supply-chain risks, in 2024 Cassa Centrale Banca published the "Group Third-Party Risk-Management Regulation", which describes the Group's Third-Party Risk-Management Framework. The objective, in accordance with current regulations, is to ensure and regulate prudent management of third-party risk and an adequate and controlled operating environment, seeking to prevent the emergence of situations of excessive exposure to the same risk.

Management of suppliers is also based on environmental and social sustainability criteria, favouring responsible practices and careful selection of ethical standards. All suppliers are asked to provide a self-declaration of acceptance of the Code of Ethics and ESG policies. In addition, strategic suppliers are required to acquire ESG certifications. For ordinary and strategic suppliers, an ESG overview score is assigned through a national InfoProvider, which assesses several risk categories, including ESG risk, physical risk and transition risk. The outcome of the analysis, together with its economic-financial evaluation, leads to the definition of an overall score for the supplier. In addition, each supplier is interviewed and a reputational analysis is regularly carried out. In particularly significant negotiations, ESG criteria are already included in the selection phase, representing a determining factor for the inclusion or exclusion of a supplier in contracting processes.

Where possible, the Group selects a panel of suppliers, leaving it up to the individual Banks to choose which supplier to utilise (e.g., this approach was adopted for the procurement of electricity, gas and workplace-related products). Some expenditure categories, which are typically local, are not managed at Group level, so as to favour the generation of local value, a distinctive feature of Cooperative Credit. This procurement strategy diversifies operational risk in the event of a critical issue in the provision of a service or product by a single supplier. In addition, the individual Banks may select and decide to rely on additional suppliers (always subject to registration, analysis and qualification procedures within the Group Supplier Register), provided that they furnish the Parent Company with a report stating the rationale behind their choice. The latter can be driven, for example, by establishment in the area and consequently the desire to support the local economy.

In 2024, the Group undertook training for Purchases employees to adequately inform them about the above-mentioned criteria in order to make well-considered procurement decisions while limiting supply chain risks.

The Group also has an open dialogue with its suppliers, either through communication by e-mail, telephone or through meetings at the supplier's or the Group's premises. In addition, for critical supplies (e.g. those defined as essential or important functions within the definition of the EBA outsourcing guidelines), the possibility of on-site or remote auditing is contractually required.

In 2025, Cassa Centrale Banca plans to reinforce active management of suppliers, taking into account additional ESG factors, including:

- drafting of a Code of Conduct for suppliers;
- the opportunity to run a questionnaire for a subset of suppliers in order to better understand the specifics of their ESG profile.

### **Prestipay and Supplier management**

In relation to the management of relationships with suppliers, Prestipay not only adopted the Group's expenditure management regulations but also defined an internal purchasing procedure. The Subsidiary performs:

- **assessment of suppliers prior to signing a contract;**
- **spot checks by Internal Audit function;**
- **continuous monitoring of SLA compliance by process owners.**

The main assessment activities include verifying the supplier's financial soundness to minimise default risks, checking their reputation, analysing their operational capabilities, assessing compliance with industry-specific regulations (environmental, legal, ethical, etc.) and monitoring management of their supply chain.

Spot checks by the Internal Audit function, on the other hand, include verification of documentation (e.g. contracts, invoices and quality certificates), process checks (including the assessment of suppliers' actual operations against contractual agreements) and inspections of supplier premises.

The final step, regarding continuous monitoring of SLA compliance, is carried out by analysing and evaluating the supplier's performance in relation to SLAs, monitoring agreed metrics (e.g. service levels, delivery times, product availability, etc.), automated monitoring tools, and regular communication with suppliers to discuss performance and address any critical issues.

### **Targets and objectives**

[ESRS 2 MDR-T]

The Cassa Centrale Group recognises the importance of responsible supply-chain management and is committed to ensuring supplier selection and management processes are aligned with ESG sustainability principles. Within the framework of the Sustainability Plan, clear objectives have been defined to promote a more sustainable and responsible approach with suppliers, focusing particularly on environmental, social and governance criteria.

With this in mind, the Group has set two goals to be achieved by 2026:

- **ESG assessment of suppliers:** 100% of standard and strategic suppliers will be assessed according to sustainability criteria, ensuring that their practices are in line with the ethical and social responsibility principles promoted by the Group;
- **sustainability in critical supplies:** 100% of supplies of goods and services under the Framework Agreement, which by their nature have significant ESG impacts (in terms of raw materials, production and management), will be monitored and managed to ensure that they meet stringent sustainability standards.

#### 4.1.4.1 Payment practices

[ESRS G1 G1-6]

[ESRS 2 MDR-M]

**The Group does not have any specific policies on the timing of payments;** payment terms normally establish a deadline of 30 days from the invoice date and the use of bank transfers.

The percentage of payments that do not meet the standard deadlines is mainly attributable to invoices without a due date or with an on-demand mechanism, due to the technical delays in the payment authorisation process.

Any specific requests are handled by involving the purchase contact persons for timely resolution. In this regard, it should be noted that NEAM has adopted and keeps updated an Accounting Policy governing payment methods to major suppliers. In particular, remuneration is handled quarterly for delegated managers and distributors.

**The average time taken by the company to pay an invoice from the date on which the contractual or legal payment deadline starts to be calculated, expressed in number of days, the percentage of payments meeting standard payment terms and the number of legal proceedings currently pending due to late payment**

PAYMENT PRACTICES	UoM	31/12/2024
<b>Average invoice payment time</b>	<b>no. days</b>	<b>25.2</b>
<i>of which, SMEs</i>	no. days	23.0
<i>of which, Other companies</i>	no. days	27.3
<b>% of payments meeting standard terms</b>	<b>%</b>	<b>67.7%</b>
<i>of which, SMEs</i>	%	65.4%
<i>of which, Other companies</i>	%	69.8%
<b>Pending legal proceedings due to late payment</b>	<b>no.</b>	<b>-</b>
<i>of which, SMEs</i>	no.	-
<i>of which, Other companies</i>	no.	-

#### Metrics

To calculate average days before payment, the difference between the date of payment and the date of receipt of the invoice was calculated. With regard to payment deadlines, invoices paid within three days after the due date are considered paid on time. Where the due date was not specified on the invoice, the date of receipt or the standard no. of days applied by the suppliers, even if not formally established, was considered as the due date.

If the payment was made by direct debit/advance transfer, it was considered as paid on time even if the entry in the accounts occurred at a later date due to handling limitations.

# Independent Auditors' Report on the Consolidated Sustainability Statement of the Cassa Centrale Group

## INDEPENDENT AUDITOR'S REPORT ON THE CONSOLIDATED SUSTAINABILITY REPORT PURSUANT TO ARTICLE 14-BIS OF LEGISLATIVE DECREE No. 39 OF JANUARY 27, 2010

To the Shareholders of  
**Cassa Centrale Banca – Credito Cooperativo Italiano S.p.A.**

### Conclusion

Pursuant to arts. 8 and 18, paragraph 1 of Legislative Decree no. 125 of September 6, 2024 (hereinafter also the “Decree”), we have carried out a limited assurance engagement on the consolidated sustainability report of the Cassa Centrale Banca Credito Cooperativo Italiano Cooperative Banking Group (hereinafter also the “Group”) for the year ended on December 31, 2024, prepared pursuant to Art. 4 of the Decree, included in the specific section of the management report.

Based on the work performed, nothing has come to our attention that causes us to believe that:

- the consolidated sustainability report of the Cassa Centrale Banca Credito Cooperativo Italiano Cooperative Banking Group for the year ended on December 31, 2024 is not prepared, in all material respects, in accordance with the reporting principles adopted by the European Commission pursuant to the Directive (EU) 2013/34/EU (European Sustainability Reporting Standards, hereinafter also “ESRS”);
- the information included in the paragraph “*European Taxonomy*” of the consolidated sustainability report is not prepared, in all material respects, in accordance with art. 8 of Regulation (EU) No. 852 of June 18, 2020 (hereinafter also the “Taxonomy Regulation”).

### Basis for conclusion

We conducted the limited assurance engagement in accordance with the assurance standard of the sustainability report - “*Principio di Attestazione della Rendicontazione di Sostenibilità - SSAE (Italia)*”. The procedures in a limited assurance engagement vary in nature and timing from, and are less in extent for, a reasonable assurance engagement.

Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the level of assurance that would have been obtained had we performed a reasonable assurance engagement. Our responsibilities pursuant to that standard are further described in the paragraph *Auditor’s responsibilities for the limited assurance of the consolidated sustainability report* of this report.

Ancona Bari Bergamo Bologna Brescia Cagliari Firenze Genova Milano Napoli Padova Parma Roma Torino Treviso Udine Verona

Sede Legale: Via Santa Sofia, 28 - 20122 Milano | Capitale Sociale: Euro 10.688.930,00 i.v.

Codice Fiscale/Registro delle Imprese di Milano Monza Brianza Lodi n. 03049560166 - R.E.A. n. MI-1720239 | Partita IVA: IT 03049560166

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We are independent in accordance with the independence and other ethical requirements applicable under Italian law to the limited assurance engagement of the consolidated sustainability report.

Our firm applies International Standard on Quality Management (ISQM Italia 1), which requires the firm to design, implement and operate a system of quality management including policies or procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our conclusion.

**Other matter**

The comparative information for the year ended on December 31<sup>st</sup>, 2023 presented in the consolidated sustainability report in the paragraph “European Taxonomy” has not been verified.

**Responsibility of the Directors and the Board of Statutory Auditors of Cassa Centrale Banca – Credito Cooperativo Italiano S.p.A. for the consolidated sustainability report**

The Directors are responsible for developing and implementing the procedures performed to identify the information reported in the consolidated sustainability report in accordance with the ESRS (hereinafter the “double materiality assessment process”) and for disclosing this process in the paragraph “Management of Impacts, Risks and Opportunities - Double materiality analysis process” of the consolidated sustainability report.

The Directors are also responsible for the preparation of the consolidated sustainability report, which includes the information identified as part of the double materiality assessment process, in accordance with the requirements of Art. 4 of the Decree, including:

- compliance with ESRS;
- compliance of the information included in the paragraph “European Taxonomy” with art. 8 of the Taxonomy Regulation.

Such responsibility involves designing, implementing and maintaining, within the terms established by the law, such internal control that the Directors determine necessary to enable the preparation of the consolidated sustainability report in accordance with the requirements of the art. 4 of the Decree that is free from material misstatements, whether due to fraud or error. Furthermore, the abovementioned responsibility involves the selection and application of appropriate methods in elaborating information and making assumptions and estimates about specific sustainability information that are reasonable in the circumstances.

The Board of Statutory Auditors is responsible for overseeing, within the terms established by law, the compliance with the provisions set out in the Decree.

**Inherent limitations in the preparation of the consolidated sustainability report**

In reporting forward looking information in accordance with ESRS, the Directors are required to prepare the forward looking information on the basis of assumptions, as described in the consolidated sustainability report, regarding events that may occur in the future and possible future actions of the Group, as indicated in the paragraph *“Disclosures in relation to specific circumstances – Sources of estimation and outcome uncertainty”*. Due to the inherent uncertainty regarding any future event, including whether these events will take place and their extent and timing, the variances between actual outcomes and forward looking information could be significant.

The information provided by the Group regarding Scope 3 emissions is subject to greater inherent limitations compared to those related to Scope 1 and 2 emissions. This is due to the lower availability and relative accuracy of the data used to define the information on Scope 3 emissions, both quantitative and qualitative, in relation to the value chain, as indicated in the paragraph *“Disclosures in relation to specific circumstances – Sources of estimation and outcome uncertainty”*.

**Auditor’s responsibilities for the limited assurance of the consolidated sustainability report**

Our objectives are to plan and perform procedures to obtain limited assurance about whether the consolidated sustainability report is free from material misstatements, whether due to fraud or error, and to issue an assurance report that includes our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, could influence the decisions of users taken on the basis of consolidated sustainability report.

As part of the limited assurance engagement in accordance with the *Principio di Attestazione della Rendicontazione di Sostenibilità - SSAE (Italia)*, we exercise professional judgment and maintain professional skepticism throughout the engagement.

Our responsibilities include:

- considering risks to identify and assess the disclosure where a material misstatement is likely to arise, either due to fraud or error;
- designing and performing procedures to verify disclosures in the sustainability report where material misstatements are likely to arise. The risk of not detecting a material misstatement due to fraud is higher than the risk of not identifying a material misstatement due to error, as fraud may involve collusion, falsifications, intentional omissions, misrepresentations, or the override of internal control;
- the direction, supervision and performance of the limited assurance engagement of the consolidated sustainability report. We remain solely responsible for the conclusion on the consolidated sustainability report.

**Summary of the work performed**

A limited assurance engagement involves performing procedures to obtain evidence as the basis for expressing our conclusion.

The procedures performed on the consolidated sustainability report are based on our professional judgement and included inquiries, primarily with the personnel of the Group responsible for the preparation of information included in the consolidated sustainability report, analysis of documents, recalculations and other procedures aimed to obtain evidence as appropriate.

Specifically, we performed the following main procedures partly in a preliminary phase before year end and then in a final phase up to the date of issuance of this report:

- understanding the business model, the Group's strategies and the context in which the Group operates with reference to sustainability matters;
- understanding the processes underlying the generation, collection, and management of qualitative and quantitative information included in the consolidated sustainability report, including an analysis of the reporting perimeter;
- understanding the process carried out by the Group for the identification and evaluation of material impacts, risks and opportunities, based on the principle of double materiality, with reference to sustainability matters;
- identification of the information where a risk of material misstatement is likely to arise, taking into considerations, among others, risk factors related to the generation and collection of the information, to the estimates and to the complexity of the related calculation methods, as well as qualitative and quantitative factors related to the nature of such information;
- design and performance of procedures, based on the professional judgment of the auditor of the consolidated sustainability report, to respond to identified risks of material misstatement also with the support of Deloitte specialists, with reference to specific environmental information;
- understanding of the process set up by the Group to identify eligible exposures and determine their aligned nature according to the requirements of the Taxonomy Regulation, and verifying the related information included in the consolidated sustainability report;
- comparison of the information reported in the consolidated sustainability report with the information included in the consolidated financial statements pursuant to the applicable financial reporting framework, or with the accounting data used for the preparation of the financial statements, or with the management data accounting in nature;

- verification of the structure and presentation of the information included in the consolidated sustainability report in accordance with ESRS, including the information related to the materiality assessment process;
- obtaining the representation letter.

DELOITTE & TOUCHE S.p.A.,

Signed by  
**Enrico Gazzaniga**  
Partner

Milan, Italy  
April 29<sup>th</sup>, 2025

*This independent auditor's report has been translated into the English language solely for the convenience of international readers. Accordingly, only the original text in Italian language is authoritative.*