



# VII.b CSRD Report

# Sustainability statement Degroof Petercam

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### ESRS 2 - General disclosures

#### [BP-1] General basis for preparation of sustainability statements

#### ESRS2\_BP-1\_5

(a - b) "For the reporting year ended December 31, 2024, the company reports its consolidated sustainability information for the first time in accordance with article [3:6/3] [3:32/2] of the Companies' and Associations' Code, including compliance with the applicable European Sustainability Reporting Standards ("ESRS"). This includes:

- compliance of the process carried out by the Company to identify the information reported in the consolidated Sustainability Statement (the "Process") is in accordance with the description set out in the delegated regulation [ESRS 2 IRO-1], disclosed in section "[IRO-1] Description of process to identify and assess material impacts, risks and opportunities"; and
- compliance of the disclosures with the requirements of article 8 of EU Regulation 2020/852 (the "Taxonomy Regulation") disclosed in section "RI Responsible Investments, E1-3 Actions and resources in relation to climate change policies"

The contents of the sustainability statement were subject to a limited assurance report in accordance with ISAE 3000 (Revised). The Independent Auditor 's Report on a Limited Assurance Engagement can be found on page 303.

The consolidated sustainability statements are part of the Company's consolidated directors report, which was authorized for issue by the Board of Directors on 23/04/2025.

These sustainability statements have been prepared considering the consolidation scope of Degroof Petercam SA, Nijverheidsstraat 44 1040 Brussels – Belgium (VAT BE 0403 212 172). In that respect financial statements & non-financial statements are mapped in terms of scope. The term 'Degroof Petercam' in this report refers to both the legal entity Bank Degroof Petercam salnv and the companies in the group. Through this report, the distinction between Degroof Petercam Asset Management (DPAM) and Bank Degroof Petercam (eventually specific for Belgium or Luxembourg) is indicated when describing sustainability elements and measures.

On June 3, 2024, Crédit Agricole Indosuez (100 % owned by CACIB – Crédit Agricole Corporate & Investment Banking) closed the transaction in which it obtains majority of shares of Degroof Petercam SA (DP). As a result, Degroof Petercam entered the consolidation and prudential scope of CACIB as from that date and is integrated a.o. in the financial statement of CACIB by 31/12/24.

In contrast with the consolidation of financial statements, the non-financial statement of CACIB covering the year 2024 does not include Degroof Petercam yet. Degroof Petercam therefore publishes its own non-financial report in accordance with CSRD requirements, hence does not use the exemption for Group reporting (at the level of CACIB).

CACIB & Degroof Petercam consider this approach as the most transparent to provide the users and readers of the non-financial report with a fair representation of the information reported. In particular, the following elements led to the decision to isolate the DP non-financial information in a standalone report:

- 1. The acquisition of DP by CA Indosuez took place during the year 2024. The harmonization of policies, strategies, actions, targets is part of a mid/long-term plan following the acquisition, which was not finalized in the course of 2024. As a result, most policies and procedures existing during the year 2024 at Degroof Petercam were Degroof Petercam-specific and not yet aligned with the policies of the Group CACIB (to which CA Indosuez adheres), although synergies and similarities were identified. Providing Degroof Petercam-specific information outside of the CACIB report is therefore seen as the most representative way to describe the policies and organization in place during 2024.
- 2. As the sustainability journey is core to Degroof Petercam's strategy, being transparent on the policies, actions and targets in place is important. Until the analysis on common targets, action plans, commitments with CACIB is finalized, Degroof Petercam believes that transparent reporting on these aspects via a standalone report is the most appropriate way to support a fair representation on material sustainability matters within the company.

To ensure a smooth transition towards an integrated non-financial report as from 2025, working groups have been put in place to ensure collaboration and harmonization of approaches between CACIB, CA Indosuez and Degroof Petercam.

(c) As mentioned above these sustainability statements are based on the consolidated financial statements of Degroof Petercam. It includes own operations as well as material downstream & upstream information so the full Value Chain for Degroof Petercam. Materiality has been assessed in the DMA (Double Materiality Assessment) exercise. As for material downstream information, Degroof Petercam mainly identified & report upon disclosures linked to client investments (cf. specific chapter on Responsible Investments). As for upstream information, materiality linked to its business partners and suppliers has been assessed.

There are no joint ventures or associates in the value chain.

- (d) There are no specific information corresponding to intellectual property, know-how or the results of innovation that have been omitted.
- (e) Not applicable

#### [BP-2] Disclosures in relation to specific circumstances

ESRS2\_BP-2\_9

There are no deviations from the medium- or long-term time horizons defined by ESRS 1.

ESRS2\_BP-2\_10 & 11

#### Disclosures in relation to specific circumstances - Value chain estimation

 Value chain data are utilized to report Degroof Petercam's carbon footprint within Scope 3. This includes estimating GHG emissions associated with Purchased Goods & Services and Capital Goods.

In cases where there are uncertainties regarding the metrics disclosed in these statements, such uncertainties are reported alongside the respective metrics within each chapter.

Calculations to determine Scope 3 GHG emissions from own operations are
primarily based on estimates derived from sector-average data or qualitative proxy
data, which convert transactional data to CO2e. When applicable, information
about the value chain is directly collected.

The key assumptions and sources used are detailed in section ESRS E1.

### <u>Disclosures in relation to specific circumstances - Sources of estimation and outcome</u> uncertainty

• Principal Adverse Impacts linked to Responsible Investments - the so-called Sustainable Finance Disclosure Regulation (SFDR) PAI - are disclosed in a dedicated chapter "Responsible Investments" in the PAI-M section. Degroof Petercam and DPAM acknowledge the significant challenges posed by data availability and quality provided by companies and issuers, the limitations of ESG reporting, and the use of non-financial rating agencies. Key limitations include the coverage rate of companies, biases towards large market capitalizations and western benchmarks, and the relevance of evaluation criteria leading to potential discrepancies in PAI scores. This is managed through active engagement with companies to disclose information, reliance on multiple external data sources, and systematic exclusion of companies facing severe controversies or non-compliance with global standards. Despite these efforts, inaccuracies may still occur, various remediation steps are employed to address them.

Important notice linked to **presenting comparative information**: where metrics have been reported previously, comparative information is presented. The comparative information in the sustainability statement and thereto related disclosures are presented on a voluntary basis and have not been subject to any audited assurance procedure, unless stated otherwise in the relevant sections of the sustainability statement. For newly introduced metrics, the company makes use of the transitional provisions for the first year in accordance with ESRS 1.

#### **ESRS2 BP-2 15**

In this sustainability statement, references are made to several existing regulations and recognized standards, including the Sustainable Finance Disclosure Regulation (SFDR) and the Science-Based Target initiative (SBTi). SFDR & SBTi are both used as reference in the Responsible Investment's chapter. SBTi is also used as reference in the ESRS E1-Climate change chapter when highlighting the transition plan and actions planned related to Climate.

#### [GOV-1] Role of the administrative, management and supervisory bodies

#### ESRS2\_GOV-1\_21

In accordance with the Articles of Association, the Bank Degroof Petercam is managed by a Board of Directors (BoD) of 15 members as of December 31, 2024 which is its ultimate decision-making body, except in matters reserved for shareholders by company law or by the Articles of Association (e.g. the Belgian Code of Companies and Associations, the Belgian Banking Act of April 25, 2014, EBA Guidelines of July 2, 2021 on internal governance under Directive 2013/36/EU). The Board is responsible for the strategic direction of the company and for the control of the day-to-day management, responsibility delegated to the Management Committee.

Within the Board of Directors, Degroof Petercam has, in accordance with the legal provisions, set up four specialized committees (audit, risk, nomination and remuneration), composed exclusively of non-executive directors, at least one of whom (and the majority in the case of the audit committee) is an independent director within the meaning of Article 3, 83 of the Banking Act.

In accordance with the law (e.g. the Belgian Code of Companies and Associations, the Belgian Banking Act of April 25, 2014), the Board of Directors has also set up a Management Committee (CoDir) of 5 members as of Dec 31, 2024 meeting once a week, whose capacities, competences and obligations have been determined. This delegation however involves neither the determination of general policy nor acts reserved for the Board of Directors by company law.

Next to the Management Committee (CoDir) Degroof Petercam has also set an Executive Committee (ComEx) who meets once a week and whose members are the members Management Committee completed by the CEO of Degroof Petercam Luxembourg, the head of Investment Banking, the head of DPAM, the head of Asset Services, the Group General Counsel, the Chief Strategy Officer and 2 permanents invitees: Head of Human Resources and the Chief Compliance Officer. The ComEx discusses cross-functional issues. Proposals for decisions made by the ComEx are debated and decided by the Executive Committee. This broader audience which covers all parts of the organization allows the company to address more efficiently all the material impacts, risks and opportunities.

#### **Board of Directors:**

#	Name	Status	Function(s)
1	Gilles Samyn	Chairman Independent director	Chairman of the board of directors, Chairman of the Nomination Committee and member of the Audit and Remuneration Committees
2	2 Sylvie Rémond Non-executive independent director		Chairwoman of the Risk Committee, and member of the Audit and Remuneration Committees
3	Yvan De Cock	Non-executive independent director	Chairman of the Audit and Remuneration Committees, and member of the Risk Committee
4	Frank van Bellingen	Non-executive director	Member of the Risk and Remuneration Committees
5	Jacques Prost	Non-executive director	Vice Chairman
6	Olivier Chatain	Non-executive director	Member of the Audit and Risk Committees
7	Eve Duret	Non-executive director	
8	Anne-Laure Branellec	Non-executive director	Member of the Nomination and Remuneration Committees
9	Gérald Grégoire	Non-executive director	

10	Pierre Masclet	Non-executive director	Member of the Nomination Committee
11	Hugo Lasat	Executive director	CEO of the management committee
12	Gilles Firmin	Executive director	CRO of the management committee
13	Nathalie Basyn	Executive director	CFO of the management committee
14	Filip Depaz	Executive director	COO of the management committee
15	Sabine Caudron	Executive director	Head of Private Banking of the management committee

Concluding, it can be noted that 3 out of 15 Board members (i.e. 20 %) qualify as independent director. This includes the chairman of the Board. In terms of gender diversity, 5 out of 15 Board members are female, hence 33 %.

#### **Audit Committee**

Name	Role   Status
Yvan De Cock	Chairman   Independent
Sylvie Rémond	Member   Independent
Gilles Samyn	Member   Independent
Olivier Chatain	Member

#### **Risk Committee**

Name	Role   Status
Sylvie Rémond	Chairman   Independent,
Yvan De Cock	Member   Independent
Frank van Bellingen	Member
Olivier Chatain	Member

#### **Remuneration Committee**

Name	Role   Status
Yvan De Cock	Chairman   Independent
Sylvie Rémond	Member   Independent
Gilles Samyn	Member   Independent
Frank van Bellingen	Member
Anne-Laure Branellec	Member

#### **Nomination Committee**

Name	Role   Status
Gilles Samyn	Chairman   Independent
Anne-Laure Branellec	Member
Pierre Masclet	Member

#### ESRS2\_GOV-1\_22

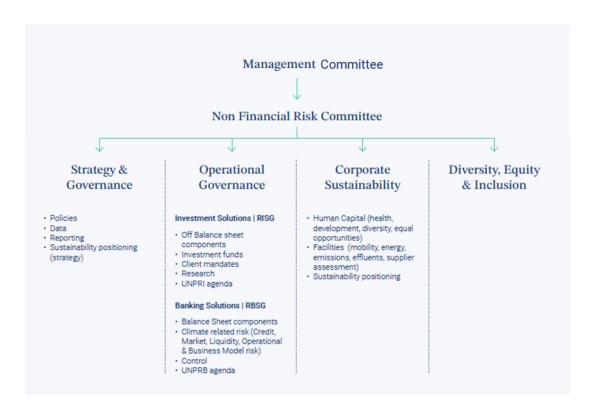
(a) Responsibility for the oversight of Impacts, Risks and Opportunities (IROs) is embedded in the organization itself through a governance structured around a bottom-up approach. As described below different steering groups keep the oversight of several IROs. These steering groups report into the Non-Financial Risk Committee which reports into the Management Committee. Important to note is that the CEO is present in all steering groups except for the Responsible Investment Steering Group. Information shared & gathered within this operation governance is discussed at Board level and/or in its dedicated committees (Audit Committee, Risk Committee, ...) as mentioned below.

It should be noted that further integration & aligning of identified IROs within the company governance structure has been slowed down over 2024. This is linked to the ongoing discussions on the integration with Indosuez and insufficient view on future governance and committees. Moreover IROs defined within Degroof Petercam environment might be finetuned taken into account the IROs identified by Indosuez. The DMA's need to be combined and governance adjusted.

As soon as a unified set of IROs as well as a common governance structure are in place (timing end of 2Q 2025), follow-up of action plans, metrics and targets will be managed in a joint structure.

- (b) Beside the Management bodies described above the group corporate governance embeds its commitment to sustainability. Degroof Petercam leverages on a proven ESG track record in four pivotal steering groups, each dedicated to a specific aspect of sustainability.
  - 1. The Operational Governance Steering Group is dedicated to implementing sustainable finance within operational activities, including client assets, investment funds, UN commitments, and climate. It is comprised of two sub-groups:
    - The Responsible Investment Steering Group (RISG) convenes monthly under the leadership of DPAM's CEO. It maintains the transparency and consistency of ESG methodology, practices, solutions, and services across all business lines, aligning with UN's Principles for Responsible Investment (UN PRI). Non-DPAM staff members are invited to join the RISG to extend its scope to all the group's responsible investment aspects.
    - o The Responsible Banking Steering Group (RBSG) convenes monthly and is chaired by the Group Head of Non-Financial Risk and oversees the sustainability of banking operations. This includes steering the Private Banking value proposition and service offering, balance sheet components, climate-related risks (credit, market, liquidity, operational and business model risk). It also monitors and follows the agenda of UN's Principles for Responsible Banking (UNPRB).

- 2. The Corporate Sustainability Steering Group discusses sustainability topics at group level, including HR (health, training and development, equal opportunities) and facilities (mobility, energy & waste management, carbon emissions). It also monitors the implementation of the group's overall sustainability position.
- 3. The Diversity Equity and Inclusion (DE&I) Steering Group directs the agenda of all topics relating to Diversity, Equity, and Inclusion.
- 4. These steering groups, apart from the RISG, report to the Non-Financial Risk Committee (NFRC), a delegated committee of the management board that meets monthly and is chaired by the Chief Risk Officer. The committee monitors the group's exposure to non-financial risks. Its objectives are to assess the potential impact of significant changes on the group's risk profile and to ensure that all activities related to first and second-line operational risks, including compliance aspects, or ESG risks are executed with due regard to risk appetite, policies and procedures, laws, and regulations. The CEO, also member of the NFRC, reports to the Management Committee on both the assessment and management of the Sustainable Finance agenda, including climate-related risks and opportunities. In 2024, the Board of Directors took a deep dive on the sustainable finance agenda twice.



The above paragraphs describe the governance in place during most of 2024. Second half of the year was influenced by reflections on the future set-up of governance within the Indosuez Group. As a first step, Indosuez colleagues were invited to the different existing steering groups. It should be noted that by 2025 the existing governance structure will have to further evolve.

(c) The Executive Committee (CoDir) provides the Board of Directors or its committees with appropriate information on different IROs e.g. disclosures on social matters concerning own workforce are anchored within Remuneration committee, who takes into consideration data and policies amongst others. Furthermore, the Board of Directors was informed over 2024 on Net Zero trajectories (main IRO linked to Responsible Investments), on the results of the Double Materiality Assessment as well as on Sustainable Finance regulation and its impact on Degroof Petercam.

The Board of Directors defines and supervises, where appropriate and based on proposals or opinions from the Risk Committee, the risk policy, including the acceptable risk tolerance level for all the activities carried out by the Bank and the Group, and the identification and appropriate management of the risks associated with the Group's activities, including environmental, social and governance (ESG) risks. The Board of Directors ensures that the Executive Committee has put in place appropriate risk management and control systems and supervises the existence and operation of the internal control systems. It examines, where appropriate, with the support of the Audit Committee, the report(s) of the internal audit function concerning the independent assessment of the quality and efficiency of the internal control, risk management and governance systems of the Bank and the Group.

(d) Degroof Petercam has been monitoring for a few years various performance and risk indicators related to sustainable finance roll-out and ESG risks. These indicators are continuously updated to align with the Degroof Petercam's evolving business environment and risk materiality, its strategy as well as new regulations. They are monitored and reported to Degroof Petercam's governance committees, at least to the RBSG and NFRC, on a quarterly basis.

Indicators include but are not limited to:

- Performance indicators ensuring that strategic objectives related to key elements such as SFDR, Net Zero, green bonds are met;
- The monitoring of corporate sustainability matters such as the group GHG emissions, the trust in Degroof Petercam sustainable commitments;
- Risk indicators issued by business line, monitoring the clients, funds, credits and the bank's own investments compliance with the sustainable investments classifications, controversial activities and exclusion policies;
- Operational risk indicators monitoring climate-related events disrupting business continuity and execution errors related to sustainable finance processes.

These indicators will evolve further taking into account the results of DMA & IROs identified.

#### ESRS2\_GOV-1\_23

The collective skills of the Bank's Executive Committee are underpinned by the individual professional experience of its members. The experience and areas of expertise of the members of the Executive Committee cover all the sectors and products of Degroof Petercam, for all the geographies in which the Bank is active. They bring their knowledge of banking regulations, technical expertise, operational knowledge of the business lines and managerial skills making it possible to address the various set of material IROs efficiently. Any knowledge which the Board of Directors or the Executive Management do not directly possess is leverageable from internal support functions including Risk Committees and Group Sustainability experts. In addition, external advisors are regularly consulted for specific topics.

The Bank's Executive Committee receives regular presentations on all topics, including Sustainable Finance regulations and obligations which includes climate change issues and risks.

To that extent, there is a continuous education policy for Bank Degroof Petercam directors: the objective of the continuing education program is to ensure that the Bank's Board of Directors has, both individually and collectively, at all times, the appropriate knowledge, skills and experience required to understand the Bank's and the Group's businesses, including the principal risks and sustainability stakes to which the Bank and the Group are exposed.

More specifically, the basic and recurring group training modules for directors encompass the ESG topic. In addition, standard ESG e-learning courses made available to the Bank's staff are also aimed at directors.

In 2024, the directors attended the following three ESG training courses: (1) Net Zero Transition, (2) Sustainable Finance, and (3) ESG, Climate Change & the Board.

# [GOV-2] Information provided to and sustainability matters addressed by administrative, management and supervisory bodies

#### ESRS2\_GOV-2\_26

The results of the DMA were discussed and validated in the ESG strategy Group, approved at the Management Committee and provided for information purpose to the Board of Directors. In the same Board session, all information was shared about the Net Zero Commitment of Degroof Petercam.

In the second half of the year, an insight on sustainable finance regulation on the activities of Degroof Petercam was provided.

The follow-up of IROs within Degroof Petercam in the context of the new Indosuez Group will be elaborated in 2025.

### [GOV-3] Integration of sustainability-related performance in incentive schemes

#### ESRS2\_GOV-3\_29

(a) Description of the Key Characteristics of the Incentive Schemes:

Degroof Petercam has established a comprehensive remuneration policy that aligns with its sustainability strategy, ensuring that incentive schemes and remuneration policies for members of its administrative, management, and supervisory bodies are closely linked to sustainability matters.

The remuneration policy at Degroof Petercam includes both fixed and variable components. Fixed remuneration is designed to be sufficiently high to attract and retain qualified employees, while variable remuneration is performance-based and includes both short-term and long-term incentives. The policy promotes a balanced remuneration system that respects good governance and encourages individual skills, commitment, and alignment with the company's long-term objectives. The group scorecard which contains both financial & non—

financial data is central in the variable remuneration scheme. The group scorecard is the basis upon which the group's envelop on variable remuneration is decided. The group scorecard is updated on a yearly basis. As a non-exhaustive example, KPI's linked to SBTi alignment related to the portfolios (counterparties), greenwashing claims and trainings were included in the group scorecard for the year 2024 next to other, not disclosed, financial & non-financial parameters. The content of the scorecard is considered confidential and therefore not publicly disclosed.

Degroof Petercam Asset Management (DPAM) integrates sustainability factors into its remuneration policy to promote sustainable growth, stability, and long-term employment, ensuring that remuneration practices do not encourage excessive risk-taking. DPAM's remuneration framework also includes both fixed and variable components.

(b) Performance Assessment Against Specific Sustainability-Related Targets:

Performance assessments for variable remuneration include specific sustainability-related targets. For instance, at DPAM variable remuneration is based on performance metrics that incorporate sustainability considerations. Specifically, the policy mandates that the evaluation of employee performance includes qualitative criteria such as compliance with internal procedures, regulatory requirements, and the integration of Environmental, Social, and Governance (ESG) factors. This approach ensures that employees are incentivized to contribute to the company's sustainable finance goals.

(c) Inclusion of Sustainability-Related Performance Metrics in Remuneration Policies:

Sustainability-related performance metrics are integral to the remuneration policies at Degroof Petercam. The remuneration structure includes specific objectives related to sustainability which is part of the Group Scorecard. Additionally, the variable remuneration for identified staff is indexed to the performance of a representative sample of funds managed by DPAM, which promotes sound and effective risk management about sustainability risks.

(d) Proportion of Variable Remuneration Dependent on Sustainability-Related Targets:

The above-mentioned Group Scorecard is used as part of the company's remuneration policy (cf. ESRS S1). It is updated on a yearly basis and directly impacts the variable pay. As for 2024, over 40 % of weight was associated with non-financial elements which are linked with material topics identified, e.g. Employee engagement score, retention rate, SBTi alignment of portfolios and client satisfaction.

Referring to ESRS E1-Climate change, it is fair to note that there is nowadays no direct link between Net Zero plans and remuneration. The SBTi alignment of portfolios has been included, but this is only a first step as final targets still need to be set.

The Group Scorecard is shared with Management Committee and Board of Directors.

(e) Level at Which the Terms of Incentive Schemes are Approved and Updated:

The terms of the incentive schemes are approved and updated at multiple levels within the organization. The Remuneration Committee, composed of non-executive members of the Board of Directors, plays a crucial role in advising on and overseeing the remuneration policies. The Board of Directors is responsible for the adoption and maintenance of the Remuneration Policy, ensuring its alignment with the company's long-term interests and sustainability strategy. Regular evaluations and updates are conducted to ensure the effectiveness and compliance of the remuneration policies with applicable regulations (the

Belgian Banking Act of April 25, 2014, NBB Circular letter 2021/30 of December 7, 2021, on sound remuneration policies, implementing EBA Guidelines of July 2, 2021) and the company's sustainability objectives.

### [GOV-4] Statement on due diligence

CORE ELEMENTS OF DUE DILIGENCE	PARAGRAPHS IN THE SUSTAINABILITY STATEMENTS
a) Embedding due diligence in governance, strategy and business model	GOV-1 Role of the administrative, management and supervisory bodies SBM-1 Strategy, business model and value chain SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model
b) Engaging with affected stakeholders in all key steps of the due diligence	SBM-2 Interests and views of stakeholders - general
c) Identifying and assessing adverse impacts	IRO -1 Description of process to identify and assess material impacts, risks and opportunities IRO -2 Disclosure Requirements in ESRS covered by sustainability statements ESRS 2 SBM 3 Material impacts, risks and opportunities and their interaction with strategy and business model S1-2 Processes for engaging with own workers and workers' representatives about impacts S1-4 Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions S4-2 Processes for engaging with consumers and endusers about impacts G1 (Business conduct) – IRO -1 Description of processes to identify and assess material impacts, risks and opportunities
d) Taking actions to address those adverse impacts	ESRS 2 SBM 3 Material impacts, risks and opportunities and their interaction with strategy and business model 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  MDR-A Actions and resources in relation to material sustainability matter  RI Disclosures related to Principle Adverse Impacts - mainly MDR-M

e) Tracking the effectiveness of these efforts and communicating

RI (Responsible Investments) MDR-T Tracking effectiveness of policies and actions through target G1-4 Incidents of corruption or bribery

# [GOV-5] Risk management and internal controls over sustainability reporting

#### ESRS2\_GOV-5\_36

Managing risks related to sustainability reporting is part of ESG Risk Management.

(a) A dedicated validation process was developed in scope of the CSRD project. The purpose was to ensure completeness and correctness by the project team of the data received from business data owners. Dedicated EUC tools were also built to secure the data flow, document validation and track changes applied to the CSRD narratives.

On top of the controls made in scope of the project, the CFO department is starting to integrate the CSRD report in the Internal Control Framework. This is already applied to legal and prudential reports which include specific controls, four-eyes check validations and evidencing.

(b) (c) During the pre-project phase it was identified that data accuracy and completeness of a large and diversified set of data is considered as a key risk. The project governance therefore included the development of the necessary tooling to capture and store the data in a structured way while being able to track changes in data owner input that would not properly answer the CSRD requirements.

From a metrics point of view, another critical risk identified relates to value chain data. To mitigate risks, Degroof Petercam engages in dialogue with its suppliers to ensure a common understanding of the needs and quality of data necessary to build-up EU Taxonomy, Principal Adverse Impact (PAI) or GHG emissions metrics. The review of these metrics is leveraging existing controls already embedded in the businesses producing the data.

Moreover, Degroof Petercam started the journey to fully embed CSRD production in its existing control framework by elaborating new variance and completeness controls at CFO level. The CFO department has established a structured Internal Control Framework to ensure the quality and efficiency of reporting. This includes a control matrix, formal process descriptions, and a dashboard to verify completeness at each financial closing. Risks are identified and prioritized based on their potential impact, then integrated into documented internal control processes, with evaluations regularly updated through Risk Control Self-Assessment (RCSA) reviews. Major risks such as the reliability of information collection, staff shortages, data confidentiality, and transaction errors are addressed with first- and second-line controls, team accountability, and monthly monitoring of financial variations.

Findings from risk analyses and internal control are incorporated into relevant processes, with dashboards and formal documentation ensuring coordination by the Finance function. Results and progresses are regularly shared with governance bodies through specific reports and dashboards, highlighting the status of corrective actions and incidents to support decision-making at the CFO level.

(d) The CSRD project governance included the escalation of key decisions and arbitrages to the CSRD Steering committee which is composed of the representatives of the involved departments. This includes, for instance the validation of a limited number of proxies to be used when value chain data were not fully available. CSRD report progresses, and major risks are also discussed during the ESG Strategic Committee.

Ultimately, the review by the ComEX members, the validation by the audit Committee and the Board of directors of the CSRD report is also part of the standard reporting validation process. This CSRD report process therefore follows the same validation milestones as the yearly financial reporting.

#### [SBM-1] Strategy, business model and value chain

#### ESRS2\_SBM-1\_40

Degroof Petercam's mission statement is 'creating responsible prosperity for all'.

Its business model is centered around 4 integrated business lines creating thereby an Investment House with expertise at the center.

1. Within Private Banking, Degroof Petercam act as a steward of all assets, for families, corporate executives and business owners. The service model combines the experience of seasoned professionals with constantly evolving technology to meet six major challenges: making clients' private or professional assets grow, protecting them from unforeseen events, financing their projects, diversifying their investments, giving them a societal and philanthropic dimension, and finally, when the time comes, ensuring optimal transfer.

Services offered: Portfolio Management and Investment Advice Estate Planning • Private Equity • Credits • Family Office • International Wealth Structuring • Life Insurance • Art Advisory

Countries: Belgium and Luxembourg with its hub for international clients

2. Based in Luxembourg, Asset Services (DPAS) offers a comprehensive, integrated and scalable range of services for both Luxembourg and Belgian investment funds. These services are aimed at all types of initiators and investment funds. DPAS provides structuration, domiciliation, central administration, custodian bank (via Banque Degroof Petercam Luxembourg and its branch in Belgium) as well as custody services, registration support, risk management, distribution network supervision, currency hedging and asset management for clients acting as investment advisors.

Services offered: Fund Management Company • Depositary Bank and Custody Services • Transfer Agency • Fund Administration • Fund Legal Services Countries: Belgium and Luxembourg

3. Investment Banking (DPIB) focuses on mergers and acquisitions, and financial engineering with the issuance of equity and debt securities for both private and listed companies. In terms of capital markets activity and intermediation, Degroof Petercam owns one of the largest internal research teams in the Benelux. Thanks to an own dealing and trading room, Degroof Petercam is a key player in the field of specialized execution services for all listed and unlisted financial products, such as bonds, structured products, derivatives, customized risk hedging solutions, etc.

Degroof Petercam also offer corporate services such as stock option plans, market making for listed companies, treasury or foreign exchange.

Services offered: 1. Corporate Finance • Mergers & Acquisitions • Equity & Debt Capital Markets • Financial Advisory 2. Global Markets • Equity Research • Liquidity Providing • Equity & Fixed Income Sales and Trading • Foreign Exchange • Derivatives & Structured Products • Stock Option Plan

Countries Belgium, Luxembourg and the Netherlands

4. Institutional Asset Management (DPAM) business has been committed to offering active, sustainable and research-based investment solutions for more than two decades. DPAM's institutional clients include pension funds, foundations, insurance companies and nonprofit organizations. With 20 years of sustained dedication to responsible investments, DPAM integrates ESG factors across all asset classes and themes. In-house research is at the heart of DPAM's management, relying on several teams of fundamental and quantitative research analysts.

Services offered: Investment Funds (Multi-Asset, Equity and Fixed Income) • Institutional Mandates (Global Balanced, Equity and Fixed Income)
Countries Belgium, France, Luxembourg, the Netherlands, Germany, Switzerland, Spain, Italy and Hong Kong

It should be noted that the above-mentioned set-up will evolve considering the Indosuez integration.

Sustainability matters are integral part of Degroof Petercam's business as its activities are centered around managing client investments. The latter is the key component of Degroof Petercam's downstream value chain.

Split in terms of employees confirms that Degroof Petercam is at this stage mainly driven by activities in BFLUX.

Country	Headcount
Belgium	1005
Luxembourg	391
Other countries	33
Grand Total	1429

With regards to disclosure ESRS 2 SBM 1 40 e), f) & g) it should be noted that sustainability is core to DP's main activities of Private Banking & Asset Management. As such, DPAM has committed to Net Zero by adhering to NZAMI already in 2022, followed by a commitment at SBTi at Group level in 2024. For further information to these commitments, please refer to disclosures done within ESRS E1-Climate change & Responsible Investments.

#### ESRS2 SBM-1 42

In more details, in terms of Value Chain, the following main inputs were identified (upstream):

- Financial Capital (equity & client assets at the beginning of the financial year)
- Human Capital
- Social Capital linked to Degroof Petercam's reputation
- A limited set of Manufactured Capital linked to DP branches.

Degroof Petercam adds its financial expertise mainly through its Human Capital to manage and deliver 'responsible prosperity for all for its 'own operations'.

Main outputs (downstream) result in an increase/decrease of:

- Financial Capital (both in equity as in client assets)
- Human Capital (e.g. measured through training days, engagement...)
- Responsible Investments (cfr definition explained in RI-SBM1)
- Negative impacts on society e.g. CO2 emissions linked to scope 1,2 & 3 (including client assets)

This view on the value chain has been reflected in the DMA & identification of IROs as shown in the table mentioned in SBM 3.

#### [SBM-2] Interests and views of stakeholders - general

#### ESRS2\_SBM-2\_45

Capturing & integrating stakeholders' views & concerns are core to the company's activities. This includes Private or Professional clients, own workforces, authorities and also the society we live in. Reputation is key in Degroof Petercam's activities. Hence ensuring compliance with regulation, including & managing clients' interest, ensuring engaged inhouse experts and finally integrating impact of planetary boundaries into the analysis, are all crucial components to create a sustainable business.

A Double Materiality Analysis, in line with CSRD requirements, was conducted in 2023. This analysis formalized & structured interactions & concerns of the main stakeholders.

In more detail, the below list of key stakeholder interactions & stakeholder concerns were also reflected in the DMA:

#### Clients' interactions:

- Via regular personal contact, we accompany the clients, stand side by side with them and establish a durable partnership based on trust and knowledge.
- Clients are regularly invited to sessions in which DP's experts share their views on a broad range of topics including sustainability.
- Clients are being requested to express their sustainable preferences in line with the current MIFID setup.
- Client surveys are regularly ran (after some touchpoints and annually).

#### Clients' concerns:

- Protection, resilient financial return and well managed (ESG) risk of their assets.
- Impact investing (for some clients).
- Resilient financial return and well managed (ESG) risk of Degroof Petercam.

#### Staffs' interactions:

- Via regular communication moments and initiatives, the company strives to increase staff 's understanding of its objectives, strategy and activities and to foster and engage staff in its vision and values.
- A yearly internal survey linked a.o. to employee wellbeing has been rolled out. In 2024 a new type of survey, aligned on shareholder level, has been launched thereby creating a new baseline measurement.
- Permanent feedback is fostered via social dialogue and the development of a humane and open culture.
- Regular contacts with work council's representation are established.

#### Staffs' concerns:

- Fair and attractive remuneration.
- Learning and development.
- Good work-life balance.

#### Government/Regulators' interaction:

- We have an open dialogue with the company's regulators on different levels and in different countries.
- Regular reports and exchanges with FSMA, NBB, CSSF, AMF, etc. take place.

#### Government/Regulators' concerns:

- Respect and implementation of the regulation (Tax, SFDR, MiFID, AML, CRR, etc.), no greenwashing
- Robust risk & control framework.
- Future proof infrastructure and processes.

#### Shareholders' interaction:

- Shareholders are duly informed and can officially exchange with the company during the Annual General Meeting.
- Shareholder conventions regulate the type and frequency of intermediate shareholders meetings.
- Board members (some of which are also shareholder) are strongly involved in different governance bodies (risk, IT, audit, remuneration, etc.) as well as through monthly board meetings.

#### Shareholders' concerns:

- Resilient financial return of client assets.
- Resilient financial return of the company.
- Well managed (ESG) risk creating responsible prosperity in society.

#### Other partners:

- Committed to collaborate with partners promoting sustainability (UN PRI, CDP, Climate Action, Fair, etc.).
- Regular contacts with Academic World to increase mutual understanding.

Insights from different stakeholder interactions are managed by different owners and translated, when applicable, in new or updated processes, products, strategies... based on existing governance structures. The launch of a new offer linked to 'New Digital' (see ESRS S4) is in that respect a good example.

# [SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

#### ESRS2\_SBM-3\_48

This disclosure describes Degroof Petercam's value chain followed by an overview of different material IROs as revealed through the Double Materiality Assessment as described below. For financial impacts linked to risks, Degroof Petercam refers a.o. to its 2024 risk report published on its website. Only the conclusions of the analysis are presented here.

In terms of Value Chain (also described above in this chapter), the identified main input are:

- Financial Capital (equity & client assets at the beginning of the financial year)
- Human Capital
- Social Capital linked to the company's reputation
- A limited set of Manufactured Capital linked to DP branches.

Degroof Petercam adds its financial expertise through its Human Capital to manage 'responsible prosperity for all'.

Main output result in an increase/decrease of:

- Financial Capital (both in equity as in client assets)
- Human Capital (e.g. measured through training days, engagement...)
- Responsible Investments (cfr definition explained in RI\_MDR-P\_65)
- Negative impacts on society as e.g., CO2 emissions linked to scope 1, 2 & 3 (including client assets)

In terms of IROs & its place in the value chain, the following table provides an overview:

					Position in the	
Topical standard	ESG sub-topic	IRO Type	IRO description	Actual/potent	value chain	Time horizon
ESRS E1	Climate change	Risk	Reputational damage if BDP does not implement initiatives to reduce emissions, nor demonstrate a commitment to "walking the talk"	Potential	Own operations	Long term
ESRS E1	Climate change	Opportunity	Reputational opportunity for BDP by implementing initiatives to reduce emissions, demonstrating a commitment to "walking the talk."	Actual	Own operations	Short term
ESRS S1	Diversity, Inclusion and Equity	Risk	Financial loss and reputation damage resulting from claims of a lack of diversity and inclusion within the company.	Potential	Own operations	Medium term
ESRS S1	Diversity, Inclusion and Equity	Opportunity	Innovation and business opportunities due to diverse profiles within the companies.	Potential	Own operations	Short term
ESRS S1	Employee development	Opportunity	Financial gains due to highly trained employees	Actual	Own operations	Short term
ESRS S1	Employee development	Positive impact	Staff development through training, social dialogue with employees and career development support.	Actual	Own operations	Short term
ESRS S1	Employee development	Risk	The financial loss due to talents leaving the company	Potential	Own operations	Short term
ESRS S3	Involvement with communities	Positive impact	Creating a positive group culture	Actual	Downstream	Short term
ESRS S3	Involvement with communities	Positive impact	Encouraging Ultra-High-Net-Worth Individual (UHNWI) to engage in philanthropy	Potential	Downstream	Medium term
ESRS S3	Involvement with communities	Opportunity	Increased talent attractiveness due to increased team spirit through engagement with communities.	Actual	Downstream	Short term
ESRS S3	Involvement with communities	Opportunity	Reputation gain due to the visibility of local initiatives taken by BDP	Actual	Downstream	Short term
ESRS S4	Data privacy, data security and cybersecurity	Negative impact	Client insecurity due to data breaches and cybersecurity attacks.	Potential	Downstream	Short term
ESRS S4	Data privacy, data security and cybersecurity	Positive impact	Client's assets protection via strong data security systems.	Actual	Downstream	Short term
ESRS S4	Data privacy, data security and cybersecurity	Risk	Financial loss and reputation damage due to data breaches, cybersecurity attacks and/or data litigation.	Potential	Own operations	Medium term
ESRS S4	Data privacy, data security and cybersecurity	Risk	Financial risk if BDP is not able to prove the reliability of its ESG data.	Potential	Own operations	Short term
ESRS S4	Data privacy, data security and cybersecurity	Risk	Reputational damage, fines and financial penalties due to non-compliance and poor monitoring of regulatory data and security requirements.	Potential	Own operations	Short term
ESRS S4	Financial access	Negative impact	Exclusion of society due to high entry criteria to open account at BDP	Actual	Downstream	Short term
ESRS S4	Financial access	Opportunity	Financial gain due to the position of BDP being a bank for the top 5% of the population.	Actual	Own operations	Short term
ESRS S4	Financial access	Risk	Prevent access to financial markets	Actual	Own operations	Short term
ESRS S4	Responsible Marketing and communication	Positive impact	BDP supporting in the academic world regarding ESG and financial literacy.	Actual	Downstream	Short term
ESRS S4	Responsible Marketing and communication	Positive impact	Building educational and financial literacy for stakeholders.	Actual	Downstream	Short term
ESRS S4	Responsible Marketing and communication	Risk	Loss of clients due to ineffective communication strategy failing to meet client demands.	Potential	Own operations	Medium term
ESRS S4	Responsible Marketing and communication	Negative impact	Over information provided to clients.	Actual	Downstream	Short term
ESRS S4	Responsible Marketing and communication	Risk	Reputational and/or financial loss due to incorrect/incomplete product communication (e.g. greenwashing and green bleaching)	Potential	Own operations	Short term

ESRS G1	Corporate Conduct and Culture	Positive impact	BDP acting as a responsible player and "walking the talk".	Actual	Own operations	Medium term
ESRS G1	Corporate Conduct and Culture	Risk	Removal of memberships (e.g. UN PRI) due to improper governance (oversight),	Potential	Upstream	Long term
ESRS G1	Legislation and compliance	Positive impact	irresponsible lobbying Client's protection via a strong implementation of regulations (e.g. protection of client's interest, data protection, human rights	Actual	Downstream	Short term
ESRS G1	Legislation and compliance	Positive impact	protection).  Enhancing society's ethics and transparency via a strong implementation of regulations (e.g. AML regulations)	Actual	Downstream	
ESRS G1	Legislation and compliance	Risk	Financial losses due to a weak ESG due diligence process.	Potential	Own operations	Medium term
ESRS G1	Legislation and compliance	Opportunity	Increased revenues, reputational gain and strengthened relationships with clients due to the front runner position of BDP being a valid and strong player in terms of ESG (e.g. in the ESG regulation landscape).	Actual	Own operations	Short term
ESRS G1	Legislation and compliance	Risk	Reputational damage and financial penalties if BDP does not comply with legislation and regulations.	Potential	Own operations	Medium term
ESRS G1	Legislation and compliance	Positive impact	Responsible management of assets of clients participate s in the shift towards sustainable transition.	Actual	Downstream	Short term
Entity specific	Digitalization and use of new technologies	Risk	Financial loss and reputational damage due to the non-regulate use of technologies (e.g. ChatGPT) by employees and misinformation	Potential	Own operations	Short term
Entity specific	Digitalization and use of new technologies	Positive impact	Improved accuracy of ESG data thanks to new technologies	Potential	Own operations	Long term
Entity specific	Digitalization and use of new technologies	Opportunity	Reduced costs and higher scalability due to streamlined processes via the use of digitalization and new technologies.	Actual	Own operations	Medium term
Entity specific	Responsible investments	Positive impact	3rd party funds managers encouraged by DPAS to adapt their policies, leading to more responsible investments	Actual	Upstream	Short term
Entity specific	Responsible investments	Negative impact	Client investment decision not aligned with the RI policy of BDP (e.g. in execution mode)	Potential	Downstream	Short term
Entity specific	Responsible investments	Negative impact	Companies excluded becoming stranded assets and not being financed anymore (e.g., impact on repricing of AuM).	Potential	Downstream	Long term
Entity specific	Responsible investments	Opportunity	Create business and financial revenues by helping small and medium caps to collect ESG data.	Actual	Downstream	Short term
Entity specific	Responsible investments	Positive impact	Create client's awareness regarding RI so to increase their investments that positively contribute to the environment and society	Actual	Downstream	Short term
Entity specific	Responsible investments	Risk	Due to financial market participants investing 'responsibly', it will lead to more industry concentration risk	Potential	Downstream	Long term
Entity specific	Responsible investments	Positive impact	Effectively supporting sustainable sectors and companies via RI	Actual	Downstream	Short term
Entity specific	Responsible investments	Opportunity	Financial gain due to investments in sustainable companies and sectors generating high financial performance.	Actual	Downstream	Short term
Entity specific	Responsible investments	Opportunity	Financial gain due to the development of new product offerings adapted to the new ESG regulatory requirements.	Actual	Own operations	Short term
Entity specific	Responsible investments	Opportunity	Financial revenues due to the retention of labelled funds (e.g. Febelfin label)	Potential	Upstream	Short term
Entity specific	Responsible investments	Opportunity	Financial/reputational gain and/or increase in market share due to the integration of ESG criteria in investment decisions required by ESG regulations (e.g. SFDR, EU Taxonomy, etc).	Actual	Own operations	Short term
Entity specific	Responsible investments	Positive impact	Helping small and medium companies to build ESG data through an internal ESG scoring system performed by BDP.	Actual	Downstream	Long term
Entity specific	Responsible investments	Positive impact	Institutional clients requesting an active engagement of BDP in the society and environment.	Actual	Downstream	Short term
Entity specific	Responsible investments	Negative impact	Investing in companies and/or sectors that have adverse impacts on the society or environment.	Potential	Downstream	Short term
Entity specific	Responsible investments	Positive impact	Investing in companies through active stewardship (i.e., engagement and voting) with the companies to influence their sustainable transition.	Actual	Downstream	Short term
Entity specific	Responsible investments	Risk	Legislation is pushing for quantitative assessments, hence leaving no room for qualitative assessment for RI	Potential	Downstream	Medium term
Entity specific	Responsible investments	Risk	Lowered financial performance and competitive advantage due to RI policy excluding investments in non-responsible sectors and/or companies despite their high financial returns.	Actual	Own operations	Short term
Entity specific	Responsible investments	Positive impact	Providing RI solutions aligned with the client's ESG preferences.	Actual	Downstream	Short term
Entity specific	Responsible investments	Opportunity	Reputation and financial opportunity for DPAS by providing guidance to its third-party clients and encouraging a more sustainable approach.	Actual	Upstream	Short term

The current financial effects of the identified material risks and opportunities are limited. As the material IROs are related to the core business activities and ability to grow, the company initiatives to improve opportunities and mitigate impacts and risks are embedded in already established governance structures. As a result, resilience is deemed high within the time horizons applied in the DMA. This is further supported by the results of Internal Capital Adequacy Assessment Process (ICAAP) which concluded that Degroof Petercam would be able to maintain its solvency ratios well above the regulatory requirements. In that sense it is fair to conclude that current & anticipated financial effects of the risks identified in this exercise are low, i.e. less than 10% of own funds. As of today, there is no financial effect of climate risk reflected in the financial statements.

Degroof Petercam does not disclose anticipated financial effects as foreseen in the Phased-in provisions.

No IRO was identified as material regarding ESRS E2, E3, E4 E5 (so-called 'environmental topics' in the DMA). However, Degroof Petercam finds it relevant to report on its Responsible Investments in a separate chapter using a.o., the existing European framework the Sustainable Finance Disclosure Regulation (SFDR: Regulation (EU) 2019/2088) which requires to report on Principal Adverse Impact Indicators (PAI). This includes existing information about biodiversity and waste. This explains why these PAI are actively managed as this is core to Degroof Petercam's positioning. Tools, data sources and processes have been deployed in the past - e.g., Rimes data platform - and will be equally maintained at the highest level possible.

# [IRO-1] Description of process to identify and assess material impacts, risks and opportunities

ESRS2\_IRO-1\_53

To perform the DMA and identify material IROs, a five-step approach was followed:

- 1. Define the scope and objective
- 2. Identify ESG topics and IROs
- 3. Assess materiality
- 4. Validate DMA results
- 5. Document the process and the outcome.

Through this process, DP defined its value chain, assessment scope, and stakeholder engagement to identify and assess the IROs associated with the assessed ESG sub-topics. ESG sub-topics were defined based on a mapping and clustering of ESRS sub-topics and sub-sub-topics and entity/sector specific ESG topics for DP. Information collected from direct and indirect stakeholder engagement was collected to identify and assess IROs. As the DMA exercise linked to reporting 2024 was conducted in Q4 2023, scoring criteria and materiality thresholds used to assess the IROs followed the recommendations of the ESRG 2022 and ESRS June 2023.

Per the requirements of ESRS 1, the materiality analysis is performed using the concept of double materiality. Consequently, in addition to assessing the risks and opportunities arising

from ESG concerns for DP (outside-in perspective), Degroof Petercam also examines the impacts it has or can have on the environment and society (inside-out perspective).

The identification of potential and actual positive and negative impacts was conducted in close collaboration with a wide range of stakeholder groups. These impacts were identified and assessed through desk research, subject-matter expertise, and stakeholder consultation, including workshops and interviews. It should be noted that the identification of IROs was mainly based on structured interviews with internal carefully selected experts who are in regular contact with the concerned stakeholder. In this respect, Degroof Petercam estimates that the IROs identified present a fair insight on stakeholders' concerns.

As a first step in the DMA process, DP identified three business layers to test the different material topics. These layers are:

- 1. Own operations: all internal activities to the bank that are needed to provide the bank's services to clients (e.g. Operations, Compliance, Front office, Risk, Product, Legal, Procurement, HR, ...).
- 2. Wealth managing activities: all activities related to investments in own name or in the name of clients. It can be on a discretionary, advisory or execution basis. As well as lending, credit activities and asset servicing.
- 3. Investment banking: all activities providing financial services for corporate and institutional customers, such as investing and raising capital and arranging mergers and acquisitions. As well as global market activities (e.g. equity research, fixed income, equity sales, sales trading).

Information collected from both direct and indirect stakeholder engagement was gathered and used to assess the quantitative criteria in accordance with ESRS 1, using a standardized rating system.

The assessment of each negative impact on society and the environment is based on severity - scale, scope, and remediability - and likelihood, in accordance with ESRS 1. Positive impacts of Degroof Petercam were evaluated with respect to scale, scope, and likelihood, also in line with ESRS 1.

The thresholds for assessing the impact materiality effects of sustainability topics were determined when the scores were scaled as important, significant, or critical. Sustainability-related impacts were assessed independently from each other for both impact and financial materiality.

The outside-in perspective, i.e., the assessment of the impact of ESG topics on Degroof Petercam activities, is represented by a risk and opportunity management process during which sustainability-related risks and opportunities are first identified, evaluated, and finally prioritized based on a defined set of thresholds. The identification of risks and opportunities was based on consultations with internal and external stakeholders with in-depth knowledge on specific topics and the company.

Risks and opportunities are assessed based on the likelihood and potential financial magnitude of the effects in the short/medium/long term. The retained parameters are aligned with those used by Degroof Petercam in the context of its Risk policy and more specifically to support its risk owners in performing risk assessments. In the absence of formal standards/guidance from ESRS on the scales to be used, the scales used are based on those defined by Degroof Petercam RCSA Methodology Policy for the likelihood and Degroof

Petercam Internal Capital Adequacy Assessment Process (ICAAP) report for the financial magnitude.

Sustainability-related risks for the double materiality assessment were aligned with ICAAP (and indirectly the ERM systems) and RCSA Methodology of Degroof Petercam.

The whole process was conducted by a small core team with members from a.o. compliance, risk finance, business; reporting on progress & results were done at the ESG Strategy Steering Group. Finally, the results were presented to CoDir & Board of Directors.

Up to date, Degroof Petercam has used the double materiality assessment to identify and assess opportunities. Further structured management processes that integrate opportunities in the Group's operations have not yet been implemented.

Company-specific sources of information were collected using primary stakeholder consultation (interviews, workshops and bilateral meetings), and secondary stakeholder consultation (desk research). Secondary sources included (not exhaustive):

- Database and frameworks: SDGs, SASB, GRI, PAI (SFDR), TCFD, ...
- Peer's materiality topics
- Associations: trade associations and sector associations (Febelfin, NBB, UN PRI, ...)
- Degroof Petercam internal documentation (integrated annual report 2022, Investment Policies, Risk Policies, ...)

A double materiality assessment was set up for the first time in 2023. As the materiality assessment is a dynamic process that is subject to the inherent evolution of Degroof Petercam, it will be updated on an ongoing basis and when deemed necessary e.g., organization and operational changes raising new material IROs. An update took place in December 2024 reflecting potential impacts of the Indosuez acquisition. Degroof Petercam concluded that this transaction did not affect the outcome of the DMA results, hence no modifications for several reasons:

- 1. The acquisition was finalized beginning of June, hence just before summer break. Numerous workgroups were launched to study potential future set-up of the new group. End of December most of these inventories are finalized and will start now to be implemented depending on underlying set- up of tools & systems.
- 2. Organization charts did not change in 2024 linked to this acquisition, Degroof Petercam continued to function as before with a reporting line to the Board in which Indosuez representatives are present.
- 3. There is an important overlap in business activities, Indosuez also being a wealth manager. Main difference is geographical reach where DP is BeLux oriented while Indosuez covers much more countries.

Going forward & over 2025, Degroof Petercam's & Indosuez Wealth Management business will evolve & mutually enrich each other.

The above confirms that DMA results of end of 2023 are still a correct basis for reporting on 2024.

Within its DMA exercise, Degroof Petercam did not identify material impacts, risks and opportunities with regards to Pollution (ESRS E2), Water (ESRS E3), Biodiversity (ESRS E4) and Resource Use (ESRS E5). These items are considered as not relevant for the own operations

as a Financial Institution, active through 17 locations in BE/LU (mainly smaller client facing meeting rooms). There was no specific screening of the portfolios for the downstream part of the value chain.

Note that for sustainability matters identified DMA as material following the DMA exercise, policies, actions and targets have not systematically been setup for each sub-sub-topics (ESRS1 AR16). This is because the first DMA performed was for the financial year 2024. If policies, actions or targets exist, they will be disclosed as such under the topical chapters. If not, relevant development will be taken into consideration in the future.

### [IRO-2] Disclosure Requirements in ESRS covered by sustainability statements

#### [ESRS2\_IRO-2\_56]

The list of ESRS disclosure requirements (DRs) covered by the company's sustainability statement as well as the table of all the datapoints derived from other EU legislation (the so-called Appendix B of this standard) can be found in Annex II.

#### ESRS2\_IRO-2\_57

The Double Materiality Assessment concluded that Climate Change is material both for Degroof Petercam's own operations (e.g. Buildings, fleet) as well as for its indirect impact mainly through investment portfolios (mainly of its clients). The latter is covered in a dedicated chapter called 'Responsible Investments'.

#### ESRS2 IRO-2 58

Sub-topics 'workers in the value chains' and 'all the environmental topics excluding ESRS E1-Climate change proved to be non-material due to Degroof Petercam's very limited impact on these metrics.

#### ESRS2\_IRO-2\_59

Sustainability topics from European Sustainability Reporting Standards (ESRS) were completed with dedicated desk research. After mapping all relevant sub-topics, structured interviews helped to identify impacts, risks, and opportunities (IROs). To proceed to the IRO assessment a common scoring methodology was agreed upon and appropriate quantitative and qualitative materiality thresholds were defined. Based on conversations with engaged stakeholders each identified IRO was assessed on impact and financial materiality.

IROs were first qualitatively categorized, according to indicators required by ESRG 1 Double Materiality Guidelines:

- Materiality Type: positive or negative (impact), risk or opportunity (financial)
- Location of IRO: global or local
- Position in value chain: upstream, own operations or downstream
- Time horizon: short-term, mid-term or long-term
- Actual vs. potential: within or after a one-year timeframe

Then, IROs were assessed through a quantitative scoring grid using criteria such as scale, scope, remediability, likelihood and magnitude to determine the materiality of each ESG subtopics according to internal methodology and EFRAG IG1 Materiality assessment guidelines.

This was mainly within financial materiality zone where Degroof Petercam used its Internal Risk Framework. It's however also clear that no quantitative assessment is available at this stage for all IROs. In terms of financial materiality, topics which were identified as being 'critical' or 'significant' were considered as 'material', topics which were considered as 'important', 'informative' or 'minimal' were considered as 'non-material'. As for impact materiality score, sub-topics which are 'critical', 'significant' or 'important' were considered as 'material' whereas 'informative' or 'minimal' subtopics were considered as 'non-material'. The difference of approach between financial materiality – where only critical & significant aspects are considered and impact materiality - where the 'importance' criteria is taken into account - is linked to Degroof Petercam's risk appetite. With an estimated financial impact of less than 10 % of regulatory capital, Degroof Petercam assesses subtopics as not material.

### E1 - Climate change

This chapter on Climate Change covers the required disclosures linked to Degroof Petercam's Own Operations. As mentioned in ESRS 2 IRO 2, Degroof Petercam has applied 3 layers to assess its main impacts, risks & opportunities (IRO). The main IROs were identified in the third layer on Wealth Management. This explains the decision to develop an entity specific chapter – Responsible Investments. As for Degroof Petercam's own operations (layer 1), only climate change was considered as material.

Reporting about data & management linked to Scope 3 - Category 15 'financed emissions' is therefore found in the dedicated chapter Responsible Investments. This chapter also includes all ESRS E1 disclosures linked to Responsible Investments a.o., EU Taxonomy (ESRS E1 6). Although the disclosures linked to ESRS E1 are hence split over two chapters (this one and the one Responsible Investments), Degroof Petercam estimates that this ensures a better reading & understanding the Sustainability Strategy. Keep acting on Climate Change challenges within its own operations is a matter of 'walking the talk', although own operations impact remains smaller compared to the overall challenges.

# DR related to ESRS2 [GOV-3] Integration of sustainability-related performance in incentive schemes

E1\_DR related to ESRS 2 GOV-3 \_13

As already stated under ESRS2 GOV3, there is no direct link for the moment between the Net Zero plans and the variable remuneration.

DR related to ESRS2 [SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model & DR related to ESRS2 [IRO-1] Description of processes to identify and assess material climate-related impacts, risks and opportunities

E1\_DR related to ESRS 2 SBM-3 \_18 & 19

Degroof Petercam group stakeholders involved in the DMA exercise identified Climate change as a material topic. As outlined in ESRS2 IRO1, the climate-related impacts, risks, and opportunities were evaluated as follows:

- **Risk**: Reputational damage if the company does not implement initiatives to reduce emissions, nor demonstrate a commitment to "walking the talk
- Opportunity: Reputational opportunity for Degroof Petercam by implementing initiatives to reduce emissions, demonstrating a commitment to "walking the talk."

While Degroof Petercam's reputation is considered as a material climate risk from an overall CSRD perspective, the assessment made in the ICAAP report highlights that there is no further specific transition or physical climate risk expected within a 3-year period. The following paragraphs provide more explanations about the ICAAP scenarios.

(a-b) Since 2022, the ICAAP of Degroof Petercam has included an ESG Risk scenario with a focus on climate risk in line with the scenarios of the ECB's 2022 climate stress test. These first scenarios/quantifications related to climate risk take the main vulnerabilities identified and covered into account in the ESG risk policy.

In 2025 (as in the last two years), in the absence of new parameters, it was decided to keep the same scenario as in 2022 applied to the situation at the end of December 2024.

The calibrations of the ECB climate stress test 2022 are based on NGFS scenarios (June 2021 – Phase II)1.

Transition risk is modelled in long-term and short-term scenarios, whereas physical risk scenarios are designed as instantaneous shocks.

The long-term transition risk scenarios are as follows:

The "Orderly" scenario based on the NGFS net zero 2050 scenario characterized by:

- Early and Gradual Climate Policies: Policies are introduced early and become more stringent over time.
- Net Zero 2050: Global warming is limited to 1.5°C, with net zero carbon emissions achieved around 2050.
- Risks: Both physical and transition risks are relatively subdued due to the smooth and gradual nature of the transition.

The "Disorderly" scenario based on the NGFS delayed transition scenario defined by:

- Delayed Climate Policies: New policies are not introduced until 2030, requiring strong actions to limit warming to below 2°C.
- Higher Transition Risks: Delays lead to higher transition risks, including higher carbon prices.
- Physical Risks: Increased temperature results in more frequent and severe extreme weather events.

<sup>&</sup>lt;sup>1</sup> On November 7, 2023, the Network for Greening the Financial System (NGFS) published the fourth edition of its long-term climate macro-financial scenarios for forward-looking climate risk assessments. NGFS scenarios explore the transition and physical impacts of climate change over a long-term horizon and under a variety of assumptions.

The NGFS scenarios have been updated to reflect the latest GDP and population trajectories, as well as the most recent country-level climate commitments as of March 2023.

These scenarios are designed for central banks and supervisors to use for their next regulatory stress tests. They are drawn up at national level or even for certain geographical areas and do not include a complete split at sectoral level. During the previous climate stress test, the ECB had broken down the NGFS parameters into finer parameters to feed the macroeconomic data feeding the scenarios

They are therefore not yet used in the context of the ICAAP/ILAAP update.

The "Hot House World" scenario based on the NGFS current policies scenario characterized by:

- No New Climate Policies: No new policies are implemented, leading to global emissions growth until 2080.
- 3°C Warming: Global warming reaches about 3°C.
- Risks: Negligible transition risks but significant physical risks due to extreme weather events and economic impacts.

The ECB "Short-term Disorderly Transition Risk" scenario based on the NGFS "Delayed Transition" scenario is defined by:

- Sharp Increase in Carbon Prices: A sharp and unexpected increase in the price of carbon emissions occurs over a three-year period.
- **Delayed Policy Measures**: Policy measures to reduce carbon emissions are delayed, necessitating sudden and severe actions to meet Paris Agreement targets.
- Tail Risk Assessment: This scenario captures severe but plausible tail risks, assessing the sensitivity of banks' current balance sheets to unexpected sharp measures to curb carbon emissions in the near term.

The following physical risks are covered by the ECB 2022 climate stress test:

- Drought and Heat Risk: Models the economic effects of a severe drought and heatwave in Europe, impacting labor productivity and leading to output losses in several economic sectors.
- Flood Risk: Assumes severe floods sweep across Europe, causing significant damage to human lives and physical capital, with risk variations accounted for at the regional level.

The parameters of DP's ICAAP were based on the short-term disorderly transition risk scenario and the flood risk scenario. The latter is only used on real estate collateral (credit) for quantification purposes. Indeed, the scenario used in the ECB climate stress test had to be adapted to cover the risks of DP.

The ECB stress test does not include shocks to sovereigns, so an internal approach had to be developed. The latter considers a rate spread based on a general spread by geographical area (provided by the ECB) as well as a specific spread by country based on the countries vulnerabilities to a transition shock.

Nor does it include scenarios concerning reputational and continuity risks. Hence, scenarios have been developed considering internal parameters estimated based on past events or external greenwashing case observed in the market.

The ICAAP scenarios' horizon is of 3 years, at this stage the climate scenarios chosen are therefore not long-term scenarios.

#### Measuring transition risks

This scenario assumes a disorderly climate transition in the short term, affecting companies active in risky sectors, coupled with a change in customer preferences (migration to "green" assets) and reputational impact in a context of changing definitions of "green" products offered to customers.

- The transition is causing a re-pricing of financial assets in the sectors most impacted by the transition (following a sharp increase in the cost of carbon).
- This re-pricing affects Degroof Petercam on several levels: reduction in the value of the assets held in the portfolio (P&L / OCI impact), reduction in the value of the collateral held as collateral in the credit portfolio and increase in the risk of default of counterparties active in these sectors.
- At the same time, macroeconomic changes imply an increase in interest rates (to contain rising inflation – inflation therefore remains within the limits of the base case according to the 2022 EBA climate stress test assumptions) as well as a change in GDP (especially in countries dependent on carbon-intensive industries), impacting the value of the sovereign bonds of these vulnerable countries.
- Finally, in a context of changing regulations related to "green" products offered to customers, Degroof Petercam is involved in a controversy concerning these products. Part of the "green" portfolio does not meet the defined rules, implying a flight of customers as well as weaker than expected growth in activities. For this ICAAP, no sanction for greenwashing were considered because the MiFID SFDR changes was not yet in place. This became part of the 2023 scenario (reputational risk).

Hence, this scenario led in particularly to apply stress factors to:

- The loan portfolio, through the application of depreciation factors on collateral (securities and real estate) and sector default;
- The corporate and government bonds, through a widening of the spreads.
- Reduced revenues on equity;
- The simulation of a reputational impact related to ESG, through a simulation of client outflows.

Such as for other changes in stock market parameters, an estimation of the shocks was performed on the internal benchmark i.e., the patrimonial fund "DP Global Strategy L", representative of the average investment profile of DP's clients or mixed funds.

#### Measuring physical risk

The impact of physical risk on business continuity is analyzed through a flood risk scenario affecting Degroof Petercam's buildings, based on past flooding events in Belgium.

The physical risk on real estate collateral (credit) is quantified using the ECB flood risk scenario with a time horizon of 1-year, which accounts for within-country variation in risks. As such, shocks to residential and commercial real estate are estimated at NUTS3 regional level, according to a specific flood risk level.

Chronic physical risks (such as drought) are not suitable for our scenarios because they have a long-term impact and our scenarios cover 3-year periods.

#### **Mitigations**

The scenario also considers all actions taken by the bank to mitigate climate-related risks such as establishing stronger governance in sustainable finance integrating ESG risks with:

- the establishment of the Responsible Banking Steering Group, which is responsible for integrating this risk
- the implementation of ESG Strategy Governance, which is responsible for ensuring the consistency of ESG policies, procedures and reporting
- an action plan including all actions required to ensure full compliance with the ECB's expectations in terms of management and communication of climate and environmental risks and the EBA's guidelines on the management of ESG risks, such as a set of transversal ESG risk indicators
- strengthening ESG reporting controls.

DP has made several sustainability commitments including the Net Zero commitment. In 2024, DPAM also became an 'Early Adopter' of the Taskforce on Nature-related Financial Disclosures (TNFD).

When it comes to physical risk impacting DP business continuity, the following mitigations actions should be considered:

- Ability to perform critical tasks from another agency and/or in telecommuting mode;
- Business Continuity Plan covering multiple scenarios; and
- Crisis Communication Plan policy implemented and operational.

(c) The resilience analysis shows that DP is able of complying with regulatory solvency ratios while maintaining a stable bonus with a floor at the level of 2024 and this even in a scenario considering a reputational impact combined with a substantial loss of clients.

#### [E1-1] Transition plan for climate change mitigation

#### E1 E1-1 14

Degroof Petercam committed to SBTi in March 2024. As from June 2024, Degroof Petercam's name figures on the SBTi website with the status 'committed'. DP has 24 months to submit its targets in line with reaching Net Zero – Paris Climate Agreements. The transition plan covers 3 elements:

- 1. Reducing Scope 1 & 2: this consists of reducing the emissions linked to the buildings & fleet. Investment plans are being drafted/executed to significantly upgrade the energy efficiency of the owned buildings. It has also been decided to shift towards an electric fleet as from 1Q2025 onwards. Both elements should enable realizing an important decrease of CO2 emissions on scope 1&2 compared to 2023 baseline.
- 2. As for Scope 3 elements: no specific target is set as the main factor in this Scope is linked to "purchased goods & services". The Procurement policy has been updated in 2023 by including checks on 'environmental' measures taken by the suppliers e.g., SBTi alignment. It should be noted that main suppliers are linked to

IT & data. These suppliers have taken significant steps themselves (e.g., Microsoft, Avaloq...). It should also be noted that 'procurement' going forward will be steered from an Indosuez Group perspective. As for the other categories e.g., Commute & travel, there are policies in place favoring 'sustainable' options (e.g., Preference for train instead of plane for short distances).

3. Scope 3 – Cat 15 – financed emissions, which is the major part of Degroof Petercam's GHG footprint, is covered in an entity-specific chapter called 'Responsible Investments'.

#### E1\_E1-1\_16 - (a)

Cfr Above.

Targets which are currently being set up will be higher than near-term science-based targets for 2030 under SBTI, which eventually reflect an objective of net-zero by 2050.

#### E1\_E1-1\_16 - (b)

With regards to the reduction targeted on scope 1 & 2, the main investment files & leviers are linked to the Headquarter buildings in Belgium & Luxembourg. They stand for 85 % of total gas consumption. Studies have been prepared on upgrading the heating & cooling systems. Implementation is pending awaiting further decisions post-merger as this operation also includes merging buildings & headquarters.

- Facilities: major refit is needed in BE & Lux HQ. However, further study considering the real estate footprint of the new group is required to define the necessary level of investments. This could lead to a possible reduction of more than 50 % of CO2 emissions due to a shift to electricity.
- Fleet: the decision was taken to shift to electric fleet in Belgium, starting from the first quarter of 2025. Degroof Petercam Belgium's fleet (84% of total Degroof Petercam Fleet) should be fully electrified by 2030 as AVG lease takes 4 years. As of today, BE Fleet consists of 22 % electric cars.

With regards to Scope 3 – upstream actions:

- It has been approved to integrate ESG elements (a.o., SBTi alignment) in the Procurement policy in 2023; further follow-up & finetuning will be done within the context of the new Indosuez Group.
- Furthermore, the impact linked to commuting burden is being mitigated through teleworking policies as well as opportunities to not opt for a car (e.g., Introduction Federal Mobility Plan in BE).
- Finally, the impact linked to business travel is mitigated through encouraging digital meetings & promoting train for short distance.

#### E1\_E1-1\_16 - (c)

Non applicable

#### E1\_E1-1\_16 - (d)

Locked in GHG emissions are not applicable to Degroof Petercam as the Group doesn't sell key assets or products for which estimates of future GHG emissions could be locked within their operating lifetime.

E1\_E1-1\_16 - (e)

Non applicable

E1\_E1-1\_16 - (f)

Non applicable

E1\_E1-1\_16 - (g)

Non applicable.

E1\_E1-1\_16 - (h)

As explained in the sub-chapter E1 4 (Targets related to climate change mitigation and adaptation), the transition plan consists of two parts, one linked to own operations and the other one linked to 'Responsible Investments'. Both transition plans are embedded in the business strategy (eg follow-up on SBTi alignment within the investment portfolios is integrated) & hence reflected in financial planning. In that sense the transition towards a carbon neutral society, considering other factors such as social ones, are embedded day-to-day acting, services & solutions. Although main impact lies in providing sustainable solutions through Responsible Investments, Degroof Petercam emphasizes the importance of 'walking the talk' as it comes to its own operations. It's one of the 3 pillars of DPs' sustainability strategy.

#### E1\_E1-1\_16 - (i)

The Net Zero commitment, which is the fundament of the transition plan has been approved by the Management Committee on December 19, 2023. It has been submitted for information to the Board of Directors on January 25, 2024. The underlying elements have been discussed in the different steering groups e.g., Corporate Sustainability Steering Group & ESG Strategy Steering Group in 2023. Relevant updates are shared in the same governance bodies in 2024.

#### E1\_E1-1\_16 - (j)

- With regards to Scope 1 & 2 emissions (facilities & fleet): decisions have been taken (e.g.: choice for an electric fleet); but more time is needed to assess whether these decisions were adequate.
- With regards to Scope 3 emissions: decisions have been taken, but data quality, especially CO2 data quality & availability of Purchased goods & services, is insufficient at this moment to draw main conclusions.
- With regards to Scope 3 financed emissions: see specific chapter 'Responsible Investments'.

Updates on the action plans are shared within the different Steering Groups as soon as updates are available:

- With regards to Scope 1&2: yearly CO2 footprint as well as creation of Facilities dashboard
- With regards to Scope 3 emissions: yearly CO2 footprint as well as creation of Procurement dashboard
- With regards to Scope 3 financed emissions: more regular updates at TCFD DPAM & RBSG

The CO2 footprint of Degroof Petercam has been published in the non-financial report from 2021 onwards. These first calculations are not necessarily in line with CSRD requirements and therefore the comparison might not lead to correct conclusions.

It should be noted that the above-mentioned governance will change given the merger with Indosuez.

### [E1-2] Policies related to climate change mitigation and adaptation

#### E1\_E1-2\_24

Policies detailed below cover all topics within GHG except for 'Cat 15 - financed emissions' which are covered in the sector specific chapter 'Responsible Investments'. All these policies are available on DP's intranet and can be consulted by all employees anytime.

- Mobility Policy (mitigation):
  - (a) Summary: The Mobility Policy provides employees with flexible transportation options, promoting greener mobility and better work-life balance. It includes a Mobility Budget that employees can allocate to various transportation modes, such as leased cars, bicycles, public transport, and shared mobility services. This policy aims to reduce the environmental impact of commuting and offers employees the flexibility to choose the most suitable transportation options for their needs. In 2024 Degroof Petercam implemented the 'Federal Mobility Budget' giving employees not opting for a leased car even more alternative mobility and other solutions. Degroof Petercam is in that sense a frontrunner in the market regarding sustainable mobility policies for employees. In Luxembourg there is no Federal Mobility Budget. However, the local policy has been revised to prohibit any future order of thermal vehicles and favor full electric vehicles. The parking of the Bank Degroof Luxembourg building has been equipped with 64 charging points. Next to that, all public transport is free of charge throughout Luxembourg.
  - (b) Scope: all Degroof Petercam employees in Belgium and Luxembourg
  - (c) **Ownership of the policy:** HR is responsible for managing and reviewing the Mobility policy.
- Procurement Policy (mitigation):
  - (a) **Summary:** The Group Procurement Policy of Degroof Petercam aims to ensure that all business units and functions involved in the procurement of goods and services operate with maximum efficiency and effectiveness while adhering to internal guidelines and external regulations. The policy outlines the roles and responsibilities of the Group Procurement Team, which acts as the Center of Excellence for facilitating and coordinating procurement activities. The procurement process is detailed in several steps, including needs specification, market analysis, RFx process, supplier selection and negotiation, contract management, and follow-up. The policy emphasizes ethical behavior, transparency, and compliance with regulations, and includes guidelines for supplier selection, contract complexity, and the involvement of the Investment

Committee for high-value contracts. Additionally, the policy addresses the management of external workforce and includes a whistleblowing process for reporting concerns about illegal or unethical conduct.

- (b) **Scope**: The policy applies to all DP entities and covers acquisitions from third-party suppliers with a contractual value above a specified threshold, excluding certain categories like salaries, taxes, and banking fees.
- (c) Ownership of the Policy: procurement is responsible for this policy. Further management & finetuning of this policy going forward will be done within the context of the new Indosuez Group.
- Travel Policy (mitigation):
  - (a) Summary: The travel policy of Degroof Petercam aims to optimize business travel while ensuring safety, comfort, and adherence to company standards. It also seeks to control travel expenses and promote responsible business travel practices. The policy includes guidelines for booking travel, which should be done at least one month in advance when possible and requires approval from direct supervisors. Travel arrangements are managed through the Travel Plus platform. Employees are encouraged to use cost-effective and environmentally friendly transportation options, such as trains, and to stay in partner hotels within specified budget limits.
  - (b) Scope: The policy applies to all DP entities.
  - (c) Ownership of the Policy: Facilities

#### E1\_E1-2\_25

Degroof Petercam's core own operations have a limited link with Climate change mitigation, adaptation, energy efficiency & renewable energy. Therefore, the set of policies described above is also limited.

Through its mobility, travel & procurement policies, Degroof Petercam acts on climate change mitigation a.o., purchasing 100 % green energy.

# [E1-3] Actions and resources in relation to climate change policies

#### E1\_E1-3\_28

Actions & resources detailed below cover all topics within GHG except for Cat 15 - financed emissions which are covered in the entity specific chapter 'Responsible Investments'.

Degroof Petercam did not identify any critical elements which could hamper the actions needed in the transition plan.

With regards to scope 1 & 2 which is own energy consumption linked to fleet & buildings:

- Fleet: Main part of the Degroof Petercam fleet (84 %) is located in Belgium, the other part is linked to Luxembourg.
  - o In Belgium, a gradual shift of mobility plans has been worked out over the last few years. After the phasing out of fossil fuel only cars, Degroof Petercam has decided to move to a 100 % Electric Fleet over the coming

years. As from end of Q1 2025, the only possibility for employees interested in a car will be electric. As of today, electric cars consist of 22 % of total Belgian fleet. As the average leasing contract is 4 years, Degroof Petercam will completely switch to an electric fleet by 2029 at the latest. The company also invests in charging infrastructure both at workplace as well as in providing home charge infrastructure. Next to that, a new mobility package for employees based on the Federal Mobility Plan has been launched as of July 1st, 2024. This option was taken by 91 persons, over 10 % of eligible staff.

- As for Luxembourg, car policy no longer allows fossil fuel cars. As of today, there is no engagement on Electrical Vehicles only. However, Luxembourg staff benefits of 64 charging point at HQ which supports the transition. Next to that, public transport in Luxembourg is free of charge.
- As for the other countries in which Degroof Petercam is active, cars are not a material component of wage package, are not material in total & are hence not included in the action plans.

#### Buildings:

It should be noted that the building footprint of Degroof Petercam will also be impacted over the coming years given the merger with Indosuez which will impact Belgian & Luxembourg operations.

- o In Belgium, studies have been launched & are being finalized on major energy upgrades for DP's Brussels Headquarter. Based on these studies and also considering upcoming plans within the new group, budgets still need to be determined. Geothermal systems are being studied, for instance. But projected energy reduction for these buildings is hence not yet available.
- o In Luxembourg, plans have been drafted to significantly upgrade & renovate the existing cooling & heating systems. These plans will be further studied & decided upon after the physical relocation of the Indosuez teams into the Degroof Petercam LU Building.
- o Outside the buildings in BE and Lux, Degroof Petercam doesn't own buildings.
- Electricity: in Belgium and Luxembourg, all facilities use certified 100 % green electricity.
- Taking all these actions into account, Degroof Petercam targets a material reduction of its Scope 1&2 emissions by 2030 compared to 2023.

As for Scope 3 emissions (apart from Cat - 15 financed emissions), no specific commitment has been taken for the time being although actions have been put in place, such as:

- Business Commute: in Luxembourg, public transport is free of charge, in Belgium public transport is reimbursed according to the mobility policy. In Belgium, employees can also enjoy a bike lease program. Over 100 colleagues entered this program.
- Waste: waste is collected & recycled with support of external parties as MCA recycling in Belgium and Netto-Recycling in Luxembourg.
- Business Travel: a travel policy is in place thereby no more allowing too short flights.

- Purchased goods & services: main part of these services is linked to IT providers &/or consultancy. Especially the big IT providers (e.g., Microsoft, Avaloq, ...) do already have significant action plans in place. In that respect, it is good to note that Degroof Petercam joined the Belgian Institute for Sustainable IT thereby enabling it to benefit from analysis & best practices going forward. A first detailed analysis has been finalized & will lead to further actions going forward.
- As overall society will reduce its CO2 emissions linked to increased usage of renewables, DP' scope 3 (except for Financed emissions) will also benefit from this decrease.

#### E1\_E1-3\_29 (a)

(a) reference is made to the disclosure above. As Degroof Petercam is active in the financial sector, it doesn't use nature-based solutions.

#### E1\_E1-3\_29 - (b)

- (b) where available, the expected reductions are mentioned:
  - Knowing that the fleet has a fixed lease term of 4 years, it will become fossil fuel free in 2029 at the latest.
  - As for buildings, analysis are being finalized, but are dependent on the update of the real estate footprint strategy given the new Indosuez context.
  - For all other elements of the Carbon footprint, there was no specific general or detailed analysis conducted.

#### E1\_E1-3\_29 - (c)

(c) The investments needed to retrofit the buildings are not yet set. This is linked to ongoing analyses about real estate footprint which will be required as part of our new Indosuez group going forward.

EU taxonomy regulation is not applicable on Degroof Petercam's own operations. This regulation is covered in the section on Responsible Investments.

# [E1-4] Targets related to climate change mitigation and adaptation

Introductory remark: as for target setting linked to climate change mitigation and adaptation, the following summary can be given and might help further reading of the different disclosures E1-4 in this chapter as well as in the second part of E1-4 disclosure reflected in the Responsible Investments chapter. Degroof Petercam took two commitments as of today:

- (a) SBTi commitment on Group level: status committed, no targets submitted nor validated by SBTi
- (b) NZAMI commitment on the level of Degroof Petercam Asset Management. Commitment & targets validated.

#### (a) SBTi commitment:

• SBTi: The Science Based Targets initiative was established in 2015 to help companies to set emission reduction targets in line with climate sciences. Over 10.000 companies have set targets since the launch of the initiative.

 Degroof Petercam committed to SBTi in 2024; as of June 24, Degroof Petercam is mentioned on the website. Within 24 months the targets have to be validated. Internally, actions are taken on scope 1 & 2 emissions (which will lead to a material decrease of GHG footprint by 2030). As for targets linked to category 15 (financed emissions), analysis on potential targets is going on for ao. assets linked to Private Banking. The targets will be inspired by the targets already set by DPAM.

#### (b) NZAMI commitment

DPAM committed to NZAMI in March 2022 and has targets approved for its funds.
 DPAM uses SBTi as a methodology for this commitment, but it did not take a specific commitment at SBTi. As CSRD is a consolidated report the AUM of DPAM are equally in Degroof Petercam's value chain – category 15 – financed emissions.

It should be noted that targets linked to climate change & climate adaptation might evolve going forward because of the merger with Indosuez. Targets might also be adopted considering specific requirements made by SBTi in the new guidance currently being drafted.

Note that NZAM published the following post on their website in January 2025: "The Net Zero Asset Managers initiative exists to help investors mitigate the material financial risks of climate change and to realise the enormous benefits of the economic transition to net zero. Recent developments in the U.S. and different regulatory and client expectations in investors' respective jurisdictions have led to NZAM launching a review of the initiative to ensure NZAM remains fit for purpose in the new global context. Signatories will be consulted throughout the review process and informed of any updates in a timely and transparent fashion".

Despite this recent statement, Degroof Petercam Asset Management remains convinced that this initiative's objectives are important and therefore will continue its efforts to achieve its net zero emissions targets.

Targets linked to own operations i.e., linked to Scope 1-2 & 3 (except category 15 – financed emissions) are covered in the following E1-4 paragraphs. Targets linked to Scope 3 category 15 – financed emissions are covered in the chapter on Responsible Investments in the disclosure ESRS E1 4 within that chapter.

#### E1\_E1-4\_33

- With regards to Scope 1 & 2, Degroof Petercam actions are taken to materially reduce carbon footprint by 2030 compared to 2023 baseline. Degroof Petercam's targets will be set in the framework of its commitment to SBTi in March 2024.
- With regards to Scope 3 (except for Cat 15 financed emissions): no target has been set; in general, footprint should decrease in line with its overall decline in the society, hence in line to NDC's (Nationally Determined Contribution).

The above-mentioned approach was elaborated by Degroof Petercam Group (meaning Belgium & Luxembourg). However, continuous integration with Indosuez will further impact operations both in Belgium & Luxembourg. Therefore, these targets will be re-assessed and aligned with existing and future Indosuez targets.

#### E1\_E1-4\_34 - (a)

Degroof Petercam did not formally decide on a target but has taken actions to further reduce its carbon footprint by 2030.

#### E1\_E1-4\_34 - (b)

- Actions mentioned above are for Scope 1 & 2 combined, which is logic considering that Scope 2 is linked to energy usage in Scope 1. For Degroof Petercam, the scope 2 emissions contain the electricity mix linked to charging of the fleet. For its buildings, green electricity is used. The target is applicable on consolidated level.
- The actions do only cover CO2 emissions as the other greenhouse gas emissions are not relevant for the company's activity.
- The activities included in the calculation cover the Belgian & Luxembourg operations which count for high majority of activities (e.g. 98% of FTE) for all GHG factors except for 'Purchased Goods & Services & Capital Goods' where consolidated figures are used.
- No off setting or avoided emissions are used.
- Actions mentioned do cover 100 % of Scope 1 and Scope 2 GHG emissions. The rest of the emissions under Scope 3 are not covered.

#### E1\_E1-4\_34 - (c)

Baseline year is 2023 in which a Scope 1 & 2 footprint of 3.575 ton CO2 is reported. The underlying data includes the operations in Belgium & Luxembourg, and more precisely the fleet & buildings. The base year is representative because this takes into consideration all main contributions based on a limited data set which covers 98% of FTE: number of cars, and energy used for cooling & heating of buildings.

#### E1\_E1-4\_34 - (d)

Degroof Petercam will set a target reducing scope 1 & 2 using 2023 as a base year. The CO2 footprint is being measured as of year 2021. These first calculations are not necessarily in line with CSRD requirements and comparison might hence not always lead to correct conclusions.

The company took its first measures with regards to fleet (e.g., no more fossil fuel cars as from 2023 onwards, and electric only as from 1Q2025 (for the Belgian fleet) as well as with regards to its owned buildings. Impact of these decisions should become visible as from 2026 onwards.

With regards to targets on Scope 3 - financed emissions - reference is made to a specific chapter on 'Responsible Investments'.

#### E1\_E1-4\_34 - (e)

Degroof Petercam's targets will be set in the framework of its commitment to SBTi in March 2024 which foresees 24 months to have the targets validated, hence by March 2026. In terms of target setting, Degroof Petercam will use the available target setting methodology i.e., 'Financial Sector Science-Based targets guidance version 1.1 dd. August 2022. As for scope 1 and 2 this guidance provides a cross-sector target with a minimal annual reduction of 4,2%.

The target setting Scope 1 & 2 entails a reduction in absolute terms which Degroof Petercam intends to do. As for its scope 3 emissions, this document does not require a Scope 3 target setting except for Category 15 - Financed Emissions. These targets are explained in the specific chapter on 'Responsible Investments'.

In terms of future developments, as indicated before, the targets will be impacted by the integration of Degroof Petercam within CA Indosuez. The impact will be analyzed further in the future together with the new parent company.

#### E1\_E1-4\_34 - (f)

Main decarbonization levers can be detailed as follows:

(a) Scope 1 & 2 will decarbonize as the fleet will be electrified and necessary investments in the buildings will be made. The estimated contribution stands at 2,681 ton CO2eq, i.e. 75 % of 2023 footprint.

As for Scope 3 in the framework of this chapter, ie. own operations, no decarbonization levers are identified or targeted.

- (b) No new technologies need to be adopted in order to achieve these reductions.
- (c) Actions taken to decrease Scope 1 & 2 by 2030 are in line with a climate scenario compatible with limiting global warming to 1.5°C. No other scenarios were tested.

# [E1-5] Energy consumption and mix

#### E1\_E1-5\_37

	Energy consumption and mix	2023	2024
-1	Fuel consumption from coal and coal products (MWh)		
-2	Fuel consumption from crude oil and petroleum products (MWh)		
-3	Fuel consumption from natural gas (MWh)	3.825	3.919
-4	Fuel consumption from other fossil sources (MWh)	11.717	9.362
-5	Consumption of purchased or acquired electricity, heat, steam, and cooling from fossil sources (MWh)	-	-
-6	Total fossil energy consumption (MWh) (calculated as the sum of lines 1 to 5)	15.542	13.281
Share o	of fossil sources in total energy consumption (%)	75%	73%
-7	Consumption from nuclear sources (MWh)	0	0
	of consumption from nuclear sources in total energy option (%)		
-8	Fuel consumption for renewable sources, including biomass (also comprising industrial and municipal waste of biologic origin, biogas, renewable hydrogen, etc.) (MWh)		
-9	Consumption of purchased or acquired electricity, heat, steam, and cooling from renewable sources (MWh)	5.129	4.888
-10	The consumption of self-generated non-fuel renewable energy (MWh)		
-11	Total renewable energy consumption (MWh) (calculated as the sum of lines 8 to 10)	5.129	4.888
Share of renewable sources in total energy consumption (%)		25%	27%
Total energy consumption (MWh) (calculated as the sum of lines 6, 7 and 11)			18.169

The actual electricity consumption over the months November and December 2024 was not yet available at the moment of drafting this report. Therefore, these figures have been proxied using average day consumption in the months November and December 2023. This way full year consumption of 366 days was covered with 10 months real data & 2 months 'proxied' data.

### [E1-6] Gross Scopes 1, 2, 3 and Total GHG emissions

#### E1\_E1-6\_44

Cfr table. Degroof Petercam delivers with the consumption data (see detail below) to Futureproofed, (BE 0466.140.824) a Belgian-based company, part of SWECO. Futureproofed provides us a.o. with detailed CO2 calculation according to GHG protocol which serves as the basis of the table shown.

#### Main assumptions used:

- Data used cover Luxembourg & Belgian operations as these are the most material.
   As an indication this covers 98 % of staff. Hence staff outside BELUX is excluded except for Categories Purchased Goods & Services & Capital Goods
- For Company facilities, real consumption data are used. DP has data for all branches & buildings (including HQ Lux) it owns. For 7 buildings energy consumption is estimated. For electricity consumption, a proxy based on HeadCount is used (AVG Headcount electricity consumption of the owned buildings is applied to the rented branches). For gas consumption, a similar proxy has been used based on m². It should be noted that these are buildings are branches. Result of the estimate is 117ton CO2 GHG. The latter is mentioned in the category upstream leased assets.
- For Company Fleet, real consumption data in liters as well as Kwh for all hybrid & electric cars are available
- For **Scope 2**, DP has green electricity certificates. The amount calculated reflects home charging.
- For **business travel**: all details available in terms of dates & trips. For business travel in Luxembourg, a calculation needs to be performed in order to establish train miles & air miles using publicly available sources to compute distances between departure & arrival. Tools used are Air Miles (plane) and Copilot (train).
- For the categories "Capital Goods' & Purchased Goods & Services" consolidated figures are used:
  - For Capital Goods (cfr table 7.6 excluding leasing IFRS 16)., amounts are in general low, in 2024 even zero (buildings & IT), Futureproofed converges using CO2 proxies
  - o For Purchased Goods & Services: Degroof Petercam uses an overview of general expenses split in 4 categories (IT, consultancy, Maintenance & Marketing). Futureproofed uses proxies by CO2 intensity per EUR expended in these categories (e.g., marketing, IT...) taken into account real GHG emissions of the most important suppliers.
- For Employee Commuting:
  - o For Belgium:
    - People having a company car, fuel consumption is taken in Company Fleet
    - People using public transport, data from NMBS/SNCB is used.
    - People using own car: data available
    - No data on people arriving by bus or metro (but considered not material)

- o For Luxembourg:
  - 114 people are using public transport; no data available as public transport is free in Luxembourg. Proxy used: 50 % on AVG 10 km, 25 % on AVG 20, 25 % on AVG 30 km times 80 %
     \* 220 days
  - People using own car: 132 employees having access to parking & no fleet car, based on real distances, proxy is used by multiplying with 80 % \* 220 days (taking into account limited homeworking)
- For energy related services: based on Degroof Petercam's upstream energy consumption, emissions factors stemming from Futureproof were applied to obtain this figure.
- For waste
  - In Belgium: all data on all waste categories available in the HQ (source: MCA recycling) and on paper waste for HQ & all branches (source: MCA recycling).
  - o In Luxembourg: one single data source with a full overview (source: SICA)

#### **Definitions & operational boundaries:**

#### • Scope 1 GHG emissions

Scope 1 emissions are direct emissions that originate from sources that a company controls or is responsible for. They are closely linked to internal activities and include various processes that release greenhouse gases. For Degroof Petercam this includes energy consumption of owned & rented buildings as well as its fleet in BE & LU; these figures cover 98 % of staff.

#### • Scope 2 GHG emissions

Scope 2 emissions are indirect emissions caused by the purchase of energy, such as electricity, steam, heating and cooling. These emissions are not generated directly on site but are the result of activities outside the company's boundaries.

#### • Scope 3 GHG emissions

Scope 3 emissions are indirect emissions that result from activities in a company's value chain but for which it does not directly control. This includes both upstream and downstream activities except for category 15 which are covered in a specific chapter Responsible Investments. Operational boundaries for Scope 3 are in line with consolidation perimeter of Degroof Petercam for the 2 major categories (Purchased goods & services as well as capital goods); for the other categories only figures of BE & LU activities were taken into account, as this covers 98 % of staff.

Scope 1, 2 & 3 GHG emissions (except for Cat 15 – Financed Emissions) are calculated with the help of a Third-Party solution provided by Futureproofed. Underlying databases to perform the calculation are multiple but mainly CO2emissiefactoren.be, ADAME as well as EEA, FEFCO-tool, GT Transport Base Carbone.

#### E1\_E1-6\_48

(a) GHG emissions scope 1, cfr table below. Degroof Petercam's Scope 1 emissions include energy used for its cooling & heating systems in buildings as well as energy used for its fleet. Futureproofed uses standard conversions factors based on latest market insights to calculate the CO2 emissions.

(b) Degroof Petercam is not subject to any emission trading schemes.

	Retrospective			Milestones and target years				
	2023	Compa- rative	2024	% 2024/2023	2025	2030	2050	Annual % target / Base year
Scope 1 GHG emissions	l .			i.				
Gross Scope 1 GHG emissions (tCO2eq)	3,534		2,764	78%		No T	arget Se	t
Percentage of Scope 1	Not Relevant/Not applicable							
GHG emissions from regulated emission trading schemes (%)								
Scope 2 GHG emissions								
Gross location-based Scope 2 GHG emissions (tCO2eq)	Not Avail.		542			No T	arget Se	t
Gross market-based Scope 2 GHG emissions (tCO2eq)	41		100	244%		No T	arget Se	t
Significant scope 3 GHG emissions				•				
Total Gross indirect (Scope 3) GHG emissions (tCO2eq)	14,954		11,657,418	Not Relevant				
1 Purchased goods and services	12,660		12,612	100%		No T	arget Se	t
[Optional sub-category: Cloud computing and data centre services	Not Relevant/Not applicable							
2 Capital goods	565		-	0%		No T	arget Se	t
3 Fuel and energy-related	1,135		829	73%		No T	arget Se	t
Activities (not included in Scope1 or Scope 2)						No T	arget Se	t
4 Upstream transportation and distribution	Not Releva	ant/Not ap	plicable					
5 Waste generated in operations	34		38	112%		No T	arget Se	t
6 Business travelng	137		133	97%		No T	arget Se	t
7 Employee commuting	423		399	94%		No T	arget Se	t
8 Upstream leased assets	Not Avail.		117					
9 Downstream transportation	Not Releva	nt/Not ap	plicable					
10 Processing of sold products	Not Releva	nt/Not ap	plicable					
11 Use of sold products	Not Releva	nt/Not ap	plicable					
12 End-of-life treatment of sold products	Not Releva	nt/Not ap	plicable					
13 Downstream leased assets	Not Releva	nt/Not ap	plicable					
14 Franchises	Not Releva	nt/Not ap	plicable					
15 Investments	Not Avail.		11,643,290	Not Relevant	See chapt	er Respons	ible Inve	stments
Total GHG emissions								
Total GHG emissions (location-based) (tCO2eq)	Not Avail.		11,660,724					
Total GHG emissions (market-based) (tCO2eq)	Not Avail.		11,660,165					

As stated in the annual report, Degroof Petercam Luxembourg will be discontinued and is held for sale. This will have an impact on next year's carbon footprint which can be estimated at about 29 % of total combined footprint.

#### E1\_E1-6\_49

- (a) the gross location-based Scope 2 GHG emissions in metric tonnes of CO2eq of Degroof Petercam stands at 542 tonCO2eq.
- (b) the gross market-based Scope 2 GHG emissions in metric tonnes of CO2eq stands at 100 tonCO2eq. This is explained by the fact that DP uses certified green electricity both in Belgium & in Luxembourg for electricity consumption at its owned premises. There are no data available for home charging of fleet vehicles, that's the reason why there's still a small volume of Scope 2 emissions.

#### E1\_E1-6\_50

Scope 1 & 2 figures are done on a consolidated basis as explained above. Degroof Petercam is not part of any material joint venture or alike or partially owns unconsolidated subsidiaries which might have a material impact on the reported Scope 1 & 2 figures mentioned in this report.

#### E1\_E1-6\_51

As mentioned above, the figure shown in the table only shows Scope 3 emissions including Cat 15 - financed emissions.

As for Scope 3 category 4 (Upstream transportation) category 9 (downstream transportation), category 10 (processing of sold products), category 11 (use of sold products), category 12 (EOL sold products), they are not relevant for a financial institution. Degroof Petercam doesn't have any franchises (hence no category 14) nor upstream leased assets (category 13).

Scope 3 calculations in this chapter are done by Futureproofed (BE 0466.140.824), a Belgian based subsidiary of the SWECO group. They make the calculation based on Degroof Petercam's input as explained above.

#### [E1\_E1-6\_53]

Over 2023, the ratio TonCO2eq/m€ Revenue stood at: 0,0254001115281314 tonCO2/mEUR. (116m tCO2/460mEUR) for location-based intensity and 0,025399149 tonCO2/mEUR for market-based intensity. (116m tCO2/460mEUR)

The revenue figure used is the one reflected in FINREP table 02.01 of the reporting period December 31, 2024 consolidated as sent to NBB on line 0355 Total Net Operating Income.

#### E1\_E1-6\_55

Total Operating Income, Net (code 0355) of the consolidated statement of profit/loss was taken to calculate the CO2 intensity.

# [E1-7] GHG removals and GHG mitigation projects financed through carbon credits

#### E1\_E1-7\_56

Degroof Petercam does not have any plans, targets, actions linked to GHG removals, storage nor did it purchase any carbon credits. Degroof Petercam focuses on reducing its GHG footprint.

#### E1\_E1-7\_58

This paragraph is not relevant as Degroof Petercam doesn't have any plans, targets, actions linked to removals, neither in its strategy for own operation neither for its downstream value chain elements linked to eg investments.

# [E1-8] Internal carbon pricing

#### E1 E1-8 63

Decarbonization is part of Degroof Petercam's strategy and corporate commitment linked to Net Zero. The use of internal carbon pricing is considered not relevant to the business activities.

# [E1-9] Anticipated financial effects from material physical and transition risks and potential climate-related opportunities

As foreseen in ESRS 1 annexe C, Degroof Petercam omits this information prescribed by ESRS E1-9 for the first year of presentation.

# S1 - Own workforce

As Degroof Petercam's business is a people business, it's clear that fostering in all aspects its talents is a material topic going forward. Positive impact identified in the DMA include staff development through training, social dialogue, and career support, with no material negative impacts identified. Degroof Petercam worked out an Employer of Choice Program, focusing on company, culture, leaders, benefits, and job as well as a Leadership Development Program to develop future leaders.

To support own workforce a set of policies including mobility, telework, diversity and Inclusion, training & remuneration has been worked out. Engagement with Workforce happens in first instance through direct interaction by team coach but also through a yearly employee survey. Degroof Petercam's headcount stands at 1.429 employees predominantly in Belgium & Luxembourg.

### DR related to ESRS2 [SBM-2] Interests and views of stakeholders

S1 DR related to ESRS 2 SBM-2 12

Interest and views of our own workforce are described under ESRS2 SBM-2.

# DR related to ESRS2 [SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

S1\_DR related to ESRS 2 SBM-3\_13/14

Reference is made to ESRS 2 SBM 3, more specifically concerning own workforce, it can be noted that:

- (a) All employees are included when defining impacts, risks & opportunities. An overview of staff numbers is given in DR S 1-6. Next to staff, Degroof Petercam also has 79,63 (Full Time Equivalents) so -called "non-employee workforce". These are consultants mainly active in IT. Positive impact identified (Staff development through training, social dialogue with employees and career development support) is only applicable to own employees.
- (b) No material negative impact related to Own Workforce were identified in the DMA.
- (c) Degroof Petercam aims at realizing a positive impact through its staff as Degroof Petercam's business is a people business. It is central in its value chain. Degroof Petercam adds expertise through its staff. Hence the 'Employer of Choice' program is a key part of Degroof Petercam's strategy. In that respect the following IRO were identified:

• Staff development through training, social dialogue with employees and career development support. In that sense, focusing on engaged staff is a crucial enabler. Providing ample training opportunities, strong leadership, regular management and performance checks are all relevant elements to focus on.

This is valid for all countries & business lines in which Degroof Petercam is active.

- (d) Degroof Petercam identified potential financial gains:
  - Financial gains due to highly trained employees: Degroof Petercam being an investment house driven by expertise, should bring along additional financial gains
  - Diversity, equity & inclusion: innovation and business opportunities due to diverse profiles within the companies

As well as some potential financial risks:

- The financial loss due to talents leaving the company
- Financial loss and reputation damage resulting from claims of a lack of diversity and inclusion within the company.

(e - f - g) Not applicable as there are no material impact arising from transition plans and no operations at risk.

#### S1\_DR related to ESRS 2 SBM-3\_15

No material negative impact was identified regarding employees with particular characteristics or doing particular activities.

### [S1-1] Policies related to own workforce

#### S1\_S1-1\_19

Degroof Petercam is committed to foster a diverse, inclusive, and equitable workplace, recognizing that such an environment is essential for sustainable business success. The company has implemented several policies to manage risks, impacts, and opportunities related to its workforce, ensuring that all employees are supported and valued. These policies cover various aspects of employment, from mobility and telework to diversity, inclusion, and training. Having these in place should support creating positive impact (as DP's business is a people business), realize potential financial gains & limiting talents leaving the company. The policies presented under S1 are group policies. However, in view of the national regulations in each country, there are Belgian and Luxembourg versions of these policies, which include the same elements (Group guidelines). Where material differences are noted, these are specifically mentioned in the text.

- Mobility Policy:
  - (a) Summary: The Mobility Policy provides employees with flexible transportation options, promoting greener mobility and better work-life balance. It includes a Mobility Budget that employees can allocate to various transportation modes, such as leased cars, bicycles, public transport, and shared mobility services. This policy aims to reduce the environmental impact of commuting and offers employees the flexibility to choose the most suitable transportation options for their needs. In 2024 DP implemented the 'Federal Mobility Budget' giving employees who do not

opt for a leased car even more alternative mobility and other solutions. This policy permits more personal ownership on mobility choices & is therefore an important enabler for employee engagement. DP is in that sense a frontrunner in the market regarding sustainable mobility policies for employees. Note that in Luxembourg there is no Federal Mobility Budget. However, the local policy has been revised to prohibit any future order of thermal vehicles and favor electric vehicles (including hybrid). The parking of the Bank Degroof Luxembourg building has been equipped with 64 charging points. It should also be noted that all public transport is free of charge throughout Luxembourg.

- (b) Scope: all Degroof Petercam employees in Belgium and Luxembourg
- (c) **Ownership of the policy**: HR is responsible for managing and reviewing the Mobility policy.

#### Telework Policy:

- (a) Summary: The Telework Policy allows employees to work remotely up to two days a week, enhancing work-life balance and productivity. It outlines the conditions for telework, including the need for a written agreement, the equipment provided by the company, and the reimbursement of telework-related costs (for some employees' categories). The policy also addresses the security measures required for remote work and the procedures for handling work accidents and other insurance matters. This policy helps mitigate risks associated with commuting and provides employees with the flexibility to work from different locations. Luxembourg colleagues who use regular teleworking, benefit from a plan (including a monthly allowance in addition to basic salary) defined by a Luxembourg collective banking agreement.
- (b) Scope: all Degroof Petercam employees in Belgium and Luxembourg
- (c) **Ownership of the policy**: HR is responsible for managing and reviewing the Telework policy.

#### • Diversity and Inclusion Policy:

- (a) Summary: The Diversity and Inclusion Policy underscores Degroof Petercam's commitment to creating a workplace where all employees are valued and respected. It defines diversity, inclusion, and equity and sets out the principles for promoting these values within the company. The policy includes specific measures to ensure equal opportunities, prevent discrimination, and support the reintegration of employees after long absences. It includes six key performance indicators (KPIs) to support awareness and contribute to more transparency. These KPIs cover aspects such as ensuring no gender wage gap, treating all employees with respect, and monitoring training hours by gender.
- (b) Scope: all Degroof Petercam employees
- (c) Ownership of the policy: HR is responsible for managing and reviewing the Diversity and Inclusion policy.

#### Training Policy:

- (a) Summary: The Training Policy emphasizes the importance of continuous learning and development for all employees. It outlines the types of training available, including internal and external training, long-term certification programs, and mandatory regulatory training. The policy also details the roles and responsibilities of employees, managers, and HR in identifying training needs (5 days/year training for each employee), organizing training sessions, and ensuring that employees complete the required training. This policy aims to enhance employees' skills and knowledge, ensuring they are well-equipped to perform their roles and contribute to the company's success.
- (b) **Scope**: all Degroof Petercam employees in Belgium and Luxembourg
- (c) **Ownership of the policy**: HR is responsible for managing and reviewing the Training policy.

#### Remuneration Policy:

- (a) Summary: The remuneration policy of Banque Degroof Petercam is designed to be beneficial for employees in several ways. Firstly, it ensures fair and equal pay by being gender-neutral, promoting equal remuneration for male and female staff for the same or equivalent work. Secondly, it integrates sustainability and ESG (Environmental, Social, and Governance) criteria into remuneration, encouraging employees to support the bank's sustainability strategy. Thirdly, the policy emphasizes long-term interests and prudent risk management, which helps in creating a stable and secure work environment. Additionally, the policy includes mandatory training programs to foster employee development and knowledge, particularly in sustainability. Lastly, the policy ensures that performance evaluations are based on both financial and non-financial criteria, promoting a balanced and fair assessment of employee contributions.
- (b) **Scope**: all Degroof Petercam employees
- (c) **Ownership of the policy**: HR is responsible for managing and reviewing the Remuneration policy approved by the Remuneration Committee.

These policies collectively help Degroof Petercam manage risks, impacts, and opportunities related to its workforce, fostering a supportive and inclusive work environment that promotes employee well-being and organizational sustainability.

#### S1\_S1-1\_20 & 22

Given the sector of activities and the countries where Degroof Petercam operates in, specific human rights policies, including those related to trafficking in human beings, forced labor, compulsory labor, and child labor are not relevant to develop. Degroof Petercam policies are based on Belgian and European laws which integrate labor and human rights frameworks.

#### S1\_S1-1\_23

The company has established a comprehensive workplace accident prevention management system. This is evidenced by the presence of the CPPT (Comité pour la Prévention et la Protection au Travail), which is responsible for executing tasks and missions related to worker well-being and safety, as outlined in various legislative documents. The CPPT operates under a detailed internal regulation that ensures regular meetings, proper documentation, and follow-up on safety measures. Additionally, the company has appointed 'persons of trust' to manage psychosocial risks at work, providing frontline support in collaboration with an external

prevention advisor. Furthermore, the Employee Assistance Program (EAP) has been introduced to address mental health issues, including burnout prevention, offering 24/7 access to psychological support for employees and their families. This multi-faceted approach demonstrates the company's commitment to preventing workplace accidents and promoting a safe and healthy work environment.

In Luxembourg, the 'Designated Worker' and 'Safety Officer' ensure all aspects of safety and health at work. ASTF is the preferred partner for all medical follow ups, including psychosocial aspects.

#### S1\_S1-1\_24

Degroof Petercam is committed to fostering a diverse and inclusive workplace, recognizing that such an environment is essential for a prosperous and sustainable business.

- (a) Degroof Petercam has a dedicated policy in place aimed at eliminating discrimination and harassment, promoting equal opportunities, and advancing diversity and inclusion cfr Diversity & inclusion policy. This policy ensures that all employees are treated with dignity and respect; it includes measures as well to prevent and address any form of discrimination or harassment. The company also emphasizes the importance of diversity in its recruitment processes and strives to create an inclusive culture where all employees can thrive. Elearnings are also organized to raise employee awareness on this subject.
- (b) The company's Diversity, Inclusion & Equity policy specifically cover various grounds for discrimination, including racial and ethnic origin, color, sex, sexual orientation, gender identity, disability, age, religion, political opinion, national extraction, and social origin. This policy is aligned with Union regulations and national laws to ensure comprehensive protection against discrimination.
- (c) Degroof Petercam has specific policy commitments related to inclusion and positive action for people from groups at particular risk of vulnerability within its workforce. For instance, the company has set a target that the underrepresented gender would reach min 33,33% of top management representatives (two highest categories). Additionally, the company has signed the "Women in Finance" charter to promote gender balance at all levels of the organization.
- (d) This policy is implemented through various procedures to ensure that discrimination is prevented, mitigated, and acted upon once detected. The company has established a Diversity and Inclusion Manager responsible for identifying key actions and implementing them through a structured program. Recruitment processes are designed to attract diverse candidates, and internal mobility, training, and communication processes support the principles of diversity and inclusion. The company also monitors and reports on diversity metrics, such as gender pay gaps and representation in leadership roles, to ensure continuous improvement.

# [S1-2] Processes for engaging with own workers and worker's representatives about impacts

#### S1\_S1-2\_27

In its commitment to fostering a collaborative and inclusive work environment, Degroof Petercam actively engages with its own workforce to inform the company's decision-making process and manage both actual and potential impacts on its employees. This engagement is conducted through multiple channels and at various stages, ensuring comprehensive feedback and participation.

- (a) Engagement occurs both directly with employees through direct leadership and through worker's representatives. This dual approach allows us to capture a wide range of perspectives and address concerns effectively.
- (b) Engagement is structured and occurs at multiple stages, including regular monthly meetings with the workers' representatives (also extraordinary sessions when urgent issues arise) and through the annual employee survey. On Bank and department level 'All Staff meetings' are organized on a regular basis to ensure a structured communication approach towards DP's workforce. The frequency of these various engagements ensures that we remain attuned to the evolving needs and concerns of the company's employees.
- (c) The operational responsibility for ensuring effective engagement lies with the Chief Human Resources Officer (CHRO), who is a member of the Executive Committee. The CHRO oversees the implementation of engagement initiatives and ensures that the insights gathered inform the strategic and operational decisions. Next to that, every ComEx Member and senior manager has the responsibility to engage with its team members and to cascade all relevant related information.
- (d) We have established an 'Internal Regulation of the Workers' Council with workers' representatives, which underscores DP's commitment a.o., to foster a positive work environment. Regular dialogue with the Workers' Council helps us gain deeper insights into the workforce's perspectives, ensuring that their voices are heard and considered in the decision-making processes. Degroof Petercam is respecting all legal requirements that govern the interaction with worker's representatives and foster a regular and respectful dialogue.
- (e) The effectiveness of the engagement efforts is assessed through various means, including the annual survey, which measures employee engagement and satisfaction across all departments and countries. The survey results are analyzed to identify areas for improvement and to track progress over time.

Through these comprehensive engagement practices, Degroof Petercam strives to create a supportive and inclusive workplace where every employee feels valued and heard.

#### S1\_S1-2\_28

At Degroof Petercam, the importance of understanding and addressing the perspectives of the company's workforce, no matter their age, gender, or potential disabilities is recognized. The annual engagement survey includes specific questions designed to capture the sentiments of all employees. Additionally, a Diversity, Equity, and Inclusion (DE&I) Steering Group is established and is responsible for directing the agenda on all topics related to diversity, equity, and inclusion. The group has developed as mentioned above a Diversity and Inclusion Policy, which includes six key performance indicators (KPIs) to support awareness and contribute to increased transparency. These KPIs cover aspects such as ensuring no gender wage gap, treating all employees with respect, and monitoring training hours by gender.

# [S1-3] Processes to remediate negative impacts and channels for own workforce to raise concerns

S1\_S1-3\_32

#### Processes for Remedying Material Negative Impacts on Workforce

Although no material negative impact was identified, Degroof Petercam finds it important to set-up a structured framework for identifying, reporting, and addressing concerns, ensuring that all employees have access to effective channels for raising issues and seeking redress.

(a) General Approach to Remedy: Degroof Petercam is committed to providing or contributing to remedies where it has caused or contributed to a material negative impact on its workforce. The company has implemented a Whistleblowing Policy that encourages employees to report any alleged wrongdoing, including violations of internal or external rules, through designated channels. The policy ensures that reports are handled confidentially and that whistleblowers are protected from retaliation. The effectiveness of the remedy is assessed through a structured investigation process managed by the Investigation Committee, which includes feedback mechanisms to ensure that the concerns are adequately addressed.

To address and remedy personal material negative impact on its workforce the company has implemented an Employee Assistance Program (EAP). This program is designed to support employees in achieving a balance between their professional and personal lives by offering confidential, free, and immediate access to various support services. The EAP includes psychological counseling, stress reduction programs, life coaching, and practical support for legal, financial, and daily life challenges. To ensure the effectiveness of the remedies provided, the provider tracks and monitors issues raised through the EAP. Feedback is collected from users to assess the impact and effectiveness of the support services. Additionally, the company involves stakeholders, such as the Internal Department for Protection and Prevention at Work (IDBPW), which oversees occupational safety, hygiene, psychosocial aspects, ergonomics, and occupational medicine. The IDBPW's prevention advisor provides guidance on welfare policies and assists in implementing measures to enhance employee well-being.

- (b) Channels for Raising Concerns: Degroof Petercam has established multiple channels for its workforce to raise concerns. These include direct reporting to the line management or if needed to the Head of Compliance or the Head of Internal Audit. In case of personal relationship concerns it can be done via the Human Resources or the Persons of Trust and the Prevention Advisor. These channels are designed to be accessible and confidential, ensuring that employees can report issues without fear of reprisal. Reference is made to EAP & Whistleblowing Policy explained under a)
- (c) Grievance/Complaints Handling Mechanism: The company has a grievance and complaints handling mechanism in place, as outlined in its Whistleblowing Policy. This mechanism covers all types of alleged fraud and malpractice, ensuring that all reports are thoroughly investigated, and appropriate actions are taken. The policy also includes provisions for reporting concerns related to personal relationships with the employer or psychosocial concerns in the work environment through the Human Resources department and the Internal Department for Protection and Prevention at Work.
- (d) Support for Availability of Channels: Degroof Petercam supports the availability of these channels through regular communication and trainings. The company ensures that all

employees are aware of the reporting mechanisms and their rights under the Whistleblowing Policy. The Prevention Advisor plays a crucial role in advising on welfare policy matters and assisting in the implementation of measures to address reported concerns. Managers are trained to recognize signs of distress and can refer employees to the EAP, ensuring that concerns are addressed promptly and effectively. This multi-faceted approach demonstrates the company's commitment to supporting its workforce and maintaining a healthy, productive work environment.

(e) Tracking and Monitoring Issues: The company tracks and monitors issues raised through its whistleblowing channels using a structured process managed by the Investigation Committee. This includes maintaining records of all reports, investigations, and outcomes. The effectiveness of the channels is ensured through regular reviews and updates to the policy, as well as feedback from employees. The company also reports on whistleblowing cases and remedial actions to senior management and the Board of Directors, ensuring transparency and accountability.

#### S1\_S1-3\_33

Degroof Petercam ensures that its workforce is aware of and trusts the structures and processes in place to raise their concerns or needs through communication and trainings on one hand and measure the trust of these through its employees' annual survey (showing great trust in the policies and channels) on the other hand.

In compliance with the Group Degroof Petercam Whistleblowing Policy, individuals who report irregularities in good faith are provided with the highest level of protection against any form of retaliation. The policy explicitly prohibits any retaliatory actions such as dismissal, salary cuts, changes in position or job content, discrimination, harassment, or withholding of training. The identity of the whistleblower is kept confidential to the maximum extent possible, and any disclosure of their identity is strictly limited to what is legally required.

# [S1-4] Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

#### S1 S1-4 37

As part of Degroof Petercam's commitment to managing material impacts, risks, and opportunities related to its workforce, Degroof Petercam has implemented a comprehensive action plan under our "Employer of Choice" program which is one of the 3 pillars of the Route 2026 strategic plan. This program is structured around five key pillars: company, culture, leaders, benefits, and job; each path is sponsored by a member of the Management Committee. Our strategic initiatives include the introduction of the Total Reward Statement, the Federal Mobility Budget, and the Employee Assistance Program, all aimed at enhancing employee satisfaction and well-being. The Performance Management Process had been refined and extensive Learning & Development programs have been launched, including leadership development for over 125 leaders and transversal learning modules on sustainability and 'know your business'. The operational excellence initiatives and transition to an Agile Delivery Organization further support a collaborative and efficient work environment (including possibility for working @distance 2 days/Week). Additionally, ambitious diversity,

equity, and inclusion targets are set, such as achieving a 33% female presence in all our boards by 2026 and have integrated ESG-related KPIs into the variable remuneration schemes. These efforts are continuously monitored through the annual survey, which tracks employee engagement and well-being, ensuring responsiveness to own workforce needs and alignment with sustainability goals. All Degroof Petercam entities benefit from these actions. No additional relevant actions are planned beyond those already mentioned above.

#### S1\_S1-4\_38

Degroof Petercam has taken significant steps to address material impacts on its own workforce, focusing mainly on preventing and mitigating negative impacts and delivering positive outcomes.

- (a) Actions taken to prevent or mitigate material negative impacts include the implementation of the "Route 26" strategic roadmap for all employees, which aims to foster a positive working environment and enhance employee engagement. This includes initiatives such as the "Employer of Choice" program, which emphasizes training and development, leadership programs, and well-being initiatives. The company has also launched reconnecting initiatives to mitigate the side effects of hybrid working and foster a culture of belonging and motivation. In the light of the integration process with Indosuez, HR and management has given particular attention to implement targeted retention measures to ensure integration progress, operational and business continuity. Regular information sessions for leadership and all staff were organized to ensure common understanding of the integration project and the opportunities it gives. Staff Degroof Petercam participated to a culture survey organized by Indosuez in order to build a shared value proposition and culture framework. Workshops were organized in the last quarter of 2024 to interact on this shared culture model.
- (b) No material negative impacts identified in the DMA.
- (c) Additional actions to deliver positive impacts include the launch of the Leadership Journey program to develop future leaders, the integration of non-financial KPIs in variable remunerations to emphasize sustainability and non-financial performance and the promotion of diversity, equity, and inclusion through dedicated workshops and policies. The company also supports gender-neutral remuneration and has confirmed no structural gender pay gap through internal audits.
- (d) The effectiveness of these actions and initiatives is tracked and assessed through various KPIs, including employee engagement scores from the engagement survey, participation rates in training programs, and feedback from reconnecting initiatives.

#### S1\_S1-4\_40

(a) Actions to Mitigate Material Risks: Degroof Petercam has identified several material risks related to its workforce, including financial losses due to talent attrition and potential reputation damage from claims of a lack of diversity and inclusion. To mitigate these risks, the company has implemented a comprehensive "Employer of Choice" strategy, which is part of its Route 26 strategic roadmap. This strategy focuses on five key pillars: company, culture, leaders, benefits, and job. Specific actions include:

Linked to Diversity, Equity, and Inclusion (DEI): Degroof Petercam is committed to genderneutral remuneration and has confirmed no structural gender pay gap for similar roles through internal audits. The company aims to increase female representation in senior management and supports initiatives like Women in Finance to make the financial sector more appealing to women.

#### Linked to talent attrition:

- (1) Employee Engagement and Well-being: The company conducts an annual engagement survey to measure employee engagement and well-being. In 2024, the participation rate was 86%, indicating high levels of staff involvement. The survey helps identify areas for improvement, such as workload management and availability of tools and resources.
- (2) Employer Branding Campaign: Launched in 2023, this campaign aims to build brand recognition and attract qualified candidates. The campaign was considered successful according to the results of an ad-hoc study
- (3) Leadership Development: The Leadership Journey program was launched to develop the leadership potential of approximately 125 leaders. This program includes sessions on change management, feedback and aims to foster a safe environment and a speak-up culture.
- (4) Well-being Initiatives: Degroof Petercam has launched the Employee Assistance Program, providing 24/7 mental health support, legal and financial advice to staff and their families. The company also conducts in specific situations stress and workload surveys to monitor and address employee well-being.
- (5) Reconnecting Initiatives: To foster a strong sense of belonging and motivation among employees, the company has introduced monthly anniversary celebrations, induction days, CEO breakfasts and 'connect' initiatives. These initiatives aim to enhance mutual understanding and create a supportive work environment

The effectiveness of these actions is tracked through key performance indicators (KPIs) such as training and development hours, retention rates, diversity KPI's and overall employee engagement scores.

- (b) Actions to Pursue Material Opportunities: Degroof Petercam recognizes several opportunities related to its workforce, including financial gains from highly trained employees and innovation from diverse profiles. To capitalize on these opportunities, the company has implemented the following actions:
  - 1. Training and Development: The company offers a robust training program through the Degroof Petercam Academy, covering soft skills, technical skills, and transversal skills like sustainability. In 2024, mandatory training courses included topics like GDPR, Sustainability, Investing Under MIFID, Business Continuity and Know Your Business.
  - 2. Flexible and Modern Rewards: Degroof Petercam offers competitive compensation packages, a flexible mobility plan, and a best-in-class retirement plan. The company has also integrated non-financial KPIs, including ESG-related elements, into variable remuneration schemes.
  - 3. Innovation and Business Opportunities: The company leverages its diverse workforce to drive innovation and business opportunities. By promoting a culture of inclusion and diversity, Degroof Petercam aims to harness the unique perspectives and skills of its employees to achieve better business outcomes.

These actions are part of the broader commitment to creating a positive and inclusive work environment, thereby enhancing its ability to attract and retain top talent while driving innovation and business growth.

#### S1\_S1-4\_43

Degroof Petercam has allocated significant resources to manage its material impacts, particularly in the areas of employee well-being, engagement, and development. Degroof Petercam has established internal functions such as the two "persons of trust" to address psychosocial risks, a healthy and safety advisor and implemented an Employee Assistance Program (EAP) as explained before. These initiatives demonstrate the commitment to fostering a supportive and inclusive work environment, thereby managing its material impacts on employee well-being and organizational culture.

With respect to preparing staff on the impact arising from the transition to a greener, climateneutral economy, the efforts reflected in the mobility policy as well as the development of transversal sustainability learning program are good examples. The kick-off of this sustainability program included an obligatory e-learning on the concept of Net Zero.

# [S1-5] Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

#### S1\_S1-5\_46

As of today, Degroof Petercam has put forward the following targets:

- Employee Engagement score for the group: current target is set at 80 % by 2026; please note that this target might be reviewed as a shift was performed towards Crédit Agricole Survey as from 2024 onwards. Engagement score in this survey stood at 77 %
- Average training hours per employee (for the group) target stands at 40 by 2025 while current actuals are 44 hours. More information on training metrics can be found in section "S1-13 - Training and skills development metrics"
- DFI:
  - No gender wage gap across the firm is confirmed in 2024. It should be noted that this KPI is different from the one reported in S1-16. The No gender wage gap across the firm KPI aims at ensuring that there is no difference (or no unexplained difference) in terms of wage for a function regardless of the sex occupying it.
  - No major difference in training hours by gender was achieved in 2024 (for more information on this please refer to section "S1-13 - Training and skills development metrics" in this chapter). This means that the average training hours for men and women are very similar.
  - One third of top management (the two highest categories) should be female. Currently, this ratio stands at 25 %. For more information on this please refer to section "S1-9 Diversity metrics" of this chapter

The above-mentioned targets are already applicable and are set within the framework of the Route 2026 strategic plan.

The above-mentioned targets were set at the level of Degroof Petercam Group. Going forward, these targets might be adapted/aligned with targets put by the new shareholder Indosuez. It should also be noted that Degroof Petercam in 2025 will only consider the Belgian activities, in that sense the underlying base case scenario might be adapted going forward.

#### S1\_S1-5\_47

- (a) Targets on Employee Engagement and Average Training Days per Employee are part of the Group KPI Scorecard Process and as such validated by the executive committee and presented to the Board of Directors. Targets on DE&I have been proposed by DE&I committee and validated by the Management Committee. Workers Council have been informed about people related KPI's. As mentioned in ESRS2-GOV3 Degroof Petercam doesn't disclose publicly the content of the scorecard which is considered as confidential.
- (b) Progress on KPI's is measured by the HR Department which gives status to Management Committee and Board of Directors. This is also part of the Group KPI Scorecard evaluation process. For the target on Employee Engagement, Degroof Petercam uses the outcome of the annual Engagement survey (via Willis Towers Watson). This survey is orchestrated by Crédit Agricole as of 2024. Worker's Council are informed about progress on KPI related measures, specifically also on health and safety related items (part of engagement survey).
- (c) Action plans for KPI's have been identified and are being monitored (with reporting to the Management Committee):
  - DE&I: action plan / approach has been proposed and discussed with Management Committee
  - Employee Engagement: action plans per department are identified and being monitored. This has been presented to Management Committee. Overall feedback has been given to Workers Council. Every department has communicated on its action plan to its staff members.
  - Average Training Days per Employee: Training plan per department has been identified according to our legal requirements. Plan has been approved by Workers Council (as legally required) and by Management Committee. These training plans can be consulted by every staff member via intranet.

# [S1-6] Characteristics of undertaking's employees

#### S1\_S1-6\_50

(a) The total number of employees by head count, and breakdowns by gender and by country for countries:

Gender	Headcount
Female	587
Male	842
Grand Total	1429

Country	Headcount
Belgium	1005
Luxembourg	391
Other countries	33
Grand Total	1429

- (b) the total number by head count
- i. Permanent workers split by gender

Gender	Headcount
Female	575
Male	831
Grand Total	1406

### ii. Temporary workers split by gender

Gender	Headcount
Female	12
Male	11
Grand Total	23

iii. non-guaranteed hours employees, and breakdown by gender.

Degroof Petercam doesn't employ non-guaranteed hours employees.

- (c) In 2024, Degroof Petercam had 167 employees leaving the company. The turnover rate in 2024 stood at 11,55%. The latter % was calculated by dividing 167 leavers through the average headcount which is 1.464 at the beginning of 2024 & 1.429 at the end of 2024.
- (d) Employee figures mentioned above are **as of end of 2024**. They include active internal workforce and the administrators. The following are excluded from the above headcounts: internships, external workforce like interims, consultants, long term absent (+ 12 month of illness). Source of information is a database linked with the payroll services provider.

<u>Permanent employees</u> are employees that are on the payroll of our entity and have a permanent or open-ended labor contract. In our HR system we register, at the hiring, or at any change the type of contract. Permanent contracts are the most common types of contracts and have no end-date.

<u>Temporary employees</u> are employees that are on the payroll of our entity and have a temporary or time-limited labor contract. In our HR system we register, at the hiring, or at any change the type of contract. Temporary contracts are contracts where an end-date has been defined.

(f) The total headcount of 1429 employees above-mentioned in point (a) is reflected in the FTE number shown in the note 8.9 Payroll expenses of section VI. consolidated accounts in the Annual Report.

### [S1-7] Characteristics of non-employees in undertaking's own workforce

S1\_S1-7\_55

(a) a disclosure of the total number of non-employees in the undertaking's own workforce

Non-employee type	FTE
Interims	10
Externals	69.63
Grand Total	79.63

(b) Figures in the above table are based on T&M (Time and Material) timesheets explaining the choice to use FTE (Full Time Equivalent) instead of headcounts. As for externals, time registration is done by the externals in a specific tool which provides their number of working days per month. This number of days is than we divided by the number of working days for that month. This way an FTE calculation is provided.

As for interims, working time is mentioned on their contract which is managed in DP database, similarly to regular employees.

Non-employees include interims and external workforces (consultants) mainly working in the IT department.

### [S1-8] Collective bargaining coverage and social dialogue

#### S1\_S1-8\_60

(a) 100% of the employees working under a Belgium or Luxembourg labor contract are covered by collective bargaining agreements. Collective bargaining agreements include both collective labor agreements on sector level (as reflected in eg PC 310 for Belgium) as well as collective labor agreements on entity level.

(b)

Country	Percentage of employees covered by collective bargaining agreements
Belgium	100%
Luxembourg	100%

As staff of other countries do only count for 2 % of workforce, information on the other countries is considered as not material. Local working condition agreements, if existing, agreed upon at sector level are applied in these countries.

(c) Outside EEA (Canada: 1 headcount and Switzerland: 3 headcounts) Degroof Petercam follows, if existing, working condition agreements are aligned at sector level in these countries.

#### S1\_S1-8\_63

Degroof Petercam has a 100% collective bargaining coverage ratio.

There is no European works council within Degroof Petercam. So far, Degroof Petercam never received a request to establish a European Works Council.

# [S1-9] Diversity metrics

#### [S1\_S1-9\_66]

a) the gender distribution in number and percentage at top management level (two highest categories)

	Female	%	Male	%	total
Top Management	35	25%	104	75%	139

b) the distribution of employees by age group: under 30 years old; 30-50 years old; over 50 years old

Age group	Headcount
30 to 50 years	708

50 years and older	560
under 30 years	161
Grand Total	1429

# [S1-10] Adequate Wages

#### S1\_S1-10\_69

Degroof Petercam ensures that all its employees are paid an adequate wage, in line with applicable external benchmarks provided by HR consultancy companies. This commitment is reflected in the company's adherence to a gender-neutral remuneration policy and equal pay practices, as outlined in their remuneration policy documents. The company conducts periodic reviews to ensure that remuneration practices are effectively gender-neutral and aligned with market standards, ensuring fair compensation for all employees regardless of gender.

### [S1-11] Social protection

#### S1\_S1-11\_74

All employees are covered by social protection which includes sickness, unemployment, employment injury and acquired disability, parental leave and retirement.

Degroof Petercam offers (next to existing public social security schemes) to all its employees a complete retirement plan coupled with additional individual insurances, such as an insurance for hospitalization, or loss of income in case of illness.

Country	Percentage of employees covered by social protection
Belgium	100%
Luxembourg	100%

As staff of other countries do only count for 2 % of workforce, information on the other countries is considered as not material

# [S1-12] Persons with disabilities

#### S1\_S1-12\_79

As foreseen in ESRS 1 – Annexe C, this disclosure can be phased-in. Degroof Petercam will not disclose this information in 2024.

### [S1-13] Training and skills development metrics

#### [S1\_S1-13\_83]

(a) the percentage of employees that participated in regular performance and career development reviews broken down by gender

Gender	Percentage
Female	100%
Male	100%
Grand Total	100%

b) the average number of training hours per employee and by gender

Category	Female (hours)	Male (hours)	Total (hours)
Employee	43.33	40.97	41.98
Top Management	61.24	63.49	62.92
Grand Total	44.40	43.75	44.02

In June 2019, Degroof Petercam rolled out a new HR platform. DPeople is the internal name for our SAP/Successfactors solution. This platform also includes a learning platform. This platform is the only and central platform for learning within the company. All offered internal trainings (classroom, elearning, Webex, ...) are offered via this platform. This platform allows a complete view on the learning efforts of the employees and is the basis for all Learning reporting. This database is also used for other e.g. legal reporting like Social Balance.

# [S1-14] Health and safety metrics

Not relevant nor material for Degroof Petercam.

# [S1-15] Work-life balance metrics

#### [S1\_S1-15\_93]

- (a) the percentage of employees entitled to take family-related leave
- 100% of employees are entitled to take family related leave.
- (b) the percentage of entitled employees that took family-related leave, and a breakdown by gender.

Gender	%
Female	21
Male	20

Under family related leave we understand:

- Parental leave
- Paternity leave
- Maternity leave
- Leave for family reasons

#### S1\_S1-15\_94

All employees are entitled to take family-related leave.

# [S1-16] Remuneration metrics (pay gap and total remuneration) - general

#### S1\_S1-16\_97

a) Gender pay gap, defined as the difference of average pay levels between female and male employees, expressed as percentage of the average pay level of male employees

The gender pay gap for Degroof Petercam is 17%. This gender pay gap is explained by the fact that male are overrepresented in top management functions as disclosed in S1-9.

b) Annual total remuneration ratio of the highest paid individual to the median annual total remuneration for all employees

The ratio for 2024 is 9.66.

# [S1-17] Incidents, complaints and severe human rights impacts -general

#### [S1\_S1-17\_103]

No incident, complaint and severe human right impact has been recorded in the course of 2024.

# S3 – Affected communities

This chapter highlights Degroof Petercam's commitment to support different communities through its Foundations' activities. Through its DMA exercise, Degroof Petercam identified philanthropy as an activity which is important as part of Degroof Petercam's value proposition as well as impacting surrounding communities. Further analysis revealed that ESRS S3 seemed the most appropriate place to structure the reporting.

The Foundations yearly action plan includes a Degroof Petercam Foundation Award, which provides a 1 million EUR grant and non-financial support to selected organizations working on access to employment in the EU as well as the launch of the Lab initiative addressing employment challenges in Belgium.

Next to that philanthropic advice to clients and Employee Social Engagement program are developed which are identified as the main positive impact. No negative impacts nor risks were identified linked to affected communities within own operations.

Targets for managing impacts are under construction based on a to be developed dashboard for measuring the impact of Degroof Petercam Foundation award winners.

There is no policy as the activities linked to affected communities of Degroof Petercam are ran through a dedicated Foundation.

# DR related to ESRS2 [SBM-2] Interests and views of stakeholders

S3\_DR related to ESRS 2 SBM-2\_7

The disclosure ESRS S3 below solely concerns IROs linked to its own operations through the activity of Degroof Petercam's Foundation.

# DR related to ESRS2 [SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

S3\_DR related to ESRS 2 SBM-3\_9

Philanthropic activities are for several years core to Degroof Petercam's vision. On one hand clients are interested in them as part of real estate planning, on the other hand the company

aims to have an impact through its own Degroof Petercam Foundation. Being active itself in philanthropy, strengthens its impact towards clients but supports as well societal concerns. Degroof Petercam Foundation focuses on one clear societal challenge which is access to employment in the EU.

Having a Foundation as well as an attractive Employee Social Engagement Program supports Degroof Petercam's employer branding as well its efforts towards creating engaged staff.

- (a) Organizations supported by Degroof Petercam Foundation focus on access to employment in the EU. The supported communities supported depend on the operational area of the selected organizations.
- (b) There were no negative impact identified in the DMA outcome.
- (c) In terms of material positive impacts:
  - Creating a positive group culture; this is ao. supported by the Employee Social
    Engagement Program (Solidarity Days, where employees volunteer 1 day for social
    or environmental projects, and a Skills-giving program that allows staff to dedicate
    up to 3 days of their working time per year to a charitable cause by sharing their
    competencies and expertise; as well as microdonations: a monthly automated
    donation from employee's salaries doubled by Degroof Petercam Group is awarded
    to one project of their choice.
  - Encouraging Ultra-Net-Worth-Individual to engage in philanthrophy, a service, which has been established for over fifteen years. This service provides structured guidance to clients wishing to invest their capital and time in philanthropic initiatives aimed at building a more sustainable world.
- (d) The material opportunities for Degroof Petercam include:
  - Increased talent attractiveness thanks to increased team spirit through engagement with communities.
  - Reputation gains due to the visibility of local initiatives taken by Degroof Petercam

# [S3-1] Policies related to affected communities

S3 S3-1 14

Degroof Petercam Foundation has no policy available as this is considered as not relevant for the Degroof Petercam Foundation activities. A small, dedicated team works within a clear governance structure on fulfilling Degroof Petercam Foundations' mission to support organizations scaling their solutions for employment in the EU.

# [S3-2] Processes for engaging with affected communities about impacts

The engagement processes described here mainly concern the Degroof Petercam Foundation (DPF) Awards activity. If it applies to another activity, this will be explicitly mentioned.

#### S3 S3-2 21

- (a) Degroof Petercam Foundation worked-out a solid process for its Degroof Petercam Foundation Award. It uses therefore a selection process which starts by organizations being nominated by peers. This ensures a good broad view on issues & solutions available on the market. Active participation in the European philanthropy landscape by attending conferences, speaking at events, and collaborating with various collectives and working groups strengthens this engagement approach.
- (b) Engagement is conducted via financial and extra-financial support. Annually, one organization receives an unrestricted €1 million grant spread over five years and tailored support for five years. Engagement occurs before and during (5 years) the donation accompany process. In 2024, French based organization ETRE received the award.
- (c) For the Degroof Petercam Foundation Award's final selection phase, four to six organizations get invited to pitch in front of the Jury that presents different sectors. The jury changes each year and decides on the laureate independently. In the DPF Award selection process, DP Foundation has no say in who gets nominated, nor who gets selected laureate. The operational team consists of 4 FTE's and facilitates the selection process: Managing Director, Program Coordinator, Senior Program Manager, and Junior Program Manager.
- (d) In line with the Theory of Change, Degroof Petercam Foundation aims ao. for the following output in the organizations supported:
  - Strong talent and leaders in the organization
  - Build legitimacy with the public sector
  - Gain visibility and recognition
  - Increase beneficiaries
  - Share best practices

#### S3\_S3-2\_22

Amongst the eligibility criteria for the Degroof Petercam Foundation Award is that the organization is set up as a non-profit organization and that its purpose is in line with at least one of the four priority areas including facilitating universal access to employment and promoting a fair job market. The selection process consists of five phases: 1) nomination by peers, 2) online application by eligibility and impact questionnaire, 3) online interviews on financial health, 4) field visits to meet the team, stakeholders, and beneficiaries of the organization, and 5) jury.

# [S3-3] Processes to remediate negative impacts and channels for affected communities to raise concerns

#### S3\_S3-3\_27

- (a) There were no negative impacts identified in the DMA, hence this disclosure is not applicable.
- (b c) Degroof Petercam Foundation main channel to engage and raise concerns from affected communities is linked to regular contacts with the laureates. For example, within the DPF Award program, the 10-month due-diligence of organizations includes field visits and a

jury pitch where beneficiaries are directly invited to take part and raise their concerns and needs.

(d) Degroof Petercam Foundation aims to be as effective as possible, by supporting scalable and innovative solutions that supplement the efforts of the existing involved parties (such as the public authorities). At the very beginning and at the end of the 5-years support, an assessment takes place to identify needs; every six months, meetings are held between the Degroof Petercam Foundation Award laureates and Degroof Petercam Foundation to increase mutual learning and to monitor intermediary impact.

#### S3\_S3-3\_28

The annual grant is unrestricted, meaning discretionary to the organization and its needs. This is a gesture of trust by Degroof Petercam Foundation towards the selected organization. In this set-up, a relationship is built for 5 years where laureates benefit from a tailored package of extra-financial support throughout the five-year program. This should enable the organizations to express concerns if needed. There is no further formal policy in place.

# [S3-4] Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions

Main recurring action taken by Degroof Petercam Foundation is clearly the Degroof Petercam Foundation Award (which is a yearly process).

#### S3\_S3-4\_32

- (a) As there are no negative impacts identified, there is no disclosure to be made.
- (b) DPF intends directly to create a positive group culture through initiatives such as Solidarity days 1 day per year, employees can participate to social activities with other colleagues and the possibility to allocate up to 3 days working days for a charitable cause by sharing competencies and expertise. These initiatives which are renewed every year since a couple of years are applicable for the Belgium and Luxembourg entities.

Indirectly, the Foundation's core activities such as DPF Awards and the DPF Lab (rather new initiative which has been started in 2024) also contribute to create to this positive impact both within society (hence communities linked), within client base (creating connections between laureates of the DPF award & certain clients) as well as within staff (feeling more engaged as Degroof Petercam also walks the talk).

- (c) Reference is made to disclosure ESRS S3 SBM 3 9c. Additionally, Degroof Petercam Foundation manages its own funds in a responsible way by preferring SFDR article 8 products (products promoting ESG characteristics and making sustainable investments) and invests a maximum of 15% into 'impact investment' (based on Degroof Petercam Foundation's own definition).
- (d) Measuring the effectiveness of the actions is done through structured interviews being held by start of the 5-year laureate period & at the end. So far only 1 laureate exited the program (Duo for a Job). Assets are managed by a de dedicated investment committee that

consults on the investments of the Degroof Petercam Foundation. Finally, DPF launched an intermediary survey on impact to laureates of the DPF Award.

#### S3\_S3-4\_34

- (a) As there are no risk identified, there is no disclosure to be made.
- (b) DP Foundation runs different projects and actions: the foundation is well-known, with a large reputable network which enables support to clients in their philanthropic desire. In 2024, the DPF team supported the Estate Planning team with philanthropic advice to approximately 10 clients in Belgium.

#### S3\_S3-4\_38

Following the mission of the Degroof Petercam Foundation, a major part of the budget is to be used for philanthropic projects through its main programs—DPF Award EUR 950 000, consisting of EUR 800 000 to winners of the DPF award and EUR 150 000 to the 2024 finalists; next to that some other ad hoc projects for in total 93.000 EUR were funded.

Degroof Petercam Foundation also launched in 2024 its second program, The Lab, focusing exclusively on Belgium. Through this initiative, the Foundation proactively identifies key employment-related challenges and develops innovative solutions through research, experimentation, collaboration and funding of civil society actors. The first challenge selected by The Lab is reconciling parenthood and employment in Belgium. The Lab adopts a collaborative approach, engaging civil society and key stakeholders in Belgium. As a first action, a public consultation was successfully conducted in May and June 2024. Broadcast throughout Belgium, the consultation gathered nearly 180,000 votes and identified nine concrete possible solutions that will be further developed in 2025.

Generally, DPF aims at a maximum of 25% to be spent on overhead costs such as accounting & audit, operational management, public relations ... The Foundation's accounts are audited every year and can be found on the website of Crossroad Bank for Enterprises.

# [S3-5] Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

#### S3\_S3-5\_41

For the moment DPF hasn't defined any targets yet. The DPF's Awards is a relatively new process which completed in 2023 its first 5-years cycle of support with the first award's winner. Following this the Foundation's management board came up in May with the idea of setting up KPIs to better monitor the positive impact of this activity on the beneficiary associations. For the moment the effectiveness of our actions is realized through the regular follow-up meetings organized with the Awards winners.

For the solidarity days action, the quality of these is assessed by gathering informal feedback from the associations taking part in these days and by a small satisfaction survey amongst the employees who took part to it.

There is no tracking of the effectiveness of the DPF Lab actions yet as this is a very recent initiative.

#### S3\_S3-5\_42

For the time being, the Foundation's Board has agreed on the principle of introducing such metrics and targets. The Foundation is working on the identification of relevant data that will be discussed and validated in the Foundation's Board during 2025. At this stage we are not able to disclose the process for setting targets.

## S4 - Consumers and end-users

The chapter focuses on consumers and end-users, referred to as 'clients' in the context of Degroof Petercam's services. Key areas addressed include responsible marketing, financial access, and data privacy & security (in general, disclosures apply to all 3 key areas. If a disclosure specifically applies to only one of the 3 areas, the section will be identified using a title announcing the respective section). In terms of Responsible Marketing, it's mainly about emphasizing transparency, accountability, and providing clear, accurate, and non-misleading information. In terms of Data Privacy & Security, our focus is on protecting client data through robust data security systems. In terms of Financial Access, it's mainly about the development of a low-threshold digital investment platform to democratize financial advice and broaden the target audience.

Material Risks and Opportunities include financial loss and reputational damage due to data breaches and non-compliance. Opportunities are linked to enhancing financial access through digital platforms and being recognized as a dedicated investment house for wealthy clients.

Our policies to act on these risks, impacts & opportunities include a responsible marketing policy and a data privacy charter & data protection policy.

Targets and KPIs are linked to avoiding greenwashing, closely monitoring of data breaches, phishing incidents, and vulnerabilities. Future action plan includes the launch of the 'New Digital' platform in 2025 as well as further strengthening of data security measures and IT risk management.

The new-scale digital challenges facing the financial sector, such as the sustainable use of Artificial Intelligence and automated processes using robots, are the subject of a chapter dedicated to digitalization, since they can have an impact on both DP's clients and DP's employees.

#### DR related to ESRS2 [SBM-2] Interests and views of stakeholders

#### S4\_DR related to ESRS 2 SBM-2\_8

As mentioned in ESRS 2 SBM 2, Degroof Petercam manages its 'Clients' interactions' through different perspectives:

- Via regular personal contact, we accompany our clients, stand side by side with them and establish a long-term partnership based on trust and knowledge.
- Clients are regularly invited to sessions in which our experts share their views on a broad range of topics including sustainability.
- Clients are being requested to express their sustainable preferences in line with current MIFID setup.
- Client surveys are regularly ran.

Emphasis is placed on integrating the interests, views, and rights of its clients into its strategy and business model. Transparency and accountability in the interactions with clients are prioritized, providing comprehensive information through the website and client communications. This "Responsible Marketing" commitment is embedded in the company's marketing guidelines (policy), which are designed to ensure the protection of clients and investors by providing clear, accurate and non-misleading information. The guidelines prohibit abusive, misleading, and aggressive advertising, ensuring that clients receive accurate and clear information to make informed decisions. Furthermore, the company adheres to stringent regulatory requirements, such as the MiFID regulations and the Sustainable Finance Disclosure Regulation (SFDR), to promote transparency and sustainability in its offerings.

# DR related to ESRS2 [SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

#### S4\_DR related to ESRS 2 SBM-3 \_9/10

(a) It should be mentioned that there are no specific steps taken to gain insight from clients that may be particularly vulnerable to impacts and/or marginalized. Given our type of activities and offer, DP doesn't consider this as being relevant.

With respect to Financial Access, it should be noted that DP does not formally apply a minimum required investment, Degroof Petercam's private banking services are typically offered to clients with investable assets of minimum 500 000 EUR. When evaluating such new client relationships, DP takes into account other members of the same family.

#### (b) Negative impacts:

- Responsible Marketing: over-information provided to any type of clients was
  identified as a material negative impact. This is a side-effect caused by regulations
  such as MIFIDII and SFDR whose objective is to protect the clients by making
  providing them with complete, accurate and non-misleading information on the
  products and their related risks. This leads some customers to feel that they are
  being over-informed, even though the information is intended to protect them
- <u>Data privacy & security:</u> All clients could be impacted by a cybersecurity attack or a data breach. This material impact affects all industries without exception (the

companies but also their clients). Financial data is a very critical data, a robust IT risk & security framework to limit the occurrence and the impact of these type of issues has been defined.

• <u>Financial Access:</u> The exclusion from DP's banking services of some population categories due to high entry criteria for opening an account was identified as a potential negative impact. This holds for the whole population within the geographic scope.

#### (c) Positive impacts:

- <u>Responsible Marketing:</u> Supporting the academic world regarding ESG and financial literacy as well as building educational and financial literacy for stakeholders. The longstanding commitment towards Sustainability made by DPAM and more recently by Degroof Petercam makes that DP has more and more resources that have acquired expertise on the ESG matters. This expertise can be shared with the academic world, market competitors and last but not least with DP's clients.
- <u>Data privacy & security:</u> Client's assets are protected through strong data security systems which helps maintaining confidence of its stakeholders in DP's technical infrastructure and in the Financial industry's robustness as a whole. The framework for data security will be detailed in this chapter.

#### d) Main Risks:

- Responsible Marketing: loss of clients due to ineffective communication strategy failing to meet client demands and reputational and/or financial loss due to incorrect/incomplete product communication (e.g. greenwashing and green bleaching) were identified.
- Data privacy & security:
  - Financial loss and reputation damage due to data breaches, cybersecurity attacks and/or data litigation
  - Financial risk if Degroof Petercam is not able to prove the reliability of its ESG data.
  - Reputational damage, fines and financial penalties due to noncompliance and poor monitoring of regulatory data and security requirements.
- <u>Financial Access:</u> being a Wealth Manager could prevent some people categories from accessing financial markets due to historical applicable minimum wealth thresholds. On the other hand, DP also sees it as an opportunity to be recognized from the outside world as a dedicated Investment House providing quality services to a wealthy population.

#### S4\_DR related to ESRS 2 SBM-3 \_11

#### **Responsible Marketing**

DP's marketing guidelines strictly prohibit abusive, misleading, and aggressive advertising practices, ensuring that all communications are clear, accurate, and not misleading. DP also

respect the MiFID and SFDR regulations, which specifies that all financial information provided to clients is correct, clear, and not misleading, with particular emphasis on highlighting potential risks alongside any benefits. Moreover, as an investment house, the company also respects MiFID rules on 'duty of care' (Product governance, suitability and appropriateness) whereby certain types of products are only proposed to clients which have the required level of knowledge or that are suitable for these investors. In this regard, stricter rules for product communications as defined by EU regulators and specific information for those investing in complex financial products are applied. These policies include enhanced disclosure requirements, tailored communication strategies, and rigorous compliance checks to ensure that all marketing materials meet the highest standards of transparency and fairness. By continuously monitoring and updating our practices, DP aims to mitigate the risks and protect the interests of all our clients.

#### **Data privacy & security**

Degroof Petercam focuses in each process on the weakest part of the chain to ensure reliable data processing whether it's linked to protecting personal data, respecting data privacy, securing systems, networks and programs against data breaches. No specific measures are taken in that respect for specific group of clients. All clients are engaged with the same level through diverse channels.

#### S4\_DR related to ESRS 2 SBM-3\_12

In the comprehensive assessment of material risks and opportunities arising from impacts and dependencies on clients, it was determined that the primary risks and opportunities are not specifically tied to distinct groups of clients, such as particular age groups, but rather apply broadly across all client segments.

### [S4-1] Policies related to consumers and end-users

S4\_S4-1\_15

#### **Responsible Marketing**

- Marketing guidelines policy
  - (a) Summary: The Marketing guidelines is an internal policy of Degroof Petercam regarding marketing guidelines for product information and advertising. It outlines the rules and regulations that must be followed to ensure that financial products and services are marketed in a clear, accurate, and not misleading way. The document includes general advertising rules, specific requirements under MiFID regulations, and additional obligations for the marketing of financial products to retail clients as per the Royal Decree of April 25, 2014. It also covers advertising related to collective investment schemes (UCITS/AIFs) and public offers of investment instruments. The guidelines emphasize the importance of transparency, the inclusion of necessary risk disclosures, and compliance with both local and cross-border regulations. The document also details the operational workflow for obtaining internal and regulatory approvals for marketing materials. With this policy Degroof Petercam intends to manage its material impacts, risks and opportunities related to marketing to clients.

- (b) Scope: this policy applies to DP Belgium
- (c) **Ownership of the policy**: Compliance is responsible for managing and reviewing the Marketing guidelines policy.

#### **Data privacy & security**

The Privacy Charter of the Bank contains information about the rights of the data subjects (i.e., clients, member of the personnel, etc.), as well as the policies and commitment to data privacy, and refers to the role of the Data Protection Officer, which is created and regulated by the General Data Protection Regulation ("GDPR"). DP has an IT control framework governing all IT risk and security concerns, based on Cobit and CIS.

- Data Privacy Charter (Degroof Petercam): This charter outlines how Degroof Petercam processes personal data of its customers and affiliated individuals. It emphasizes compliance with legal and regulatory provisions, transparency, and data protection. The charter details the purposes for data processing, types of data collected, data sharing practices, data retention periods, and security measures. It also explains the rights of individuals regarding their data, such as access, rectification, erasure, objection, and data portability. The charter ensures that data processing is in line with GDPR (Regulation (EU) 2016/679 of April 27, 2016) and other relevant laws (The Belgian Act of July 30, 2018 on the protection of natural persons with regard to the processing of personal data, Royal Decree of 4 April regulating the sending of advertisements by electronic mail).
- Data Protection Policy (Degroof Petercam Group):
  - (a) Summary: This policy establishes principles for protecting personal data within the Degroof Petercam Group. It includes guidelines for data collection, processing, and security, ensuring compliance with GDPR. The policy covers the roles and responsibilities of employees, data minimization, transparency, data transfers, and subcontracting. It also addresses the rights of data subjects, such as access, rectification, and erasure of data. The policy mandates maintaining a data processing register and conducting impact assessments for high-risk data processing activities. It emphasizes the importance of data security and outlines procedures for handling data breaches.
  - (b) **Scope**: all Degroof Petercam employees and non-employees.
  - (c) **Ownership of the policy**: the DPO is responsible for managing and reviewing the Data Protection Policy.

#### **Financial Access**

There is no policy available or planned on Financial Access as the access to the product offering solely depends on quantitative criteria (minimum invested amount) and anti-money laundering processes (AML).

#### S4 S4-1 16/17

Degroof Petercam policies towards consumers are based on Belgian and European laws which integrate labor and human rights frameworks. Within these frameworks, there was no specific analysis performed of Compliance of DP's policy with regards to UN Guiding Principles on Business and Human Rights, ILO Declaration on Fundamental Principles and Rights at Work or OECD Guidelines for Multinational Enterprises.

# [S4-2] Processes for engaging with consumers and end-users about impacts

#### S4 S4-2 20

(a-b) On a day-to-day basis Degroof Petercam prioritizes active engagement with its clients to understand and address their actual and potential concerns. This engagement process involves direct interactions, feedback mechanisms, and structured procedures to ensure that DP remains responsive to their needs and concerns. Most of the time DP engages with its clients through the regular interactions in place with their relationship managers, and by conducting satisfaction surveys that take place right after client events. For institutional clients, DPAM conducts annual satisfaction surveys, such as the Ipsos survey, to benchmark and enhance client satisfaction. The feedback from these surveys is instrumental in refining our service offerings and ensuring they align with client expectations.

Furthermore, the engagement concept is also encompassing sustainability and responsible value creation which requires action on three levels: company, people, and solutions. That's why Degroof Petercam also engages with its clients to help them embrace more responsible behaviors. Practically, clients are guided in their sustainable transition through regular personal contacts with their relationship manager or advisor. Discussions, lectures, and awareness sessions where our experts share their views on a broad range of topics including sustainability are organized on a regular basis. Clients are also invited to express their MiFID preferences regarding sustainability, which participates to DP's approach to sustainable finance and investment strategies.

Any grievance is promptly and effectively addressed through a dedicated claims procedure. This procedure ensures that any issue raised by clients is handled with the utmost care and resolved to their satisfaction.

But engagement with clients also occurs via digital channels.

On a monthly basis DP distributes internally a 'Voice of the Customer' report including - but not limited to - client feedback provided to support helpdesk and usage statistics.

Each year, a client satisfaction survey in which we measure client satisfaction with regards to digital channels is conducted. The collected feedback from the described initiatives directly feeds the priorities for the development of our digital tools.

#### **Responsible Marketing**

Finally with regards to the responsible marketing activities (brochures, blogs, ...) procedures require systematic validations from compliance experts before any publication towards clients is released, making sure that content is fully compliant from both financial and non-financial aspects.

Through these comprehensive engagement processes, Degroof Petercam aims to foster trust, enhance client satisfaction, and drive positive impacts for our clients.

#### **Financial Access**

In the past, specific quantitative and qualitative market research on the 'Private bank of the future, through the eyes of millennials' was conducted. This research specifically informed our efforts in the development of a low-threshold digital investment platform, directly responding to identified market needs.

- (c) Operational responsibility for ensuring this engagement lies with the Private Banking and Institutional Asset Management teams. The most senior role overseeing this process is the Chief Executive Officer (CEO), who ensures that the insights gained from client interactions are integrated into the strategic planning and decision-making processes.
- (d) To assess the effectiveness of the engagement, annual client satisfaction surveys are conducted and feedback is gathered after the events. This feedback is systematically reviewed and used to refine our services and strategies. Additionally, a clear governance framework was established, to monitor and enhance engagement practices.

When engagement is related to claims and to capture and ensure a timely, complete, and accurate processing of these claims a dedicated mailbox(claims@degroofpetercam.com) is used. Internal procedure describes how the claims are processed. Claims management is done by the Front Care & risk team under supervision of the operational risk department.

#### S4\_S4-2\_21

There are no specific steps taken to gain insight into the perspectives of clients that may be particularly vulnerable to impacts and/or marginalized. Given the type of activities and offer, Degroof Petercam doesn't consider this as being relevant.

# [S4-3] Processes to remediate negative impacts and channels for consumers and end-users to raise concerns

#### S4\_S4-3\_25

- (a) Degroof Petercam has established a comprehensive framework to address and remediate negative impacts on clients. The company has implemented several processes to ensure that any adverse effects are promptly identified and addressed. These processes include a complaints management system, where clients can easily raise their concerns through various channels such as relationship manager and a dedicated claims email address.
- (b) Additionally, Degroof Petercam has a Whistleblowing Policy that provides secure and confidential channels for reporting any misconduct or unethical behavior, ensuring that individuals who report in good faith are protected against any form of retaliation.

To further enhance transparency and accountability, Degroof Petercam conducts regular reviews and updates of its policies and procedures, including those related to data privacy, cybersecurity, and compliance with regulatory standards.

(c) Degroof Petercam usually manages directly the channels enabling clients to report problems.

(d) To track and monitor the issues raised, Degroof Petercam employs a robust data management system that records and analyzes all consumer and end-user feedback. This system allows the company to identify trends, address recurring issues, and implement preventive measures. The effectiveness of these channels is regularly reviewed through stakeholder involvement, ensuring that the intended users are satisfied with the resolution process. This continuous feedback loop helps Degroof Petercam maintain high standards of consumer and end-user satisfaction and trust.

#### **Data privacy & security**

Our general approach to remedy when we identify that we have caused or contributed to a material negative impact on client data is structured around the NIST framework's five steps: Identify, Protect, Detect, Respond, and Recover. This journey towards cyber resilience ensures that security incidents are systematically addressed and managed. When a security incident occurs, we follow a detailed incident response procedure is followed. This includes initial assessment, containment, eradication, and recovery.

In case of major security incidents, Degroof Petercam's business continuity plan will be evoked, which includes a communication stream covering both internal and external stakeholders. This ensures a transparent and comprehensive communication to affected clients.

A root cause analysis is conducted to understand the underlying issues and implement corrective actions. The effectiveness of the remedy provided is assessed through post-incident reviews and regular stress tests to measure the solidity of our security controls, particularly focusing on end-user devices and critical business applications.

Clients can raise their concerns & needs directly with us, through specific channels. The inbox for claims is managed within Private Banking and can handle all types of claims, including those related to data security or data privacy. Upon receiving a claim, the sender receives an acknowledgment receipt within 48 hours. A ticket is then created in our GRC system, ensuring that all relevant information is captured, and the Data Protection Officer (DPO) is informed directly. The sender will receive a detailed response within 30 days, and the ticket will only be closed if no further communication is received within 30 days after our response.

Degroof Petercam also has an internal procedure for managing personal data breaches, in compliance with the General Data Protection Regulation (GDPR). It details the steps to be taken when a data breach is discovered, including immediate reporting to the Data Protection Officer (DPO), investigation, risk assessment, and notification to the relevant Data Protection Authority (DPA) and affected individuals if necessary. The procedure emphasizes the importance of timely action, specifying that breaches likely to result in a risk to individuals' rights must be reported to the DPA within 72 hours. It also defines roles and responsibilities, including those of the DPO, Chief Risk Officer, Group General Counsel, and Chief Information Security Officer, in managing and mitigating the impact of data breaches.

#### S4 S4-3 26

#### Responsible Marketing

Degroof Petercam actively assesses the awareness and trust of its clients in these mechanisms through various channels, including annual surveys, in-depth interviews, and direct feedback during client contacts. For instance, the Private Banking division conducts yearly quantitative surveys and qualitative interviews to gauge client satisfaction and gather insights on their experiences with the services. Additionally, DPAM clients participate in

surveys conducted by Ipsos, which help us understand their perceptions and trust in our processes.

To protect individuals from retaliation when they use these structures, a comprehensive Whistleblowing Policy was established a comprehensive Whistleblowing Policy. This policy provides secure channels for reporting any form of misconduct or unethical behavior, ensuring strict confidentiality and effective protection against any form of reprisal. Degroof Petercam's commitment to safeguarding whistleblowers is reinforced by the Code of Ethics, which mandates compliance with legal and regulatory requirements, ethical conduct, and the prevention of fraud and corruption.

These measures are part of our broader governance framework, which includes the Risk Awareness and Control Excellence (RACE) program. This program combines informational campaigns and mandatory training sessions to ensure that all staff members are aware of and adhere to Degroof Petercam's ethical standards and reporting mechanisms. By fostering a culture of openness and accountability, the company aims to build and maintain the trust of our clients and stakeholders in our commitment to ethical and responsible business practices.

#### **Data privacy & security**

Degroof Petercam ensures that clients are aware of and trust the processing of their personal data and privacy and enable them to raise their concerns via the publication of information in the Privacy Charter and the General terms and conditions both available on our website, as well as by enabling them to ask questions to the Data Protection Office per email or per post. This approach is designed to foster transparency and build trust, ensuring that stakeholders feel confident in the mechanisms available to address their privacy questions.

# [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

Note that except for the specific action on Financial Access's material impact hereunder all the actions undertaken and described in this chapter are related to client's data privacy & security.

#### S4\_S4-4\_30

Unless specified the actions described below are applicable to all entities of Degroof Petercam group.

#### **Financial Access**

Degroof Petercam worked out its 'New Digital' offer to act on an identified negative impact: the exclusion of some client categories due to high entry threshold. Firstly, an interest from prospects to start investing in earlier life stages with typically lower amounts was noticed. Furthermore, digitalization and the proliferation of online investment have reshaped client expectations regarding digital experiences also in private banking & wealth management. These observations led to start developing a low-threshold digital investment platform, that could serve as a future acquisition channel and simultaneously complete Degroof Petercam's existing private banking business. With such a platform, Degroof Petercam is further

contributing to the democratization of financial advice, making our investment expertise available to a broader audience.

The intention is to launch the 'New Digital' platform, dedicated to individual Private investors, in Belgium in 2025. This program aims to democratize access to investment management services.

#### Responsible Marketing

At the end of 2023, Degroof Petercam recognized that discussing sustainability with our clients had become increasingly complicated due to legal requirements, unclear concepts, risks of miscommunication ("greenwashing"), and polarizing opinions. As Degroof Petercam believes that conversations on sustainability are fundamental to our business, in line with Responsible Marketing challenges, Degroof Petercam has set up and rolled-out in 2024 for the Private Banking in Belgium an ambitious program called the 'Private Banking Sustainability Journey' days. About 170 frontline staff members were trained by a team of experts to have meaningful conversations with clients about ESG and sustainability matters.

#### For Data privacy & security in specific,

Degroof Petercam has implemented a comprehensive strategy to address the material impact with Data Privacy and security. The company has prioritized data privacy, data security, and cybersecurity as critical areas, recognizing their importance in protecting consumer information and maintaining trust. To this end, Degroof Petercam has already adopted a 'Defense-in-depth' strategy, which involves multiple layers of security measures to protect its assets. This includes strict network segmentation, live simulations involving the Executive Committee to test cyber resilience, and adherence to the NIST Framework and other security standards such as the EBA guidelines and the Swift Customer Security Control Framework.

Additionally, the company prepared compliance with the EU's Digital Operational Resilience Act (DORA) by January 2025. These measures are complemented by continuous updates to processes and policies, inspired by best market practices, to ensure robust protection against data breaches, cyber-attacks, and data litigation. Furthermore, Degroof Petercam's IT & digital transformation program are designed to enhance operational efficiency and provide secure, innovative services to clients (cfr Digitalization topic at the end of the report).

Key improvement opportunities for 2025 lie in the analysis of more stringent data leakage controls, the consolidation of our multi-factor authentication platform, further strengthening our access management processes and linking existing on-prem access management controls with MS Azure management systems.

More specifically and broadly actions are also taken to strengthen the data governance. In an environment where data processing is a major challenge to effectively and agilely meet business needs and regulatory requirements, the Bank's organization in terms of data management is continuously strengthening from a Group perspective.

The data management strategy is implemented under the governance of a Data Management Committee, involving representatives from various business lines, responsible for coordinating projects and actions aimed at ensuring better control and protection of the Bank's data.

In 2024, in Belgium, the main actions in terms of data management were:

- The implementation of a specific data quality module that allows the automation of quality controls, this module is notably used for quality controls for BCBS239 (Precisely's Trillium module);
- The strengthening of internal governance and the operational model framing data management: this includes the management of AI and robotic solutions;
- The establishment of an ESG repository;
- The implementation of an operating model for managing automation projects via Robotics and AI solutions – establishment of the "Data & AI experts board" which evaluates the risk of proposed solutions;
- The delivery of 12 new robots, the delivery of our first automation solutions using generative AI.

In 2025, in Belgium, the main objectives in terms of data management will be:

- The continuation of data quality improvement projects, with BCBS239 still being a priority;
- The delivery of the AI roadmap and the Robotics roadmap;
- The implementation of a new Data platform to support the data consolidation needs at the CA Indosuez group level.

#### S4\_S4-4\_31

#### As for Data privacy & security in specific,

As for actions taken to prevent, mitigate or remediate material negative impacts on consumers and/or end-users, Degroof Petercam adheres to the NIST Framework and other security standards like the EBA guidelines and the Swift Customer Security Control Framework further bolster our strategy. Additionally, Degroof Petercam prepared compliance with the EU's Digital Operational Resilience Act (DORA) by January 2025. These measures are complemented by continuous updates to processes and policies, inspired by best market practices, to ensure robust protection against data breaches, cyber-attacks, and data litigation that would negatively impact our clients. These are tracked in a set of security projects, which are formally tracked through the project management processes. The effectiveness of these actions is tracked through regular testing and simulations performed by the 3 internal lines of control and by independent assessments performed by world class security service providers such as Nviso and Falconforce.

#### S4\_S4-4\_32

#### As for Data privacy & security in specific,

(a - b) Degroof Petercam assesses the actions which are needed and appropriate in relation to Client insecurity due to data breaches and cybersecurity attacks through the implementation and strict use of a security incident response procedure.

This is a structured approach to managing the aftermath of security breaches or attacks. Its goal is to minimize damage and reduce recovery time and costs through a step-by-step process. Rapid detection, minimizing loss, addressing vulnerabilities, and restoring IT services are crucial components. Swift and effective responses are vital due to the frequent compromise of personal, financial, or business data.

Effective communication with internal and external groups is essential, with predetermined guidelines ensuring relevant information is shared appropriately.

This procedure applies to all suspected or confirmed IT Security breach (cyber-attack included) linked to assets under the control of Degroof Petercam.

Degroof Petercam uses the services of a certified Security Operations Center and Security Information and Event Management provider. Reported incidents are analyzed internally by a team of IT security experts who identify and initiate the required actions to address this material impact.

(c) Effectiveness is ensured via the framework described above.

S4 S4-4 33

#### As for Data privacy & security in specific,

Degroof Petercam takes data security and privacy matters seriously. Reputational damage and financial penalties due to non-compliance and poor monitoring of regulatory data and security requirements is a material topic for us. The control framework used enables Degroof Petercam to manage the risks involved. Key improvement opportunities for 2025 lie in the analysis of more stringent data leakage controls, the consolidation of our multi-factor authentication platform, further strengthening the access management processes and linking existing on-prem access management controls with MS Azure management systems.

These initiatives aim to ensure clients trust and satisfaction, thereby driving business growth and reinforcing Degroof Petercam's position as a leader in the financial industry.

S4\_S4-4\_34

Within Degroof Petercam the project governance includes a mandatory step prior to the project's execution phase where all impact and risk dimensions are analyzed and validated with the matter experts (Data Privacy Officer, Operational Risk Manager, Compliance, CISO,...) ensuring to anticipate and to avoid any negative impact or risk coming from the planned solutions.

S4 S4-4 37

#### As for Data privacy & security in specific,

Degroof Petercam has a team of 11,05 FTEs working on IT risk, split across the first, second and third lines of defense. The IT budget represents about 18,2% of total expenses. The Cybersecurity project budget is about 3% of Degroof Petercam IT budget (other security initiatives such as data security are predominantly included in other CDO or Business budgets).

# [S4-5] Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (consumers and end-users)

S4\_S4-5\_41

#### Responsible Marketing

In the group scorecard 2024, a KPI on responsible marketing has been selected. Degroof Petercam aims at receiving no claim linked to greenwashing. For the year 2024, there were neither greenwashing-related claims from regulators, nor greenwashing claims

communicated from clients. Degroof Petercam is developing a coherent toolbox to mitigate Greenwashing claim risk, mainly focused on the communication around the financial products made available to clients:

- Firstly, internal marketing guidelines underline the importance of disclosing coherent proportionate and exhaustive information, encouraging to make an appropriate use of ESG and sustainability terminology.
- Secondly, as explained in section S4\_S4-2\_20 Financial access, a dedicated procedure and mailbox exists to capture any claim, including greenwashing claim coming from clients.
- Thirdly, Greenwashing prevention is subject to further integration within the context of the Indosuez integration.

This Responsible marketing KPI is monitored in the Responsible Banking Steering Group. This way we mitigate potential risks such as reputational and/or financial loss due to incorrect/incomplete product communication: e.g., greenwashing, and green bleaching. As mentioned earlier in this chapter, information about products and services is subject to very precise rules in the financial sector (MiFID, SFDR...). This can lead to a feeling of over-information on the part of some customers, but we have no real solution to this problem, since this information is intended to provide our customers with all the transparency and protection they need.

#### **Data privacy & security**

While Degroof Petercam, like any other company, aims to avoid any data security or privacy breaches in theory, the most practical way to monitor this goal and assess the effectiveness of our actions is by defining, measuring, and acting upon a set of Key Risk Indicators (KRIs) as detailed in the following paragraphs.

Targets and KPIs linked to IT security are not publicly disclosed for security reasons.

First Line KRI Reporting (already in use):

- 1. Data Breach: the number of data breaches that have been reported specifically for Belgium and Luxembourg are monitored and reported. This metric is crucial for understanding our exposure and response capabilities in these regions.
- 2. Phishing: the report includes the percentage of users who have been lured by phishing campaigns. Additionally, Degroof Petercam emphasizes the reporting rate of these incidents, as it serves as a key metric for assessing user awareness and the effectiveness of our training programs.
- 3. Vulnerabilities on the DMZ: the company provides insights into vulnerabilities present in the Demilitarized Zone (DMZ), which is the publicly exposed area of our IT landscape. The focus is on identifying critical and exploitable vulnerabilities within the systems located in this zone.
- 4. Vulnerabilities on the Network: the analysis extends to vulnerabilities within the internal network, particularly focusing on critical and exploitable vulnerabilities in systems that are not publicly exposed. This helps to maintain a robust security posture.
- 5. Patching: Degroof Petercam reports on the status of missing security patches for critical systems. This information is vital for ensuring that our infrastructure remains secure against known vulnerabilities.

6. Go Live Without Penetration Testing: instances where critical and internet-facing applications go live without undergoing penetration testing are tracked as it is a significant risk factor that needs to be minimized.

#### Second Line KRI Reporting:

- 1. Major Incidents: Degroof Petercam reports on the number of Priority 1 and 2 major incidents, providing a detailed breakdown of the causes and suppliers associated with these incidents. This analysis serves to identify trends and areas for improvement in the incident response processes.
- 2. Phishing threats: the number of phishing threats being blocked by our secure email gateways and arriving in mailboxes for both Belgium and Luxemburg are being reported. This allows us to track the external threat landscape, adjust Degroof Petercam's technical barriers and create focused security awareness for staff.

## G1 - Business conduct

Resilient business conduct is at the core of Degroof Petercam's organization. It was also identified as material in its DMA. Degroof Petercam has established comprehensive policies, including a Code of Ethics, Whistleblowing Policy, Anti-Corruption and Anti-Bribery Policies, and a Gift Policy, to ensure ethical behavior and protect stakeholders. Its main action plan consists of providing mandatory training ao. on these policies for all employees and independent investigations of allegations. These action plans are fostered within a company culture where core values—Excelling, Teaming Up, Humane, Intrapreneurial, and Client Centric (ETHIC)—serve as the foundation.

For the reference period (2024) no convictions (and consequently fines imposed) occurred regarding violations of anti-corruption and anti-bribery laws (OECD Anti-Bribery Convention and recommendations, the Belgian Criminal Code, law of September 18, 2017 on the prevention of money laundering and terrorist financing).

### For 2025, Degroof Petercam will align its policies with CA Indosuez.

For a financial institution business conduct of an utmost importance and this is even more the case for an Investment House as Degroof Petercam; this is also reflected in the list of IROs below:

- No negative impacts identified
- Positive impacts identified will support trust in the Financial Sector taken up its responsibilities as it comes to sustainability, regulation... Degroof Petercam estimates that this image is crucial for the niche (wealth management) it functions in and therefore puts in all means & efforts it deems required
  - o Degroof Petercam acting as a responsible player and "walking the talk".
  - Client's protection via a strong implementation of regulations (e.g. protection of client's interest, data protection, human rights protection).
  - o Enhancing society's ethics and transparency via a strong implementation of regulations (e.g. AML regulations)
  - o Responsible management of assets of clients participated in the shift towards sustainable transition.
- Identified Risks are linked to Degroof Petercam's positioning itself as a trustworthy financial institution which takes regulation and sustainability seriously
  - o Financial losses due to a weak ESG due diligence process.
  - Removal of memberships (e.g. UN PRI) due to improper governance (oversight), irresponsible lobbying

- o Reputational damage and financial penalties if Degroof Petercam doesn't comply with legislation and regulations.
- Opportunity: Degroof Petercam estimates that increased revenues could be realized linked to reputational gain and strengthened relationships with clients due to the front runner position of DP being a valid and strong player in terms of ESG (e.g. in the ESG regulation landscape). The increase of revenues is linked to increasing volumes of Responsible Investments as defined in RI\_MDR-P\_65 for both its Private Banking activity as well as for it Asset Management activity.

# DR related to ESRS2 [GOV-1] Role of administrative, supervisory and management bodies

#### G1\_DR related to ESRS 2 GOV-1\_5

As business conduct is material for Degroof Petercam, this is also being reflected in the governance i.e. Administrative, supervisory and management bodies as described above. Reference is made to disclosure ESRS 2 GOV-1.

The process to report outcomes to the administrative, management, and supervisory bodies involves regular updates and material issue reporting to the Executive Committee and Risk Committee (or equivalent governance body) of each DP entity. These updates are included in the Compliance Quarterly report and cover the status of the ABC Program implementation, significant deviations from policies and procedures, legal and regulatory developments, and the results of internal reviews.

The collective skills of the Bank's Executive Committee are underpinned by the individual professional experience of its members also with respect to business conduct. Moreover, training is provided to all staff, including management bodies, ensuring that they are also adequately informed and compliant with the Anti Bribery & Corruption (ABC) principles

# DR related to ESRS2 [IRO-1] Description of processes to identify and assess material impacts, risks and opportunities

#### G1\_DR related to ESRS 2 IRO-1\_6

The process to identify and assess material impacts, risks and opportunities has been described above. Reference is made to ESRS 2.

### [G1-1] Business conduct policies and corporate culture

#### G1\_G1-1\_7

Degroof Petercam is committed to maintaining the highest standards of business conduct and corporate culture, as outlined in our Code of Ethics. The core values—Excelling, Teaming Up, Humane, Intrapreneurial, and Client Centric (ETHIC)—serve as the foundation for DP's corporate culture and guide our actions and decisions. These values are deeply embedded in the operations and are reflected in the policies and practices.

Degroof Petercam's Code of Ethics emphasizes compliance with legal and regulatory obligations, client protection, prevention of conflicts of interest, and the fight against money laundering and terrorist financing. We ensure that all employees are well-informed and trained on these matters, fostering a culture of integrity and responsibility. Additionally, our Whistleblowing Policy provides a secure and confidential channel for reporting any unethical behavior, ensuring that whistleblowers are protected from retaliation.

Degroof Petercam also prioritizes diversity, equity, and inclusion, creating a work environment that respects and values differences. The company's commitment to these principles is demonstrated in our policies and the initiatives we undertake to promote a diverse and inclusive workplace. Furthermore, **Degroof** Petercam actively engages with our clients, investee companies, and other stakeholders on sustainability-related topics, helping them meet their own objectives and fostering a culture of responsible prosperity.

By adhering to these principles and continuously striving to improve, the aim is to build and maintain trust with our clients, employees, and the broader community, thereby reinforcing our reputation as a responsible and ethical financial institution. As also specified later in this chapter these policies are applicable to all employees and entities of Degroof Petercam group.

#### G1 G1-1 9

Degroof Petercam establishes, develops, promotes, and evaluates its corporate culture through a comprehensive and structured approach embedded in its strategic and operational frameworks. The foundation of its corporate culture is encapsulated in the ETHIC values—Excelling, Teaming Up, Humane, Intrapreneurial, and Client Centric. These values are not only articulated in the company's Code of Ethics but are also actively promoted and integrated into daily operations and interactions.

The company also follows the McKinsey model to ensure it becomes an Employer of Choice, focusing on five key ingredients: company, culture, leaders, benefits, and job. This model is supported by initiatives such as the employees annual survey, which measures employee engagement and satisfaction, and the Leadership Program, which aims to develop strong, inspirational leaders within the organization.

Promotion of the corporate culture is achieved through various initiatives and communication efforts. For instance, the Route 26 strategic roadmap was presented to employees, emphasizing the company's commitment to long-term goals and sustainable practices. Additionally, the company has launched an employer branding campaign to reinforce its corporate positioning and attract top talent. This campaign highlights the unique culture, values, and mission of Degroof Petercam, thereby fostering a sense of belonging and pride among employees.

Evaluation of the corporate culture is conducted through regular surveys and feedback mechanisms. The annual employees survey, for example, covers governance aspects such as corporate culture, compliance, and ethics. Based on the survey results, actions are taken to address any identified issues and to continuously improve the work environment. The outcomes of these surveys are discussed and divided among relevant sub-parties to ensure that appropriate measures are implemented.

Overall, Degroof Petercam's approach to establishing, developing, promoting, and evaluating its corporate culture is comprehensive and dynamic, ensuring that the company's values are deeply ingrained in its operations and that continuous improvements are made based on employee feedback and strategic assessments.

#### G1\_G1-1\_10

 Degroof Petercam is committed to maintaining the highest standards of business conduct and integrity. The company has established comprehensive policies and mechanisms to ensure ethical behavior, compliance with legal and regulatory requirements, and the protection of stakeholders. These policies are designed to prevent unlawful behavior, manage conflicts of interest, and protect whistleblowers. A short description of these policies is given hereunder.

#### Code of Ethics:

- (a) Summary: DP's Code of Ethics outlines the ethical principles and professional standards that all directors, management, and employees must adhere to in their work. It emphasizes the importance of maintaining a good reputation through integrity, compliance with legal and regulatory obligations, and the provision of quality services to clients. The document covers various aspects such as client protection, prevention of conflicts of interest, anti-money laundering, tax compliance, market abuse prevention, data protection, collaboration with authorities, and whistleblowing. It also addresses issues related to fraud, corruption, confidentiality, information security, and equal treatment. The Code requires all concerned persons to stay informed and comply with its provisions, participate in relevant training, and acknowledge receipt of the Code annually or whenever updated.
- (b) **Scope**: This policy is applicable to all employees and top management of Degroof Petercam
- (c) Ownership of the policy: Compliance is responsible for managing and reviewing the Ethics Code, ensuring it aligns with the Group's values and legal requirements

#### Whistleblowing Policy:

investigation.

(a) Summary: Degroof Petercam has a well-defined Whistleblowing Policy that provides a framework for reporting suspected irregularities. This policy ensures that individuals who report concerns in good faith are treated with strict confidentiality and are protected against any form of retaliation. The policy covers all types of alleged fraud and malpractice, including violations of internal rules and external regulations (EU Law Directive (EU) 2019/1937 of October 23, 2019 on the protection of persons who report breaches of Union law, EBA Guidelines on Internal Governance under CRD of July 2, 2021). Reports can be made through designated internal channels, such as the Head of Compliance or the Head of Internal Audit, and external channels, including national competent authorities like the National Bank of Belgium (NBB) and the Financial Services and Markets Authority (FSMA). Investigation Process: Upon receiving a report, the designated recipient conducts a preliminary analysis and acknowledges receipt of the report. The report is then forwarded to the Investigation Committee, which assesses the admissibility of the report and appoints a case owner to conduct a thorough

The Whistleblowing Policy guarantees the confidentiality of the whistleblower's identity and provides protection against any adverse consequences resulting from the report. The policy also outlines the rights of individuals implicated in the report, ensuring that they are informed of the allegations and can respond.

- (b) **Scope**: This policy is applicable to all employees and top management of Degroof Petercam
- (c) Ownership of the policy: Compliance is responsible for managing and reviewing the Whistleblowing policy.
- Anti-Corruption and Anti-Bribery Policies:
  - (a) Summary: Degroof Petercam adheres to stringent anti-corruption and anti-bribery policies based on European framework. Within this framework, there was no specific analysis performed of Compliance of our policy with regards to UN Conventions against corruption. The company has a zero-tolerance policy towards bribery and corruption, which is enforced through its Anti-Bribery and Corruption (ABC) Program. This program includes the following key elements:

Governance and Oversight: the ABC Program is overseen by senior management and led by the Compliance Officer. Regular updates and reports on the program's implementation and any significant issues are provided to the Executive Committee and the Board of Directors.

Controlled Activities: the program includes specific controls for activities that are susceptible to bribery and corruption, such as gifts and hospitality, employment and work experience, charitable giving, political contributions, and marketing sponsorships. These activities are subject to formal validation processes, risk-based controls, and ongoing monitoring.

#### Training and Awareness:

Functions at Risk of Corruption and Bribery: the company has not yet identified Functions at Risk. Hence, all staff are considered. The ABC Policy includes stringent controls and monitoring mechanisms to mitigate these risks, including due diligence procedures, approval processes for gifts and hospitality, and regular risk assessments.

Therefore, all employees receive a training on the ABC Program, including practical examples and lessons learned. An all-staff training took place in 2021 and as part of the Compliance Awareness and Education Program. In 2024, this training was followed by 18.7% of staff which represents a regularisation exercise for all newjoiners employees arrived at Degroof Petercam in 2022, 2023 and 2024.

A new round of ABC training is launched in H1 2025 for all entities of Degroof Petercam.

Going forward, the ABC training will be integrated in the Indosuez 'Pole corruption' training cycle. However, the exact timing of the training program integration is not yet known at this stage.

- **(b) Scope**: This policy is applicable to all employees and top management of Degroof Petercam
- (c) Ownership of the policy: Compliance is responsible for managing and reviewing the Anti-corruption and bribery policy.
- AML (Anti Money Laundering) policy:
  - (a) Summary: The document is the Anti-Money Laundering (AML) General Policy for the Degroof Petercam (DP) Group. It outlines the group's commitment to preventing money laundering and countering the terrorism financing (CFT) by implementing a comprehensive AML/CFT framework. The policy includes detailed procedures for client onboarding, ongoing due diligence, transaction monitoring, and reporting suspicious activities. It also defines the roles and responsibilities of various stakeholders within the organization, including the Board of Directors, Executive Committee, Compliance Department, and Anti-Money Laundering Compliance Officers (AMLCOs). The policy emphasizes a risk-based approach, enhanced due diligence for high-risk clients, and strict adherence to legal and regulatory requirements.
  - (b) Scope: This policy applies to all entities and activities within the DP Group. It is mandatory for all directors, managers, and staff members across the group to understand and comply with the policy's provisions. The policy sets minimum standards that must be adopted by all group entities, taking into account their respective activities and any more stringent local legal or regulatory requirements.
  - (c) Ownership of the policy: The Group AMLCO within the Compliance function is responsible for ensuring the group-wide coordination of the implementation and updates of the AML/CFT policies, procedures, and internal control measures. The policy is subject to periodic review to ensure its relevance and effectiveness in enabling DP Group to comply with applicable legal and regulatory provisions.
- Gift policy:
  - (a) Summary:\_The document outlines the procedure for the acceptance of gifts and entertainment by employees of Degroof Petercam. It provides detailed guidelines on how employees should handle offers of gifts or entertainment from clients, suppliers or any third-party including the necessary steps for recording and obtaining approvals. The procedure emphasizes the importance of preventing and managing conflicts of interest, ensuring that any acceptance of gifts or entertainment does not influence professional behavior. It categorizes gifts and entertainment based on their value, specifying different levels of approval required for items below and above 150 EUR, and highlights the need for prior compliance approval in certain cases, such as gifts from politically exposed persons or public officials. The document also includes reporting and monitoring mechanisms to ensure adherence to the policy, and links to other related policies and legal sources.
  - **(b) Scope**: This policy is applicable to all employees and top management of Degroof Petercam.

(c) Ownership of the policy: Compliance is responsible for managing and reviewing the Gift policy.

Degroof Petercam's commitment to ethical business conduct is reflected in its comprehensive policies and procedures, which are designed to promote integrity, transparency, and accountability across all its operations. The company continuously reviews and updates these policies to ensure they remain effective and aligned with evolving regulatory requirements and best practices.

Please note that all these policies are the subject of mandatory training for all employees, and that knowledge is regularly refreshed through the introduction of new training courses.

### [G1-2] Management of relationships with suppliers

It should be noted that there was no IRO identified linked to relationship with suppliers.

### [G1-3] Prevention and detection of corruption or bribery

#### G1\_G1-3\_18

(a) Degroof Petercam has implemented a comprehensive system to prevent, detect, investigate, and respond to allegations or incidents of corruption and bribery. This system is anchored in the Group's Anti-Bribery and Corruption (ABC) policy, which is part of the broader Compliance and Integrity framework. The policy, approved by the Board of Directors, outlines a zero-tolerance stance towards bribery and corruption, applicable to all entities and staff members within the Group. To ensure adherence, the policy mandates the establishment of an ABC Program that includes governance structures, risk assessments, controlled activities, and monitoring mechanisms.

Training is a critical component of Degroof Petercam's anti-corruption efforts. The Group's training policy emphasizes the importance of continuous education and skills development. This policy applies to all employees and includes mandatory training on regulatory topics such as anti-money laundering (AML), market abuse, and IT security. The RACE (Risk Awareness and Control Excellence) program, which is obligatory for all staff, includes modules on anti-bribery and corruption, and non-compliance impacts variable pay.

The training program is designed to be comprehensive and accessible, with internal and external training options, as well as long-term certification opportunities. The HR Learning Manager and Business Learning Responsibles play pivotal roles in identifying training needs, designing training plans, and ensuring that all employees complete the necessary training. This structured approach ensures that all staff members are well-equipped to recognize and respond to potential corruption and bribery risks, thereby upholding the Group's commitment to ethical business practices.

(b) The investigators or investigating committee responsible for handling allegations or incidents of corruption and bribery are separate from the chain of management involved in the matter. The ABC Program is led by a Compliance officer or Compliance unit with the requisite expertise and authority, ensuring independence from the operational management. Furthermore, the Internal Audit function conducts independent reviews of the adequacy of the

ABC Program, providing an additional layer of oversight and ensuring that investigations are conducted impartially.

(c) The process to report outcomes to the administrative, management, and supervisory bodies involves regular updates and material issue reporting to the Executive Committee and Risk Committee (or equivalent governance body) of each DP entity. These updates are included in the Compliance Quarterly report and cover the status of the ABC Program implementation, significant deviations from policies and procedures, legal and regulatory developments, and the results of internal reviews. Periodic updates on the effectiveness of the ABC Program and any significant deviations requiring attention are also provided to the Board of Directors, ensuring that the highest levels of governance are informed and involved in the oversight of anti-corruption efforts.

#### G1\_G1-3\_20

To ensure that our anti-bribery and corruption (ABC) policy is accessible and understood by all relevant stakeholders, Degroof Petercam has implemented a comprehensive communication strategy. This strategy includes the publication of the ABC policy on our internal intranet page, where all professional ethics policies are listed and readily available to employees. Additionally, the policy is disseminated through mandatory training sessions, which are part of our broader Compliance Awareness and Education Program. These sessions are designed to educate employees on the importance of ethical business practices and the specific requirements of the ABC policy. Furthermore, DP has established clear reporting channels and procedures for employees to follow if they encounter or suspect any instances of bribery or corruption. Regular updates and reminders about the policy are communicated via internal newsletters and during team meetings to ensure continuous awareness and adherence. This multi-faceted approach ensures that all employees are well-informed about the ABC policy and understand their role in maintaining the integrity and reputation of Degroof Petercam.

#### G1\_G1-3\_21

- (a) Degroof Petercam is committed to maintaining the highest standards of integrity and professionalism, as reflected in its comprehensive Anti-Bribery and Corruption (ABC) training program. The nature, scope, and depth of these programs are designed to ensure that all employees, especially those having functions in contact with customers and people in contact with external service providers are well-equipped to recognize and prevent bribery and corruption. The ABC training is a core component of the RACE (Risk Awareness and Control Excellence) program, which is mandatory for all staff members.
- (b) Functions at Risk of Corruption and Bribery: the company has not yet identified Functions at Risk. Hence, all staff are considered. The training policy at Degroof Petercam ensures 100% coverage of all employees, including those in Business, Support, and Control Functions, as well as senior management. In 2024, 18.7% of staff followed this training which represents the regularisation of newcomers having joined Degroof Petercam in 2022, 2023 and 2024.
- (c) New members of the management bodies receive a standard training package covering various topics. While the ABC training is not included in this package (unlike the whistleblowing policy and the code of ethics), it can be provided upon request.

Furthermore, the extent of training provided to members of the administrative, management, and supervisory bodies is robust. The training policy mandates that all employees, including senior management, participate in the RACE program, which includes modules specifically designed to address anti-bribery and anti-corruption. This comprehensive approach ensures

that the entire organization, from top to bottom, is aligned with the Group's commitment to ethical business practices and compliance with legal and regulatory requirements.

### [G1-4] Incidents of corruption or bribery

#### G1\_G1-4\_24

(a) For the reference period (2024) no convictions (and consequently fines imposed) occurred regarding violations of anti-corruption and anti-bribery laws (OECD Anti-Bribery Convention and recommendations, the Belgian Criminal Code, law of September 18, 2017 on the prevention of money laundering and terrorist financing).

In 2025 the current Anti-corruption and bribery group policy will be reviewed and adjusted by implementing the policy of CA Indosuez in all Degroof Petercam group activities and geographies. A gap analysis is currently ongoing. This will allow full alignment on anti-corruption and bribery practices across the CA Indosuez group. The new policy will be applicable to all employees and top management of Degroof Petercam.

Note that in the framework of the internal control system, the control functions (Risk and Compliance) conduct periodic controls in relation to the ABC Program (eg monitoring of expense reimbursement, business hospitality, sponsorships and corporate events) ensuring that we track the effectiveness of our actions.

#### **Bribery**

An offer or receipt of any gift, loan, fee, reward or other advantage to or from any person as an inducement to do something which is dishonest, illegal or a breach of trust, in the conduct of the enterprise's business. This definition is based on Wolfsberg Anti-Bribery and Corruption Compliance Program Guidance.

#### **Corruption**

Corruption can be either active (paying bribes) or passive (accepting bribes). A corrupt practice is the offering, giving, receiving, soliciting, directly or indirectly of anything of value to improperly influence the actions (or the non-actions) of another party. This definition is based on Wolfsberg Anti-Bribery and Corruption Compliance Program Guidance.

(b) In 2025 to review the current Anti-corruption and bribery group policy will be reviewed and adjusted by implementing the policy of CA Indosuez. A gap analysis is currently ongoing. This will allow full alignment on anti-corruption and bribery practices across the CA Indosuez group. The new policy will be applicable to all employees and top management of Degroof Petercam.

#### G1\_G1-4\_25

Voluntary disclosure which Degroof Petercam chooses not to disclose.

### [G1-5] Political influence and lobbying activities

#### G1\_G1-5\_30

Degroof Petercam doesn't conduct specific lobbying efforts outside partnerships in sector federations as Febelfin (Financial Institutions Belgium), BEAMA (Association of Asset Managers), etc.

Degroof Petercam does refrain as well from political contributions.

## [G1-6] Payment practices

As corporate business partners are not material for Degroof Petercam, no disclosure is made in this respect.

# RI - Responsible Investments

### INTRO1 - Introductory disclosure on Responsible Investments

This chapter focuses on Responsible Investments, a concept with a long history which recently has seen some significant evolutions both in Europe and globally. It forms the basis of the Paris Climate Agreement, which commits world leaders in Article 2c to "making finance flows consistent with a pathway towards low greenhouse gas emissions and climate-resilient development." The European Union has been a pioneer in this area, announcing the Green Deal in December 2019, which includes a comprehensive set of rules affecting financial institutions.

The goal is to ensure that companies disclose reliable and comparable non-financial information, enabling investors to assess a company's non-financial performance. The regulatory reporting roadmap is still under development, although the direction is clear. A major challenge for the industry moving forward is capturing the market data necessary to report on sustainable strategies.

As previously mentioned in this report, Degroof Petercam identified in the Double Materiality Assessment (DMA) Responsible Investments as a most significant element. These responsible investments are linked to both investments made for private and institutional clients, as well as through investment funds. Therefore, Degroof Petercam has included this entity-specific chapter to transparently disclose aspects such as governance, policies, targets, and actions that are in place to manage the negative impact of these investments on environmental and social matters. In the absence of reporting standards for such entity-specific topics, Degroof Petercam has chosen to rely on existing frameworks such as Principle Adverse Impact indicator (SFDR) and TCFD as reporting guidelines.

Impact of the Green Deal on the traditional economy through regulations

The European Union has set up through the Green Deal an action plan to motivate various types of stakeholders to redirect their capital flows towards investments that allow for more sustainable growth. The European Green Deal entails various reporting regulations aimed at monitoring and assessing progress towards its sustainability goals. These include the CSRD report (current report), the EU Taxonomy (cfr RI E1-3) and SFDR.

In this regard, companies are held to provide more detailed information regarding extra-financial data such as their Greenhouse Gas emission (GHG) or their water use (examples of potential datapoints in the Corporate Sustainability Reporting Directive, CSRD), and how they contribute to achieving Europe's environmental goals (Taxonomy).

Asset managers, and investment companies such as Degroof Petercam need to clarify which of their activities contribute to the achievement of Europe's environmental goals (Taxonomy). In addition, they also need to publish the most important impact figures (PAI) of their investment decisions and must provide information on how they address sustainability in the financial products they offer to clients (Sustainable Finance Disclosure Regulation, SFDR).

Finally, Europe has updated a few years ago MiFIDII to oblige Financial Institutions to ask their clients about their sustainability preferences, so that investors are able to engage in the appropriate sustainable investments.

# INTRO2 – index table to Explain to the reader what he/she will find in this topic

The table below outlines all sections included in this entity-specific chapter. The initial part of this chapter provides a comprehensive overview of the Responsible Investment topic, addressing our governance, strategy, IROs, policies, actions, targets, and metrics. This includes, but is not limited to, our material IROs on climate change.

As previously mentioned in the introduction to the chapter "E1 - Climate Change," disclosures related to ESRS E1-Climate change are split over two chapters: ESRS E1, which covers Degroof Petercam group's own operations, and this entity-specific chapter, which focuses on climate change-related disclosures for its Scope 3 downstream activities of financed emissions. Degroof Petercam believes this approach enhances the readability and understanding of its Sustainability Strategy.

Specific references to Degroof Petercam's transition plan, policies, actions, and targets related to climate change mitigation and adaptation are included in the second part of this chapter, labeled in the table below as "ESRS E Standard."

In the third and final part of this chapter (before the conclusion), external references to international standards or frameworks (SFDR PAI and SBTi) are included for illustration.

#### ESRS2 standards

GOV-1 The role of the administrative, management and supervisory bodies

GOV-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

SBM-1 Strategy, business model and value chain

SBM-2 Interests and views of stakeholders

SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

IRO-1 Description of the process to identify and assess material impacts, risks and opportunities

IRO-2 Disclosure Requirements in ESRS covered by the undertaking's sustainability statement

MDR-P Policies adopted to manage material sustainability matters

MDR-A Actions and resources in relation to material sustainability matters

MDR-T Tracking effectiveness of policies and actions through targets

MDR-M Metrics in relation to material sustainability matters

#### ESRS E1 standard

E1-1 - Transition plan for climate change mitigation

E1-2 - Policies related to climate change mitigation and adaptation

E1-3 – Actions and resources in relation to climate change (Taxonomy reporting)

E1-4 - Targets related to climate change mitigation and adaptation

E1-6 - Gross Scopes 1, 2, 3 and Total GHG emissions

#### Other international standards

PAI-BP – Basis for preparation of the consolidated PAI reporting (explain scope, proxies,...)

PAI-M or PAI metrics – Table with the consolidated reported PAI indicators.

PAI-A or PAI actions – Recap on the various actions taken to directly or indirectly manage our negative impact on PAI

#### PAI-T - PAI targets

SBTi-BP - Basis for preparation of the SBTi metrics (explain scope, proxies, methodology,...)

SBTi-M - SBTi metrics

SBTi-A - Actions taken related to our SBTi commitment

SBTi-T - SBTi targets

#### Conclusion

CONCL-1 - Conclusion

#### **ESRS2** standards

# GOV-1 The role of the administrative, management and supervisory bodies

#### RI\_GOV-1\_21

Degroof Petercam's responsible investments governance is structured around two steering groups, each dedicated to a specific aspect of sustainability. This governance framework ensures that sustainability is deeply embedded in the company's investments and strategic decisions.

Furthermore, Degroof Petercam Asset Management (DPAM) has created four governance bodies that are involved in their investment process, feeding DPAM's investment strategies, supervised by DPAM's Board of Directors.

It should be noted that this governance is under review & will evolve from 2025 onwards linked to the integration of Indosuez & Degroof Petercam.

#### RI\_GOV-1\_22

Here is a summary of Degroof Petercam steering groups:

- Strategy and Governance Steering Group
  - o Purpose: Oversees the strategic sustainability position, policy development, data management and reporting.
  - o Composition: Senior individuals from various business and support lines.
  - o Meetings: Every two months.
- Operational Governance Steering Group
  - Responsible Banking Steering Group (RBSG): Oversees the sustainability of banking operations, including the Private Banking value proposition, balance sheet components, climate-related risks, and the UN's Principles for Responsible Banking (UNPRB).
  - o Meetings: Monthly.

These steering groups (except the RISG) report to the Non-Financial Risk Committee (NFRC), a delegated committee of the management Committee that meets monthly and is chaired by the Chief Risk Officer. The NFRC monitors the group's exposure to non-financial risks and ensures compliance with risk appetite, policies, procedures, laws, and regulations.

Additionally, the CEO reports to the board of directors on the assessment and management of the Sustainable Finance agenda, including climate-related risks and opportunities.

Degroof Petercam has also created two workgroups to further enhance its sustainability efforts:

 Sustainable Coordination Meeting: This workgroup's objective is to share progress on sustainability matters ensuring alignment and collaboration across different investment areas of the organization in relation with Private Clients (Private Banking and DP Fund Mngt) with active participation of the Sustainability Manager, Investment strategy team, DP Fund Management, Compliance and Transformation Office.  TCFD Taskforce: The objective of this workgroup is to coordinate actions related to Bank Degroof Petercam's net zero commitment (through SBTi). This includes implementing strategies, measures and targets to achieve the bank's climaterelated goals in line with the recommendations of the Task Force on Climaterelated Financial Disclosures (TCFD).

As stated above DPAM has created Sustainability governance bodies which are summarized below:

- Responsible Investment Steering Group (RISG)
  - The RISG is the initiator and guardian of DPAM's identity as an active, sustainable, and research-driven investor. It oversees the implementation of DPAM's mission statement regarding responsible investment.
  - o Meetings: every month
- TCFD Steering Group:
  - The TCFD steering group integrates climate-related risks into DPAM's investment processes, the DPAM Management Board established the TCFD Steering Group. This group consists of internal members, including Management Board members and RISG members. The TCFD Steering Group has both advisory and operational roles concerning the implementation of the TCFD recommendations and the Net Zero Asset Managers (NZAM) commitment.
- Voting Advisory Board (VAB):
  - The VAB consists of external and internal members who meet three times a year. It is responsible for the strategic framework of responsible ownership applied to all DPAM Funds and discretionary portfolio management mandates. The VAB regularly reviews the Voting Policy and adapts it according to legal, regulatory requirements, and best practices in corporate governance.
- Fixed Income Sustainability Advisory Board (FISAB):
  - o The FISAB consists of six voting members, including external experts, who meet twice a year. The FISAB selects criteria to assess the sustainability of countries and determines the weights attributed to these criteria.

Next to that some dedicated group projects do focus on assuring correct implementation of Regulatory and non-regulatory Sustainable Finance Agenda.

#### RI\_GOV-1\_23

Degroof Petercam ensures the availability and development of appropriate skills and expertise to oversee sustainability matters through a structured governance framework. This includes the Strategy and Governance Steering Group, which meets bi-monthly to oversee strategic sustainability positioning, policy development, data management, and reporting. Additionally, the Responsible Banking Steering Group (RBSG) meets monthly to ensure the integration of ESG principles across investment and banking operations. These bodies plan and support trainings on Sustainability topics (either trainings for all employees or more function-linked trainings) and align with international standards like SBTi to address the company's material impacts, risks, and opportunities. The sustainability-related expertise is reinforced by regular

participation of Degroof Petercam experts to external workshops and conferences on Sustainability with a regulatory, market or more commercial focus.

Within Degroof Petercam Asset Management (DPAM), the Board of Directors, responsible for ESG oversight, integrates sustainability into DPAM's strategy, risk management, and investment processes. DPAM leverages the expertise of various internal and external bodies, such as the Fixed Income Sustainability Advisory Board (FISAB), the Voting Advisory Board (VAB), the TCFD Steering Group, and the Responsible Investment Steering Group (RISG). These bodies consist of members with diverse backgrounds in environmental, social, and governance fields, ensuring a holistic approach to sustainability. The FISAB and VAB include external experts who provide critical insights and validate sustainability criteria and voting policies. The TCFD Steering Group, comprising internal members, focuses on integrating climate-related risks into investment processes. The RISG promotes responsible investing and spreads ESG knowledge within DPAM. The Responsible Investment Competence Center (RICC), led by the Chief Sustainable Investment Officer, supports these efforts by providing ESG expertise and acting as a central point for ESG-related initiatives. This multi-faceted approach ensures that DPAM's sustainability-related skills and expertise are aligned with its material impacts, risks, and opportunities.

### GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

#### RI GOV-2 26

During the reporting period, the administrative, management, and supervisory bodies of Degroof Petercam (DP) were regularly informed about material impacts, risks, and opportunities related to ESG (Environmental, Social, and Governance) factors. The Non-Financial Risk Committee (NFRC) and the Responsible Banking Steering Group (RBSG) played pivotal roles in this process, ensuring that the Board of Directors and the Executive Committee received quarterly updates. These updates included the implementation of due diligence measures and the effectiveness of policies, actions, metrics, and targets adopted to address ESG risks. The Board of Directors, which includes both executive and non-executive members, is responsible for defining the bank's risk appetite in alignment with its strategy. The Executive Committee oversees the adherence to this risk appetite through the NFRC, which monitors ESG risks as part of the broader risk management framework. During the reporting period, the administrative, management, and supervisory bodies addressed several material impacts, risks, and opportunities, including climate-related risks, compliance with sustainable finance regulations, and reputational risks associated with ESG factors.

# GOV-3 Integration of sustainability-related performance in incentive schemes

#### RI\_GOV-3\_29

For explanation related to the integration of sustainability-related performance in incentive schemes please refer to ESRS2-GOV-3.

### SBM-1 Strategy, business model and value chain

#### RI\_SBM-1\_40

- (a) Degroof Petercam Private Banking only offers products promoting ESG characteristics, as core strategy for its Discretionary Portfolio Management (DPM). Although these do not pursue sustainable investment as primary objective, they partially invest into sustainable assets that contribute positively to environmental and/or social objectives. Depending on client's MIFIDII sustainable preferences the proportion of Sustainable Investments varies from a minimum of 20% (applicable to DPM clients having no or moderate sustainable preferences) to a minimum of 50% (applicable to DPM clients having strong sustainable preferences). Degroof Petercam has a very limited number of legacy client portfolios managed under article 6 (without any integration of ESG characteristics) but this is not the standard offer we propose to our clients.
- (d) Degroof Petercam is not active directly in:
- i. the fossil fuel (coal, oil and gas) sector
- ii. chemicals production
- iii. controversial weapons (anti-personnel mines, cluster munitions, chemical weapons and biological weapons); and/or
- iv. the cultivation and production of tobacco.

However, Degroof Petercam's investment universe can contain issuers active in these sectors. Exposures to these sectors is strictly managed through investment policies and more specifically through the controversial activities and exclusion policy.

Management of such sector's exposures as well as Degroof Petercam's commitment to sustainability is reflected in investment policies, which relies on controversial & exclusion policies that exclude financial instruments issued by companies involved in controversial sectors such as unconventional oil and gas and even for some more sustainable strategies in fossil fuels. This also covers controversial weapons, tobacco, gambling, adult entertainment, and companies that fail to comply with global governance standards. As it comes to portfolio management via funds Degroof Petercam starts engagement if these fund managers would invest in instruments that are excluded by the group's Global Sustainable Investment Policy (instruments non-compliant with the controversial weapons, tobacco, gambling, adult entertainment, global compact, controversies, and governance checks). Note that due to the integration with Indosuez the controversial and exclusion policy will slightly evolve beginning 2025.

- (e) In alignment with Degroof Petercam's commitment to sustainability and responsible investment, Degroof Petercam has taken significant strides towards achieving net zero emissions. In 2022, DPAM, joined the Net Zero Asset Managers initiative (NZAM), pledging to support investments that align with the ambition to reach net zero emissions by 2050 or sooner. This commitment has binding implications for all assets under DPAM's management and guides our investment decisions towards more sustainable practices. DPAM makes a distinction in its target setting between High Climate Impact sectors (TCFD sectors such as agriculture, energy, buildings/transition) and Low Climate Impact sectors:
  - For High Climate Impact sectors, DPAM's ambition is to reach 75% of portfolio constituents with a Science-based target or emissions aligned with a 1.5°C

- scenario by 2030, and this applicable for funds categorized under Article 8 or 9. By 2040, DPAM aims to cover 100% of these funds' constituents.
- For Low Climate Impact sectors, the 2030 target is set at a minimum of 50% of portfolio constituents with a Science-based target or emissions aligned with a 1.5°C scenario for the funds categorized under SFDR Article 8 and 9. By 2040, DPAM aims to cover 100% of these funds' constituents.

In 2023, Degroof Petercam extended this commitment across the entire group by voluntarily joining the Science Based Targets initiative (SBTi). This group-wide commitment underscores Degroof Petercam's dedication to reducing carbon footprint and aligns operations with the goals of the Paris Agreement. As part of this initiative, Degroof Petercam intends to reduce its Scope 1 and 2 emissions by 2030, impacting buildings and fleet as mentioned in ESRS E1-Climate change. Additionally, Degroof Petercam aims for a 100% SBTi-aligned investment portfolio by 2040. In terms of target settings Degroof Petercam intends to follow the same setup as DPAM by making a distinction between the two sector groups. The scheduling of intermediate objectives to reach this final objective still needs to be analysed and communicated to SBTi.

(f) Referring to SFDR regulation which imposes transparency for all financial institutions when they design products (as Financial Market Participant) or provide financial advice (as Financial Adviser), the following KPIs can be listed over the last 2 years:

#### 1. Funds DPAM (in %)

SFDR category	2023	2024
Non-ESG (Art. 6)	9%	9%
ESG charact. (Art. 8)	34%	31%
ESG charact with sustainable investments - Art. 8+/Sustainable objectives - Art. 9	57%	60%

#### 2. Mandates Private Banking in % (Belgium only)

SFDR category	2023	2024
Non-ESG (Art. 6)	5%	4%
ESG charact. (Art. 8)	90	88%
ESG charact with sustainable investments - Art. 8+/Sustainable objectives - Art. 9	5%	8%

#### 3. DPAS's in % where DPAS is member of Manco

SFDR category	2023	2024
Non-ESG (Art. 6)	4%	2%
ESG charact. (Art. 8)	76%	78%
ESG charact with sustainable investments - Art. 8+/Sustainable objectives - Art. 9	20%	20%

(g) Degroof Petercam has the relevant expertise to guide investors in their sustainable investment choices. The regulatory environment and ESG investments have significantly evolved in recent years. As a result, investment products with a sustainable label must meet strict sustainability criteria. Since August 2022, the MiFID II regulation requires financial actors to ask clients with services under discretionary portfolio management or investment advice about their respective sustainability preferences and to enable them to engage in the suitable sustainable offering.

For institutional clients, DPAM also focuses on the client's requirements respecting their institutional mandate.

As already mentioned for Private Banking clients, Degroof Petercam caters at least a moderate sustainable offer to all clients with a discretionary mandate: ESG criteria with a portion of sustainable underlying investments are integrated. In other words: for Private Banking clients with a discretionary portfolio mandate, the standard offering integrates ESG characteristics as defined by Degroof Petercam (commonly known as Article 8) and governed by SFDR. Degroof Petercam has a very limited number of legacy client portfolios managed under article 6 (without any integration of ESG characteristics) but this is not the standard offer we propose to our clients.

Clients with a discretionary mandate and a 'neutral' answer to the MiFIDII sustainability preferences questionnaire will also partially invest in sustainable investments. Clients with a strong sustainability preference have access to a more impact-oriented offer.

### SBM-2 Interests and views of stakeholders

#### RI\_SBM-2\_45

In the context of Responsible Investments Degroof Petercam recognizes key external stakeholders such as clients, investee companies and third-party fund managers. Engagement with these stakeholders occur at different levels, for different reasons.

#### **Clients**

Degroof Petercam engages with its clients, through a structured and comprehensive approach to integrate sustainability preferences into investment decisions, as required by the MiFID II regulations. The primary stakeholders in this context are private banking clients and asset management clients. Engagement with these stakeholders occurs through personalized consultations and the administration of a detailed MiFIDII sustainability preferences questionnaire. This engagement is organized by private bankers and investment advisors who assist clients through the process of expressing their sustainability preferences. For some Private Banking clients this questionnaire is also available through their personal digital platform "My Degroof Petercam".

The purpose of this engagement is to ensure that clients' investment portfolios align with their sustainability values and objectives.

For Private Banking clients the outcome of these engagements is meticulously documented and incorporated into the client's investment profiles, influencing the selection of financial instruments and portfolio management strategies (moderate and strong strategies). This process ensures that the client's preferences for sustainable investments are respected and integrated into the bank's discretionary portfolio management and investment advice services.

Through this engagement, Degroof Petercam gains a deeper understanding of the interests and views of its clients allowing us to align with our strategy and business model. The last years the bank has amended its strategy to include a stronger focus on sustainable investment options, aligning with the European Union's regulatory framework and the broader goals of environmental and social responsibility. Note that this strong focus on Sustainability was already amongst DPAM's priorities for many years as well as within Degroof Petercam Patrimonial Sustainable funds.

The administrative, management, and supervisory bodies of Degroof Petercam are regularly informed about the views and interests of affected stakeholders through internal reports and strategic meetings. This ensures that the bank's sustainability-related impacts are continuously monitored and addressed, fostering a transparent and responsive approach to stakeholder engagement.

#### **Investee companies**

Investee companies are engaged through voting and direct dialogues to promote ESG best practices. The purpose of these engagements is to defend Degroof Petercam Asset management (DPAM) values and convictions, spread best practices, and mitigate the negative impacts of the investments. For example, DPAM's engagement policy outlines specific priorities such as promoting board independence, advocating for sound corporate governance, and encouraging transparent and integrated reporting of ESG risks.

#### **Funds managers**

If a fund manager does not comply with Degroof Petercam's GSIP (Global Sustainable Investment Policy), the TGC (Third-Party Funds Group Committee) may decide to exclude the fund from the Convictions List or to start engaging with it, thereby aligning the bank's investment strategy with stakeholder expectations. This process ensures that stakeholder interests are reflected in DP's investment decisions and sustainability commitments. Where applicable, Degroof Petercam has amended its strategy to address stakeholder interests by implementing a rigorous engagement and monitoring process. This includes the potential exclusion of non-compliant funds and the issuance of waivers for funds that show a willingness to improve their ESG performance. These steps are planned and executed within a one-year engagement cycle, and they are likely to enhance the relationship with stakeholders by demonstrating DP's commitment to sustainable investment practices.

# SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

#### RI\_SBM-3\_48

The description of material impacts linked to Responsible Investments have been included in ESRS 2 SBM 3.

Responsible Investments is at the core of Degroof Petercam's activities as Investment House. Already in 2001, the first fund integrating ESG parameters was launched; over the past years these parameters gained importance both in society and within Degroof Petercam. This evolution has even further accelerated linked ao. to regulation. Degroof Petercam has been acting in the forefront of this topic and has been recognized in this respect by the Responsible

## Investment Brand Index 2024 with a first place (<u>DPAM ranks first in the Responsible</u> Investment Brand Index (RIBI™)

As such a long list of IROs was identified on this topic.

- In terms of positive impacts identified, Degroof Petercam estimates that through its activities as an Investment House, it is creating a positive impact by supporting all stakeholders & clients in the value chain in the transition:
  - o 3rd party funds managers encouraged by DPAS to adapt their policies, leading to more responsible investments.
  - o Providing RI solutions aligned with the client's ESG preferences.
  - o Create client's awareness regarding RI so to increase their investments that positively contribute to the environment and society.
  - o Effectively supporting sustainable sectors and companies via RI
  - Helping small and medium companies to build ESG data through an internal ESG scoring system performed by DP.
  - o Institutional clients requesting an active engagement of DP in the society and environment.
  - o Investing in companies through active stewardship (i.e., engagement and voting) with the companies to influence their sustainable transition.
- In terms of negative impacts identified, it is clear that Degroof Petercam through continued investment for its clients on companies which don't act responsibly, supports these companies in their irresponsible behavior. This might also impact client relationships as well future client returns
  - o Investing in companies and/or sectors that have adverse impacts on the society or environment.
  - o Client investment decision not aligned with the RI policy of DP (e.g. in execution mode)
  - o Companies excluded becoming stranded assets and not being financed anymore (e.g., impact on repricing of AuM).
- In terms of opportunities identified, Degroof Petercam estimates that positioning itself as a trustworthy Investment House as it comes to Responsible Investments provides opportunities for its business:
  - o Create business and financial revenues by helping small and medium caps to collect ESG data.
  - o Financial gain due to investments in sustainable companies and sectors generating high financial performance.
  - o Financial gain due to the development of new product offerings adapted to the new ESG regulatory requirements.
  - o Financial revenues due to retention of labelled funds (e.g. Febelfin label)
  - o Financial/reputational gain and/or increase in market share due to the integration of ESG criteria in investment decisions required by ESG regulations (e.g. SFDR, EU Taxonomy, etc....).
  - o Reputation and financial opportunity for DPAS by providing guidance to its third-party clients and encouraging a more sustainable approach.
- In terms of risks identified, the topic of Responsible Investments makes a large impact and is subject to quite some fast-moving evolutions. On the one hand, greenwashing risks of companies, greenbleaching of companies, green bubbles....

  On the other hand investor uncertainty on all kind of topics are impacting

Responsible Investments (eg interest rate levels on sustainable growth companies). Hence market watch remains an important factor for Degroof Petercam

- Due to financial market participants investing 'responsibly', it will lead to more industry concentration risk.
- o Legislation is pushing for quantitative assessments, hence leaving no room for qualitative assessment for RI.
- Lowered financial performance and competitive advantage due to RI policy excluding investments in non-responsible sectors and/or companies despite their high financial returns.

## IRO-1 Description of the process to identify and assess material impacts, risks and opportunities

#### RI\_IRO-1\_53

The description of this process has been described in ESRS 2 IRO 1 which includes the part on Responsible Investments.

## IRO-2 Disclosure Requirements in ESRS covered by the undertaking's sustainability statement

#### RI\_IRO-2\_59

Degroof Petercam did not identify any IRO as material regarding ESRS E2, E3, E4 E5 (so-called 'environmental topics' in the DMA). However, it is considered relevant to report on Responsible Investments in a separate chapter using a.o., the existing European framework the Sustainable Finance Disclosure Regulation (SFDR: Regulation (EU) 2019/2088) which requires to report on Principal Adverse Impact Indicators (PAI). This includes existing information about biodiversity and waste. This explains why these PAI are actively managed as this is core to Degroof Petercam's positioning. Tools, data sources and processes have been deployed in the past - e.g., Rimes data platform - and will be equally maintained at the highest level possible.

## MDR-P Policies adopted to manage material sustainability matters

#### RI\_MDR-P\_65

Degroof Petercam and DPAM have a wide range of policies to govern the entire sustainable investment process. All these policies are available on our websites (group website and DPAM website).

#### **Degroof Petercam policies**

- Global Sustainable Investment Policy ("GSIP"):
  - (a) **Description**: The document titled "Global Sustainable Investment Policy" by Degroof Petercam provides a comprehensive overview of the bank's approach to sustainable investments. It outlines the principles and processes the bank employs to integrate sustainability risks and manage

the Principal Adverse Impacts on Sustainability Factors in its investment decisions. It details the bank's extra-financial investment process, which includes screening financial instruments for ESG criteria, sustainability labeling, and product management. The policy aims to ensure that all financial instruments used in the bank's investment services are evaluated for their sustainability impact, and it sets out specific rules for different types of SFDR products. Additionally, the document emphasizes the importance of transparency and regular review to adapt to evolving regulations and market best practices.

- (b) Scope: The scope of the Global Sustainable Investment Policy encompasses all relevant entities and activities of Bank Degroof Petercam, including its operations in Belgium and Luxembourg. The policy applies to the bank's Private Banking activities, Asset Services (DPAS), and its own fund management, but excludes activities executed by Degroof Petercam Asset Management, which are covered by a separate policy. The principles outlined in the policy are applicable to all employees involved in these activities and are designed to meet the bank's obligations under the SFDR both as a Financial Market Participant and as a Financial Adviser. The policy covers the selection and classification process for all financial instruments within the bank's investment universe, ensuring they align with the client's sustainability preferences under MiFID II. It also includes specific guidelines for the integration of sustainability risks, impact assessment of Principal Adverse Sustainability Indicators (PAI), and the incorporation of sustainability considerations into remuneration policies. The policy is intended to provide a common framework for all Degroof Petercam entities to promote sustainable investment practices and manage sustainability risks effectively.
- (c) Ownership of the policy: the Chief Investment Strategy Private Banking is responsible for managing and reviewing the Global Sustainable Investment Policy ensuring it aligns with the Group's values and legal requirements
- Fund engagement policy:
  - (a) Description: The document titled "Fund Engagement Policy" by Degroof Petercam outlines the bank's approach to engage with fund managers. As an investor in third-party funds on behalf of its clients Degroof Petercam accepts it has the responsibility to express its opinion on the management of these funds and make its voice heard. Within Degroof Petercam we will therefore not hesitate to speak up to fund managers if they invest in instruments that would be excluded in case they would be analyzed as direct lines by our internal investment strategy teams. It details the reasons for engagement, the timing, the responsible parties, and the methods of engagement. The document also describes the potential reactions from external fund providers and the subsequent actions the bank may take, including exclusion of non-compliant funds. Additionally, it includes a monitoring process to ensure ongoing compliance and engagement and

references the Global Sustainable Investment Policy (GSIP) as a guiding framework.

- (b) **Scope**: The scope of the Fund Engagement Policy encompasses Degroof Petercam's Belgian and Luxembourg Private Banking activities. It applies to the bank's interactions with third-party fund managers, particularly those managing funds included in the bank's Convictions List or Patrimonial Funds. The policy is reviewed annually or when significant changes occur, with the Executive Committee responsible for approving new versions. The policy aims to ensure that the bank's investments adhere to best practices and sustainable finance principles, and it involves various internal committees and teams in the engagement and monitoring processes.
- (c) Ownership of the policy: the Chief Investment Strategy Private Banking is responsible for managing and reviewing the Fund engagement policy
- Controversial activities and exclusion policy:
  - (a) Description: The document titled "Controversial Activities Policy" by Degroof Petercam outlines the bank's stance and policies regarding investments in activities that are deemed controversial. It provides a comprehensive framework for identifying and excluding certain business activities from the bank's investment universe based on ethical, environmental, and social considerations. The policy applies to both onbalance and off-balance investments. It details the criteria for exclusion, the responsibilities of various business units, and the alignment with recognized global standards such as the United Nations Global Compact. The document also includes a summary table listing specific controversial activities and their treatment.
  - (b) Scope: The scope of the Controversial Activities Policy encompasses all investment activities of Degroof Petercam, including its own investments and those managed on behalf of its clients. It applies to investments with environmental and/or social characteristics as well as those with sustainable objectives, in alignment with the EU's Sustainable Finance Disclosure Regulation (SFDR). The policy covers a wide range of controversial activities, including but not limited to armaments, fossil fuels, gambling, adult entertainment, and palm oil production. It also extends to decision-making guidelines for Investment Banking prospects and suppliers. The policy is designed to ensure that the bank's investment practices are responsible and sustainable, thereby minimizing sustainability risks and negative impacts. Additionally, it allows for more restrictive measures by specific business units if deemed necessary.

Note that Patrimonial funds managed by Degroof Petercam Fund Management also have a set of policies that regulate the Responsible Investments that are made. In case they don't have a specific policy they refer to the policies of the bank. (c) Ownership of the policy: the Chief Investment Strategy Private Banking is responsible for managing and reviewing the Controversial Activity Policy

#### <u>Degroof Petercam Asset Management ("DPAM") policies:</u>

- The Sustainable and Responsible Investment Policy:
  - (a) **Description**: The document outlines DPAM's comprehensive sustainability policy, which is supported by three additional policies: Voting Policy, Controversial Activities Policy, and Engagement Policy. These policies guide all DPAM investment funds, discretionary portfolios, and advisory services. DPAM's goal is to maximize positive societal impact while minimizing the negative effects of its investments. Four governance bodies oversee the implementation of DPAM's Environmental, Social, and Governance (ESG) strategy, which aligns with the company's mission of responsible investment. ESG factors are integrated into research, investment processes, and portfolio management to promote long-term sustainable growth. DPAM emphasizes sound corporate governance, addressing environmental challenges, and respecting societal values. DPAM is committed to international sustainability initiatives, including the UN Principles for Responsible Investment (PRI) and the Net Zero Asset Management initiative. As a sustainable investor, DPAM believes integrating ESG factors optimizes risk and return, and the company assesses sustainability risks and opportunities according to asset classes and industries. Dialogue with companies, through proxy voting or direct engagement, is key to refining investment decisions and encouraging best practices. The policy aims to reduce negative impacts by screening controversial activities and aligning investments with the UN Sustainable Development Goals (SDGs). Transparency, education, and client engagement are also critical, and DPAM regularly reports on its sustainable investment activities. All policies are publicly available, and the DPAM website provides detailed information on its sustainability efforts.
  - (b) Scope: The Policy is applied to public investment funds which are managed by DPAM, by designation or delegation (to the extent agreed between DPAM and the delegating management company) (the "DPAM Funds") and to discretionary portfolio management mandates DPAM manages on behalf of institutional asset owners/investors, as agreed between DPAM and its clients. This policy is also one of DPAM's considerations when providing investment advisory services to its clients. It describes the adopted sustainable approaches including: ESG integration, best-in-class, sustainability themes and norms-screening, for example that DPAM can apply to all asset classes. DPAM is convinced about sustainable and responsible investments and this has been ingrained in our approach, since 2001. Nonpublic funds for which DPAM acts as management company may also apply this policy to the extent foreseen in the offering document.
  - (c) Ownership of the policy: the Responsible Investments Competence Center (RICC) headed by the Chief Sustainable Investment Officer (CSIO) is

responsible for managing and reviewing the <u>Sustainable and Responsible</u> <u>Investment Policy</u>

#### Engagement Policy:

- (a) Description: This document outlines DPAM's vision of effective and sustainable investing. It aims to optimize our positive impact for the benefit of the society. This Engagement Policy aims: (a) to reduce the negative impact of investment; and (b) to defend our values and convictions on the environment and social and governance issues. It highlights why we engage and our choices on which topics to prioritize. It explains the engagement process and its expectations in terms of progress from investee companies. It also includes details on means, channels and potential escalation. It makes clear how transparency is at the heart of engagements.
- (b) **Scope**: This statement applies consistently to all DPAM-labelled public funds and sub-funds for which DPAM acts as the management company. It also applies to the discretionary portfolio management mandates DPAM manages on behalf of institutional asset owners/investors. Additionally, it applies to funds and sub-funds managed by DPAM by delegation for external parties, where specifically requested by the counterparty. It may apply to a non-public fund managed by DPAM to the extent foreseen in its offering document.
- (c) Ownership of the policy: the Responsible Investments Competence Center (RICC) headed by the Chief Sustainable Investment Officer (CSIO) is responsible for managing and reviewing the Engagement Policy.

#### Voting Policy:

(a) Description: This Voting Policy outlines the corporate governance values and principles that DPAM advocates and implements across listed companies in which the DPAM Funds (as defined below) invest. It also describes DPAM's approach as a responsible investor. DPAM focuses on investing in sustainable, high-quality companies for the long term. Investing in well managed companies is a key element and an integral part of DPAM's investment policy. An efficient corporate governance system, established through control mechanisms and appropriate checks and balances, contributes to fostering sound company management and the better understanding of risks. Taking part in the shareholder meetings of the investee companies is a tenet of DPAM's social responsibility.

It is an efficient way of showing commitment to a more sustainable financial industry, to advocate for sustainable growth and a long-term risk management approach. General meetings are a good venue for exchanging ideas between shareholders and company executives. This allows well-informed investors to address specific issues in a more detailed manner or to raise pertinent questions. By adopting this approach, DPAM advocates a vision that shows greater respect for all people and their environment in the long term. As investment horizons become constantly shorter, it is important to put the shareholder at the heart of the company as a co-

owner who places its longevity above short-term profits.

- (b) Scope: For coherence and efficiency, this Voting Policy applies consistently to all investment funds managed by DPAM (by designation) or those that have delegated the exercise of their voting rights in listed companies (excluding investment funds) to DPAM (hereinafter referred to as "DPAM Funds"). However, this Voting Policy does not affect the independent exercise of voting rights associated with the shares and other securities granting the right to vote, held by the DPAM Funds. In that sense, each DPAM Fund has separately endorsed this policy. In all circumstances, voting rights are exercised in compliance with the investment objectives and policy of the relevant DPAM Fund and in the best interest of its shareholders, in accordance with applicable laws. Additionally, DPAM exercises voting rights in listed companies for institutional clients with discretionary portfolio management mandates who have expressly delegated the exercise of such rights to DPAM in accordance with this policy.
- (c) Ownership of the policy: the Responsible Investments Competence Center (RICC) headed by the Chief Sustainable Investment Officer (CISO) is responsible for managing and reviewing the <u>Voting Policy</u>.
- Controversial Activity Policy:
  - (a) Description: These controversial activities policy aims at describing and explaining DPAM's choices in terms of exclusions and restrictions on investments in corporate activities that are deemed unethical and / or irresponsible and / or unsustainable. As such, this policy plays an important role in DPAM's effort to avoid sustainability risks and to reduce as much as possible the negative impact of its investments. The policy details the exclusions and/or investment restrictions DPAM is applying to its sustainable strategies (including transition strategies) and/or to its mainstream strategies. It also describes the exclusions and/or restrictions applying to actively managed strategies and index-tracking strategies, as well as those applying to equity strategies, credit strategies, balanced strategies, or other groups of DPAM strategies. Additionally, this policy covers the case of several controversial activities for which DPAM applies an ESG integration approach.
  - (b) Scope: This Controversial Activities Policy is applied consistently to all DPAM-labelled public funds and sub funds for which DPAM acts as Management Company. Unless otherwise contractually agreed with DPAM, it does not apply neither to discretionary portfolio management mandates DPAM manages on behalf of institutional asset owners/investors, nor to funds and sub-funds managed by DPAM by delegation for external parties. It may apply to a non-public fund managed by DPAM to the extent foreseen in its offering document.

(c) Ownership of the policy: the Responsible Investments Competence Center (RICC) headed by the Chief Sustainable Investment Officer (CISO) is responsible for managing and reviewing the <u>Controversial Activity Policy.</u>

## MDR-A Actions and resources in relation to material sustainability matters

#### RI\_MDR-A\_68

- DPAM has decided, after careful consideration, to join the Net-Zero Asset Managers (NZAM) Initiative in 2022. This requires asset managers to commit to support investing aligned with net zero emissions by 2050 or sooner. The company aligns its methodology to reach this objective with the approaches endorsed by the Network Partners. The goal is to have 100% of DPAM's corporate AUM with Science Based Targets (SBT) or 1.5°C alignment. Up to 2025, it will leverage on collaborative engagement initiatives, such as the annual collaborative engagement via 'CDP SBT campaign'. Moreover, individual TCFD assessment of high emittent portfolio companies, ensure a targeted focus to achieve this objective.
- In the course of 2024 Degroof Petercam committed to Net zero emission and decided to follow the SBTi framework. Degroof Petercam has up to two years after having signed the commitment to communicate on its targets and roadmap.
- Since a couple of years (as of 2021) now Degroof Petercam's investments undergo ESG integration due diligence for its discretionary portfolio management in both Belgium and Luxembourg. The extent of this due diligence depends on the sustainability credentials of the selected financial product. The full due diligence process is governed by the Global Sustainability Investment Policy (GSIP). This type of due diligence already existed, prior to SFDR, at DPAM and is documented by the Sustainable & Responsible Investment policy. Those policies have an impact on reporting like the Principal Adverse Impact (PAI) report which is issued at the entity level by DPAM, Degroof Petercam Belgium and Luxembourg. This type of report outlines the principal adverse sustainability impacts of its investments, the policies that help to identify and prioritize these impacts, and the steps taken by DPAM or Degroof Petercam Private Banking and Patrimonial funds management to mitigate adverse impacts. Note that although this action is already implemented for both Degroof Petercam and DPAM, it is regularly enhanced to meet new regulations, market best practices and efficient data sourcing.

The ESG due diligence process (Degroof Petercam and DPAM) consists of the following steps. The depth of their application depends on the sustainability preferences of the relevant financial product with exposure to corporates or corporate issuers:

- Normative screening ensures that corporates do not infringe on global standards.
- Activity screening ensures that corporates are not involved in controversial activities.
- Behavior screening ensures no exposure to corporates facing severe ESG controversies.
- Positive screening ensures that the Group invests in companies demonstrating best ESG practices.

- SDG alignment helps identify companies whose products and services align with the Sustainable Development Goals (SDGs).
- Impact perspective identifies companies that generate a positive impact on society.

Next to the due diligence described above for corporate issuers' exposure, DPAM has also defined a detailed due diligence process for its sovereign exposure, based on its sustainability country model. With regards to sovereign investments Private Banking relies on information obtained from external suppliers.

We currently don't have complete and accurate information on financial resources allocated to the realization of these actions.

## MDR-T Tracking effectiveness of policies and actions through targets

#### RI\_MDR-T\_80

- Degroof Petercam targets 100% of discretionary portfolio management to be invested according to the SFDR article 8 classification (promoting ESG characteristics with a proportion of sustainable investments without especially pursuing sustainable objectives). In that context Degroof Petercam sets and monitors this KPI, which is communicated to the Risk Committee, every quarter. The conditions to be met to achieve this target are defined in the Global Sustainable Investment Policy. No time-horizon has been defined yet.
- DPAM's objective is to have at least 50% of its gross Assets Under Management (AUM) in DPAM funds to be invested in articles classified as article 8 or article 9, according to the SFDR regulation. The rules to be met to achieve article 8 or 9 categorization are defined in the Sustainable and Responsible Investment Policy. No time-horizon has been defined yet.
- DPAM has decided, after careful consideration, to join the Net-Zero Asset
  Managers (NZAM) Initiative. It aims to have all assets to be aligned to
  Sciences-Based Targets initiative (SBTi) or equivalents by 2040 for its
  corporate investments. Please refer to section "E1-4 Targets related to climate
  change mitigation and adaptation" of this chapter for further details.

Note that tracking the effectiveness of the actions through PAI or other types of indicators is still jeopardized by the availability and quality of the data used.

## MDR-M Metrics in relation to material sustainability matters

#### RI\_MDR-M\_75

- For information on the percentage of investments by SFDR categories, please see paragraph SBM-1 40 in this chapter.
- For metrics on the proportion of SBTi aligned investments please see paragraph SBTi-M in this chapter.
- Regarding its financed emissions as previously stated Degroof Petercam has signed a voluntary Net zero commitment (following SBTi approach), meaning that by 2040 100 % of the investments will be SBTi aligned when it comes to discretionary & patrimonial portfolios as well for its banking book.

### **ESRS E1 standard**

The data (narratives and metrics) linked to Scope 3 - Category 15 'financed emissions' are to be found in this dedicated chapter "Responsible Investments" and more precisely within the ESRS E1-Climate change sections that one can find below. You'll also find here, under "E1-3 - Actions and resources in relation to climate change (Taxonomy reporting)" the disclosures linked to EU Taxonomy as requested by ESRS E1 6.

### E1-1 - Transition plan for climate change mitigation

As already disclosed in the section RI\_SBM-1\_40 (about Strategy, business model and value chain) of this chapter when we refer to Scope 3 – Financed emissions DPAM ambition is to reach 75% of portfolio constituents with a Science-based target or emissions aligned with a 1.5°C scenario by 2030 for High impact sectors and 50% for low impact sectors. This is applicable to funds categorized under Article 8 or 9.

For Degroof Petercam, targets are being defined (also considering the recent integration within Indosuez Group).

### E1-2 - Policies related to climate change mitigation and adaptation

For a complete description of policies related to climate change mitigation and adaptation that are applicable to Degroof Petercam's Responsible Investments please refer to section "MDR-P Policies of this chapter. Note that all these policies support climate change mitigation objectives realized through our Responsible Investments.

## E1-3 – Actions and resources in relation to climate change policies

As mentioned in section RI\_MDR-A\_68 (Actions and resources in relation to material sustainability matters) of this chapter, DPAM and Degroof Petercam have initiated actions to address climate change impacts. DPAM committed to the NZAMI in 2022, while Degroof Petercam signed a commitment letter to the SBTi in 2024. Currently, Degroof Petercam has not yet communicated its targets for 2030. Additional information related to Net Zero actions can be found in the section 'SBTi-A – Actions taken related to our SBTi commitment' of this chapter.

As requested by the ESRS standards (guiding principles for CSRD reporting) under paragraph E1-3 29 (c), please find below the Taxonomy data (Commission Delegated Regulation (EU) 2021/2178).

As part of its European Green Deal aiming to finance sustainable growth and to prevent greenwashing, the European Parliament and Council have developed a unified classification system for sustainable economic activities called the Taxonomy.



The Taxonomy regulation (EU 2020/852) sets out the high-level criteria enabling to determine whether an economic activity substantially contributes to or not significantly harms the objectives. So far, six environmental objectives have been identified.

- 1. Climate Change Mitigation (CCM)
- 2. Climate Change Adaptation (CCA)
- 3. Sustainable Use and Protection of Water and Marine Resources (WTR)
- 4. Transition to a Circular Economy (CE)
- 5. Pollution Prevention and Control (PPC)
- 6. Protection and Restoration of Biodiversity (BIO)

Taxonomy rules to identify sustainable economic activities have been further developed. The latter has been done in multiple waves. Technical criteria were defined for climate change mitigation and climate change adaptation in Commission Delegated Regulation 2021/2139². Additionally, the Commission Delegated Regulation (EU) 2022/1214 sets criteria for sustainable activities related to nuclear energy and fossil gas. In 2023, the Commission established the technical criteria for the remaining four objectives (WTR, CE, PPC, and BIO). Furthermore, the EU Parliament and Council are also expected to determine social objectives. In February 2025, the European Commission has adopted a package of proposals to simplify EU rules, boost competitiveness, and unlock additional investment capacity. These first 'Omnibus' packages bring together proposals in several legislative fields, including EU Taxonomy. At the time of the preparation of these reports, the Omnibus packages were not yet adopted and were therefore not taken into account in this EUT Report.

The technical rules defining the reporting setup under article 8 Taxonomy are further defined in the Taxonomy Disclosure Delegated Act (Commission Delegated Regulation (EU) 2021/2178, adopted on July 6, 2021).

Since 2022, DP, as credit institution, must report on Taxonomy and since 2024, DP must disclose its Green Asset Ratio (GAR) i.e., the proportion of the credit institution's assets financing and invested in taxonomy-aligned economic activities as a proportion of total covered assets. This year DP must also report on the Taxonomy-alignment of its assets

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<sup>&</sup>lt;sup>2</sup> Amended by the Commission Delegated Regulation (EU) 2023/2485

regarding the first two environmental objectives (CCM and CCA) and the Taxonomy-eligibility of its assets regarding the other four objectives.

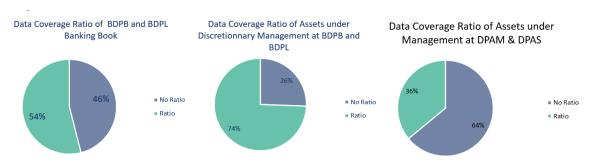


Furthermore, since 2024, the assets in scope of the Taxonomy reporting were extended to include off-balance assets i.e., assets under management and given financial guarantees. These activities of DP as a credit institution are included in the consolidated figures of DP Group presented in this report, and separate reports are included in the Annex regarding the asset management activities of DPAM and DPAS (cfr. Annex). Activities which do not contribute significantly to the on- and off-balance sheets KPIs have not been included in this report (e.g., corporate finance activities and non-financial activities).

Taxonomy reporting is a journey, which DP has undertaken whilst building on its ESG expertise. Meanwhile, the capacity to report accurate information also depends on the capacity of the service providers and the industry as a whole. The reporting of taxonomy-eligible and taxonomy-aligned activities is inherent on the industry's capacity to report accurate and detailed information on Taxonomy-eligible and Taxonomy-aligned activities. This has led to certain limitations regarding 2024 DP reporting such as:

1. The difficulty to collect information on all DP's counterparties. This year reporting was produced using reported information collected by S&P Global Trucost (S&P Global ESG solution). Furthermore, published information on third-party funds was collected through Cleversoft. Finally, some counterparties' and green bonds' Taxonomy KPIs were collected from their public reports.

The following pie charts depict the proportion of assets with EUT data compared to the total covered assets. The data coverage of the banking book and the assets under discretionary management at BDPB and BDPL remains similar to last year. Regarding DPAM and DPAS scope, the data coverage is also stable when looking at the level of the funds. However, the below graph depicts the data coverage at the level of the funds underlying investments which is quite low.



2. The Taxonomy Regulation requires to identify counterparties that are not obliged to publish non-financial information (non-NFRD undertakings). Yet, due to a lack of data it wasn't possible to identify the NFRD status of all counterparties. Hence, the counterparties for which the NFRD status wasn't identified have been classified as non-NFRD undertakings in the report.

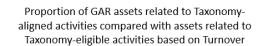
This year's reporting should therefore be considered as a best effort based on available data under the abovementioned evolving landscape.

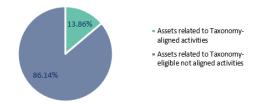
Furthermore, the reporting will evolve according to future regulatory obligations.

### Taxonomy reporting as a credit institution

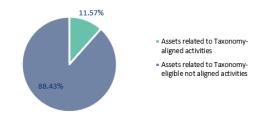
0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation									
		Total environmentally	Turnover-based	CapEx-based		Capex-			
		sustainable assets based	Taxonomy-	Taxonomy-	Turnover-	based		% of assets excluded from	% of assets excluded from the
		on Turnover	eligibility ratio	eligibility ratio	based GAR	GAR	% coverage (over total assets)	the numerator of the GAR	denominator of the GAR
Main KPI	Green asset ratio (GAR) stock	101,229,771.62 €	12.76%	12.78%	1.77%	1.48%	66.44%	31.28%	33.56%
	of which Banking Book	87,909,771.62 €	22.13%	22.17%	3.95%	3.16%	68.93%	31.73%	31.07%
	•	•					•	•	
			Turnover-based	CapEx-based		Capex-			
		Total environmentally	Taxonomy-eligibility	Taxonomy-	Turnover-	based		% of assets excluded from	% of assets excluded from the
		sustainable assets	ratio	eligibility ratio	based GAR	GAR	% coverage (over total assets)	the numerator of the GAR	denominator of the GAR
Additional KPIs	GAR (flow)	15,526,599.46 €	15.59%	15.69%	1.41%	1.62%	85.21%	22.99%	14.79%
	Financial guarantees	- €	0%	4%	0%	0%			
	Assets under management	205,768,367.35 €	8.55%	8.89%	2.48%	3.14%			

The assets covered in the GAR are the loan book and the banking book, from which the exposures to central banks and governments and supranational issuers have been excluded as well as the trading book. The total amounts used to compute the GAR and additional KPIs align with the FINREP.





Proportion of GAR assets related to Taxonomyaligned activities compared with assets related to Taxonomy-eligible activities based on CapEx



Compared to 2023 EUT report, the Taxonomy-eligibility and Taxonomy-alignment KPIs have slightly risen. This can be explained by the increase in investments in green, sustainable, social and sustainability-linked bond. This year, the eligibility of the loans granted to DP clients were analysed, which explains the growth of the Taxonomy-eligibility KPI. Furthermore, the increased Taxonomy-alignment KPI is driven by the large exposures to financial institutions which only started reporting on their activities' Taxonomy-alignment this year.

It is worthwhile to note that the main activity of the bank lies in asset management (i.e., client portfolios management and fund management). Loan products constitute a complementary offer to clients with managed portfolios (mostly given as collateral) while the banking book is managed with thorough due diligence to ensure suitable liquidity and capital adequacy ratios.

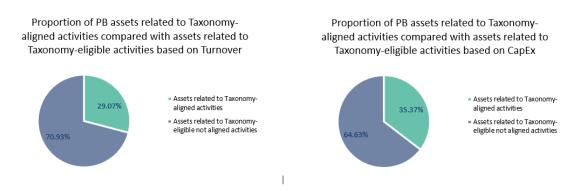
In order to mitigate potential negative impacts of its loan activity, Degroof Petercam has included measures to prevent financing any controversial activities int its Group Lending Policy.

When it comes to the banking book, Degroof Petercam also seeks to reduce negative impacts by

- refraining from investing in financial instruments issued by certain companies in controversial sectors and not holding positions linked to the fossil fuel industry;
- verifying that the investments do fit in the Article 8 set-up as defined by the EU at the moment of their acquisition;
- Including the banking book in the scope of DP Net Zero Commitments;

Regarding the additional KPIs on off-balance sheets, the KPI on assets under management (AuM) only covers asset management activities of the credit institutions of the group i.e., Bank Degroof Petercam SA and Bank Degroof Petercam Luxembourg SA. According to the Commission Notice (C/2024/6691) of 8 November 2024<sup>3</sup>, DP should include in this KPI assets managed based on the individual investment mandates received from the asset owners apart from exposures to central governments, central banks and supranational issuers and assets for which portfolio management has been delegated to DP by third parties.

As a mean to reduce the negative impact of its client portfolios, the group has set up a Global Sustainable Investment Policy (GSIP) which includes the identification of controversial activities to be excluded from DP's investment universe. As part of this, investments are subject to ESG integration and impact due diligence. Furthermore, the discretionary management portfolios are included in DP Net Zero commitments as part of the financed emissions.



The Taxonomy-eligibility and Taxonomy-alignment KPIs of BDPB and BDPL assets under management have risen. This can be explained by the increase in investments in green, sustainable, social and sustainability-linked bond as well as a higher data coverage. Furthermore, the increased Taxonomy-alignment KPI can be explained by the large exposures to financial institutions including funds which only started reporting on their activities' Taxonomy-alignment this year.

<sup>3</sup>https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=OJ:C\_202406691. Question 42., pp.38-39

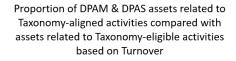
<sup>&</sup>lt;sup>4</sup> Cfr. Part V

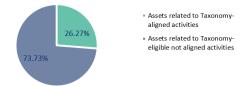
This year, the Taxonomy-eligibility KPI of the given financial guarantees is not null thanks to one financial guarantee given in 2024 to a counterparty which perform some Taxonomy-eligible activities.

### Taxonomy reporting regarding asset management activities

			Turnover-	based KPI			Captx-b	ased KPI	
		Of which towards taxonomy		Proportion of total covere	ed assets funding taxonomy	Of which towards taxonomy	relevant sectors (Taxonomy-	Proportion of total covere	d assets funding taxonomy
		eligi	ble)	relevant sectors (1	Taxonomy-eligible)	elig	ble)	relevant sectors (1	axonomy-eligble)
	Total Amount (€)		Of which environmentally sustainable (Taxonomy- aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- aligned)		Of which environmentally sustainable (Taxonomy- aligned)		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy- aligned)
Covered Assets under Management	34,651,408,292.29 €	3,940,849,606.47 €	€ 1,085,103,679.01	11.37%	2.99%	4,354,639,757.01 €	1,527,228,571.07 €	12.57%	4.41%
Assets exluded from the denominator of the KPI <sup>1</sup>	10,936,658,221.59 €								
Total Assets under Management	45,588,066,513.82 €								
<sup>1</sup> Exposure to central banks, cantral governments and supranatio	nal Issuers								

This KPI covers asset management activities of the group's management companies i.e., Degroof Petercam Asset Management SA (DPAM), Degroof Petercam Asset Services SA (DPAS) The total amounts used to compute this KPI align with the amounts of the FINREP from which double counting was removed (e.g., funds of funds and investments in house funds). Furthermore, the assets of which the portfolio management was delegated by third parties to DP subsidiaries and the exposures to central banks and governments and supranational issuers have been excluded as required by the regulation.





# Proportion of DPAM & DPAS assets related to Taxonomy-aligned activities compared with assets related to Taxonomy-eligible activities based on CapEx



The differences in Taxonomy-eligibility and Taxonomy-alignment KPIs of the asset management activities between 2023 and 2024 can be explained amongst others by the sale of Degroof Petercam Wealth Management France SA (DPWM) shares to CA Indosuez (France).

Besides the group abovementioned efforts, DPAM applies the regulatory 'do not harm' principle by reviewing any significant controversies surrounding invested companies, engaging with them to enhance their ESG profile and monitoring adverse impacts. DPAM not only engages with companies but with countries as well. Furthermore, DPAM joined the NZAM initiative committing to Net Zero portfolios. It has also set strict guidelines to limit investing in companies with controversial activities, as detailed in its controversial activity policy. Additional details of measures at DPAM to apply the do not harm principle, can be found in its Principle Adverse Impact Statement on entity level.

### Consolidated weighted Taxonomy KPI

	Proportion of Total Revenue	Turnover-based KPI	CapEx-based KPI	Weighted Turnover-based KPI	Weighted CapEx-based KPI
GAR (Banking Book and Loans)	20.98%	1.77%	1.48%	0.37%	0.31%
Financial Guarantees Given	0.02%	0.00%	0.00%	0.00%	0.00%
PB Discretionary AuM	16.25%	2.48%	3.14%	0.40%	0.51%
Asset Management and Asset Services	62.75%	2.99%	4.41%	1.87%	2.77%
Total	100.00%			2.65%	3.59%

## Impact of the transfer of BDPL shares to CA Indosuez Wealth Europe (CAIWE) in 2025

As stated in the annual report, BDPL shares will be transferred to CAIWE in 2025 (subject to supervisory approval). This will have an impact on next year EUT KPIs, which have been estimated as follows:

EUT KPIs	Estimated Impact on Total Covered Assets	Taxonomy-Eligibility based on Turnover	Taxonomy-Alignment based on Turnover
GAR	Around 20% decrease	Around 10% rise	Around 1% rise
Financial Guarantees Given	Around 10% decrease	0%	0%
PB Discretionary AuM	Around 15-20% decrease	Around 3-4% rise	Around 5-6% rise
Asset Management	Around 50% decrease	Around 25% rise	Around 7% rise

## E1-4 - Targets related to climate change mitigation and adaptation

DPAM has committed to the Net-Zero Asset Managers (NZAM) Initiative, aiming to align all its assets with the Science-Based Targets initiative (SBTi) or equivalent standards by 2040 for its corporate investments. As outlined in the Responsible Investment E1-1 – Transition Plan, intermediary targets have been set to achieve 75% of portfolio constituents with a science-based target or emissions aligned with a 1.5°C scenario by 2030 for high-impact sectors, and 50% for low-impact sectors. Degroof Petercam is currently in the process of defining these targets.

It should be added that future developments with regards to the SBTi framework and its impact on corporates, are difficult to anticipate. DPAM observes a growing number of companies to commit to SBT (or equivalent), and the SBTi continues to work out standards which might impact companies' target setting. DPAM's governance system on climate, such as the TCFD group, are keeping a close watch to these developments.

For targets please also refer to SBTi-T paragraphs of this Responsible Investments chapter.

### E1-6 - Gross Scopes 1, 2, 3 and Total GHG emissions

- Gross scope 1, 2 and 3 and Total GHG emissions of our Financed emissions include the following scope:
  - o Private Banking Discretionary Portfolio Management Belgium
  - o Private Banking Discretionary Portfolio Management Luxembourg
  - o DPAM Institutional Discretionary Mandate
  - o DPAM B & L funds
  - BDP Fund Management (Patrimonial Funds managed by Degroof Petercam)
  - o Degroof Petercam banking book
- Calculations have been performed using the methodology outlined in the SFDR regulation technical standards (RTS), utilizing a reporting tool adopted by DPAM for producing its PAI statement. The GHG emissions disclosed in section E1-6 correspond to the SFDR PAI 1 indicators.
- The total GHG emissions (scope 1, 2 and 3) of our financed emissions through our proper investments, those realized on behalf of our clients when they are in discretionary management and through our DPAM and Patrimonial funds is equal to 11,643,290.09 tons CO2 (cfr PAI metrics in this chapter).
- As for energy mix, the share of non-renewable energy consumption stands at 56% cfr PAI M.
- In this methodology, there is no distinction based on market & location based GHG.
- Degroof Petercam does not have any plans, targets, actions linked to GHG removals, storage nor did it purchase any carbon credits.
- Degroof Petercam does not apply an internal carbon price mechanism.

#### **Definitions & operational boundaries:**

Scope 3 GHG emissions – category 15 – financed emissions

Scope 3 emissions are indirect emissions that result from activities in a company's value chain but for which the company does not have direct control. This includes both upstream and downstream activities and hence also financed emissions. To determine the operational boundaries of this category, Degroof Petercam took the following approach:

- Accounting for emissions from investments (required according to GHG protocol)
- Equity investments: Degroof Petercam takes into account the GHG linked to investment portfolios of its 2 main subsidiaries DPAM & BDPL. As for DPAS asset services, these investments are not included to avoid double counting.
- Debt investments (with known use of proceeds):
  - o Banking book (3,2 bnEUR) is taken into account for the calculation
  - Mortgages (694 mEUR) are not taken into account as they are considered as not material ([< 2 %] of total AUM (off balance + on balance) taken into consideration)
- Project Finance: no outstandings

- Accounting for emissions from investments (optional according to GHG protocol)
- Debt investments (without known use of proceeds): this is the main part of lending business of Degroof Petercam (Lombard loans) 1,9 bnEUR (not considered)
- Managed investments and client services: this is the core part & most material part of Degroof Petercam's business totaling 76,5 bnEUR. For this category Degroof Petercam took into account these activities for which Degroof Petercam has 'decision' power. For advisory portfolios the final decision is held by the client as it's also the case for execution only portfolios. These portfolio stands for 82 % of total AUM
  - o Private Banking Discretionary Portfolio Management Belgium
  - o Private Banking Discretionary Portfolio Management Luxembourg
  - o DPAM Institutional Discretionary Mandate
  - o DPAM B & L funds
  - o Degroof Petercam Fund Management (Patrimonial Funds)
- Other investments or financial services: no activity

### Other international standards

## PAI-BP – Basis for preparation

The Responsible Investments topic is an entity/sector specific for Degroof Petercam for which the reporting requirements are not defined/approved yet by the regulator. In 2024, due to the absence of these, Degroof Petercam has chosen to use relevant existing ESG standards (SFDR PAI, SBTi) to complement the ESRS2 disclosures for its Responsible Investments topic reporting.

#### What is SFDR PAI?

A Principal Adverse Impact (PAI) is any impact of investment decisions or advice that results in a negative effect on sustainability factors, such as environmental, social and employee concerns, respect for human rights, anti-corruption, and anti-bribery matters. Under SFDR regulation these impacts are measured using a large set of quantitative indicators. These indicators are reported by Financial Institutions on an annual basis on their website. There are 14 mandatory PAI indicators and 31 voluntary indicators. In the context of this sustainability statement Degroof Petercam has have selected some of these indicators according to the following criteria:

- Only mandatory PAIs (more comparable between companies so more aligned with CSRD objectives)
   AND
- PAI indicators with a coverage > 60% (for the moment data used in the calculations are not available for all issuers so the coverage is equal to the percentage of eligible assets for which we do have values)
   AND
- PAI that are mapped with ESRS standards according to EFRAG annex III (cfr PAI IRO hereunder)

DP did not identify any IRO as material regarding ESRS E2, E3, E4 E5 ('environmental topics' in the DMA). However, Degroof Petercam finds it relevant to report on its Responsible Investments in this separate chapter using a.o., the existing European framework the

Sustainable Finance Disclosure Regulation (SFDR: Regulation (EU) 2019/2088) which requires to report on Principal Adverse Impact Indicators (PAI). This includes existing information about biodiversity and waste. This explains why these PAI are actively managed as this is core to Degroof Petercam's positioning. Tools, data sources and processes have been deployed in the past - e.g., Rimes data platform - and will be equally maintained at the highest level possible.

To ensure consistency with the consolidation scope of the overall sustainability statement, the following assets have been included:

- Private Banking Discretionary Portfolio Management Belgium
- Private Banking Discretionary Portfolio Management Luxembourg
- DPAM Institutional Discretionary Mandate
- DPAM B & L funds
- BDP Fund Management (Patrimonial Funds)
- Degroof Petercam banking book

Additionally, to avoid double counting, we have excluded products managed by group entities that are held within other group products (e.g., DPAM funds held by PB Discretionary clients) from our calculation basis.

### PAI-M - Table with the consolidated reported PAI indicators

Product Principal Adverse Indicators	PAI Annual Average
	2024
I. Adverse sustainability indicator for corporates	Value
I.A. Climate and other Environment-Related Indicators	

• Greenhouse gas emissions

1-1-1	Scope 1 GHG emissions (in tons CO2)	1,002,172.99
1 - 1 - 2	Scope 2 GHG emissions (in tons CO2)	372,278.69
1-1-3	Scope 3 GHG emissions (in tons CO2)	10,271,542.10
1 - 1 - 4	Total GHG emissions (in tons CO2)	11,643,290.09
1 - 2 - 1	Carbon footprint (in tons CO2 per million of AUM)	152.24
1-3-1	GHG intensity of investee companies  (tons per million in revenues from underlying companies)	847.69

1 - 5 - 1	Share of non-renewable energy consumption	56%
1-5-2	Share of non-renewable energy production	3%
	Biodiversity	

Activities Negatively Affecting Biodiversity (Share of investments in investee companies with sites/operations located in or near to biodiversity-sensitive areas where activitie of those investee companies negatively affect those areas)	4%
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#### Waste

	Hazardous Waste Production Tonnes-SF (in tons of hazardous	
1 - 9	waste and radioactive waste generated by investee companies	3.78
	per million EUR invested, expressed as a weighted average)	3.70

I.B. Indicators for Social and Employee, respect for Human right, Anti-corruption and Anti-bribery matters

• Social and employee matters

1 - 10	Breach of UN Global Compact Principal (Share of investments in investee companies that have been involved in violations of the UNGC principles or OECD Guidelines for Multinational Enterprises)	15%
1 - 11	Lack of Processes & Compliance Mecha (Share of investments in investee companies without policies to monitor compliance with the UNGC principles or OECD Guidelines for Multinational Enterprises or grievance /complaints handling mechanisms to address violations of the UNGC principles or OECD Guidelines for Multinational Enterprises)	42%
1 - 13	Board Gender Diversity Percentage of (Average ratio of female to male board members in investee companies, expressed as a percentage of all board members-	38%

You can find the formulas used to calculate the PAI indicators in the Annex 1 of the Final Report on draft Regulatory Technical Standards issued by ESA, the European Supervisory Authorities: https://www.esma.europa.eu/sites/default/files/2023-12/JC\_2023\_55\_-\_Final\_Report\_SFDR\_Delegated\_Regulation\_amending\_RTS.pdf

The Principle Adverse Impact Indicators highlighted in blue in the above table have not been audited by the statutory auditor, except for PAI indicator 1 which is linked to the requirements of E1-6.

## PAI-A – Actions taken to directly or indirectly manage our negative impact on PAI

Degroof Petercam and DPAM tackle environmental, social, and governance (ESG) issues through their adopted policies (refer to the policies section in this Responsible Investments chapter). The primary indicators in the PAI statement focus on **Green House Gas (GHG) emissions**, which are central to the company's strategy and the Net Zero commitment for both our operations and responsible investments. To support this, we exclude companies involved in thermal coal extraction, coal-based power generation, and unconventional oil and gas production. Additionally, companies with severe controversial behavior related to emissions are also excluded.

More specifically DPAM engages with companies to disclose scope 3 emissions and set science-based targets (refer to the SBTi metrics section hereunder), aiming for net zero emissions by 2050. As a signatory of the Net Zero Asset Management initiative, DPAM requires a significant portion of its portfolio to align with a 1.5°C scenario by 2030.

In terms of **Biodiversity**, as part of the normative screening, companies in breach with the Global Standards are omitted from investments. These Standards include - but are not limited to - supporting a precautionary approach to environmental challenges and encouraging the development and diffusion of environmentally friendly technologies. DPAM furthermore employs a biodiversity footprint tool to assess impacts and dependencies, integrates biodiversity risks into its ESG research, and is an early adopter of the TNFD framework. DPAM is committed to the Finance for Biodiversity Pledge.

Regarding **Waste**, DPAM excludes companies involved in nuclear weapons and nuclear energy production due to the associated radioactive waste. It includes hazardous and radioactive waste risks in its positive screening to favor the best performers.

For **Social Matters**, as part of the normative screening, companies in breach with the Global Standards (which include labor and human rights) are omitted from investments. Not complying with these Standards equates to violating UN Global Compact principles and Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises. DPAM also participates in initiatives like the UN PRI's ADVANCE and the World Benchmarking Alliance.

Lastly, for **Board Diversity**, this is used within the broader extra-financial assessment whereby worst performers are excluded from our universe. DPAM encourages companies to improve gender diversity on their boards, voting against nomination committees if boards do not have at least one-third female members. It includes board gender diversity in its positive screening to favor the best performers.

### PAI-T - PAI targets set on our negative impacts

Although the goal is to limit the negative impacts, strict quantitative targets for the PAI have not yet been defined. The reason is that, in the absence of widespread reporting on ESG indicators (like CSRD), at least until recently, the quality of these data remained very uncertain. Additionally, Degroof Petercam still lacks some perspective on the calculation of these indicators to be able to define targets that make fully sense.

## SBTI-BP - Basis for preparation of the SBTi report (explain scope, proxies, methodology, ...)

Second ESG standard used to report on the Responsible Investment is the SBTi - Science Based Targets initiative (SBTi). This is a key component in aligning with the TCFD (Task Force for Climate related Financial disclosures) frameworks. SBTi provides a method for companies to set greenhouse gas emission reduction targets that are in line with the latest climate science.

The following asset categories are excluded from SBTi calculations: Sovereign/Government bonds, derivatives and cash.

The SBTi commitment/alignment metrics are calculated on the following scope:

- DPAM funds B&L
- Medium risk strategy model portfolios for our various offers in Private Banking
- Medium strategy of our 2 main Patrimonial funds

#### SBTi-M - SBTi metrics

Given that the degree of urgency of the transition varies from one sector to another Degroof Petercam splits the alignment/commitment percentages showed hereunder between assets invested in high-impact sectors and those invested in low-impact sectors (aligned with international regulatory practices).

#### **For DPAM**

Type of sector	Percentage of AUM with SBTi or equivalent commitment
High climate impact sector	76.28%
Low climate impact sectors	70.36%

#### For Private Banking & Bank Degroof Petercam Fund Management

The percentages provided hereunder are derived from data and calculations conducted during the last SBTi monitoring, in September 2024.

High climate impact sector					
Product name	Percentage of AUM with SBTi or equivalent commitment				
DP Mixte Medium model portfolio	75.87%				
DP Mixte Sustainable Medium model portfolio	78.09%				
DP Sicav Medium model portfolio	71.20%				
DP Sicav Sustainable Medium model portfolio	78.45%				
DP Global Strategy patrimonial fund	75.46%				

DP Patrimonial Sustainable patrimonial fund	78.45%
Low climate impact sector	
Product name	Percentage of AUM with SBTi or equivalent commitment
DP Mixte Medium model portfolio	70.02%
DP Mixte Sustainable Medium model portfolio	74.19%
DP Sicav Medium model portfolio	65.24%
DP Sicav Sustainable Medium model portfolio	75.19%
DP Global Strategy patrimonial fund	66.46%
DP Patrimonial Sustainable patrimonial fund	75.19%

A model portfolio is a pre-constructed investment portfolio designed to meet the specific risk tolerance of a client. Its construction occurs in adherence with bank's investment strategy and is representative of a standard portfolio composition.

#### SBTi-A - Actions taken related to our SBTi commitment

In terms of actions performed to reach the Targets that have been set DPAM continued to enhance its engagement and voting actions to support alignment with the Science-Based Targets initiative (SBTi). As part of its commitment to the Net Zero Asset Managers initiative (NZAMi), DPAM focused on engaging with investee companies to encourage the setting and achievement of science-based emissions reduction targets. This was done through both individual and collaborative engagements, such as the Climate Action 100+ initiative, where DPAM played an active role in engaging with high-emitting companies to improve their climate governance, emissions reduction, and climate-related financial disclosures.

DPAM's engagement strategy included sending formal letters to companies, participating in virtual meetings, and following up on commitments to ensure that companies were on track with their climate targets.

In addition to direct engagement, DPAM also revised its voting policy to enhance it. This included sending engagement letters to companies with Say-on-Climate resolutions and voting on climate-related shareholder proposals. DPAM's voting decisions were based on a thorough assessment of the companies' climate transition plans, including their ambition, action, and accountability in achieving net zero targets.

Furthermore, DPAM's Steering Committee played a crucial role in overseeing the integration of climate-related risks and opportunities into investment decision-making processes. This included the development of a dashboard to monitor the exposure of DPAM's investments to carbon-intensive industries and the progress of investees towards their climate targets.

Degroof Petercam joined the movement launched by DPAM by signing an SBTi commitment letter in 2024. The company has set up a dashboard to monitor the situation, which is presented to an internal taskforce for Private Baking and Funds of funds activities on a quarterly basis for discussion and follow-up. As DPAM funds are as such a core asset within DPs' discretionary management, the bank's targets & ambitions are benefitting from DPAMs'

initiatives & actions. Next steps, as required in the SBTi commitment letter, is the development of a science-based target aligned with SBTi criteria and the submission of the targets to SBTi for validation at the level of Degroof Petercam.

### SBTi-T - SBTi targets

#### For DPAM by 2030

- 75% SBTi or 1.5 degree aligned for High impact sectors
- 50% SBTi or 1.5 degree aligned for Low impact sectors

#### **Private Banking**

Degroof Petercam has not yet published its SBTi targets and is working on these. Degroof Petercam has 24 months after commitment letter signature (March 2024) to submit these targets.

#### **CONCL-1 - Conclusion**

In a fast-evolving world with opposing views on responsible investments, Degroof Petercam will continue its endeavors also within the new Indosuez Group. Several discussions took place to align a.o., controversial activity policies, responsible investments set-up... within the new Group context; the sustainability journey continues and will be even further enlarged thanks to ample synergies in this new group context.

Working on gaining more insight, accessing more and better data will remain some of the key elements going forward, however not limiting DP's targets and ambitions.

## **DIG - Digitalization**

Digitalization is a cornerstone of Degroof Petercam's strategic vision, driven by the insights gained from the Double Materiality Assessment. This chapter is dedicated to disclosing digital transformation initiatives, which are essential for enhancing operational efficiency, client engagement, and overall business resilience. Degroof Petercam's focus on digitalization is not just about adopting new technologies but also about integrating them in a way that aligns with DP's sustainability goals. This includes the responsible use of Artificial Intelligence (AI) and robotics, which have the potential to revolutionize the operations while also posing new risks and ethical considerations. By addressing these aspects, DP aims to ensure that our digital advancements contribute positively to the business model and stakeholder value, while mitigating any potential negative impacts.

## GOV-1 The role of the administrative, management and supervisory bodies

### Dig\_GOV-1\_21

In order to support its Digitalization projects Degroof Petercam has defined a specific governance composed of 2 layers: the strategy on one side and the delivery on the other side.

- For what concerns the strategy, the 2 main business lines (Private Banking and Asset Management) have their own committees and steering groups, who decide on the digital strategy & initiatives, measure progress and trigger actions to be taken when necessary. These are the Digital Committee for the Private Banking and the TISC (Technology & Innovation Steering Committee) for DPAM. Both make sure that the Digital roadmap is aligned with the organization's strategy. These groups are composed of permanent and ad hoc members with necessary functional and executive responsibilities in the organization to be able to take the right decisions on due time.
- The delivery of Digital initiatives & epics is realized within a "SAFE Agile" framework. This framework includes a fixed capacity distributed over thematic teams (the SQUADS). Each squad is made of Business and IT representatives. It follows a structured path that includes quality and readiness forums (REACH/ART-SYNCH) monitoring an iterative delivery plan made of sprints of 2 weeks within a defined and validated PI (Program Increment) of 3 months. Every 3 months a detailed plan is reviewed and voted within a two-day "conclave" bringing together teams and all stakeholders, the PI Planning.

Due to risks and impacts inherent in the use of new technologies such as Robotics and Artificial Intelligence a specific governance body, the "Data & AI Experts Board" has been set up to manage it more efficiently. This board is composed of the DPO, IT Risk & Security, Operational Risk Manager, IT Data, CDO and IT Architecture. The Chief Data Officer (CDO) is accountable for the realization of the data and AI strategy, ensuring alignment with sustainability goals. The Data Protection Officer (DPO) ensures compliance with digital legislation to protect fundamental rights, while the Chief Information Security Officer (CISO) oversees the implementation of information security strategies.

Implementation projects of Robotics & AI components don't follow the delivery process described above for Robotics & AI components. The Head of AI leads the AI & Machine Learning squad, driving AI. Within each business entity, the target is to have a Business Squad in charge of delivering AI use cases. The process of delivering AI solutions to use cases includes the following steps: 1) The AI sponsor (business) decides to sponsor a use case 2) The AI solution is built 3) The solution is validated 4) The solution is deployed.

Permanent control on IT risks induced by Digitalization (cybersecurity, Artificial Intelligence, Robotics, ...) is addressed by the IT risk & security steering group. They meet monthly and report every quarter to the Risk Committee (who is playing the oversight role) on incidents, key programs status, budget consumption and several KPIs.

The IT risk & security steering group is composed of CISO, Head of IT Security, Head of IT Risk, Head of IT Infra, Head of IT Operations, Incident Manager & the Service Deliver Manager.

#### Dig\_GOV-1\_23

(a) Members of the IT risk & security steering group have all the required skills and competencies to manage the inherent risks related to Digitalization. The Risk Committee is knowledgeable on IT topics. They are relying on the existing IT risk management processes, including the overall IT risk framework and culture, the risk identification and risk response frameworks and the IT risk monitoring and reporting processes.

The Head of AI is responsible for building AI skills and providing training necessary for successful AI projects. The "Data & AI Experts Board", which includes the DPO, IT Risk & Security, and other key roles, reviews AI solutions to ensure they align with sustainability and ethical standards. Additionally, the AI Community of Practice fosters continuous learning and innovation by sharing knowledge and best practices among team members.

(b) These skills and expertise are directly related to DP's material impacts, risks, and opportunities. For instance, the AI governance framework aims to balance innovation with responsibility, ensuring AI systems are developed and deployed in a manner that prioritizes safety, privacy, and the rights of clients. The AI Risk Management Approach includes sustainability assessments to evaluate the environmental impact of AI technologies, such as energy consumption and GHG emissions. Furthermore, the AI vision emphasizes augmenting employees' capabilities rather than replacing them, aligning with DP's commitment to responsible prosperity and continuous improvement in operational efficiency and client satisfaction.

## GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies

#### Dig\_GOV-2\_26

IT is providing every three months an update to the Risk Committee. This includes topics such as digitalization. Risk committee reports to the board of directors.

Information related to AI is provided to the Non-Financial Risk Committee (NFRC) which:

- Ensures the Al Risk & Control Framework is in line with the Internal Control Framework
- Monitors Al risk

## GOV-3 Integration of sustainability-related performance in incentive schemes

#### Dig\_GOV-3\_27

There is no direct incentive on digitalization in Degroof Petercam's remuneration policy. Indirect there is a link as digital transformation is included in in the 3-years strategic plan "Route 26" through its "Boost Business" axis. The latter is one of the elements in the Group Scorecard which serves as basis for determining the variable remuneration as described above. In that sense, there is a potential impact on incentive schemes if an underperformance on delivering on Digital Transformation is noted.

## SBM-1 Strategy, business model and value chain

### Dig\_SBM-1\_40

Within a fast-moving environment where digitalization & new technologies as Artificial Intelligence, Robotic Process Automation, ... provides new opportunities but also risks, Degroof Petercam embraces these challenges by integrating them in day-to-day business activities.

The company's strategy for digitalization in Private Banking is centered around enhancing client intimacy, ensuring compliance, achieving scalability, and fostering sustainable growth. The digital transformation initiatives are designed to provide private bankers with the tools and time to build closer relationships with their clients. This is achieved through the development and deployment of digital platforms like Degroof Petercam's existing app "MyDP" and a "to be released" new digital investments platform which streamline client interactions and improve the overall client experience. The strategy emphasizes compliance by design, integrating regulatory requirements into the core features to minimize risks and errors. Scalability is another key focus, with features developed to support a larger client base and increased assets under management (AUM) without compromising service quality. The digitalization efforts also aim to stabilize and enhance current processes, such as Client Lifecycle Management (CLM), to create smooth end-to-end experiences. By leveraging technologies like Dynamics 365, the company seeks to learn and interpret client behaviors, thereby supporting personalized and scalable digital communication.

Within DPAM the strategy is Excellence Empowering Digital Services: Harnessing Data, Cutting-Edge Reporting and Automated Distribution for Unmatched Client Service

- "Harnessing data" means effectively collecting, managing, and utilizing data to gain
  valuable insights and make informed decisions. In our context, it involves gathering
  reliable and consolidated data from various sources, analyzing it to identify trends
  and patterns, and using these insights to improve investment strategies, client
  reporting, and overall service quality. This is materialized in the Fund Database
  (Fundlink), as well as in the Fund administrator database refactoring, and the MIS
  database.
- "Cutting-edge reporting" refers to the use of the latest technology and methodologies to create highly accurate, detailed, and visually appealing reports. DPAM relies on InvestSuite, focusing on DPAM Funds reporting; moreover DPAM builds a scalable tool internally in order to produce ESG reporting effortlessly and relying on Data products. For internal partners, DPAM relies on PowerBI dashboarding to deliver fast, accurate and reliable reports. All based on an own Fund database, Fundlink.
- Automated distribution for unmatched client service: DPAM has a digital focus on data and excellence in reporting lifecycle based on internally developed front-end tools such as 'Direct Mode'l, to manage partners, APIs and Storyteller reports, and as well Report Navigator, that distributes reports in an automated, secured and audited manner.

#### SBM-2 Interests and views of stakeholders

Dig\_SBM-2\_45

Reference is made to ESRS 2 SBM 2

## SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model

Dig\_SBM-3\_48

In terms of IROs the following elements were identified in the DMA process:

- Opportunities: Reduced costs and higher scalability due to streamlined processes via the use of digitalization and new technologies.
  - In order to significantly increase scalability, potential AI solutions & robotics are constantly being tested within Degroof Petercam in order to increase scalability.
- Risks: Financial loss and reputational damage due to the non-regulate use of technologies (e.g. ChatGPT) by employees and misinformation
  - o Ensuring proper governance, usage policies, framework definition and trainings are example of means (cfr above) used to mitigate these risks. As an illustration AI has been made available in a controlled environment for all employees mid-September.
- Impacts: Improved accuracy of ESG data thanks to new technologies

 Data aggregation platform developed by DPAM (Rimes) has been rolled out to other parts of the organization. This positive impact is crucial for making informed decisions and fostering transparency. However, quality of underlying available ESG data remains a concern.

## IRO-1 Description of the process to identify and assess material impacts, risks and opportunities

#### Dig\_IRO-1\_53

In the context of the DMA, DP identified the digitalization as a material topic. This could not be mapped against any of the existing sector agnostic standards (IRO), so Degroof Petercam created a sector/entity specific section.

### MDR-P Policies adopted to manage material sustainability matters

#### Dig\_MDR-P\_65

- Artificial Intelligence (AI) Policy:
  - (a) Description: The AI Governance Policy document outlines the framework for managing AI initiatives at Degroof Petercam (DP). It emphasizes the importance of balancing innovation with responsibility, ensuring AI systems are developed and deployed ethically and safely. The policy includes sections on vision and ambition, defining the strategic goals of AI use cases, and the scope of the policy, which covers in-house, third-party, and contractor-developed AI applications. It details roles and responsibilities, including a three-line defense model involving various stakeholders like the Chief Data Officer, Head of AI, and Data Protection Officer. The governance and oversight section describes the committees involved in AI decision-making, such as the newly introduced "Data & AI Experts" Board. The AI Risk Management Approach outlines objectives for managing strategic, operational, IT, reputational, legal, business, and ESG risks. The policy also includes processes for ideation, development, deployment, and value monitoring of AI projects, ensuring continuous improvement and alignment with DP's strategic goals.
  - **(b) Scope**: This policy is applicable to all employees and top management of Degroof Petercam Belgium
  - **(c)** Ownership of the policy: The Data Office, under responsibility of the Chief Data Officer is responsible for managing and reviewing the AI policy.

## MDR-A Actions and resources in relation to material sustainability matters

#### Dig\_MDR-A\_68

Digitalization is a key element of the Group Strategy. In 2024 Degroof Petercam has reinforced the digital setup to create more value and more flexibility/agility implementing a Safe Agile

Framework (cfr explanation given above on the governance). This new Agile governance is supported by top management. Seven squads are fully operational and supporting the Digital transformation.

(a-b) key actions and scope taken in the reporting year and planned for the future:

Top Digital programs in 2024:

#### **Private Banking Belgium**

- Digital investments platform: Full Digital investment Platform with first go-live (employees) in Q4 2024 followed by Customer go-lives as from Q2-Q3 2025
- Digital Onboarding for Private Banking Client: implementing a Digital/phygital (paperless) to accelerate onboarding and reduce risk.
- MyDP: a few enhancements on "My DegroofPetercam app" related to portfolio reporting, Document management, e-signature.
- Client lifecycle Management: digital Periodic KYC Review (Know-Your-Customer, Anti -Money Laundering...).

#### **DPAM**

• DPAM Digital: revamp of the fund information Database from which automated reporting can be generated using Al.

#### Transversal Belgium

- A few AI use cases to digitalize paper flows at middle office (front to back), generate various management reports.
- The first automation projects via Robotization (delivery of 12 robots in 2024) to
  pursue higher scalability through streamlined processes. More than the half of
  these robots have been implemented within the Operations department to perform
  documents archiving tasks as well as some redundant handlings in the Core
  Banking system.

#### (c) Time Horizon

Most of these programs will continue delivering incrementally in 2025 with affixed capacity.

#### Dig\_MDR-A\_69

Annual Budget process is in place. A dedicated envelop is dedicated for digitalization in all business lines (DPAM / Asset Services / Private Banking).

Validation of digital initiatives are managed by the Investment Committee (business case validation, also applicable to non-Digital projects) for the budget part and by Digital Committee or TISC (Technology & Innovation Steering Committee) for the strategic alignment with the business priorities.

## MDR-M Metrics in relation to material sustainability matters

### [Dig\_MDR-M\_75]

A key-metric used is the availability of the e-banking platform/app: MyDP. The average availability rate was 98,6% in 2024. Note: this rate is calculated by withdrawing to the total

hours in a year the number of planned maintenance hours and dividing it by the total hours in a year.

Robotic process automation was a key improvement during the year 2024. All handlings/transactions/process-parts done by robots couldn't be tracked due to tooling evolution during the year.

## MDR-T Tracking effectiveness of policies and actions through targets

#### Dig\_MDR-T\_80

For the moment there are no measurable, outcome-oriented and time-bound targets which have been setup. There is no specific reporting made on the effectiveness of the policies and actions that have been taken on Digitalization projects as teams only started recently. Moreover, focus has been on building bridges with Indosuez to establish a common set of targets.

## • Annex A: EUT Report

#### 0. Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation

		Total environmentally sustainable assets******				(Article 7(2) and (3) and Section 1.1.2. of Annex	% of assets excluded from the denominator of the GAR (Article 7(1) and Section 1.2.4 of Annex V)*****
Main KPI	Green asset ratio (GAR) stock	101,229,771.6	1.77%	1.48%	66.44%	31.28%	33.56%
					1		
						% of assets excluded from	
						the numerator of the GAR	% of assets excluded from the
						(Article 7(2) and (3) and	denominator of the GAR
						Section 1.1.2. of Annex	(Article 7(1) and Section 1.2.4
		Total environmentally sustainable activities	KPI	KPI	% coverage (over total assets)	V)*****	of Annex V)*****
Additional KPIs	GAR (flow)	15,526,599.4	1.41%	1.62%	85.21%	22.99%	14.79%
	Trading book*						
	Financial guarantees	0.0	0%	0%			
	Assets under management	205,768,367.3	2.48%	3.14%			
	Fees and commissions income**						

<sup>\*</sup> For credit institutions that do not meet the conditions of Article 94(1) of the CRR or the conditions set out in Article 325a(1) of the CRR

Instutitons shall dislose forwardlooking information for this KPIs, including information in terms of targets, together with relevant explanations on the methodology applied.

#### Note 1: Across the reporting templates: cells shaded in black should not be reported.

Note 2: Fees and Commissions (sheet 6) and Trading Book (sheet 7) KPIs shall only apply starting 2026. SMEs' inclusion in these KPI will only apply subject to a positive result of an impact assessment.

<sup>\*\*</sup>Fees and commissions income from services other than lending and AuM

<sup>\*\*\* %</sup> of assets covered by the KPI over banks' total assets

<sup>\*\*\*\*</sup>based on the Turnover KPI of the counterparty

<sup>\*\*\*\*\*</sup>based on the CapEx KPI of the counterparty, except for lending activities where for general lending Turnover KPI is used

<sup>\*\*\*\*\*\*</sup> Taxonomy Disclosure Delegated Act (Commission Delegated Regulation (EU) 2021/2178, adopted on 6 July 2021), Annex V

<sup>\*\*\*\*\*\*\*</sup> Total amount of environnementally sustainable assets based on Turnover (in €)

Miss   Life			n a	ь	Т с	Т д	l e	T f	T 9	l h		T i	l k		m	1 n 1	
No.   Current states   Tensor states   Tenso												-					
No.   Current states   Tensor states   Tenso					Climate	Change Mitiga	tion (CCM)		1 0	Climate Change A	daptation (C(	CA)	Water and marine resources (WTR)				
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200   Conf. conf		not HfT eligible for GAR calculation	3029.39													1 1	
Column																	
Column	4.00	Loans and advances	450.00	121.55	13.32	4.19	0.36	0.45	0.27	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Property						25.76					0.17				0.00		
80				68.57		0.00	4.64				0.00			0.00	0.00		
No		of which investment firms															
180   Equipment protection   0.00																	
100	11.00	Equity instruments	0.00	0.00	0.00		0.00	0.00	0.00	0.00		0.00	0.00	0.00		0.00	
No.	12.00		5.20				0.11		0.11				0.07				
Ro																	
17.00	15.00	Equity instruments	0.16	1.60	0.90		0.11	0.42	0.11	0.06		0.06	0.07	0.04		0.01	
## 800					0.16				0.00								
Store	18.00	Debt securities, including UoP	0.16	0.16	0.16	0.00	0.00	0.06	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00	
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\$100	22.00	Debt securities, including UoP	90.30	19.34	10.83		7.93	8.60	5.75	5.46		5.46	1.18	0.58		0.55	
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2700	25.00		54.44	38.25	0.00	0.00	0.00	0.00	0.00		0.00						
2800   House financing	26.00	of which building renovation loans	79.51	79.51	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00					
2500   Houseng Innovaring   0.000		Local governments financing							0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Collateral obtained by taking possession: existential and commercial immovable (a)	29.00	Housing 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	
Properties   Continue   Continu	30.00		0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
Assets excluded from the numerator for GAR   2694.21   0.00   0	31.00	residential and commercial immovable	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
33.00   Financial and Nor-Financial covered in the denominator)																	
33.00   Financial and Non-financial undertakings   174.65   34.00   SMEs and MEC (other than SMEs) not subject to NFFD   129.82   18.00   18.0	32.00		2694.21	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	
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40.00   Non-EU country counterparties not subject to NFPD   464.87	38.00	Debt securities	726.70														
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4100		disclosure obligations															
## 4300   Equily instruments   7/98		Loans and advances															
## 400   Derivatives   1912																	
45,00	44.00	Derivatives	149.12														
47/0	45.00																
48:00	47.00	Other categories of assets (e.g. Goodwill,	548.34														
50.00   Central governments and Supranational issuers   1003.67		Total GAR assets		670.68	67.20	29.94	13.45	17.95	22.85	17.09	0.17	5.54	1.25	0.62	0.00	0.56	
5100   Central banks exposure   55005	49.00 50.00	Central governments and Supranational issuers	2890.97														
53.00   Italia assets   55.00   Statia assets   55.00   57.0	51.00	Central banks exposure	1550.05														
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations           54.00         Financial guarantees         80.88         0.00				670.68	67.20	29.94	13.45	17 95	22.85	17.09	0.17	5.54	125	0.62	1.000	0.56	
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56.00 Of which debt securities 75175 80.18 26.50 0.76 13.82 26.58 7.32 7.08 0.00 13.99 2.34 0.81 0.00 0.72	54.00	Financial guarantees	80.88														
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	Of which e	nvironmentally sust aligned)	ainable (Taxonomy-		Of which	environmentally sust aligned)	ainable (Taxonomy-		Of which environmentally sustainable (Taxonomy- aligned)				□f wh	nich environmentally s	ustainable (Taxo	stainable (Taxonomy-aligned)	
		Of which Use of Proceeds	of Ofwhich enabling			Of which Use of Proceeds	of Ofwhich enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	
	0.23	0.00	0.13	0.96	0.10	0.00	0.00	0.00	0.00	0.00	0.00	730.47	101.23	49.63	13.58	11.69	
	0.01	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	589.06	88.74	47.61	7.48	4.30	
	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	491.99 121.82	65.40 13.32	29.94 4.19	0.89	1.18 0.45	
	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	370.17	52.08	25.76	0.53	0.73	
	0.00		0.00	0.00	0.00		0.00	0.00	0.00		0.00	0.00	0.00		0.00	0.00	
	0.01	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	97.08	23.34	17.67	6.59	3.12	
	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	17.91	13.93	12.72	6.49 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	17.91	13.93	12.72	6.49	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	
	0.01	0.00	0.00	0.01	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.36	150	0.00	0.08	0.48	
	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	2.36	1.50	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	0.01	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	0.00	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	25.66	12.49	2.02	6.10	7.39	
	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	0.22	0.00	0.12	0.95	0.10	0.00	0.00	0.00	0.00	0.00	0.00	25.66	12.49	2.02	6.10	7.39	
	0.00		0.00	0.00	0.00		0.00	0.00	0.00		0.00	0.00	0.00		0.00	0.00	
	0.00	0.00	0.00	_								115.74 38.25	0.00	0.00	0.00	0.00	
	0.00	0.00	0.00									77.50	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	
	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	
67	0.23	0.00	0.13	0.96	0.10	0.00	0.00	0.00	0.00	0.00	0.00	730.47	101.23	49.63	13.58	11.69	
	1.000	0.00	0.53	0.00	1000	0.00	1.000	1.000	1.000	1000	1.000	200.42	404.00	40.00	12.50	44.50	
	0.23	0.00	0.13	0.96	0.10	0.00	0.00	0.00	0.00	0.00	0.00	730.47	101.23	49.63	13.58	11.69	
	0.00	0.00	0.00 3.48	0.00	0.00	0.00	0.00	0.00 8.73	0.00	0.00	0.00	0.00 707.85	0.00 205.77	0.00 24.74	0.00 30.20	0.00 132.86	
	3.20						5.73	0.73	0.00	1 0.00	0.00	707.85	205.77	1 44.74	30.20	132.86	
	0.27	0.00	0.08	2.79	0.26	0.00	2.27	1.60	0.00	0.00	0.00	100.70	35.39	11.83	12.77	16.66	

ag	ah	ai	aj	ak	al	am	an	ao	ap	aq	ar	as	at			
		Climate 0	hange Mitigati	ion (CCM)		CI	imate Change Ad	daptation (CC	(A)	Water and marine resources (WTR)						
	Of w			ors (Taxonomy-elig	ible)		ds taxonomy releva			Of which to	vards taxonomy rele	vant sectors (Taxo	nomy-eligible)			
Total [gross] carrying									nable (Taxonomy-			onmentally sustain				
amount		1		ustainable (Taxonor	ny-aligned)			aligned)			O WILLIAM	aligned)	abic (Taxorioniy			
1			Of which Use of		Of which enabling			Of which Use				Of which Use of	Of which			
			Proceeds	transitional	enabling			of Proceeds	enabling			Proceeds	enabling			
3005.51	155.80	59.50	44.75	138	7.27	16.76	0.17	0.00	0.16							
1540.91	134.79	46.98	42.75	0.66	1.08	9.56	0.00	0.00								
1378.12 0.00	62.59	9.55	7.60	0.00	0.01	0.01	0.00	0.00	0.00							
1378.12	62.59	9.55	7.60	0.00	0.01	0.01	0.00	0.00	0.00							
0.00 162.79	0.00 72.20	0.00 37.43	35.16	0.00	0.00 1.07	9.56	0.00	0.00	0.00							
0.18	0.03	0.01	0.00	0.00	0.00	0.01	0.00	0.00	0.00							
0.00	0.00			0.00	0.00	0.00	0.00	0.00								
0.18	0.03	0.01		0.00	0.00	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 0.14	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
0.14	0.00		0.00	0.00	0.00	0.00	0.00 0.00	0.00	0.00							
162.83	21.02	12.52	1.99	0.73	6.19	7.20	0.17	0.00	0.16							
0.00 161.43	0.00 20.99	0.00 12.52	0.00	0.00 0.73	0.00 6.19	0.00 7.20	0.00 0.17	0.00	0.00 0.16							
1.40	0.03	0.00		0.00	0.00	0.00	0.00		0.00							
1301.77 40.57	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00								
72.04	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	0.00	0.00	0.00	0.00	0.00							
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
2489.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00							
1475.11																
990.21																
684.45																
7.60																
22.93																
282.54 23.22																
484.90																
90.25																
388.52																
6.14 204.36																
224.68																
2.04 582.84																
5494.54	155.80	59.50	44.75	138	7.27	16.76	0.17	0.00	0.16							
2654.91 1433.08																
875.28																
346.54 8149.45	155.80	59.50	44.75	1.38	7.27	16.76	0.17	0.00	0.16							
78.32 6882.98	0.00				0.00 49.14		0.00									
618.15	31.72	8.34	0.00	0.06	5.86	10.99	0.69	0.00	0.56							
1235.68	96.37	21.83	0.00	1.16	14.67	20.33	1.10	0.00	1.08							

1		 				L .		T - 6-		-	1 6	T	T - LL	L:	L:		LI.	
Contain secondary (1)   Cont		 	dx	ay ay	82	Da	1 00	L DC		De	l Di	l Dg	Dri				DK	
Company in the stand in the control of Telechon (1) and the	District				Pollutio	on (PPC)			Biodiversity and	Ecosystems (Bl	D)	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)						
O which environmentally submoded   Taimman   Spring   Taimman   Spri	Of which tow		nomv-eliaible)	Of which to			onomv-eligible)											
Charlot Use of   Charlot   Charlot		 ronmentally sustain			onmentally sustair				onmentally sustain						ned)			
		Of which Use of		1		Of which Use of		1		Of which Use of								
SSH   GSH   SGB   VS   SGB   SS   SS   SS   SS   SS   SS																		
CSS   207																		
		_	_															
1												0.00	0.0	0.0	00	0.00	O.( O.	
1												0.00	0 30.	71		0.00	0.1	
004 007												0.00	0.0	0.0	00	0.00	0.0	
000 000 000 000 000 000 000 000 000 0												0.0			00		0.1	
100   000												0.00	0.00	0.0	0.00	0.00	0.00	
0.03												0.00	0.0	0.0	00	0.00	0.	
1															0 0 00		0.	
100												0.0	0.0	0.0	00	0.00	0.1	
4700   225   139   073   02   02   02   02   02   02   02   0												0.00	3 0.0	00] 0.0 00	00		0.	
4700   255   198   073   6   100												47.03	12.52	1.9		6.2	.23	
100   100												47.00	12.5	52 1.9	39	0.73	6.	
100												0.00	3 0.0	00	0.00	0.00	0.	
100												0.00	0.0	0.0	00	0.00	0.	
0.00												0.00	0.0	0.0 00 0.0	00	0.00	0. 0.	
0.00												0.00	0.00	0.00	0.00	0.0	.00	
1.00										-		0.00	0.0	00 0.0	00	0.00	0.	
566.17   80.66   62.06   139   7.59												0.00	0.0	0.0	00	0.00	0.	
												0.00	0.00	0.00	0.00	0.00		
0.00												566.17	80.66	62.06	139	7.58		
0.00																		
0.00																		
50832 124.29 0.00 19.65 65 6230 889 0.00 0.06 5												566.17	80.66	62.06	1.39	7.58		
50832 124.29 0.00 19.65 65 6230 889 0.00 0.06 5							T					0.00	0.0	0.0	00	0.00	0.	
1   1   1   1   1   1   1   1   1   1							_									19.65	65. 5.	
																	14.7	

### CapEx-based KPI

		ā	Ь	С	d	e	f	g	h	i	i	k		m	n
				Climate I	Change Mitigati	ion (CCM)			limate Change A	dantation (CC	·A1		Water and marir	ne resources (WTI	Rì
	A COLUMN TO STATE OF THE STATE		Of	which towards taxor			aible)		ards taxonomu relev	ant sectors (Tax	onomv-eliaible)	Of which to	wards taxonomu re	levant sectors (Taxor	nomv-eliaible)
	Million EUR1	Total (gross) carrying amount			environmentally su	ustainable (Taxono	my-aligned)		Of which environ	nmentally sustai	nable (Taxonomy-		Of which env	ironmentally sustaina	ble (Taxonomy-
		amount			Of which Use of		Of which			Of which Use		1		Of which Use of	
	ISAB S				Proceeds	transitional	enabling			of Proceeds	enabling			Proceeds	enabling
	GAR - Covered assets in both numerator and  Loans and advances, debt securities and equity instruments														
1.00	not HFT eligible for GAR calculation	3029.39	695.13	68.92	29.94	14.30	21.55	26.55	11.66	0.00	0.01	0.97	0.06	0.00	0.00
2.00	Financial undertakings	1561.61	549.67	61.76	29.94	5.99	11.43	17.09	11.66	0.00	0.01	0.10	0.06	0.00	0.00
3.00	Credit institutions	1420.75	479.06	54.60	29.94	1.27	2.05	16.75	11.58	0.00	0.00	0.00	0.00	0.00	0.00
4.00	Loans and advances	450.00	121.05	14.40	4.19	0.41	0.81	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
5.00	Debt securities, including UoP	970.75	358.01	40.20	25.76	0.87	1.24	16.75	11.58	0.00	0.00	0.00	0.00	0.00	0.00
6.00 7.00	Equity instruments Other financial corporations	0.00 140.86	0.00 70.60	0.00 7.16	0.00	0.00 4.71	9.39	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
8.00	of which investment firms	23.92	4.93	1.09	0.00	4.71	0.24	0.00	0.08	0.00	0.00	0.00	0.06	0.00	0.00
9.00	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
10.00	Debt securities, including UoP	23.92	4.93	1.09	0.00	4.52	0.24	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
11.00	Equity instruments	0.00	0.00	0.00		0.00	0.00	0.00	0.00		0.00	0.00	0.00		0.00
12.00	of which management companies	5.20	190	1.10	0.00	0.12	0.55	0.33	0.08	0.00	0.00	0.10	0.06	0.00	0.00
13.00 14.00	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
14.00	Debt securities, including UoP Equity instruments	5.20	1.90	1.10	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
16.00	of which insurance undertakings	0.16	0.16	0.16	0.00	0.01	0.05	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
17.00	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
18.00	Debt securities, including UoP	0.16	0.16	0.16	0.00	0.01	0.05	0.00	0.00	0.00	0.01	0.00	0.00	0.00	0.00
19.00	Equity instruments	0.00	0.00	0.00		0.00	0.00	0.00	0.00		0.00	0.00	0.00		0.00
20.00 21.00	Non-financial undertakings	94.60	27.71 1.20	7.16 0.00	0.00	8.32 0.00	10.12 0.00	9.45 1.20	0.00	0.00	0.00	0.88	0.00	0.00	0.00
22.00	Loans and advances Debt securities, including UoP	90.30	26.51	7.16	0.00	8.32	10.12	8.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00
23.00	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
24.00	Households	1373.18	117.75	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00		0.00
25.00	of which loans collateralised by residential immovable	54.44	38.25	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00				
	property			1	1			1	1	1	1				
26.00	of which building renovation loans	79.51	79.51	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00				
27.00 28.00	of which motor vehicle loans  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
29.00	Housing 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
30.00	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
31.00	Conacerar obtained by taking possession.	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
3100	residential and commercial immovable	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
32.00	Assets excluded from the numerator for GAR.	2694.21	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
33.00	calculation (covered in the denominator) Financial and Non-financial undertakings	1794.69													
	SMEs and NFCs (other than SMEs) not subject to NFRD														
34.00	disclosure obligations	1329.82													
35.00	Loans and advances	579.14													
36.00	of which loans collateralised by commercial	23.37													
	immovable property														
37.00	of which building renovation loans	6.96													
38.00 39.00	Debt securities Equity instruments	726.70 23.98													
	Non-EU country counterparties not subject to NFRD														
40.00	disclosure obligations	464.87													
41.00	Loans and advances	185.73													
42.00	Debt securities	271.15													
43.00 44.00	Equity instruments	7.98 149.12													
44.00 45.00	Derivatives On demand interbank loans	149.12 200.49													
45.00	Cash and cash-related assets	1.57													
47.00	Other categories of assets (e.g. Goodwill,	548.34													
48.00	Total GAR assets	5723.60	695.13	68.92	29.94	14.30	21.55	26.55	11.66	0.00	0.01	0.97	0.06	0.00	0.00
		2890.97													
49.00	Assets not covered for GAR calculation														
49.00 50.00	Central governments and Supranational issuers	1003.67													
49.00 50.00 51.00	Central governments and Supranational issuers Central banks exposure	1550.05													
49.00 50.00	Central governments and Supranational issuers Central banks exposure Trading book	1003.67 1550.05 337.25 8614.58	695.13	68.92	29.94	14.30	21.55	26.55	11.66	0.00	0.01	0.97	0.06	0.00	0.00
49.00 50.00 51.00 52.00 53.00 Off-balance sheet exposur	Central governments and Supranational issuers Central banks exposure Trading book Jotal assets res - Undertakings subject to NFRD disclosure obligation	1550.05 337.25 8614.58 ons	695.13	68.92			21.55								
49.00 50.00 51.00 52.00 53.00 Off-balance sheet exposur 54.00	Central governments and Supranational issuers Central banks exposure Trading book I total assets res - Undertakings subject to NFRD disclosure obligation Financial guarantees	1550.05 337.25 8614.58 <b>PIS</b> 80.88	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
49.00 50.00 51.00 52.00 53.00 Off-balance sheet exposur 54.00	Central governments and Supranational issuers Central banks exposure Trading book India assets res - Undertakings subject to NFRD disclosure obligation Financial guarantees Assets under management	1550.05 337.25 8614.58 96.88 8283.61	0.00 600.23	0.00 240.76	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00
49.00 50.00 51.00 52.00 53.00 Off-balance sheet exposur 54.00	Central governments and Supranational issuers Central banks exposure Trading book I total assets res - Undertakings subject to NFRD disclosure obligation Financial guarantees	1550.05 337.25 8614.58 <b>ins</b> 80.88 8283.61 751.75	0.00	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 Due to the rounding to millions, several lines are at 0.

Of which towards taxonomy relevant sectors (Taxonomy-eligible)	Company   Comp	770 005 000 000 000 000 000 000 000 000	0.05 0.00 0.00 0.00 0.00 0.00 0.00 0.00	elevant sectors (Taos vironmentally sustain DF which Use of Proceeds 0.00	Description (Control of Control o	0.56 0.01 0.00 0.00 0.00 0.00 0.00 0.00 0.0	0.02 0.00 0.00 0.00 0.00 0.00 0.00 0.00	relevant sectors (Taxx vivornmentally sustain   Dir which Use of Proceeds   0.00   0.0	DF which enabling  0.00  0.00  0.00  0.00  0.00  0.00  0.00  0.00  0.00  0.00  0.00  0.00	0.00 0.00 0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00 0.00	y relevant sectors (Ta environmentally sust Of which Use of Proceeds 0.00 0.00 0.00 0.00	exonomy-eligible) sinable (Taxonomy- of Of which enabling  0.00  0.00  0.00  0.00  0.00  0.00	73169 586.34 506.16 121.05 385.11	0F which towards to 0F wh 84.67 75.20 68.01 14.40 53.61	taxonomy relevant se hich environmentally (Df which Use of Proceeds 29.94 29.94 4.19	ectors (Taxonomy-e y sustainable (Taxor of Of which transitional 11.18 7.89 1.27 0.41 0.87	eligible) nomy-aligned) OF which enabling  11.68 6.83 2.05 0.81 1.24
CF which environmentally sustainable   Taxonomy-   CF which the of   CF which the	CF which environmentally sustainable   Tanonemy	770 005 000 000 000 000 000 000 000 000	0.05 0.00 0.00 0.00 0.00 0.00 0.00 0.00	vironmentally sustain De which Use of Proceeds  0.00 0.00 0.00 0.00 0.00 0.00 0.00 0	Description (Control of Control o	0.56 0.01 0.00 0.00 0.00 0.00 0.00 0.00 0.0	0.02 0.00 0.00 0.00 0.00 0.00 0.00 0.00	wironmentally sustain  Of which Use of  Proceeds  0.00  0.00  0.00  0.00  0.00  0.00  0.00  0.00  0.00  0.00	DF which enabling  0.00  0.00  0.00  0.00  0.00  0.00  0.00  0.00  0.00  0.00  0.00  0.00	0.00 0.00 0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00	environmentally sust Of which Use of Proceeds 0.00 0.00 0.00 0.00	inable (Taxonomy)  If Of which enabling  0.00  0.00  0.00  0.00  0.00  0.00	73169 586.34 506.16 121.05 385.11	84.67 75.20 68.01 14.40 53.61	hich environmentally Of which Use of Proceeds 29.94 29.94 29.94 4.19	y sustainable (Taxor of Of which transitional 11.18 7.89 1.27 0.41 0.87	nomy-aligned]   Of which enabling   11.68   6.83   2.05   0.81   1.24
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Proceeds   Proceeds	Proceeds   Proceeds	05 000 000 000 000 000 000 000 000 000	0.00 0.00	Proceeds  0.00  0.00  0.00  0.00  0.00  0.00  0.00  0.00  0.00  0.00  0.00  0.00  0.00  0.00  0.00  0.00  0.00  0.00	enabling  0.04  0.00	0.01 0.00 0.00 0.00 0.00 0.00 0.01 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	enabling 0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00	586.34 506.16 121.05 385.11	75.20 68.01 14.40 53.61	29.94 29.94 29.94 29.94 4.19	11.18 7.89 1.27 0.41 0.87	enabling 11.68 6.83 2.05 0.81 1.24
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Second   Correct   Corre	000 000 000 000 000 000 000 000 000 00	5 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0	0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	0.01 0.00 0.00 0.00 0.00 0.00 0.01 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00 0.00 0.00	0.00 0.00 0.00	0.00 0.00 0.00 0.00	586.34 506.16 121.05 385.11	75.20 68.01 14.40 53.61	29.94 29.94 4.19	7.89 1.27 0.41 0.87	6.83 2.05 0.81 1.24
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0   0.05   0.00   0.04   0.56   0.02   0.00   0.00   0.00   0.00   0.00   0.00   731.69   84.67   29.94   11.18		0	0.05	0.00	0.04	0.56	0.02	0.00	0.00	0.00	0.00	0.00	0.00	731.69	84.67	29.94	11.18	11.68
	0.05 0.00 0.04 0.56 0.02 0.00 0.00 0.00 0.00 0.00 0.00 73169 84.67 2.9.94 11.18 11.68																	
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Total [gross] carrying	Ofv	vhich towards taxon	omy relevant sect	ors (Taxonomy-elig	ible)	Of which towa	rds taxonomy releva	ant sectors (Taxo	nomy-eligible)		ards taxonomy rele	vant sectors (Taxon	omy-eligible)
amount		Of which er	nvironmentally su	ustainable (Taxonor	ny-aligned)		Of which environ	mentally sustair	able (Taxonomy-		Of which enviro	nmentally sustaina	ole (Taxonomy
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3005.51	67.94	17.59	0.00	1.78	7.62	26.34	0.70	0.00	0.34				
1540.91 1378.12	47.50 27.02	9.38 2.20	0.00	0.42 0.00	3.12 0.01	16.18	0.36	0.00	0.00				
0.00	0.00		0.00						0.00				
1378.12	27.02	2.20	0.00	0.00	0.01	0.0	0.00	0.00	0.00				
0.00	0.00	0.00	0.00	0.00	0.00	0.00			0.00				
162.79 0.18	20.48	7.18 0.01	0.00	0.42	3.10 0.00	16.18	0.36	0.00	0.00				
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0.18	0.03	0.01		0.00	0.0				0.00				
0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00				
0.00	0.00		0.00		0.0				0.00				
0.00	0.00	0.00		0.00	0.0	0.00	0.00		0.00				
0.14	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00				
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0.00	0.00	0.00		0.00	0.0	0.00	0.00		0.00				
162.83	20.44	8.22	0.00	1.36	4.50	10.16	0.34	0.00	0.34				
0.00 161.43	0.00 20.11	0.00 8.21	0.00	0.00 1.36	0.0 4.5	0.00			0.00 0.34				
140	0.33		0.00	0.00	4.5 0.0				0.34				
1301.77	0.00	0.00	0.00		0.00	0.00	0.00	0.00	0.00				
40.57	0.00	0.00	0.00	0.00	0.0	0.00	0.00	0.00	0.00				
72.04	0.00	I	0.00	0.00	0.0	1	1	l	0.00				
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0.00	0.00		0.00										
0.00	0.00	0.00	0.00	0.00	0.0	0.00	0.00	0.00	0.00				
2489.03	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00				
475.11													
990.21													
84.45													
7.60													
2.93													
82.54													
23.22													
84.90													
90.25													
388.52													
5.14													
204.36 224.68													
2.04													
82.84													
494.54	67.94	17.59	0.00	178	7.62	26.34	0.70	0.00	0.34				
54.91 33.08													
5.28													
6.54													
49.45	67.94	17.59	0.00	1.78	7.62	26.34	0.70	0.00	0.34				
32	0.00	0.00	0.00	0.00	0.0	0.00	0.00	0.00	0.00				
6882.98	361.36	186.19	0.00	12.31	79.4	6 101.80	12.34	0.00	8.00				
618.15	37.23		0.00	1.81	6.7				1.43				
1235.68	111.42	52.54	0.00	2.67	24.6	0 27.47	3.32	0.00	3.06				

Description of the Part   Pa	au	av	aw	ax	ay	az	ba	ЬЬ	bc	bd	be	bf	bg	bh	bi	bj	bk
CF which environmentally sustanable IT sucromany-   CF which environmentally sustanable IT sucromy-   CF which environmentally sustanable IT suc		Circular eco	nomy (CE)			Pollutio	n (PPC)		Е	Biodiversity and	Ecosystems (BIC	)		TOTAL (CCM	CCA + WTR +	CE + PPC + BIO	1
Cirwitch Use of Cirwitch   Cirw	Of which tow	Of which enviro	nmentally sustaina	ble (Taxonomu-	Of which tow	ards taxonomy rele Of which enviro	vant sectors (Taxon onmentally sustaina	omy-eligible) ble (Taxonomy-	Of which tow	ards taxonomy rele	vant sectors (Taxon inmentally sustaina	omy-eligible) ble (Taxonomy-	'	Of which towards tax Of which	environmentally s	ustainable (Taxono	able) my-aligned)
15.26		1	Of which Use of	Of which			Of which Use of	Of which			Of which Use of	Of which	1		Of which Use of	Of which	Of which
9154   983   000   042   475			Proceeds	enabiing			Froceeds	enabling			Froceeds	eriabiling			Froceeds	transitional	enabiing
6859   220   000   000   000   001													125.26	18.04	0.00	1.79	9.31
0.00													91.64	9.83	0.00	0.42	4.76
SESS   230   000													0	00 0.0	0.0	0.0	0.
2305 7.83 0.00 0.42 4.75   4													68	59 2.	0.0	0.0	00
000													23.05	7.63	0.0	0.42	4.75
000													0.04	0.01	0.0	0.00	0.00
000														0.0	0.0	0.0	0.
0.00													0.00	0.00		0.00	0.00
000														00 0.0	0.0	0.0	0.
0.00													0	00 0.0	0	0.0	0.
0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0													0.01	0.00	0.0	0.00	0.00
33.62 8.22 0.00 136 4.55  0.00 0.00 0.00 0.00 0.00  33.30 8.21 0.00 136  0.00 0.00 0.00 0.00 0.00  0.00 0.00 0													1	.01 0.0	0.0	0.0	0.
0.00													33.62	8.22	0.0	1.36	4.55
0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0																	
0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0													- 0	32 0.0	0	0.0	0.
0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0																	
0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0														1	1		
0,00 0,00 0,00 0,00 0,00 0,00 0,00 0,																	
0.00 0.00 0.00 0.00 0.00 0.00 0.00 0.0													0.00	0.00	0.00	0.00	0.00
													0	00 0.0	0.0	0.0	0.
													0.00	0.00	0.00	0.00	0.00
													0.00	0.00	0.00	0.00	0.00
125.26 18.04 0.00 1.79 9.31													125.26	18.04	0.00	179	9.31
125.26 18.04 [0.00 [1.79 [9.31													125.26	18.04	0.00	1.79	9.31
0.00 0.00 0.00 0.00 0.00														00] 0.0	0.0	0.0	00] 0
547.17 208.96 0.00 14.53 60.95 12.75 0.00 181													547 60	.17 208.1	5 0.0	14.5	53 80. 81 6.
168 56 59.35 0.00 2 87													168	56 59:	5 0.0	1 28	37 24

#### 2. GAR sector information (based on Turnover)

	a	ь	c	d	e	f	8	h	1	j	k	1	m	n	0	р	q	r	5	t	u	v	w	×	У	z	83	ab
		Climate Change N	Aitigation (CCM)			Climate Change Ar	daptation (CC	(A)		Water and marine				Circular eco				Pollution				Biodiversity and			TO	TAL (CCM + CCA + W	R + CE + PPC + BII	,O)
	Non-Financial o	orporates (Subject to	SMEs and other NF	C not subject to	Non-Financial co	orporates (Subject	SMEs and oth	er NFC not subject to	Non-Financial o	orporates (Subject to	SMEs and other	NFC not subject to	Non-Financial co	porates (Subject to	SMEs and other	er NFC not subject to	Non-Financial co	porates (Subject to	SMEs and other I	4FC not subject to	Non-Financial co	rporates (Subject to	SMEs and other	NFC not subject to	Non-Financial co	rporates (Subject to	SMEs and other N	#FC not subject to
	[Gross] c	arrying amount	[Gross] carryl	ng amount	[Gross] can	rying amount	[Gross] o	arrying amount	[Gross] ca	arrying amount	[Gross] car	rrying amount	[Gross] car	rying amount	[Gross] c	arrying amount		rying amount	[Gross] carr	ying amount	[Gross] car	rrying amount	[Gross] car	rrying amount	[Gross] car	rrying amount	[Gross] carry	
Breakdown by sector - NACE 4 digits level (code and label)	Mn EUR	Of which environmentally sustainable (CCM)	Mn EUR e	Of which svironmentally stainable (CCM)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (CCA)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (WTR)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (CE)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (PPC)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (BIO)	Mn EUR	Of which environmentally sustainable (CCM + CCA)	Mn EUR 5	Of which environmentally sustainable (CCM + CCA)
1 24.2 - Manufacture of tubes, pipes, hollow profiles and related fittings, of steel	0.28	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			1.77	0.00		_
2 27.11 - Manufacture of electric motors, generators and transformers	2.07	1.18			0.00	0.00			0.04	0.00			1.81	0.16			0.00	0.00			0.00	0.00			3.88	1.30		
3 27.51 - Manufacture of electric domestic appliances	1.48	0.10			0.00	0.00			0.00	0.00			1.48	0.00			0.00	0.00			0.00	0.00			1.48	0.10		
4 28.92 - Manufacture of machineryfor mining, quarrying and construction	0.00	0.00			0.00	0.00			0.00	0.00			0.36	0.00			0.00	0.00			0.00	0.00			0.36	0.00		
5 29.1 - Manufacture of motor vehicles	6.91	0.23			0.00	0.00			0.00	0.00			0.04	0.00			0.00	0.00			0.00	0.00			6.91	0.23		_
6 35.13 - Distribution of electricity	5.53	5.53			5.46	5.46			0.55	0.55			0.00	0.00			0.00	0.00			0.00	0.00			9.76	9.76		_
7 S0.2 - Sea and coastal freight water transport	1.61	0.08			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			1.61	0.08		
8 52.21 - Service activities incidental to land transportation	0.47	0.20			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.47	0.20		_
9 61.2 - Wireless telecommunications activities	0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.06	0.00		_
10 77.11 - Renting and leasing of cars and light motor vehicles	1.30	0.25			0.00	0.00			0.00	0.00			0.68	0.00			0.00	0.00			0.00	0.00			1.98	0.25		
11 84.11 - General public administration activities	0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			0.00	0.00			12.72	12.72		
20 Other	533.26	59.65			17.39	11.63			0.66	80.0			0.30	0.06			0.96	0.10			0.00	0.00			573.72	76.60		

### Turnover-based KPI

		a	Ь	С	d	e	f	g	h	I 1		k	ı	m	n	0	р	q
							<u> </u>									_	isclosure referen	nce date T
			Climate	Change Miti	gation (CCM)		Clin	mate Change Ad	laptation (	CCA)	w	ater and marine	resources (WT	R)		Circular ed	onomy (CE)	
		Proportion of			ding taxonomy re	elevant sectors	Proportion of	f total covered a	assets fund	ling taxonomy	Proportion of	otal covered ass	ets funding taxo	onomy relevant	Proportion of t	otal covered as	sets funding taxo	onomy relevant
			(	Taxonomy-eli	igible)		rele	vant sectors (Tax	xonomy-eli	igible)		sectors (Taxo	nomy-eligible)			sectors (Taxo	nomy-eligible)	,
	% (compared to total covered assets in the denominator)				,		1			overed assets	1	,						
					vered assets fund			funding tax	onomy rele	evant sectors			f total covered a				of total covered a	
			re	elevant secto	rs (Taxonomy-al	gnea)		(Tax	onomy-ali	gned)		taxonomy relev	ant sectors (Tax	onomy-aligned)		taxonomy rele	vant sectors (Tax	conomy-aligned
				Of which	Of which	Of which			Of which	Of which			Of which Use	Of which			Of which Use	Of which
				Use of	transitional	enabling			Use of	enabling			of Proceeds	enabling			of Proceeds	enabling
				Proceeds	transitional	enabinig			Proceeds	enabiling			OI FIOCEEUS	enabing			OI FIOCEEUS	enabing
	GAR - Covered assets in both numerator and denominator																	
	Loans and advances, debt securities and equity instruments not HfT	22.14%	2.22%	0.99%	0.44%	0.59%	0.75%	0.56%	0.01%	0.18%	0.04%	0.02%	0.00%	0.02%	0.15%	0.01%	0.00%	0.00%
1	eligible for GAR calculation	22.14%	2.22%	0.99%	0.44%	0.59%	0.75%	0.56%	0.01%	0.18%	0.04%	0.02%	0.00%	0.02%	0.15%	0.01%	0.00%	0.00%
2	Financial undertakings	34.17%	3.61%	1.92%	0.35%	0.60%	1.09%	0.74%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.06%	0.00%	0.00%	0.009
3	Credit institutions	32.73%	3.66%	2.11%	0.06%	0.08%	1.20%	0.81%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Loans and advances	27.01%	2.96%	0.93%	0.08%	0.10%	0.06%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.009
5	Debt securities, including UoP	35.38%	3.99%	2.65%	0.05%	0.07%	1.72%	1.19%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.009
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%		0.009
7	Other financial corporations	48.68%	3.07%	0.00%	3.29%	5.80%	0.08%	0.05%	0.00%	0.05%	0.05%	0.03%	0.00%	0.00%	0.62%	0.00%	0.00%	0.009
8	of which investment firms	18.67%	1.26%	0.00%	18.82%	0.22%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.03%	0.00%	0.00%	0.009
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%	0.009
10	Debt securities, including UoP	18.67%	1.26%	0.00%	18.82%	0.22%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.03%	0.00%	0.00%	0.009
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%
12	of which management companies	30.71%	17.35%	0.00%	2.20%	8.02%	2.19%	1.23%	0.00%	1.22%	1.27%	0.78%	0.00%	0.12%	2.88%	0.12%	0.00%	0.06%
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%
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%
15	Equity instruments	989.37%	559.07%		70.89%	258.51%	70.41%	39.62%		39.43%	40.91%	25.18%		3.97%	92.87%	3.85%		2.00%
16	of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.009
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%
18	Debt securities, including UoP	96.84%	96.84%	0.00%	2.94%	34.97%	0.10%	0.10%	0.00%	7.33%	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%		0.009
20	Non-financial undertakings	20.44%	11.45%	0.00%	8.38%	9.09%	6.08%	5.78%	0.00%	5.77%	1.25%	0.62%	0.00%	0.58%	3.97%	0.23%	0.00%	0.139
21	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%
22	Debt securities, including UoP	21.41%	11.99%	0.00%	8.78%	9.52%	6.37%	6.05%	0.00%	6.05%	1.31%	0.65%	0.00%	0.61%	4.16%	0.25%	0.00%	0.14%
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%
24	Households	8.58%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					0.00%	0.00%		0.00%
25	of which loans collateralised by residential immovable	70.26%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					0.00%	0.00%		0.009
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%
27	of which motor vehicle loans	0.00%	0.00%	0.00%	0.00%	0.00%												
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%
29	Housing 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%		0.009
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%	0.009
31	Collateral obtained by taking possession: residential and	0.00%	0.00%	0.00%	0.00%	0.00%	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	commercial immovable properties  Total GAR assets	11.72%	1.17%	0.52%	0.24%	0.31%	0.40%	0.30%	0.00%	0.10%	0.02%	0.01%	0.00%	0.01%	0.08%	0.00%	0.00%	0.00%
32	TOTAL GAN 455EL5	11./2%	1.1/70	0.52%	0.24%	0.31%	0.40%	0.30%	0.00%	0.10%	0.0270	0.01%	0.00%	0.01%	0.0870	0.00%	0.00%	0.00%

r	S	t	u	v	w	×	z	aa	ab	ac	ad	ae	af
	Pollution					Ecosystems (BIC			TOTAL (CCM +				
Proportion of to	otal covered asse		nomy relevant	Proportion of t		sets funding taxo	onomy relevant	Proportion	of total covered			evant sectors	
	sectors (Taxon	omy-eligible)			sectors (Taxo	nomy-eligible)			(Ta	xonomy-elig	ible)		December
	Proportion of	f total covered a	ssets funding		Proportion of	f total covered a	ssets funding		Proportion	of total cove	red assets fundi	ng taxonomy	Proportion of total
	taxonomy relev	ant sectors (Tax	onomy-aligned)		taxonomy relev	ant sectors (Tax	onomy-aligned)		rele	evant sectors	(Taxonomy-alig	(ned)	assets
										Of which			covered
		Of which Use	Of which			Of which Use	Of which			Use of	Of which	Of which	
		of Proceeds	enabling			of Proceeds	enabling			Proceeds	transitional	enabling	
0.03%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	24.11%	3.34%	1.64%	0.45%	0.39%	35.17%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	37.72%	5.68%	3.05%	0.48%	0.28%	18.13%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	34.63%	4.60%	2.11%	0.06%	0.08%	16.49%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	27.07%	2.96%	0.93%	0.08%	0.10%	5.22%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	38.13%	5.36%	2.65%	0.05%	0.07%	11.27%
0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
0.00%				0.00%	68.92%	16.57%	12.54%	4.68%	2.22%	1.64%			
0.00%				0.00%	74.87%	58.22%	53.18%	27.11%	0.22%	0.28%			
0.00%	0.00%	0.00% 0.00% 0.00% 0.00% 0.00% 0.00%		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%			
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	74.87%	58.22%	53.18%	27.11%	0.22%	0.28%
0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
0.10%	0.06%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	45.40%	28.92%	0.00%	1.63%	9.29%	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%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.06%
3.33%	2.01%		0.05%	0.47%	0.00%		0.00%	1462.60%	931.70%		52.64%	299.16%	0.00%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	6.86%	2.12%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
1.01%	0.10%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	27.13%	13.20%	2.14%	6.45%	7.81%	1.10%
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%	0.05%
1.06%	0.11%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	28.42%	13.83%	2.24%	6.76%	8.18%	1.05%
0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	58.00%	0.00%	0.000/	0.00%	0.00%	0.00%
								8.43%	0.00%	0.00%	0.00%	0.00%	15.94%
								70.26%	0.00%	0.00%	0.00%	0.00%	0.63%
								97.47%	0.00%	0.00%	0.00%	0.00%	0.92%
0.000/	0.000	0.000	0.000	0.000	0.000	0.000/	0.000	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%	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%	0.00%	0.00%	0.00%	12.76%	1.77%	0.87%	0.24%	0.20%	66.44%

																	1								
ag	ah	ai	aj	ak	al	am	an	ao	ap aq	ar	as a	t au av	aw	ax ay	az	ba	bb l	bc bd	be	bf	bg	bh	bi	bj	bk
											Disclosu	re reference date	T-1												
	Climate	Change Mitigatio	n (CCM)		CI	limate Change A	daptation (CCA	A)	Water and	marine reso	urces	Circular econ	my (CE)	P	Pollution (PF	PC)	Biod	diversity and Eco	systems		TOTAL (CCM	+ CCA + WTR + CE	+ PPC + BIO)		
Proportion of	otal covered asse	ts funding taxono	my relevant secto	ors (Taxonomy-	Proportion of to	otal covered asse	ts funding tax	onomy relevant	Proportion	of total cov	rered	Proportion of to	tal covered	Propor	tion of total	covered	Pro	portion of total	covered	Proportion of	total covered asse	ets funding taxono	my relevant sector	rs (Taxonomy-	
		eligible)				sectors (Taxon	omy-eligible)		assets fur	nding taxono	my	assets funding			s funding tax			sets funding tax				eligible)			
	Proportion of	total covered ass	ets funding taxon	omy relevant		Proportion of	total covered	assets funding		on of total c		Proportion of			ortion of to			roportion of tot			Proportion of to	tal covered assets	funding taxonomy	relevant sectors	Proportion of
	,	sectors (Taxor		,				xonomy-aligned)		funding taxo		assets fundir			ets funding 1			assets funding t			,		y-aligned)		total assets
					-		Of which		Of w	sectors (Tax		relevant sector			relevant se Of which		l l'	elevant sectors ( Of which							covered
				Of which			enecialised	Of which	Use	of Ot	which	Use of	Of which		Use of	Of which		Hen of	Of which				Of which	Of which	
		Proceeds	transitional	enabling			lending	enabling		ena ceeds	abling	Proceeds	enabling		Proceeds	enabling		Proceeds	enabling			Proceeds	transitional	enabling	
5.18%	1.98%	1.49%	0.05%	0.24%	0.56%	0.01%	0.00%	0.01%												18.84%	2.68%	2.06%	0.05%	0.25%	36.88%
8.75%	3.05%	2.77%	0.04%	0.07%	0.62%	0.009	0.00%	0.00%												33.69%	4.42%	3.90%	0.04%	0.09%	6 18.91
4.54%		0.55%	0.00%	0.00%		0.009	0.00%	0.00%												30.84%	2.23%		0.00%	0.00%	
0.00%	0.00%	0.00%	0.00%			0.00%	0.00%	0.00%						$\vdash$			$\perp$			0.00%	0.00%		0.00%	0.00%	
4.54%		0.55%		0.00%		0.009	0.00%	0.00%									$\vdash$			30.84%	2.23%	1.81%		0.00%	
0.82%	0.36%	24 600/	0.00%	0.01%		0.119	0.00%	0.02%									$\vdash$			13.87%	0.00%	24.60%	0.00%	0.02%	
14.40%	22.99%		0.40%	1,28%		0.009	0.00%	0.00%		_	-			$\overline{}$			$\vdash$			57.78% 20.48%	0.00%		0.40%	0.839	
0.00%	0.00%	0.00%	0.00%	0,00%		0.009	0.00%	0.00%			-		_	$\vdash$			+			0.00%	0.00%		0.00%	0.00%	
0.00%	0.00%	0.00%	0.00%	0.00%		0.009	0.00%	0.00%			_			$\vdash$			$\vdash$			0.00%	0.00%		0.00%	0.00%	
14.40%	4.33%	-	0.17%	1.28%	5,54%	0.389		0.05%									$\vdash$			20.48%	4.77%		0.21%	1.30%	
0.00%	-	0.00%				0.009	0.00%	0.00%									$\vdash$			0.00%		0.00%	0.00%	0.00%	
0.00%	0.00%		0.00%			0.009		0.00%			_			$\vdash$			$\vdash$			0.00%	0.00%		0.00%	0.00%	
0.00%	0.00%		0.00%		0.00%	0.00%		0.00%									$\vdash$			0.00%	0.00%		0.00%	0.00%	
0.00%	0.00%		0.00%	0.00%	0.00%	0.00%	3	0.00%												0.00%	0.00%		0.00%	0.00%	6 0.009
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.009	0.00%	0.00%												19.00%	0.00%		0.00%	0.00%	
0.00%	0.00%	0.00%	0.00%	0.00%		0.00%		0.00%						$\square$			$\perp$			0.00%	0.00%		0.00%	0.00%	
0.00%	0.00%	0.00%	0.00%	0.00%		0.009	0.00%	0.00%									$\vdash$			19.00%	0.00%		0.00%	0.00%	
0.00%	0.00%	4 220/	0.00%	0.00%		0.009	0.00%	0.00%									$\vdash$			0.00%	0.00%		0.00%	0.00%	
12.91%	7.69%		0.45%	3.80%		0.109	0.00%	0.10%	$\rightarrow$		-	+	+	++			$\vdash$	_		28.88%	7.69%		0.45%	3.83%	
13.00%	7.76%		0.00%			0.009		0.00%			-	++	+	+++			$\vdash$			29.12%	7.76%		0.00%	3.86%	
2.01%			0.00%	0.01%		0.009	0.00%	0.00%									$\vdash$			2.01%	0.01%		0.00%	0.01%	
0.00%			0.00%	0.00%		0.009	0.00%	0.00%												0.00%	0.00%		0.00%	0.00%	
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.009	0.00%	0.00%												0.00%	0.00%	0.00%	0.00%	0.00%	
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.009	0.00%	0.00%												0.00%			0.00%	0.00%	
																				0.00%	0.00%		0.00%	0.00%	
0.00%		0.00.0	010011	010011	0.00.0	0.000		0.00%	+		-	+	+	$\vdash$			$\vdash$			0.00%	0.007	0.00.0	0.00%	0.00%	
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.009	0.00%	0.00%	$\rightarrow$		_	++		$\vdash$			$\vdash$			0.00%	0.00%		0.00%	0.00%	
		-							+	_	-	+	+	$\vdash$			$\vdash$	_							
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.009	0.00%	0.00%												0.00%	0.00%		0.00%	0.00%	
2.84%	1.08%	0.81%	0.03%	0.13%	0.31%	0.00%	0.00%	0.00%												10.30%	1.47%	1.13%	0.03%	0.14%	67.42%

### CapEx-based KPI

		a	b	С	d	e	f	g	h	i	j	k	ı	m	n	0	р	q
																E	isclosure referer	ice date T
			Climate	Change Mitig	ration (CCM)		Clin	nate Change Ada	aptation (	CCA)	W	ater and marine	e resources (WT	R)		Circular ed	conomy (CE)	
		Proportion of	of total covere	d assets fund	ing taxonomy re	elevant sectors	Proportion of	total covered a	ssets fund	ling taxonomy	Proportion of t	total covered ass	ets funding tax	onomy relevant	Proportion of	total covered as	sets funding tax	onomy relevant
	% (compared to total covered assets in the denominator)		Proportio	n of total cov	ered assets fund	ling taxonomy	1	Proportion	of total co	vered assets	1	Proportion of	f total covered a	ssets funding	1	Proportion of	of total covered a	assets funding
				Of which	Of which	Of which	1		Of which	Of which	1		Of which Use	Of which	1		Of which Use	Of which
				Use of					Use of									
				Proceeds	transitional	enabling			Proceeds	enabling			of Proceeds	enabling			of Proceeds	enabling
	GAR - Covered assets in both numerator and denominator																	
1	Loans and advances, debt securities and equity instruments not HfT	22.95%	2.28%	0.99%	0.47%	0.71%	0.88%	0.38%	0.00%	0.00%	0.03%	0.00%	0.00%	0.00%	0.09%	0.00%	0.00%	0.00%
	eligible for GAR calculation	22.5570	2.2070	0.5570	0.4776	0.71%	0.0070	0.3670	0.0076	0.00%	0.0376	0.00%	0.00%	0.00%	0.05%	0.00%	0.00%	0.00%
2	Financial undertakings	35.20%	3.96%	1.92%	0.38%	0.73%	1.09%	0.75%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
3	Credit institutions	33.72%	3.84%	2.11%	0.09%	0.14%	1.18%	0.82%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
4	Loans and advances	26.90%	3.20%	0.93%	0.09%	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%
5	Debt securities, including UoP	36.88%	4.14%	2.65%	0.09%	0.13%	1.73%	1.19%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
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%
7	Other financial corporations	50.12%	5.09%	0.00%	3.35%	6.66%	0.25%	0.06%	0.00%	0.01%	0.07%	0.04%	0.00%	0.00%	0.04%	0.00%	0.00%	0.00%
8	of which investment firms	20.61%	4.55%	0.00%	18.89%	1.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.07%	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%
10	Debt securities, including UoP	20.61%	4.55%	0.00%	18.89%	1.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.07%	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%
12	of which management companies	36.46%	21.15%	0.00%	2.25%	10.55%	6.33%	1.51%	0.00%	0.01%	1.88%	1.14%	0.00%	0.00%	0.65%	0.03%	0.00%	0.02%
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%
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%
15	Equity instruments	36.46%	21.15%		2.25%	10.55%	6.33%	1.51%		0.01%	1.88%	1.14%		0.00%	0.65%	0.03%		0.02%
16	of which insurance undertakings	96.37%	96.37%	0.00%	4.02%	28.96%	0.51%	0.51%	0.00%	8.50%	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%
18	Debt securities, including UoP	96.37%	96.37%	0.00%	4.02%	28.96%	0.51%	0.51%	0.00%	8.50%	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%
20	Non-financial undertakings	29.29%	7.57%	0.00%	8.79%	10.70%	9.99%	0.00%	0.00%	0.00%	0.93%	0.00%	0.00%	0.00%	2.80%	0.05%	0.00%	0.04%
21	Loans and advances	28.00%	0.00%	0.00%	0.00%	0.00%	28.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
22	Debt securities, including UoP	29.35%	7.93%	0.00%	9.21%	11.21%	9.13%	0.00%	0.00%	0.00%	0.97%	0.00%	0.00%	0.00%	2.94%	0.05%	0.00%	0.05%
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%
24	Households	8.58%	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	of which loans collateralised by residential immovable property	70.26%	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	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%
27	of which motor vehicle loans	0.00%	0.00%	0.00%	0.00%	0.00%												
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%
29	Housing 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%
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%
31	Collateral obtained by taking possession: residential and	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	commercial immovable properties		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	12.15%	1.20%	0.52%	0.25%	0.38%	0.46%	0.20%	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	0.05%	0.00%	0.00%	0.00%

r	S	t	u	v	w	x	z	aa	ab	ac	ad	ae	af
				-			_						
	Pollutio	n (PPC)		В	iodiversity and	Ecosystems (BIG	0)		TOTAL (CCM +	CCA + WTR +	+ CE + PPC + BIO	)	
Proportion of to	otal covered ass	ets funding taxo	nomy relevant	Proportion of t	otal covered as	sets funding tax	onomy relevant	Proportion	of total covered	assets fundi	ing taxonomy re	levant sectors	Proportion
	Proportion of	of total covered	assets funding		Proportion o	f total covered a	ssets funding		Proportion		ered assets fund	ing taxonomy	of total
		Of which Use	Of which			Of which Use	Of which			Of which	Of which	Of which	assets
		of Proceeds	enabling			of Proceeds	enabling			Use of	transitional	enabling	covered
		orrroccous	eaaB			or r rocceas	endoning			Proceeds	cransitional	endoning	covered
0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	24.15%	2.80%	0.99%	0.37%	0.39%	35.17%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	37.55%	4.82%	1.92%	0.51%	0.44%	18.13%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	35.63%	4.79%	2.11%	0.09%	0.14%	16.49%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	26.90%	3.20%	0.93%	0.09%	0.18%	5.22%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	39.67%	5.52%	2.65%	0.09%	0.13%	11.27%
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%	0.00%	0.00%	0.00%	56.92%	5.11%	0.00%	4.70%	3.40%	1.64%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	20.67%	4.55%	0.00%	27.18%	1.02%	0.28%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	20.67%	4.55%	0.00%	27.18%	1.02%	0.28%
0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	0.00%	0.00%
0.17%	0.01%	0.00%	0.00%	0.03%	0.00%	0.00%	0.00%	40.46%	24.64%	0.00%	0.94%	11.06%	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%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
0.17%	0.01%		0.00%	0.03%	0.00%		0.00%	40.46%	24.64%		0.94%	11.06%	0.06%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	3.06%	3.06%	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%	0.00%	0.00%	0.00%	0.00%	0.00%	3.06%	3.06%	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%
0.58%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	31.29%	10.01%	0.00%	3.47%	5.13%	1.10%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	28.00%	0.00%	0.00%	0.00%	0.00%	0.05%
0.61%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	31.45%	10.49%	0.00%	3.64%	5.38%	1.05%
0.00%	0.00%		0.00%	0.00%	0.00%		0.00%	56.00%	0.00%		0.00%	0.00%	0.00%
								2.79%	0.00%	0.00%	0.00%	0.00%	15.94%
								142.37%	0.00%	0.00%	0.00%	0.00%	0.63%
								97.47%	0.00%	0.00%	0.00%	0.00%	0.92%
								0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%	0.00%	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%	0.00%	0.00%	0.00%	12.78%	1.48%	0.52%	0.20%	0.20%	66.44%

ag	ah	ai	aj	ak	al	am	an	ao	ap	aq ar	as		av rence date 1		ax ay	az	ba	bb b	ic bd	be	bf	bg	bh	bi	bj	bk
	Climat	Change Mitigation	on (CCNA)			Climate Change A	dentation ICI	^^\	18/-	ater and marine			lar econom			Pollution (PI	DC)	Died	liversity and Ec	onustama.		TOTAL (CCA	1 + CCA + WTR + C	E + DDC + DIO\		
Dranartian of		ets funding taxon		tors (Tayanamu		otal covered asse				oportion of tota			tion of total			rtion of tota			portion of tota		Dranartian of		sets funding taxon		ore /Tayonamu	
Proportion of		f total covered as			Proportion of t			d assets funding	1"				ortion of to			portion of to			roportion of to		Proportion of		otal covered assets			Proportion of
	Proportion			morny relevant	-	Proportion of	Of which	u assets fullding	1 1	Of which	otal covered		of which	lai covereu		Of which	tai covered		Of which			Proportion of to	covered assets	Turiding taxonon	Televant sectors	total assets
		Of which Use of	Of which	Of which			Use of	Of which		Use of	Of which		Jse of	Of which		Use of	Of which		Use of	Of which			Of which Use of	Of which	Of which	covered
		Proceeds	transitional	enabling			Proceeds	enabling		Proceeds	enabling		roceeds	enabling		Proceeds	enabling		Proceeds	enabling			Proceeds	transitional	enabling	Covered
							Floceeus			Froceeds		r	Toceeus			rioceeus			Froceeus							
2.26%	0.59%	0.00%	0.06%	0.25%	0.88%	0.02%	0.00%	0.01%													4.17%	0.60%	0.00%	0.06%	0.31%	36.88%
3.08%	0.61%	0.00%	0.03%	0.20%	1.05%	0.02%	0.00%	0.00%													5.95%	0.64%	0.00%	0.03%	0.31%	18.91%
1.96%	0.16%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%													4.98%	0.16%	0.00%	0.00%	0.00%	16.91%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%													0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
1.96%	0.16%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%													4.98%	0.16%	0.00%	0.00%	0.00%	16.91%
0.75%	0.52%		0.00%	0.00%	0.56%	0.38%		0.00%													1.12%	0.90%		0.00%	0.00%	0.00%
12.58%	4.41%	0.00%	0.26%	1.90%	9.94%	0.22%	0.00%	0.00%													14.16%	4.69%	0.00%	0.26%	2.92%	2.00%
16.42%	6.89%	0.00%	0.79%	2.07%	6.09%	0.65%	0.00%	0.10%													22.05%	7.61%	0.00%	1.07%	2.09%	0.00%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%													0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%													0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
16.42%	6.89%		0.79%	2.07%	6.09%	0.65%		0.10%													22.05%	7.61%		1.07%	2.09%	0.00%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%													0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%													0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	$\perp$												0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	$\perp$												0.00%	0.00%		0.00%	0.00%	0.00%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	$\sqcup$			$\perp$						$\perp$			5.33%	0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	$\perp$			$\rightarrow$			$\rightarrow$			$\perp$			0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	$\vdash$									$\vdash$			5.33%	0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%	$\vdash$									$\vdash$			0.00%	0.00%		0.00%	0.00%	0.00%
12.56%	5.05%	0.00%	0.83%	2.76%	6.24%	0.21%	0.00%	0.21%	$\vdash$			+			_			$\vdash$			20.65%	5.05%	0.00%	0.84%	2.79%	2.00%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	$\vdash$									$\vdash$			0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
12.46%	5.09%	0.00%	0.84%	2.79%	6.29%	0.21%	0.00%	0.21%	$\vdash$		_							$\vdash$			20.63%	5.09%	0.00%	0.85%	2.82%	1.98%
23.85%	0.01%		0.00%	0.01%	0.02%	0.00%		0.00%													22.87%	0.01%		0.00%	0.01%	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%	15.97%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%													0.00%	0.00%	0.00%	0.00%	0.00%	0.50%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	-												0.00%	0.00%	0.00%	0.00%	0.00%	0.88%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%													0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%													0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	+		+ +	+									0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	$\Box$	_		+							+		0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
									+		1	+			-			$\vdash$								
0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	Ш												0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
1.24%	0.32%	0.00%	0.03%	0.14%	0.48%	0.01%	0.00%	0.01%													2.28%	0.33%	0.00%	0.03%	0.17%	67.42%

### 4. GAR KPI flow

#### Turnover-based K

		a	b	С	d	e	f	8	h	i	j	k	1	m	n	0	р	q	r	s	t	u	v	w	×	z	aa	ab	ac	ad	ae	af
																Disclosure refe	erence date	т														
			Climate Char	nan Misiansia	(CCM)	_	Clima	to Change A	Adaptation (C	CAL	Water	nd marine r		(MATE)		ircular econo	(CE)			Pollution (	nnc\		Qia dissa	aite and Eas	osystems (B	10)	_	TOTAL ICCNA	+ CCA + WTR + C	CE + DDC + BK	0)	
																															-,	
		Proportion of to			taxonomy relevant				overed assets		Proportion					of total cove			Proportion of				Proportion of				Proportio		vered assets fund		ay relevant	1
			(Taxo	onomy-eligible	e)		taxonomy r	elevant secto	ors (Taxonom	y-eligible)	taxonomy rele	evant sector	rs (Taxonoi	my-eligible)	taxonomy rel	levant sectors	(Taxonomy	r-eligible)	taxonomy releva	ant sectors	(Taxonomy-	eligible)	taxonomy rele	vant sector	s (Taxonom	y-eligible)		sector	rs (Taxonomy-el	.ligible)		( )
	% (compared to flow of total eligible assets)						Γ					Proport	ion of tota	covered		Proportio	n of total o	overed	Г	Proportio	on of total co	vered		Proporti	ion of total	overed	Г					Proportion
	· · ·		Proportion of	f total covere	ed assets funding to	axonomy			of total cover			assets	funding ta:	xonomy		assets fo	unding taxo	nomy		assets f	unding taxon	omy		assets	funding taxo	nomy	- 1	Proportion of	of total covered a	assets funding	g taxonomy	of total
			relev	ant sectors (1	Taxonomy-aligned	1)			nomy relevan			relevant	sectors (Ta	axonomy-		relevant s	ectors (Taxe	onomy-		relevant s	ectors (Taxo	nomy-		relevant	sectors (Tax	onomy-	- 1	relev	vant sectors (Tax	xonomy-align	ned)	new assets
								(Taxo	onomy-aligne	a)			aligned)				aligned)				aligned)	.			aligned)	.	- 1	i .				covered
			1 1	Of which	Of which	Of which		C	Of which	Of which			Of which	Of which			Of which	Of which			Of which	which		1	Of which	Of which	- 1	i - F	Of which	05	04 111	i
				Use of		enabling		u		enabling			Use of	enabling				enabling				abling				enabling	- 1	( P		Of which transitional	Of which enabling	i
				Proceeds	transitional	enabling		P	Proceeds	enabling			Proceeds	enabling			Proceeds	enabling			Proceeds er	abling			Proceeds	enabling			Proceeds	ransitional	enabling	
	GAR - Covered assets in both numerator and denominator																															
	Loans and advances, debt securities and equity instruments not HfT																										$\overline{}$	$\overline{}$			$\overline{}$	
1	eligible for GAR calculation	21.94%	1.93%	0.66%	0.04%	0.06%	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%	21.36%	1.93%	0.66%	0.04%	0.06%	73.02%
2	Financial undertakings	28.25%	2.93%	1.01%	6 0.07%	0.09%	0.05%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	6 0.00%	0.00%	6 0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	27.36%	2.93%	1.01%	0.07%	% 0.09%	48.11%
3	Credit institutions	27.57%		1.01%	6 0.07%	0.09%	0.05%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	6 0.00%	0.00%	6 0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	27.62%	2.95%	1.01%	0.07%	% 0.09%	47.65%
4	Loans and advances	27.01%	2.96%	0.93%	6 0.08%	0.10%	0.06%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	6 0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	27.07%		0.93%	0.08%	% 0.10%	40.79%
5	Debt securities, including UoP	30.90%		1.52%	6 0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	6 0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	30.90%	2.92%	1.52%	0.00%	% 0.00%	6.86%
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%
7	Other financial corporations	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%	0.00%	0.00%		0.00%		0.00%		0.00%		
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%
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%		
10	Debt securities, including UoP	0.00%		0.00%	0.00.0	0.00%		0.00%	0.00%	0.00%	0.00%		0.00%		0.00%	0.0074	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	010010	0.00%	0.00%			0.00%	0.00%	0.007	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%		
12	of which management companies	31.31%				8.23%		1.26%	0.00%	1.26%	1.31%				2.92%		0.00%	0.06%	0.10%	0.06%		0.00%	0.00%	0.00%		0.00%				1.68%		
13 14	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%		
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%	1.68%		0.00%
15	Equity instruments	31.31%		0,00%	2.27% 6 0.00%	8.23% 0.00%		0.00%	0.00%	0.00%	1.31%		0.00%	0.13%	2.92%		0.00%	0.06%	0.10%	0.06%	0.00%	0.00%	0.00%		0,00%	0.00%	46.25%	29.75%	0,00%	0.00%		
17	of which insurance undertakings  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%		
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%
19	Equity instruments	0.00%		0.00%	0.00%	0.00%		0.00%	3.00%	0.00%	0.00%		0.00%	0.00%	0.00%		0.0076	0.00%	0.00%	0.00%	0.0070	0.00%	0.00%		0.00%	0.00%			0.00%	0.00%		0.00%
20	Non-financial undertakings	0.00%		0.00%		0.00%		0.00%	0.00%	0.00%	0.00%		0.00%		0.00%		0.00%	0.00%	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	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%		
22	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%
23	Equity instruments	0.00%		23070	0.00%	0.00%		0.00%		0.00%	0.00%			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	9.76%		0.00%		0.00%		0.00%	0.00%	0.00%					0.009		0.00%	0.00%									9.76%	0.00%	0.00%	0.00%		
25	of which loans collateralised by residential immovable property	86.69%		0.00%	6 0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					0.00%	6 0.00%	0.00%	0.00%									86.69%	0.00%	0.00%	0.00%	% 0.00%	0.68%
26	of which building renovation loans	100.00%	0.00%	0.00%	6 0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					0.00%	6 0.00%	0.00%	0.00%									100.00%	0.00%	0.00%	0.00%	% 0.00%	1.84%
27	of which motor vehicle loans	0.00%	0.00%	0.00%	6 0.00%	0.00%	0.00%	0.00%	0.00%	0.00%																	0.00%	0.00%	0.00%	0.00%	6 0.00%	0.00%
28	Local governments financing	0.00%	0.00%	0.00%	6 0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	6 0.00%	0.00%	0.00%	0.00%	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	Housing 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%		
30	Other local government financing	0.00%	0.00%	0.00%	6 0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	6 0.00%	0.00%	6 0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	6 0.00%	0.00%
31	Collateral obtained by taking possession: residential and	0.00%	0.00%	0.00%	6 0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	6 0.00%	0.00%	6 0.00%	0.00%	0.00%	0.00%	0.00%	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	commercial immovable properties  Total GAR assets	16.02%		0.48%	6 0.03%	0.04%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	6 0.00%	0.009	6 0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.0081	0.00%	0.00%	0.00%	0.0001	15.59%	1.41%		0.03%	% 0.04%	85.21%
32	Total GAK assets	16.02%	1.41%	0.48%	0.03%	0.04%	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%	15.59%	1.41%	0.48%	0.03%	8 0.04%	85.21%

### CapEx-based KPI

		a	ь	С	d	e	f	g	h	i	i	k	1	m	n	0	р	q	r	s	t u		v	w	x	z	aa	ab	ac	ad	ae a	af
															Dis	closure refer	rence date	T														
			Climate Chang	ge Mitigation	(CCM)		Climate	e Change Ad	laptation (CCA	l)	Water and	marine resou	urces (WTR	t)	Circ	ular econon	ny (CE)			Pollution (PF	·c)		Biodiversit	ty and Ecos	ystems (BI	0)	TO.	TAL (CCM + C	CA + WTR + CE	+ PPC + BIO)		
		Proportion of tol	tal covered asse	ets funding tax	conomy relevant	sectors	Proportion	of total covi	ered assets fun	nding P	roportion of t	total covered	d assets fund	ding	Proportion o	f total covere	ed assets fu	unding	Proportion of	total covere	d assets fundin	g Pro	oportion of	total covere	ed assets fu	unding	Proportion	of total covere	ed assets fundi	ling taxonomy r	elevant	
	% (compared to flow of total eligible assets)		Proportion of t	total covered	assets funding to	axonomy	Pi	roportion of	total covered	assets		Proportion o	of total cov	ered	[	Proportion	of total co	overed		Proportion	of total covere	nd	Г	Proportion	of total co	overed	Pi	roportion of to	otal covered as	ssets funding ta	axonomy	rtion
			O	of which				Of	which			Of v	which			0	f which _			O	which			0	f which			Of	which		of to	
			U	Jse of		Of which		Us		which		Use		which		U		of which		U:	e of Of wh			U:		Of which		Us			Of which new a	
			Pr	roceeds	ransitional	enabling		Pro	oceeds ena	abling		Proc	ceeds	abling		Pr	roceeds	nabling		Pr	oceeds	ng		Pr	oceeds	nabling		Pri	oceeds tra	ansitional e	enabling cove	red:
	GAR - Covered assets in both numerator and denominator																															
	Loans and advances, debt securities and equity instruments not HfT						0.04%		0.00%									0.00%		0.00%			0.00%									
1	eligible for GAR calculation	21.86%	2.20%	0.66%	0.06%	0.17%	0.04%	0.01%	0.00%	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%	21.49%	2.22%	0.66%	0.06%	0.17% 73	3.029
2	Financial undertakings	28.12%	3.34%	1.01%	0.10%	0.25%	0.06%	0.01%	0.00%	0.00%	0.02%	0.01%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00% 0.	00%	0.00%	0.00%	0.00%	0.00%	27.57%	3.38%	1.01%	0.09%	0.26% 48	8.119
3	Credit institutions	27.44%	3.17%	1.01%	0.08%	0.15%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00% 0.	00%	0.00%	0.00%	0.00%	0.00%	27.44%	3.17%	1.01%	0.08%	0.15% 47	7.659
4	Loans and advances	26.90%	3.20%	0.93%	0.09%	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%	26.90%	3.20%	0.93%	0.09%	0.18% 40	0.79%
5	Debt securities, including UoP	30.63%	2.99%	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%	30.63%	2.99%	1.52%	0.00%	0.00%	6.86%
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%	0.009
7	Other financial corporations	100.00%	21.62%	0.00%	2.30%	10.73%	6.44%	1.52%	0.00%	0.00%	1.95%	1.18%	0.00%	0.00%	0.63%	0.03%	0.00%	0.02%	0.16%	0.01%	0.00% 0.	00%	0.03%	0.00%	0.00%	0.00%	41.06%	25.18%	0.00%	0.94%	11.35%	0.459
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%	0.009
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%	0.009
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%	0.009
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%	0.009
12	of which management companies	37.12%	21.62%	0.00%	2.30%	10.73%	6.44%	1.52%	0.00%	0.00%	1.95%	1.18%	0.00%	0.00%	0.63%	0.03%	0.00%	0.02%	0.16%	0.01%	0.00% 0.	00%	0.03%	0.00%	0.00%	0.00%	41.06%	25.18%	0.00%	0.94%	11.35%	0.45%
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%
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%
15	Equity instruments	37.12%	21.62%		2.30%	10.73%	6.44%	1.52%		0.00%	1.95%	1.18%		0.00%	0.63%	0.03%		0.02%	0.16%	0.01%	0.	00%	0.03%	0.00%		0.00%	41.06%	25.18%		0.94%	11.35%	0.45%
16	of which insurance undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	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%
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%
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%	0.009
20	Non-financial undertakings	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00% 0.	00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.009
21	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%		0.009
22	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%
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%	0.009
24	Households	9.76%		0.00%	0.00%	0.00%	0.00%	0.00%		0.00%					0.00%	0.00%	0.00%	0.00%									9.76%	0.00%	0.00%	0.00%		4.92%
25	of which loans collateralised by residential immovable property	86.69%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%					0.00%	0.00%	0.00%	0.00%									86.69%	0.00%	0.00%	0.00%	0.00%	0.68%
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%									100.00%	0.00%	0.00%	0.00%		1.84%
27	of which motor vehicle 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%
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%
29	Housing 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%		00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%		0.009
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%
31	Collateral obtained by taking possession: residential and	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00% 0.	00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
	commercial immovable properties																															
32	Total GAR assets	15.96%	1.61%	0.48%	0.05%	0.12%	0.03%	0.01%	0.00%	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%	15.69%	1.62%	0.48%	0.04%	0.13% 85	5.21%

### 5. KPI off-balance sheet exposures Stock

Turnover-based BPI

												_							_				_							
	a	b	c	d	e	f	g	h	i	j	k		m	n	0	p	q	r	5	s t	U	v	w	X	Z	88	ab	ac	ad	ae
															Disclosure i	reference d	date T													
		Climate C	hange Mitig	ation (CCM)		Cli	mate Change	Adaptation (	CCA)	Wat	er and mari	ne resources	WTR)		Circular ec	onomy (CE	E)		F	Pollution (PPC)		Bi	odiversity and	d Ecosystems (	BIO)		TOTAL (CCM	1 + CCA + W	TR + CE + PPC + B	JO)
	Proportio	n of total cove	red assets f	inding taxonon	ny relevant	Propor	tion of total o	overed assets	s funding	Proportion o	f total cover	ed assets fund	ing taxonomy	Proportion o	f total covere	d assets fu	unding taxonomy	Proportion (	of total o	covered assets fun	ding taxonomy	Proportion	of total cover	ed assets fund	ing taxonomy	Proporti	ion of total co	overed asset	s funding taxono	omy relevant
% (compared to total eligible off-balance sheet assets)		sector	s (Taxonomy	-eligible)		taxonomy	relevant sec	ors (Taxonor	ny-eligible)	relev	ant sectors	(Taxonomy-el	gible)	rele	ant sectors (	Taxonomy-	/-eligible)	rele	vant se	ectors (Taxonomy-e	igible)	rele	evant sectors	(Taxonomy-eli	gible)		sect	tors (Taxono	my-eligible)	
76 (compared to total eligible off-balance sheet assets)		Proportion o	f total cover	ed assets fundi	ng taxonomy		Proportion	of total cover	red assets	]	Proporti	on of total co	ered assets		Proportio	n of total c	covered assets		Pro	oportion of total co	vered assets		Proporti	on of total cov	ered assets	] [	Proportion	of total cov	ered assets fundi	ing taxonomy
			Of which	Of which	Of which		0	which	fudial			Of which	Of which			Of which	Of which			Of which	Of which			Of which	Of which	1		Of which	Of which	Of which
			Use of	termeltianal	or willer		U	se of				Use of	or which			Use of	or which			Use of	or which			Use of	or which			Use of	teresities al	or which
			Proceeds	transitional	enabling		Pr	oceeds	nabiing			Proceeds	enabling			Proceeds	enabling			Proceeds	enabling			Proceeds	enabling			Proceeds	transitional	enabling
1 Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.009	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.009	6 0.009	0.00%	0.00%	0.00%	0.0	0.009	6 0.00%	6	0.00% 0.00	6 0.00%	0.009	% 0.009	% 0.00%	0.00%	0.00%	0.00%	0.00	6 0.00%	0.00
2 Assets under management (AuM KPI)	5.21%	1.92%	0.039	0.42%	1.679	0.27%	0.14%	0.00%	0.34%	0.06%	0.029	6 0.009	0.01%	0.95%	0.04%	0.0	00% 0.049	6 0.159	6	0.01% 0.00	6 0.07%	0.119	% 0.009	6 0.00%	0.00%	8.55%	2.48%	0.30	6 0.36%	1.609

### CapEx-based KPI

	a	b	c	d	e	f	g	h	i	j	k	1	m	n	0	р	q	r	s	t	u	v	w	×	Z	aa	ab	ac	ad	ae
															Disclosure r	eference dat	e T													
		Climate Cl	ange Mitigat	ion (CCM)		Clim	ate Change A	daptation (CC	CA)	Wate	r and marine	resources (V	VTR)		Circular eco	nomy (CE)			Pollut	ion (PPC)				Ecosystems (8			TOTAL (CCM +	CCA + WTF	+ CE + PPC + B	(0)
	Proportio	n of total cover	red assets fur	ding taxonomy	relevant	Proporti	on of total co	vered assets f	unding	Proportion of	total covered	d assets fundi	ng taxonomy	Proportion of	total covered	assets fund	ling taxonomy	Proportion o	f total cover	ed assets fund	ling taxonomy	Proportion of	f total covere	ed assets fundi	ng taxonomy	Proportio	on of total cov	ered assets	funding taxono	ny relevant
		sectors	(Taxonomy-e	ligible)		taxonomy	relevant secto	rs (Taxonomy	y-eligible)	releva	ant sectors (1	axonomy-elig	ible)	reley	ant sectors []	axonomy-el	gible)	rele	ant sectors	(Taxonomy-el	gible)	reley		(Taxonomy-elig		_	secto	rs (Taxonom	y-eligible)	
W. Common day and a little of the land of the land		Droportion of	total covere	d assets funding	tavanamu		Proportion o	f total covered	d assets		Proportion	n of total cove	red assets		Proportion	of total cov	ered assets		Proporti	on of total co	rered assets		Proportio	on of total cove	red assets		Droportion of	total course	ed assets fundir	a tavanamu
% (compared to total eligible off-balance sheet assets)				axonomy-aligne			funding taxor	omy relevant	t sectors		funding ta:	konomy releva	ant sectors		funding ta:	conomy rele	ant sectors		funding	axonomy rele	vant sectors		funding to	axonomy relev	ant sectors	- 1			Taxonomy-alig	
		releva	ant sectors (1	axonomy-aligne	ru)		(Taxo	nomy-aligned	)		(Ta	xonomy-align	ed)		(Ta	xonomy-alig	ned)		(	Taxonomy-alig	ned)		(1	axonomy-align	ed)		relev	ant sectors	Taxonomy-ang	.eu)
		1 7	Of which	Of which	of which		Of	which or	which			Of which	Of which			Of which	Of which	1		Of which	Of which			Of which	Of which		C	f which	Of which	Of which
		1 1	Jse of	of which	of which		Use		which			Use of	Of which			Use of	Of which			Use of	Of which			Use of	Of which		lu lu	lse of	Of which	of which
		1 /	Proceeds	ransitional	nabling		Pro	ceeds ena	ibling			Proceeds	enabling			Proceeds	enabling			Proceeds	enabling			Proceeds	enabling		P	roceeds	transitional	nabling
1 Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.009	0.00%	0.00%	0.00	6 0.009	6 0.00%	0.00%	0.009	6 0.00%	0.00%	4.48%	0.00%	0.00%	0.00%	0.009
2 Assets under management (AuM KPI)	7.25%	2.91%	0.03%	0.60%	3.35%	1.04%	0.15%	0.00%	0.29%	0.07%	0.01%	0.00%	0.00%	0.58%	0.01%	0.009	0.03%	0.18%	0.00	6 0.009	6 0.07%	0.00%	0.009	6 0.00%	0.00%	8.89%	3.14%	0.03%	0.39%	1.84%

### 5. KPI off-balance sheet exposures Flow

Turnover-based BPI

	a	b	С	d	e	f	g	h	i	j	k	1	m	n	0	р	q	r	S	t	u	V	W	X	Z	86	ab	ac	ad	ae
													Disclosure refe	erence date T																
		Climate (	Change Mitigat	ion (CCM)		Clir	nate Change A	daptation (C	CA)	Wat	ter and marin	e resources (	WTR)			nomy (CE)			Pollutio					Ecosystem:		TOTAL	(CCM + C	CA + WTR +	CE + PPC	+ BIO)
	Proportio	of total cov	ered assets fur	nding taxono	my relevant	Proport	ion of total co	vered assets	funding	Proport	tion of total c	overed asset	s funding			covered a				al covered				al covered		Propor	rtion of to	tal covered	assets fi	unding
	· · · · · · · · · · · · · · · · · · ·		s (Taxonomy-e		,		relevant secto				relevant sec					relevant se				relevant:				relevant :				sectors (T		
% (compared to flow of total eligible off-balance sheet assets)						,	Proportion						vered assets		Proport	eligible) on of total	covered	f	Proporti	v-eligible) on of total	covered	l f	Proportio	v-eligible) on of total	covered	1		tion of tota		
% (compared to flow of total eligible off-balance sheet assets)			tion of total c				funding tax						vant sectors			funding ta				unding tax				unding tax				taxonomy		
		taxonom	y relevant sect	ors (Taxonor	ny-aligned)			onomy-align				xonomy-alie				sectors (Ta				ectors (Ta				ectors (Ta						
			Of which	Of which	Of which			Of which	Of which			Of which	Of which	1			Of which				Of which				Of which			Taxonom Taxonom	Of which	06
			Use of	transitional				Use of	enabling			Use of	enabling				enabling			Use of Proceed								Use of	transitio	enabling
			Proceeds	transitional	enabling			Proceeds	enabling			Proceeds	enabling			Proceed	enauling			Proceed	enabling			Proceed	enauling			Proceed	nal	enauling
1 Financial guarantees (FinGuar KPI)	0.009	0.009	6 0.00%	0.009	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.009	6 0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
2 Assets under management (AuM KPI)	0.449	0.169	6 0.00%	0.049	0.20%	0.01%	0.01%	0.00%	0.05%	0.00%	0.00%	0.009	6 0.00%	0.06%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.01%	0.00%	0.00%	0.00%	0.84%	0.23%	0.02%	0.03%	0.17%

### CapEx-based KPI

	a	b	C	d	e	f	g	h	i	j.	k		m	n	0	p	q	r	5	t	u	V	W	X	Z	86	ab	ac	ad ae
													Disclosure refe	erence date T															
		Climate Cl	nange Mitigat	ion (CCM)		Clim	ate Change	Adaptation (	CCA)	Wat	er and marin	e resources (	WTR)	Cir	rcular eco	nomy (CE)			Pollution	(PPC)		<b>Biodiversi</b>	ty and Ec	osystems	(BIO)	TOTAL	(CCM + CC	A + WTR +	CE + PPC + BIO)
	Proportion	of total cover	ed assets fur	nding taxonor	ny relevant	Proporti	on of total co	overed assets	s funding	Proport	ion of total co	overed assets	funding	Proportio	on of tota	covered a	ssets	Proporti	on of total	covered as	sets	Proportion	of total	covered	assets	Propor	tion of tot	al covered	assets funding
(compared to flow of total eligible off-balance sheet assets)		Proporti	on of total co	overed assets	funding	Γ	Proportion	n of total cov	ered assets		Proportion	n of total cov	ered assets		Proport	on of total			roportion	of total co	vered	P	oportion	of total	covered				covered assets
			Of which	Of which	Of which			Of which	Of which			Of which	Of black			Of Which	Of which			wnich	which			which	Of which			OI WIIICII C	of which
			Use of					Use of				Use of	Of which															Use of t	ransitio
			Proceeds	transitional	enabling			Proceeds	enabling			Proceeds	enabling			Proceed	enabling		P	oceed en	abling		P	roceed	enabling			Proceed	enabli
1 Financial guarantees (FinGuar KPI)	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.009	6 0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00% 0.00
2 Assets under management (AuM KPI)	0.62%	0.26%	0.00%	0.05%	0.32%	0.09%	0.01%	0.009	6 0.06%	0.00%	0.00%	0.00%	0.00%	0.04%	0.00%	0.00%	0.00%	0.02%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.83%	0.29%	0.00%	0.04% 0.1

Age	The weighted average value of all the investments to the value of total assets covered by the KPI, with	that are directed at funding, h following weights for inves	, or are associated with taxonomy-aligned economic activities relative tments in undertakings per below:	The weighted average value of	of all the investments that are of	directed at funding, or are associated with taxonomy-aligned economic	c activities, with following weights for in	nvestments in undertakings per below:
## 1985   1985	Turnover-based: CapEx—based:							1,035,103,679.01 € 1,527,228,571.07 €
Property of the content in the content the con	The percentage of assets covered by the KPI relati	ive to total investments (total	al AuM). Excluding investments in sovereign entities,	The monetary value of assets	covered by the KPI. Excluding	g investments in sovereign entities.		
The control of the c	Coverage ratio: %		76.01%	Coverage:				34,651,408,292.29 €
Section   Sect	Additional, complementary disclosures: breakdown	n of denominator of the KPI						
Section   Sect	The percentage of derivatives relative to total asse	ts covered by the KPI.		The value in monetary amou	nts of derivatives:			
Section of the Continue of t		·	-0.08%					- 27,780,884.92 €
Process		on-financial undertakings n	ot subject to Articles 19a and 29a of Directive 2013/34/EU over total	Value of exposures to EU fina	ncial and non-financial underta	akings not subject to Articles 19a and 29a of Directive 2013/34/EU:		
Page					şs:			
## Company of the common plant of the common plant of the company of the common plant of the company of the co			7-1	For financial undertakings:				2,718,042,347.10 €
Profession of the profession	The proportion of exposures to financial and non-fi 2013/34/EU over total assets covered by the KPI:	inancial undertakings from n	on-EU countries not subject to Articles 19a and 29a of Directive	Value of exposures to financia	al and non-financial undertakin	gs from non-EU countries not subject to Articles 19a and 29a of Direct	tive 2013/34/EU:	
The product of squares to found and annihilation annihilation and annihilation annihilati	For non-financial undertakings:		36.80%	For non-financial undertaking	gs:			12,750,199,141.85 €
Series   10   10   10   10   10   10   10   1	For financial undertakings:			For financial undertakings:				1,663,817,950.33 €
Professional control of the control control of the control of th	The proportion of exposures to financial and non-	-financial undertakings subj	ect to Articles 19a and 29a of Directive 2013/34/EU over total assets	Value of exposures to financia	al and non-financial undertakin	igs subject to Articles 19a and 29a of Directive 2013/34/EU:		
Progress of the companies of the compa	·		27.10%	For non-financial undertakins	PS:			9,391,690,496.65 €
Page	For financial undertakings:			i e				
Contact of the international and international		or and accepts over total accept	·		ounterparties and asset-		1	5,-5777+n7
Transfer of this incontants that are inflating contained with the inflation of this incontants that are not too concept quilities   1	The proportion of exposures to other counterpartie	es and assets over total asset		v ande of exposures to other e	ounterparties and assets:			4 0=6 0=0
Process	The value of all the investments that are funding e	conomic activities that are n		arden of Bulker's comments in	hat and for the control of the	1 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2		1,956,008,402.31
Contact   Cont	KPI:				nat are runding economic activ	ities that are not taxonomy-engible:		
The value of the interfence from tensing interviene from the content of the interviene from the following interviene from the content of the interviene from the content of								
Part	The value of all the investments that are funding to	axonomy-eligible economic a	ctivities, but not taxonomy-aligned relative to the value of total assets		hat are funding Taxonomy- eli	gible economic activities, but not taxonomy- aligned:		
Capital capadinare Amonth			830%					2,905,745,927,46 €
지								
## Fire Fire Fire Fire Fire Fire Fire Fire	Additional, complementary disclosures: breakdown	n of numerator of the KPI						
Turnover-based   Capital expenditures-based	The proportion of Taxonomy-aligned exposures to over total assets covered by the KPI:	financial and non-financial u	undertakings subject to Articles 19a and 29a of Directive 2013/34/EU	Value of Taxonomy-aligned e	xposures to financial and non-	financial undertakings subject to Articles 19a and 29a of Directive 201	3/34/EU:	
Capital expenditure-based:	For non-financial undertakings:			For non-financial undertaking	gs:			
For functed undertakings:	Turnover-based:		2.79%	Turnover-based:				966,471,007.45 €
For functed undertakings:	Capital expenditures-based:		4.24%	Capital expenditures-based:				1,468,768,640.39 €
Capital expensitures-based:   Capi	For financial undertakings:			ł.				
The proportion of taxonomy-algored exposures to ether contemparties and assets over total assets over	Turnover-based:		0.20%	Turnover-based:				68,236,157.83 €
The proportion of taxonomy-algored exposures to ether contemparties and assets over total assets over	Capital expenditures-based:		0.17%	Canital expenditures-based:				58 069 898 27 €
Turnover-based:   0.007 Turnover-based:   39651373 C		ather counterposition and acc			alianad auraannaa ta athan aan	intermenting and assets over total assets assets due the VDI.		3-1
Capital expenditures-based:   South		otner counterparties and ass			angned exposures to other cou	interparties and assets over total assets covered by the KP1:		
Beakdown of the numerator of the KPI per environmental objective  Taxonomy-aligned activities -:  (1) Climate change mitigation (2) Climate change mitigation (2) Climate change adaptation (3) Water and marine resources (4) Circular economy (5) Pollution (5) Pollution (6) Bodiversity and Ecosystems (7) Turnover:  (8) Bodiversity and Ecosystems (7) Turnover:  (8) Bodiversity and Ecosystems (8) Bodiversity and Ecosystems (8) Turnover:  (8) Bodiversity and Ecosystems (8) Capital expenditures-based:  (9) Capital expenditures-based:  (1) Capital expenditures-based:  (1) Capital expenditures-based:  (1) Capital expenditures-based:	Turnover-based:		0.00%	Turnover-based:				396,513.73 €
Taxonomy-aligned activities -:  1) Climate change mitigation  280 Transitional activities: Turnover-based: 0.48 Capital expenditures-based: 0.79% Capital expenditures-based: 0.59% Capital expenditures-based: 0.	Capital expenditures-based:		0.00%	Capital expenditures-based:				390,032.41 €
$ \begin{array}{c ccccccccccccccccccccccccccccccccccc$		environmental objectiv	e	•				
(c) Climate change mitigation  Cap Ex:	Taxonomy-aligned activities -:			1				
CyPEx.*	(1) Climate change mitigation	Turnover:	2.80%	Transitional activities:	Turnover-based:	0.48%	Capital expenditures-based:	0.79%
CqDE:: O36% Eabling activities: Turnover-based: O.25% Capital expenditures-based: O.25% Capital expenditures	(1) Canada Change integation	CapEx:%	4.18%	Enabling activities:	Turnover-based:	2.20%	Capital expenditures-based:	4.32%
CqDE:: O36% Eabling activities: Turnover-based: O.25% Capital expenditures-based: O.25% Capital expenditures		Turnover:	0.13%					
Turnover: 0.02% Capta expenditures-based: 0.00% Capital expenditures-based	(2) Climate change adaptation			Enabling activities:	Turnover-based:	0.25%	Capital expenditures-based:	0.29%
CapEx: % O.00%   Eabling activities:   Turnover-based:   O.00%   Capital expenditures-based:   O.00%   Cap								
(4) Circular economy  Turnover:  Cap Ex:  O.05%  Cap Eabling activities:  Turnover-based:  Cap Ex:  Ca	(3) Water and marine resources			Enabling activities:	Turnover-based:	0.00%	Capital expenditures-based:	0.00%
(4) Circular economy  Cap E:  Cap E:  O.02%  Turnover:  O.05%  Capital expenditures-based:  O.04%  Cap E:  Cap E::  O.05%  Cap				1				
CapEx:	(4) Circular economy		0.05%	Enabling activities:	Turnover-based:	0.06%	Capital expenditures-based:	0.04%
(5) Pollution  CapEx:%  O.00%  Enabling activities:  Turnover-based:  O.12%  Capital expenditures-based:  O.12%  Capital expenditures-based:  O.2%  Capital expenditures-based:  O.00%  Enabling activities:  Turnover-based:  O.00%  Enabling activities:  Turnover-based:  O.00%  Capital expenditures-based:  O.00%  Capital expenditures-based:  O.00%  Oapital expenditures-based:  O.00%  Oapital expenditures-based:  O.00%		CapEx:	0.02%				* *	
CapEx:% 0.00%  Turnover: 0.00%  (6) Biodiversity and Ecosystems  Turnover-based: 0.00% Capital expenditures-based: 0.00%		Turnover:	0.00%					
Turnover: 0.00%    Display the control of the contr	(5) Pollution	CapEx:%	0.00%	Enabling activities:	Turnover-based:	0.12%	Capital expenditures-based:	0.12%
(6) Biodiversity and Ecosystems Enabling activities: Turnover-based: 0.00% Capital expenditures-based: 0.00%	-			<del> </del>				
	(6) Biodiversity and Ecosystems	Turnover:	0.00%	Enabling activities:	Turnover-based:	0.00%	Capital expenditures-based:	0.00%
		CapEx:	0.00%				* * * * * * * * * * * * * * * * * * * *	

nover-based KPIs																		
plate 1 - Nuclear and fossil gas related activities																		
pace 1 reduced and room quarentee accounts																		
~	GAR	Financial Guarantees	Credit Institution Activities - AuM	Asset Management Activities - AuM	ı													
Nuclear energy related activities																		
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 outle.	NO	NO	YES	NO														
The undertaking carries out, funds or has exposures to construction and safe speciation of new nuclea installations to produce electricity or process heat, 2 including for the purpose of details hearing or industrial processes such as hydrogen production, as well as their safety upgrades, using best available technologies.	YES	NO	YES	YES														
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 vell as their safety upgrades.	NO	NO	YES	NO														
Fossil gas related activities																		
The undertaking carries out, funds or has exposures to construction or 4 operation of electricity generation facilities that produce electricity using fossil passeous fuels.	YES	NO	YES	YES														
The undertaking carries out, funds or has exposures to construction, 5 refulbishment, and operation of combined heatfood and power generation facilities using fossil gazeous fuels.	YES	NO	YES	YES														
The understaking parties out, funds or has exposures to construction, 6 refulbishment and operation of heat generation facilities that produce heat/coolusing fossi gaseous fuels.	YES	NO	YES	YES														
plate 2 - Taxonomy-aligned economic activities (denominator)																		
piste 2 - Lationomy-aligned economic activities (denominator)	GAR - Amount a	and proportion (the	e information is to be pre	esented in moneta	ary amounts and as per	centages)	Credit Institution Activities - A	M-Amount and	proportion (the information	is to be presented i	in monetary amounts and a	s percentages)	Asset Management Activ	vities - AuM - Am	ount and proportion (the info		resented in monetary am	ounts and as
Economic activities	CCM+C		Climate change mi		Climate change ad		CCM+CCA		Climate change mitig	(CCM)	Climate change adapt	-ri (CCA)	CCM+CCA		percentages) Climate change mitiga		Climate change adap	
	Amount	LA 2	Amount	ngakon (CCH)	Amount	aptation (CCA)	Amount	· -/-	Amount	pation (CCM)	Amount	ation (CCA)	Amount		Amount	non (CCM)	Amount	pranon (CCA)
Amount and proportion of taxonomy- aligned economic activity referred to in 1 Section 4.25 of Annexes I and II to Delegated Regulation 2027/2139 in the denominator of the accolicable KPI	-	0.00%	-	0.00%	-	0.00%	0.00	0	-	0.000%	0.00	0.000%	-	0.00%	-	0.00%	-	0.0
Amount and proportion of tasonomy- aligned economic activity referred to in 2 Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the acclinable KPI	89.63	0.00%	89.63	0.00%	-	0.00%	8,379,822.52	0.10%	8,379,822.52	0.101%	0.00	0.000%	17,517,077.29	0.05%	17,517,077.29	0.05%	-	0.
Amount and proportion of tasonomy- aligned economic activity referred to in 3 Section 4.28 of Annexes I and II to Delegated Regulation 2027/2139 in the denominator of the accolicable KPI	1,268,920.00	0.02%	1,268,920.00	0.02%	-	0.00%	10838256.90	0.13%	10,838,256.90	0.131%	0.00	0.000%	32,352,870.07	0.09%	32,352,870.07	0.09%	-	0.
Amount and proportion of taxonomy- aligned economic activity referred to in 4 Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the	-	0.00%	-	0.00%	-	0.00%	0.00	0.00%	-	0.000%	0.00	0.000%	-	0.00%	-	0.00%	-	0.
denominator of the acclicable KPI Amount and proportion of taxonomy—aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2027/2139 in the	612,590.48	0.01%	612,590.48	0.01%	-	0.00%	4972882.77	0.06%	4,972,882.77	0.060%	0.00	0.000%	15,316,033.27	0.04%	15,316,033.27	0.04%	-	0
denominator of the applicable KPI  Amount and proportion of taxonomy- aligned economic activity referred to in	918,873,68	0.02%	918,873,68	0.02%	-	0.00%	6969991.80	0.08%	6,969,391.80	0.084%	0.00	0.000%	21,059,561.44	0.06%	21,059,561.44	0.06%	-	0
6 Section 4.31 of Annexes I and II to Belegated Regulation 2021/2139 in the																		1
	81,497,696,99				17,093,739,48	0.30%	139,415,020,941	1.68%	127.650.287.421	1541%	11.764.733.521	0.142%	327,176,471.64	2.68%	882,419,750,55	2.55%	44,756,721.09	

Temp	ate 3 - Taxonomy-aligned economic activities (numerator)													Asset Management Activ	rities - AuM - Am	ount and proportion (the info	rmation is to be	presented in monetary am	ounts and as
Done	Economic activities			e information is to be pre				Credit Institution Activities -	AuM - Amount an							percentages)			
KOW	ECONOMIC ACTIVICES	(CCM+CC		Climate change n		Climate change		(CCM+CCA)		Climate change m		Climate change as		(CCM+CCA		Climate change mit	D	Climate change ad	
1	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the apolicable KPI	Amount -	0.00%	Amount -	0.00%	Amount	0.00%	Amount 0.00	0.00%	Amount 0.00	0.00%	Amount 0.00	0.00%	Amount 0.00	0.00%	Amount -	0.00%	Amount -	0.00%
2	numerator of the applicable KPI  Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the apolicable KPI	89.63	0.00%	89.63	0.00%	-	0.00%	8379822.52	4.91%	8379822.52	4.91%	0.00	0.00%	17517077.29	1.73%	17,517,077.29	1.73%	-	0.00%
:	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the	1,268,920.00	1.51%	1,268,920.00	1.51%	-	0.00%	10838256.90	6.35%	10838256.90	6.35%	0.00	0.00%	32352870.07	3.19%	32,352,870.07	3.19%	-	0.00%
-	numerator of the applicable KPI Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	0.00	0.00%	-	0.00%	-	0.00%
	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the anolicable RPI	612,590.48	0.73%	612,590.48	0.73%	-	0.00%	4972882.77	2.92%	4972882.77	2.92%	0.00	0.00%	15316033.27	1.51%	15,316,033.27	1.51%	-	0.00%
	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	918,873.68	1.09%	918,873.68	1.09%	-	0.00%	6969991.80	4.09%	6969991.80	4.09%	0.00	0.00%	21059561.44	2.08%	21,059,561.44	2.08%	-	0.00%
	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	81,497,696.99	96.68%	64,403,957.51	76.40%	17,093,739.48	20.28%	139415020.94	81.73%	127650287.42	74.83%	11764733.52	6.90%	927176471.64	91.49%	882,419,750.55	87.07%	44,756,721.09	4.42%
8	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	84,298,170.78	100.00%	67,204,431.30	79.72%	17,093,739.48	20.28%	170,575,974.94€	100.00%	158,811,241.42 €	93.10%	11,764,733.52 €	6.90%	1013422013.71	100.00%	968,665,292.62	95.58%	44,756,721.09	4.42%
Temp	late 4 - Taxonomy-eligible but not taxonomy-aligned economic activities																		
Temp	and 4 - Fastoniny Cagain, but not taxonomy angled economic activities	GAR - Pro	portion (the infor	mation is to be presented	l in monetary am	ounts and as percentag	es)	Credit Institution Activ	ities - AuM - Prop	ortion (the information is to l	be presented in mo	metary amounts and as pe	rcentages)	Asset Management Activ	ities - AuM - Pro	portion (the information is to	be presented in	monetary amounts and as	percentages)
Row	Economic activities	(CCM+CC		Climate change n		Climate change		(CCM+CCA)		Climate change m		Climate change as		(CCM+CCA		Climate change mit		Climate change ad	
		Amount	%	Amount	%	Amount	- %	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%	Amount	%
	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.00%	-	0.00%	-	0.00%	-	0.00%	-	0.00%	0.00	0.00%	-	0.00%	-	0.00%	0.00	0.00%
_ :	Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI Amount and proportion of taxonomy- eligible but not taxonomy-aligned	13.91	0.00%	13.83	0.00%	-	0.00%	190,190.58	0.00%	183,769.63	0.00%	0.00	0.00%	1,902,997.70	0.01%	1,871,874.50	0.01%	0.00	0.00%
- 3	Regulation 2021/2139 in the denominator of the applicable KPI  Amount and proportion of taxonomy- eigèble but not taxonomy-aigned  Regulation 2021/2139 in the denominator of the applicable KPI  Amount and proportion of taxonomy- eligible but not taxonomy-aligned	24.14	0.00%	23.78	0.00%	-	0.00%	874,947-56	0.01%	847,123.46	0.01%	0.00	0.00%	9,139,942.38	0.03%	9,005,075.14	0.03%	0.00	0.00%
4	Regulation 2021/2139 in the denominator of the applicable KPI  Amount and proportion of taxonomy- eligible but not taxonomy-aligned  Amount and proportion of taxonomy- eligible but not taxonomy-aligned	502,136.73	0.01%	500,440.97	0.01%	-	0.00%	54,879,164.22	0.66%	54,748,415.97	0.66%	0.00	0.00%	122,351,837.72	0.35%	121,676,332.91	0.35%	0.00	0.00%
	economic activity referred to in Section 4,30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI Amount and proportion of taxonomy-elicible but not taxonomy-aliened	66,888.26	0.00%	66,888.26	0.00%	-	0.00%	15,080,079.58	0.18%	15,080,079.58	0.18%	0.00	0.00%	62,208,976.86	0.18%	62,208,976.86	0.18%	0.00	0.00%
	Regulation 2021/2139 in the denominator of the applicable KPI  Amount and proportion of other taxonomy-eligible but not	622,113.02	0.01%	622,112.94	0.01%	-	0.00%	5,178,510.92	0.06%	5,172,089.97	0.06%	0.00	0.00%	16,483,963.24	0.05%	16,452,840.03	0.05%	0.00	0.00%
_	taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI Total amount and proportion of taxonomy eligible but not	608,038,852.70	10.62%	602,284,744.91	10.52%	5,755,804.07	0.10%	207,020,646.28	2.50%	196,855,622.47	2.38%	10,336,438.05	0.12%	1,503,060,529.03	4-34%	1,399,777,876.65	4.04%	104,155,270.85	0.30%
	taxonomy- aligned economic activities in the denominator of the applicable KPI	609,230,028.77	10.64%	603,474,224.70	10.54%	5,755,804.07	0.10%	283,223,539.14	3.42%	272,887,101.09	3.29%	10,336,438.05	0.12%	1715148246.94	4-95%	1,610,992,976.09	4.65%	104,155,270.85	0.30%
Temp	ate 5 Taxonomy non-eligible economic activities																		
Row	Economic activities	Amount	G/	AR Percentai	No.	Amour		ution Activities - AuM Percentage		Amount	sset Management	Activities - AuM Percentag							
-	Amount and proportion of taxonomy-non-eligible economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	2 thousand	-	resenta	0.00%	71110/11	-	recentage	0.00%	THINAIL		recenting	0.00%						
-	denominator of the applicable NPI  Amount and proportion of taxonomy-non-eligible economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable NPI		-		0.00%		-		0.00%		-		0.00%						
:	Amount and proportion of taxonomy-non-eligible economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the anolicable		140,724.32		0.00%		399,466.77		0.00%		1,631,632.52		0.00%						
-	Amount and proportion of taxonomy-non-eligible economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI		-		0.00%		-		0.00%		-		0.00%						
	Amount and proportion of taxonomy-non-eligible economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI		-		0.00%		-		0.00%		-		0.00%						
	Amount and proportion of taxonomy-non-eligible economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI		-		0.00%		-		0.00%		-		0.00%						
_	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	-	124,748.23 €		0.00%		14,760,975.36 €		0.00%		129,877,351.15		0.00%						
8	Total amount and proportion of taxonomy-non-eligible economic activities in the numerator of the applicable KPI		15,976.09 €		0.00%	11	5,160,442.13 €		0.00%	13	1,508,983.67 €		0.00%						

CanFr	-based KPIs																		
Templat	te 1 - Nuclear and Fossil gas related activities																		
Row		GAR	Financial Guaranteco	Credit Institution Activities - AuM	Accet Monagement Activities - AsM														
	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 sector processor with minimal warts from the fuel cycle.	NO	NO	NO	NO														
2	The sudortoking carries out, fisads or has exposures to construction and safe operation of axe sudoic instabilities to produce districtly or process lead, insideling for the purposes of district havings or industrial processor such as hydrogen production, us well as their safety upgradus, using best available excludibilities.	YES	NO	YES	YES														
э	The undertaking curries out, funds or has exposures to sufe operation of existing nuclear installations that produce electricity or process host, including for the purposes of district beoling or industrial processes such as hydrogen production from nuclear energy, as well as their safety approduc.		NO	YES	YES														
$\Box$	Fossil gas related activities																		
	The undertaking carries out, funds or has exposures to construction or operation of dectricity generation fodilities that produce electricity using fossil gaseous fuels.	YES	NO	YES	YES														
	The undertaking carries out, funds or has exposures to construction, refurbishment, and operation of combined heat/cool and power generation facilities using fossil	YES	NO	YES	YES														
	The undertaking carries out, funds or has exposures to construction, refurbishment and operation of heat generation facilities that produce heat/cool using fossil		NO	YES	YES														
Templat	c 2 - Taxonomy-aligned economic activities (denominator)													Asset Management Activit	ies - AuM - A	unount and proportion (the in	formation is	to be precented in monetar	u amounto
.		GAR - Amoun	it and proportion (t	he information is to be p	recested is monets	ry amounts and as perce	nksgee)	Credit Institution Activities	- AuM - Amount s	d proportion (the informatio	n is to be presente	ed in monotary amounts and	lse percentagee)			and as percentages			
Row	Economic schnitica	CCM+C	CA	Climate change miti	gation (CCM)	Climate change ada	ptation (CCA)	CCM + CCA		Clinate change nitiga	tion (DCM)	Climate change adap	tation (CCA)	CCM+CCA		Climate change mitigation	(CCM)	Climate change adaptati	on (CCA)
	Amount and proportion of tazonomy- aligned economic activity referred to in Section 4.26 of Amexes I and II to Delegated Regulation 2021/2139 in the	Anout .	0.00%	Artestit .	0.00%	Anoust .	0.00%	Anous.	0.000%	Anoust	0.00%	Amount 0.00	0.00%	Amount .	0.00%	Anout .	0.00%	Amount .	0.00
	decominator of the applicable KPI Anount and proportion of taronomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2133 in the	182,158.23	0.00%	182,158.23	0.00%		0.00%	12,280,131.68	0.148%	12,280,131.68	0.15%	0.00	0.00%	26,163,013.66	0.08%	26,163,013.66	0.00%	-	0.00
	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Amount   and    to Delegated Regulation 2021/2139 in the demonstrator of the conditions (ES)	1,089,732.22	0.02%	1,089,732.22	0.02%		0.002	9,342,752.61	0.113%	9,342,752.61	0.11%	0.00	0.00%	33,220,031.98	0.10%	33,220,031.98	0.10%	-	0.00
	Amount and proportion of taxonomy: aligned economic activity referred to in Section 4.25 of Amexes I and II to Delegated Regulation 2021/2135 in the	79.64	0.00%	13.64	0.00%		0.00%	3,071,837.04	0.007%	3,071,937.04	0.04%	0.00	0.00%	11,828,297.61	0.034	11,828,297.61	0.00%		0.00
	denominator of the anniferable KBI.  Amount and proportion of taronomy-aligned economic activity referred to in Section 4.30 of America I and II to Delegated Regulation 2021/2139 in the	26,320.57	0.00%	26,320.57	0.00%		0.00%	1,202,765.88	0.015%	1,202,765.88	0.01%	0.00	0.00%	4,453,689.73	0.01%	4,453,889.73	0.01%		0.00
	denominator of the continuits KPI Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of America I and II to Delegated Regulation 2021/2139 in the	306,283.20	0.01%	306,283.20	0.010		0.00%	1,897,109.02	0.024%	1,997,109.02	0.02%	0.00	0.00%	5,743,528.17	0.02%	5,743,528.17	0.02%		0.00
	denominator of the applicable KPI 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	70,370,010.10	1.36%	67,310,065.50	1.10%	11,659,352.59	0.20%	225,450,286.74	2.722%	212,063,246.641	2.57%	12,581,052.101	0.15%	1,430,361,583.67	4.30%	1,366,126,305.37	3.34%	124,834,677.70	0.36
8	Of the applicable KPI Total applicable KPI	80.582.586.03	12	68.922.633.43	1,20%	11.659.952.59	0.203	253,345,054,981	3.062	240,764,002,881	2.912	12.581.052.10	0.152	1,572,370,344,84	4.542	1.447.535.667.14 [	4.182	124 834 677 70 1	0.362

_																			
Templa	te 3 - Taxonomy-aligned economic activities (numerator)																		
Row	Economic activities			e information is to be pre						ant and proportion (the info percentages)					vities - AuM	<ul> <li>Amount and proportion (the amounts and as percents)</li> </ul>	ges)		
ALOH	ANNUAL ULIVERS	(CCM+CC	CA) %	Climate change r	nitigation %	Climate change		(CCM+CCA) Amount		Climate change mi Amount	itigation %	Climate change ac		(CCM+CCA)	%	Climate change mitig		Climate change adap	
1	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	Amount - €	0.00%	Amount - €	0.00%	Amount - €	0.00%	Amount -	0.00%	Amount -	0.00%	Amount -	0.00%	Amount	0.00%	Amount -	0.00%	Amount -	0.00%
2	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	182,158.23 €	0.23%	182,158.23 €	0.23%	- €	0.00%	12,280,191.68	4.85%	12,280,191.68	4.85%	-	0.00%	26,163,013.68	1.66%	26,163,013.68	1.66%	-	0.00%
3	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	1,089,732.22 €	1.35%	1,089,732.22 €	1.35%	- €	0.00%	9,342,752.61	3.69%	9,342,752.61	3.69%	-	0.00%	33,220,031.98	2.11%	33,220,031.98	2.11%	-	0.00%
4	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	73.64€	0.00%	73.64 €	0.00%	- €	0.00%	3,071,937.04	1.21%	3,071,937.04	1.21%	-	0.00%	11,828,297.61	0.75%	11,828,297.61	0.75%	-	0.00%
5	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4,30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	26,320.57€	0.03%	26,320.57 €	0.03%	- ε	0.00%	1,202,765.88	0.47%	1,202,765.88	0.47%	-	0.00%	4,453,889.73	0.28%	4,453,889.73	0.28%	-	0.00%
6	Amount and proportion of taxonomy- aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	306,283.20 €	0.38%	306,283.20 €	0.38%	- €	0.00%	1,997,109.02	0.79%	1,997,109.02	0.79%	-	0.00%	5,743,528.17	0.37%	5,743,528.17	0.37%	-	0.00%
7	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	78,978,018.18 €	98.01%	67,318,065.58 €	83.54%	11,659,952.59 €	14.47%	225,450,298.74	88.99%	212,869,246.64	84.02%	12,581,052.10	4.97%	1,490,961,583.67	94.82%	1,366,126,905.97	86.88%	124,834,677.70	7.94%
8	Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI	80,582,586.03 €	100.00%	68,922,633.43 €	85.53%	11,659,952.59 €	14.47%	253,345,054.98	100.00%	240,764,002.88	95.03%	12,581,052.10	4.97%	1,572,370,344.84	100.00%	1,447,535,667.14	92.06%	124,834,677.70	7.94%
Templa	te 4 - Taxonomy-eligible but not taxonomy-aligned economic activities																		
		GAR - Pro	oportion (the infor	mation is to be presented	in monetary am	ounts and as percentag	es)	Credit Institution Activit	es - AuM - Propo	ortion (the information is to l	be presented in n	onetary amounts and as I	ercentages)	Asset Management Activi	ties - AuM -	Proportion (the information percentages)	is to be pres	ented in monetary amou	its and as
Row	Economic activities	(CCM+CC	CA)	Climate change r	nitigation	Climate change	adaptation	(CCM+CCA)		Climate change mi	itigation	Climate change ac	aptation	(CCM+CCA)		Climate change mitig	ation	Climate change adap	tation
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 Delegated	Amount	% 0.00%	Amount	% 0.00%	Amount	% 0.00%	Amount 0.00	%	Amount 0.00	0.00%	Amount 0.00	% 0.00%	Amount	%	Amount	% 0.00%	Amount	0.00%
2	Regulation 2021/2130 in the denominator of the amplicable KPI Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated	1.02	0.00%	1.02	0.00%	-	0.00%	36305.29	0.00%	36305.29	0.00%	0.00	0.00%	397,388.29	0.00%	397,388.29	0.00%	-	0.00%
3	Regulation 2021/2139 in the denominator of the applicable KPI Amount and proportion of taxonomy- eligible but not taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated	17.15	0.00%	17.15	0.00%	-	0.00%	242527.48	0.00%	242527.48	0.00%	0.00	0.00%	2,592,561.98	0.01%	2,592,561.98	0.01%	-	0.00%
4	Regulation 2021/2139 in the denominator of the applicable KPI  Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	357-591-55	0.01%	328,453.29	0.01%	-	0.00%	19863823.21	0.24%	18690316.92	0.23%	0.00	0.00%	47,592,530.00	0.14%	42,263,703.09	0.12%	-	0.00%
5	Regulation 2021/21/30 in the denominator of the applicable KPI Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	651,865.47	0.01%	651,865.47	0.01%	-	0.00%	29612057.69	0.36%	29612057.69	0.36%	0.00	0.00%	104,614,499.79	0.30%	104,614,499.79	0.30%	-	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 Delegated Regulation 2021/2130 in the denominator of the applicable KPI	13,367.32	0.00%	13,367.32	0.00%	-	0.00%	171579.63	0.00%	171579.63	0.00%	0.00	0.00%	764,631.46	0.00%	764,631.46	0.00%	-	0.00%
7	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	640,074,493.46	11.18%	625,217,698.36	10.92%	14,885,933.36	0.26%	309535147.37	3.74%	310708580.32	3-75%	73-34	0.89%	2,305,464,723.97	6.65%	1,959,044,511.40	5.65%	351,749,039.48	1.02%
8	Total amount and proportion of taxonomy eligible but not taxonomy- aligned economic activities in the denominator of the applicable KPI	641,097,335.96	11.20%	626,211,402.60	10.94%	14,885,933.36	0.26%	359,461,440.67	4-34%	359,461,367.34	4-34%	73-34	0.89%	2,461,426,335.48	7.10%	2,109,677,296.00	6.09%	351749039.48	1.02%
Templa	te 5 Taxonomy non-eligible economic activities																		
Row	Economic activities		GA					ion Activities - AuM			sset Management	Activities - AuM							
1	Amount and proportion of taxonomy-non-eligible economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the	Amoun		Percentag	o.oo%	Amour	nt -	Percentage	0.00%	Amount	0.00	Percentag	0.00%						
2	denominator of the applicable KPI Amount and proportion of taxonomy-non-eligible economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the		1,259,862.60		0.00%		-		0.00%		14607516.30		0.00%						
3	denominator of the applicable KPI  Amount and proportion of taxonomy-non-eligible economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable		-		0.00%		399,466.77		0.00%		0.00		0.00%						
4	denominator of the applicable Amount and proportion of taxonomy-non-eligible economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI		-		0.00%		-		0.00%		0.00		0.00%						
5	Amount and proportion of taxonomy-non-eligible economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI		-		0.00%		÷		0.00%		0.00		0.00%						
6	Amount and proportion of taxonomy-non-eligible economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI		-		0.00%		=		0.00%		0.00		0.00%						
7	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  Total amount and proportion of taxonomy-non-eligible economic	-	1,259,158.30		0.00%		14,551,102.36		0.00%		115722517.46		0.00%						
8	activities in the numerator of the applicable KPI		704.30		0.00%		14,950,569.13		0.00%	1	30,330,033.76		0.00%						

# • Appendix II: Tables

# List of Datapoints originating from other legislations – Appendix B ESRS2

Disclosure Requirement and related datapoint	SFDR (23) reference	Pillar 3 (24) reference	Benchmark Regulation (25) reference	Climate Law (26) reference
ESRS 2 GOV-1  Board's gender diversity paragraph 21 (d)	Indicator number 13 of Table #1 of Annex 1		Commission Delegated Regulation (EU) 2020/1816 (27), Annex II	
ESRS 2 GOV-1  Percentage of board members who are independent paragraph 21 (e)			Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 GOV-4 Statement on due diligence paragraph 30	Indicator number 10 Table #3 of Annex 1			
ESRS 2 SBM-1	Indicators number 4 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013;	Delegated Regulation (EU) 2020/1816, Annex II	

Involvement in activities related to fossil fuel activities paragraph 40 (d) i		Commission Implementing Regulation (EU) 2022/2453 (28)Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk		
ESRS 2 SBM-1				
Involvement in activities related to chemical production paragraph 40 (d) ii	Indicator number 9 Table #2 of Annex 1		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to controversial weapons paragraph 40 (d) iii	Indicator number 14 Table #1 of Annex 1		Delegated Regulation (EU) 2020/1818 (29), Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	
ESRS 2 SBM-1 Involvement in activities related to cultivation and production of tobacco paragraph 40 (d) iv			Delegated Regulation (EU) 2020/1818, Article 12(1) Delegated Regulation (EU) 2020/1816, Annex II	
ESRS E1-1  Transition plan to reach climate neutrality by 2050 paragraph 14				Regulation (EU) 2021/1119, Article 2(1)

ESRS E1-1		Article 449a		
Undertakings excluded from Paris-aligned Benchmarks paragraph 16 (g)		Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book-Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article12.1 (d) to (g), and Article 12.2	
ESRS E1-4		Article 449a		
GHG emission reduction targets paragraph 34	Indicator number 4 Table #2 of Annex 1	Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 6	
ESRS E1-5  Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) paragraph 38	Indicator number 5 Table #1 and Indicator n. 5 Table #2 of Annex 1			

ESRS E1-5 Energy consumption and mix paragraph 37	Indicator number 5 Table #1 of Annex 1			
ESRS E1-5 Energy intensity				
associated with activities in high climate impact sectors paragraphs 40 to 43	Indicator number 6 Table #1 of Annex 1			
ESRS E1-6  Gross Scope 1, 2, 3 and Total GHG emissions paragraph 44	Indicators number 1 and 2 Table #1 of Annex 1	Article 449a; Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 1: Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity	Delegated Regulation (EU) 2020/1818, Article 5(1), 6 and 8(1)	
ESRS E1-6  Gross GHG emissions intensity paragraphs 53 to 55	Indicators number 3 Table #1 of Annex 1	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 Template 3: Banking book – Climate change transition risk: alignment metrics	Delegated Regulation (EU) 2020/1818, Article 8(1)	
ESRS E1-7				

GHG removals and carbon credits paragraph 56			Regulation (EU) 2021/1119, Article 2(1)
ESRS E1-9  Exposure of the benchmark portfolio to climate-related physical risks paragraph 66		Delegated Regulation (EU) 2020/1818, Annex II Delegated Regulation (EU) 2020/1816, Annex II	
ESRS E1-9  Disaggregation of monetary amounts by acute and chronic physical risk paragraph 66 (a)  ESRS E1-9  Location of significant assets at material physical risk paragraph 66 (c).	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraphs 46 and 47; Template 5: Banking book - Climate change physical risk: Exposures subject to physical risk.		
ESRS E1-9 Breakdown of the carrying value of its real estate assets by energy-efficiency classes paragraph 67 (c).	Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453 paragraph 34;Template 2:Banking book -Climate change transition risk: Loans collateralised by immovable property -		

		Energy efficiency of the collateral		
ESRS E1-9  Degree of exposure of the portfolio to climaterelated opportunities paragraph 69			Delegated Regulation (EU) 2020/1818, Annex II	
ESRS E2-4  Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, paragraph 28	Indicator number 8 Table #1 of Annex 1 Indicator number 2 Table #2 of Annex 1 Indicator number 1 Table #2 of Annex 1 Indicator number 3 Table #2 of Annex 1			
ESRS E3-1 Water and marine resources paragraph 9	Indicator number 7 Table #2 of Annex 1			
ESRS E3-1				

Dedicated policy paragraph 13	Indicator number 8 Table 2 of Annex 1		
ESRS E3-1	Indicator number 12 Table		
Sustainable oceans and seas paragraph 14	#2 of Annex 1		
ESRS E3-4	Indicator number 6.2 Table		
Total water recycled and reused paragraph 28 (c)	#2 of Annex 1		
ESRS E3-4			
Total water consumption in m <sup>3</sup> per net revenue on own operations paragraph 29	Indicator number 6.1 Table #2 of Annex 1		
ESRS 2- IRO 1 - E4 paragraph 16 (a) i	Indicator number 7 Table #1 of Annex 1		
ESRS 2- IRO 1 - E4 paragraph 16 (b)	Indicator number 10 Table #2 of Annex 1		
ESRS 2- IRO 1 - E4 paragraph 16 (c)	Indicator number 14 Table #2 of Annex 1		
ESRS E4-2			
Sustainable land / agriculture practices or policies paragraph 24 (b)	Indicator number 11 Table #2 of Annex 1		
ESRS E4-2			

Sustainable oceans / seas practices or policies paragraph 24 (c)	Indicator number 12 Table #2 of Annex 1		
Policies to address deforestation paragraph 24 (d)	Indicator number 15 Table #2 of Annex 1		
Non-recycled waste paragraph 37 (d)	Indicator number 13 Table #2 of Annex 1		
ESRS E5-5  Hazardous waste and radioactive waste paragraph 39	Indicator number 9 Table #1 of Annex 1		
ESRS 2- SBM3 - S1 Risk of incidents of forced labour paragraph 14 (f)	Indicator number 13 Table #3 of Annex I		
ESRS 2- SBM3 - S1 Risk of incidents of child labour paragraph 14 (g)	Indicator number 12 Table #3 of Annex I		
ESRS S1-1 Human rights policy commitments paragraph 20	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex I		

ESRS S1-1  Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 21		Delegated Regulation (EU) 2020/1816, Annex II	
processes and measures for preventing trafficking in human beings paragraph 22	Indicator number 11 Table #3 of Annex I		
ESRS S1-1 workplace accident prevention policy or management system paragraph 23	Indicator number 1 Table #3 of Annex I		
ESRS S1-3 grievance/complaints handling mechanisms paragraph 32 (c)	Indicator number 5 Table #3 of Annex I		
ESRS S1-14  Number of fatalities and number and rate of work-	Indicator number 2 Table #3 of Annex I	Delegated Regulation (EU) 2020/1816, Annex II	

related accidents paragraph 88 (b) and (c)			
ESRS S1-14  Number of days lost to injuries, accidents, fatalities or illness paragraph 88 (e)	Indicator number 3 Table #3 of Annex I		
ESRS S1-16 Unadjusted gender pay gap paragraph 97 (a)	Indicator number 12 Table #1 of Annex I	Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S1-16 Excessive CEO pay ratio paragraph 97 (b)	Indicator number 8 Table #3 of Annex I		
ESRS S1-17 Incidents of discrimination paragraph 103 (a)	Indicator number 7 Table #3 of Annex I		
ESRS S1-17 Non-respect of UNGPs on Business and Human Rights and OECD paragraph 104 (a)	Indicator number 10 Table #1 and Indicator n. 14 Table #3 of Annex I	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818 Art 12 (1)	
ESRS 2- SBM3 - S2 Significant risk of child labour or forced labour in	Indicators number 12 and n. 13 Table #3 of Annex I		

the value chain paragraph 11 (b)			
ESRS S2-1 Human rights policy commitments paragraph 17	Indicator number 9 Table #3 and Indicator n. 11 Table #1 of Annex 1		
ESRS S2-1 Policies related to value chain workers paragraph 18	Indicator number 11 and n. 4 Table #3 of Annex 1		
ESRS S2-1Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines paragraph 19	Indicator number 10 Table #1 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)	
ESRS S2-1  Due diligence policies on issues addressed by the fundamental International Labor Organisation Conventions 1 to 8, paragraph 19		Delegated Regulation (EU) 2020/1816, Annex II	
ESRS S2-4  Human rights issues and incidents connected to its upstream and	Indicator number 14 Table #3 of Annex 1		

downstream value chain paragraph 36			
ESRS S3-1 Human rights policy commitments paragraph 16	Indicator number 9 Table #3 of Annex 1 and Indicator number 11 Table #1 of Annex 1		
esrs s3-1 non-respect of UNGPs on Business and Human Rights, ILO principles or and OECD guidelines paragraph 17	Indicator number 10 Table #1 Annex 1	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)	
ESRS S3-4 Human rights issues and incidents paragraph 36	Indicator number 14 Table #3 of Annex 1		
ESRS S4-1 Policies related to consumers and end- users paragraph 16	Indicator number 9 Table #3 and Indicator number 11 Table #1 of Annex 1		
ESRS S4-1  Non-respect of UNGPs on Business and Human Rights and OECD guidelines paragraph 17	Indicator number 10 Table #1 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II Delegated Regulation (EU) 2020/1818, Art 12 (1)	
ESRS S4-4			

Human rights issues and incidents paragraph 35	Indicator number 14 Table #3 of Annex 1		
ESRS G1-1 United Nations Convention against Corruption	Indicator number 15 Table #3 of Annex 1		
paragraph 10 (b)  ESRS G1-1  Protection of whistle-blowers paragraph 10 (d)	Indicator number 6 Table #3 of Annex 1		
ESRS G1-4 Fines for violation of anti- corruption and anti-bribery laws paragraph 24 (a)	Indicator number 17 Table #3 of Annex 1	Delegated Regulation (EU) 2020/1816, Annex II)	
ESRS G1-4 Standards of anti- corruption and anti- bribery paragraph 24 (b)	Indicator number 16 Table #3 of Annex 1		

Datapoint colored in grey are deemed not material for Degroof Petercam

# o List of Disclosure requirements met in sustainability statements

Disclosure Requirements	Reference
ESRS 2 BP-1	[BP-1] General basis for preparation of sustainability statements
ESRS 2 BP-2	[BP-2] Disclosures in relation to specific circumstances
ESRS 2 GOV-1	[GOV-1] Role of the administrative, management and supervisory bodies
ESRS 2 GOV-2	[GOV-2] Information provided to and sustainability matters addressed by administrative, management and supervisory bodies
ESRS 2 GOV-3	[GOV-3] Integration of sustainability-related performance in incentive schemes
ESRS 2 GOV-4	[GOV-4] Statement on due diligence
ESRS 2 GOV-5	[GOV-5] Risk management and internal controls over sustainability reporting
ESRS 2 SBM-1	[SBM-1] Strategy, business model and value chain
ESRS 2 SBM-2	[SBM-2] Interests and views of stakeholders - general
ESRS 2 SBM-3	[SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model
ESRS 2 IRO-1	[IRO-1] Description of process to identify and assess material impacts, risks and opportunities

ESRS 2 IRO-2	[IRO-2] Disclosure Requirements in ESRS covered by sustainability statements
E1 - ESRS2 - GOV-3	DR related to ESRS2 [GOV-3] Integration of sustainability-related performance in incentive schemes
E1 - ESRS2 - SBM-3	DR related to ESRS2 [SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model & DR related to ESRS2 [IRO-1] Description of processes to identify and assess material climate-related impacts, risks and opportunities
E1-1	[E1-1] Transition plan for climate change mitigation
E1-2	[E1-2] Policies related to climate change mitigation and adaptation
E1-3	[E1-3] Actions and resources in relation to climate change policies
E1-4	[E1-4] Targets related to climate change mitigation and adaptation
E1-5	[E1-5] Energy consumption and mix
E1-6	[E1-6] Gross Scopes 1, 2, 3 and Total GHG emissions
E1-7	[E1-7] GHG removals and GHG mitigation projects financed through carbon credits
E1-8	[E1-8] Internal carbon pricing
E1-9	[E1-9] Anticipated financial effects from material physical and transition risks and potential climate- related opportunities
S1 - ESRS2 - SBM-2	DR related to ESRS2 [SBM-2] Interests and views of stakeholders
S1 - ESRS2 - SBM-3	DR related to ESRS2 [SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model

S1-1	[S1-1] Policies related to own workforce
S1-2	[S1-2] Processes for engaging with own workers and workers' representatives about impacts
S1-3	[S1-3] Processes to remediate negative impacts and channels for own workforce to raise concerns
S1-4	[S1-4] Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions
S1-5	[S1-5] Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities
S1-6	[S1-6] Characteristics of undertaking's employees
S1-7	[S1-7] Characteristics of non-employees in undertaking's own workforce
S1-8	[S1-8] Collective bargaining coverage and social dialogue
S1-9	[S1-9] Diversity metrics
S1-10	[S1-10] Adequate Wages
S1-11	[S1-11] Social protection
S1-12	[S1-12] Persons with disabilities
S1-13	[S1-13] Training and skills development metrics
S1-14	[S1-14] Health and safety metrics
S1-15	[S1-15] Work-life balance metrics

S1-16	[S1-16] Remuneration metrics (pay gap and total remuneration) - general
S1-17	[S1-17] Incidents, complaints and severe human rights impacts -general
S3 - ESRS2 - SBM-2	DR related to ESRS2 [SBM-2] Interests and views of stakeholders
S3 - ESRS2 - SBM-3	DR related to ESRS2 [SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model
S3-1	[S3-1] Policies related to affected communities
S3-2	[S3-2] Processes for engaging with affected communities about impacts
S3-3	[S3-3] Processes to remediate negative impacts and channels for affected communities to raise concerns
S3-4	[S3-4] Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions
S3-5	[S3-5] Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities
S4 - ESRS2 - SBM-2	DR related to ESRS2 [SBM-2] Interests and views of stakeholders
S4 - ESRS2 - SBM-3	DR related to ESRS2 [SBM-3] Material impacts, risks and opportunities and their interaction with strategy and business model
S4-1	[S4-1] Policies related to consumers and end-users
S4-2	[S4-2] Processes for engaging with consumers and end-users about impacts

S4-3	[S4-3] Processes to remediate negative impacts and channels for consumers and end-users to raise concerns
S4-4	[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
S4-5	[S4-5] Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities (consumers and end-users)
G1 - ESRS2 - GOV-1	DR related to ESRS2 [GOV-1] Role of administrative, supervisory and management bodies
G1 - ESRS2 - IRO-1	DR related to ESRS2 [IRO-1] Description of processes to identify and assess material impacts, risks and opportunities
G1-1	[G1-1] Business conduct policies and corporate culture
G1-2	[G1-2] Management of relationships with suppliers
G1-3	[G1-3] Prevention and detection of corruption or bribery
G1-4	[G1-4] Incidents of corruption or bribery
G1-5	[G1-5] Political influence and lobbying activities
G1-6	[G1-6] Payment practices
RI-INTRO1	INTRO1 – Introductory disclosure on Responsible Investments
RI-INTRO2	INTRO2 – index table to Explain to the reader what he/she will find in this topic

RI-GOV-1	GOV-1 The role of the administrative, management and supervisory bodies
RI-GOV-2	GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies
RI-GOV-3	GOV-3 Integration of sustainability-related performance in incentive schemes
RI-SBM-1	SBM-1 Strategy, business model and value chain
RI-SBM-2	SBM-2 Interests and views of stakeholders
RI-SBM-3	SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model
RI-IRO-1	IRO-1 Description of the process to identify and assess material impacts, risks and opportunities
RI-IRO-2	IRO-2 Disclosure Requirements in ESRS covered by the undertaking's sustainability statement
RI-MDR-P	MDR-P Policies adopted to manage material sustainability matters
RI-MDR-A	MDR-A Actions and resources in relation to material sustainability matters
RI-MDR-T	MDR-T Tracking effectiveness of policies and actions through targets
RI-MDR-M	MDR-M Metrics in relation to material sustainability matters
RI-E1-1	E1-1 - Transition plan for climate change mitigation
RI-E1-2	E1-2 - Policies related to climate change mitigation and adaptation
RI-E1-3	E1-3 – Actions and resources in relation to climate change policies

RI-E1-4	E1-4 - Targets related to climate change mitigation and adaptation
RI-E1-6	E1-6 - Gross Scopes 1, 2, 3 and Total GHG emissions
RI-PAI-B	PAI-BP - Basis for preparation
RI-PAI-M	PAI-M - Table with the consolidated reported PAI indicators
RI-PAI-A	PAI-A – Actions taken to directly or indirectly manage our negative impact on PAI
RI-PAI-T	PAI-T - PAI targets set on our negative impacts
RI-SBTI-BP	SBTI-BP - Basis for preparation of the SBTi report (explain scope, proxies, methodology,)
RI-SBTi-M	SBTi-M - SBTi metrics
RI-SBTi-A	SBTi-A – Actions taken related to our SBTi commitment
RI-SBTi-T	SBTi-T - SBTi targets
RI-CONCL-1	CONCL-1 - Conclusion
DIG-GOV-1	GOV-1 The role of the administrative, management and supervisory bodies
DIG-GOV-2	GOV-2 Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies
DIG-GOV-3	GOV-3 Integration of sustainability-related performance in incentive schemes
DIG-SBM-1	SBM-1 Strategy, business model and value chain

DIG-SBM-2	SBM-2 Interests and views of stakeholders
DIG-SBM-3	SBM-3 Material impacts, risks and opportunities and their interaction with strategy and business model
DIG-IRO-1	IRO-1 Description of the process to identify and assess material impacts, risks and opportunities
DIG-MDR-P	MDR-P Policies adopted to manage material sustainability matters
DIG-MDR-A	MDR-A Actions and resources in relation to material sustainability matters
DIG-MDR-M	MDR-M Metrics in relation to material sustainability matters
DIG-MDR-T	MDR-T Tracking effectiveness of policies and actions through targets



# RAPPORT D''ASSURANCE LIMITÉE DU COMMISSAIRE A L'ASSEMBLEE GENERALE DES ACTIONNAIRES SUR L'INFORMATION CONSOLIDÉE EN MATIÈRE DE DURABILITÉ DE BANQUE DEGROOF PETERCAM SA POUR L'EXERCICE CLOS AU 31 DECEMBRE 2024

Nous vous présentons notre rapport du commissaire dans le cadre de notre mission légale d'assurance limitée sur l'information consolidée en matière durabilité de Banque Degroof Petercam SA (la « Société ») et de ses filiales (ensemble le « Groupe »). La déclaration de durabilité consolidée du Groupe est incluse dans la section "VII.b CSRD Report" du Rapport annuel 2024 au 31 décembre 2024 et pour l'année clôturée à cette date (ci-après l' "information consolidée en matière de durabilité").

Conformément à la proposition du conseil d'administration et sur la recommandation du comité d'audit de Banque Degroof Petercam SA, nous avons été nommé par le conseil d'administration en vertu de la lettre de mission datée du 10 février 2025 pour réaliser une mission d'assurance limitée sur la déclaration de durabilité consolidée du Groupe.

Notre mandat vient à échéance à la date de l'assemblée générale délibérant sur les comptes annuels clôturés au 31 décembre 2024. Ceci est notre première année en tant que commissaire chargé du contrôle légal sur l'information consolidée en matière de durabilité.

### Conclusion d'assurance limitée

Nous avons réalisé une mission d'assurance limitée de l'information consolidée en matière de durabilité du Groupe.

Sur la base des procédures que nous avons mises en œuvre et des éléments probants que nous avons obtenus, nous n'avons rien relevé qui nous porte à croire que l'information consolidée en matière de durabilité du Groupe, dans tous ses aspects significatifs:

- n'a pas été établie conformément aux exigences visées à l'article 3:32/2 du Code des sociétés et des associations, y compris la conformité avec les normes européennes applicables pour l'information consolidée en matière de durabilité (*European Sustainability Reporting Standards* (ESRS));
- n'est pas conforme avec le processus mis en œuvre par le Groupe (« le Processus »), comme décrite dans la note "[IRO-1] Description des procédures d'identification et d'évaluation des
- impacts, risques et opportunités matériels" pour déterminer l'information en matière de durabilité consolidée publiée conformément aux normes européennes; et
- ne respecte pas les obligations de l'article 8 du règlement (UE) 2020/852 (le « Règlement taxonomie »), relatives à la publication des informations reprises dans la note "IR Investissements responsables, E1-3 Actions et moyens en lien avec les politiques de lutte contre le changement climatique".



### Fondement de la conclusion

Nous avons réalisé notre mission d'assurance limitée conformément à la norme ISAE 3000 (Révisée), Missions d'assurance autres que les audits et examens limités de l'information financière historique (« ISAE 3000 (Révisée) »), telle qu'applicable en Belgique.

Les responsabilités qui nous incombent en vertu de cette norme sont décrites plus en détail dans la section de notre rapport « Responsabilités du commissaire relatives à la mission d'assurance limitée de l'information consolidée en matière de durabilité ».

Nous nous sommes conformés à toutes les exigences déontologiques qui s'appliquent aux missions d'assurance de l'information en matière de durabilité en Belgique, en ce compris celles concernant l'indépendance.

Nous appliquons la norme internationale de gestion de la qualité 1 (ISQM 1), qui exige que le cabinet conçoive, mette en œuvre et assure le fonctionnement d'un système de gestion de la qualité comprenant des politiques ou des procédures relatives au respect des exigences éthiques, des normes professionnelles et des exigences légales et réglementaires applicables.

Nous avons obtenu du conseil d'administration et des préposés de la Société, les explications et informations requises pour notre mission d'assurance limitée.

Nous estimons que les éléments probants que nous avons recueillis sont suffisants et appropriés pour fonder notre conclusion.

### **Autre point**

L'étendue de nos travaux se limite à notre mission d'assurance limitée de l'information de durabilité du Groupe. Notre mission d'assurance limitée ne s'étend pas aux informations relatives aux chiffres comparatifs.

# Responsabilités du conseil d'administration relatives à l'établissement de l'information consolilidée en matière de durabilité

Le conseil d'administration est responsable de l'élaboration et de la mise en œuvre d'un Processus et de la publication de ce Processus dans la note "[IRO-1] Description des procédures d'identification et d'évaluation des impacts, risques et opportunités matériels" de l'information consolidée en matière de durabilité. Cette responsabilité inclut:

- la compréhension du contexte dans lequel s'inscrivent les activités et les relations d'affaires du Groupe et le développement d'une compréhension des parties prenantes concernées;
- l'identification des impacts réels et potentiels (négatifs et positifs) liés aux questions de durabilité, ainsi que des risques et des opportunités qui affectent, ou dont on peut raisonnablement penser qu'ils affecteront, la situation financière du Groupe, ses performances financières, ses flux de trésorerie, son accès au financement ou le coût de son capital à court, moyen ou long terme;
- l'évaluation du caractère significatif des impacts, des risques et des opportunités identifiés en matière de durabilité, en sélectionnant et en appliquant des seuils appropriés; et
- la formulation d'hypothèses et des estimations raisonnables au vu des circonstances.



Le conseil d'administration est également responsable de l'établissement de l'information consolidée en matière de durabilité, qui comprend l'information identifiée par le Processus:

- conformément aux exigences visées à l'article 3:32/2 du Code des sociétés et des associations, y compris aux normes européennes applicables pour l'information consolidée en matière de durabilité (European Sustainability Reporting Standards (ESRS)); et
- en respectant les obligations de l'article 8 du règlement (UE) 2020/852 (le « Règlement taxonomie ») relatives à la publication des informations reprises dans la note "IR Investissements responsables, E1-3 Actions et moyens en lien avec les politiques de lutte contre le changement climatique".

## Cette responsabilité comprend:

- la conception, la mise en œuvre et le maintien des contrôles internes que le conseil d'administration juge nécessaires pour permettre l'établissement de l'information consolidée en matière de durabilité exempte d'anomalies significatives, qu'elles soient dues à une fraude ou à une erreur; et
- la sélection et l'application de méthodes appropriées de publication de l'information consolidée en matière de durabilité et la formulation d'hypothèses et d'estimations raisonnables au vu des circonstances.

Les personnes constituant le gouvernement d'entreprise sont responsables de la supervision du processus de publication de l'information consolidée en matière de durabilité du Groupe.

### Limites inhérentes à l'établissement de l'information consolidée en matière de durabilité

En publiant des informations prospectives conformément aux ESRS, le conseil d'administration est tenu de préparer les informations prospectives sur la base d'hypothèses divulguées concernant des événements susceptibles de se produire à l'avenir et des actions futures possibles de la part du Groupe. Le résultat réel est susceptible d'être différent car les événements anticipés ne se produisent souvent pas comme prévus, et ces écarts pourraient être significatifs.

# Responsabilités du commissaire relatives à la mission d'assurance limitée de l'information consolidée en matière de durabilité

Notre responsabilité est de planifier et de réaliser la mission d'assurance afin d'obtenir une assurance limitée que l'information consolidée en matière de durabilité ne comporte pas d'anomalies significatives, que celles-ci résultent de fraudes ou d'erreurs, et d'émettre un rapport d'assurance limitée comprenant notre conclusion. Les anomalies peuvent provenir de fraudes ou résulter d'erreurs et sont considérées comme significatives lorsqu'il est raisonnable de s'attendre à ce que, prises individuellement ou en cumulé, elles puissent influencer les décisions que les utilisateurs de l'information consolidée en matière de durabilité prennent en se fondant sur celle-ci.

Dans le cadre d'une mission d'assurance limitée conforme à la norme ISAE 3000 (révisée), telle qu'applicable en Belgique, et tout au long de celle-ci, nous exerçons notre jugement professionnel et faisons preuve d'esprit critique. Ces procédures, auxquelles nous renvoyons à la section « Résumé des travaux effectués », sont moins approfondies que les procédures d'une mission d'assurance raisonnable. Nous n'exprimons donc pas une opinion d'assurance raisonnable dans le cadre de cette mission.



Étant donné que les informations prospectives incluses dans l'information consolidée en matière de durabilité, ainsi que les hypothèses sur lesquelles elles reposent, concernent l'avenir, elles peuvent être influencées par des événements qui pourraient se produire et/ou par d'éventuelles actions du Groupe. Les résultats réels différeront probablement des hypothèses, car les événements supposés ne se produiront généralement pas comme prévu, et ces écarts pourraient être significatifs. Par conséquent, notre conclusion ne garantit pas que les résultats réels rapportés correspondront à ceux figurant dans les informations prospectives de l'information consolidée en matière de durabilité.

Nos responsabilités à l'égard de l'information consolidée en matière de durabilité, en ce qui concerne le Processus, sont les suivantes:

- L'acquisition d'une compréhension du Processus, mais pas dans le but de fournir une conclusion sur l'efficacité du Processus, y compris sur le résultat du Processus;
- Concevoir et mettre en œuvre des procédures pour évaluer si le Processus est cohérent avec la description de ce Processus par le Groupe comme indiqué dans la note "[IRO-1] Description des procédures d'identification et d'évaluation des impacts, risques et opportunités matériels".

Nos autres responsabilités à l'égard de l'information consolidée en matière de durabilité sont les suivantes:

- Prendre connaissance de l'environnement de contrôle de l'entité, des processus et systèmes d'information pertinents pour l'établissement de l'information consolidée en matière de durabilité, mais sans évaluer la conception d'activités de contrôle spécifiques, acquérir des éléments probants sur leur mise en œuvre ou tester l'efficacité du fonctionnement des contrôles mis en place;
- Identifier les domaines où des anomalies significatives sont susceptibles de se produire dans l'information consolidée en matière de durabilité, que celles-ci résultent de fraudes ou d'erreurs; et
- Concevoir et mettre en œuvre des procédures adaptées aux domaines où des anomalies significatives sont susceptibles de se produire dans l'information consolidée en matière de durabilité. Le risque de non-détection d'une anomalie significative provenant d'une fraude est plus élevé que celui d'une anomalie significative résultant d'une erreur, car la fraude peut impliquer la collusion, la falsification, les omissions volontaires, les fausses déclarations ou le contournement du contrôle interne.

### Résumé des travaux effectués

Une mission d'assurance limitée implique la mise en œuvre de procédures visant à obtenir des éléments probants sur l'information consolidée en matière de durabilité. La nature et la forme des procédures effectuées dans une mission d'assurance limitée varient, et leur étendue est moindre que dans une mission d'assurance raisonnable. Par conséquent, le niveau d'assurance obtenu dans une mission d'assurance limitée est nettement plus faible que celui qui aurait été obtenu dans une mission d'assurance raisonnable.

La nature, le calendrier et l'étendue des procédures sélectionnées dépendent du jugement professionnel, y compris l'identification des cas où des anomalies significatives sont susceptibles de se produire dans l'information consolidée en matière de durabilité, que ce soit en raison d'une fraude ou d'une erreur.



Dans le cadre de notre mission d'assurance limitée, en ce qui concerne le Processus, nous avons:

- Acquis une compréhension du Processus en:
  - effectuant des demandes de renseignement pour comprendre les sources d'information utilisées par la direction (par exemple, l'engagement des parties prenantes, les plans d'affaires et les documents de stratégie); et en
  - examinant la documentation interne du Groupe relative à son Processus; et
- Évalué si les preuves obtenues à partir de nos procédures concernant le Processus mis en œuvre par le Groupe étaient cohérentes avec la description du Processus présentée dans la note "[IRO-1] Description des procédures d'identification et d'évaluation des impacts, risques et opportunités matériels".

Dans le cadre de notre mission d'assurance limitée, en ce qui concerne l'information consolidée en matière de durabilité, nous avons:

- Acquis une compréhension des processus de reporting du Groupe concernant l'établissement de son information en matière de durabilité en acquérant une compréhension de l'environnement de contrôle, des processus et du système d'information du groupe pertinents pour la préparation de l'information consolidée en matière de durabilité, mais pas dans le but de fournir une conclusion sur l'efficacité du contrôle interne du groupe;
- Évalué si les informations identifiées par le Processus sont incluses dans l'information consolidée en matière de durabilité;
- Evalué si la structure et l'établissement de l'information consolidée en matière de durabilité est conforme aux ESRS;
- Effectué des demandes de renseignement auprès du personnel concerné et des procédures analytiques sur une sélection d'informations contenues dans l'information consolidée en matière de durabilité;
- Effectué des procédures d'assurance substantives sur la base d'un échantillon d'informations sélectionnées dans l'information consolidée en matière de durabilité;
- Obtenu des éléments probants sur les méthodes-d'élaboration des estimations et des informations prospectives telles que décrites dans la section relative aux responsabilités du commissaire relatives à la mission d'assurance limitée de l'information consolidée en matière de durabilité;
- Compris le processus d'identification des activités économiques éligibles à la taxonomie et des activités économiques alignées sur la taxonomie, ainsi que les informations correspondantes dans l'information consolidée en matière de durabilité.



# Mention relative à l'indépendance

Notre cabinet de révision et notre réseau n'ont pas effectué de missions incompatibles avec la mission d'assurance limitée et notre cabinet de révision est resté indépendant vis-à-vis du Groupe au cours de notre mandat.

Diegem, le 30 avril 2025

Le commissaire, PwC Reviseurs d'Entreprises SRL Représentée par

DocuSigned by:

Damier OVEB08B09FE24A7...

Réviseur d'Entreprises

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