

HYPO VORARLBERG BANK AG

# ANNUAL REPORT

## 2024



## KEY FIGURES 2024

Key figures of Hypo Vorarlberg Bank AG (Hypo Vorarlberg) - Group reporting per IFRS:

| Balance sheet figures<br>TEUR   | Notes | 31.12.2024 | 31.12.2023 | Change<br>in TEUR | Change<br>in % |
|---------------------------------|-------|------------|------------|-------------------|----------------|
| Total assets                    |       | 15,250,325 | 15,726,535 | -476,210          | -3.0           |
| Loans and advances to banks     |       | 235,195    | 418,305    | -183,110          | -43.8          |
| Loans and advances to customers |       | 11,137,709 | 11,089,798 | 47,911            | 0.4            |
| Liabilities to banks            |       | 439,049    | 783,867    | -344,818          | -44.0          |
| Liabilities to customers        |       | 5,082,038  | 5,259,166  | -177,128          | -3.4           |
| Securitised liabilities         |       | 7,805,145  | 7,618,734  | 186,411           | 2.4            |

| Erfolgszahlen<br>TEUR         | Notes | 2024     | 2023     | Change<br>in TEUR | Change<br>in % |
|-------------------------------|-------|----------|----------|-------------------|----------------|
| Net interest income           | (5)   | 233,693  | 233,661  | 32                | 0.0            |
| Net fee and commission income | (7)   | 38,950   | 35,403   | 3,547             | 10.0           |
| Administrative expenses       | (12)  | -132,564 | -116,507 | -16,057           | 13.8           |
| Earnings before taxes         |       | 58,058   | 53,057   | 5,001             | 9.4            |
| Consolidated net income       |       | 42,450   | 40,099   | 2,351             | 5.9            |

| Corporate figures       | Notes | 2024    | 2023    | Change<br>absolute | Change<br>in % |
|-------------------------|-------|---------|---------|--------------------|----------------|
| Cost-Income-Ratio (CIR) |       | 53.07 % | 41.81 % | 11.26 %            | 26.9           |
| Return on Equity (ROE)  |       | 3.98 %  | 3.75 %  | 0.23 %             | 6.1            |
| Employees               | (52)  | 761     | 739     | 22                 | 3.0            |

| Own funds<br>TEUR                   | 31.12.2024       | 31.12.2023       | Change<br>Absolute | Change<br>in % |
|-------------------------------------|------------------|------------------|--------------------|----------------|
| Common equity tier 1 capital (CET1) | 1,460,589        | 1,434,202        | 26,387             | 1.8            |
| Additional tier 1 capital (AT1)     | 50,020           | 50,002           | 18                 | 0.0            |
| <b>Tier 1 capital (T1)</b>          | <b>1,510,609</b> | <b>1,484,204</b> | <b>26,405</b>      | <b>1.8</b>     |
| Tier 2 capital (T2)                 | 228,611          | 223,732          | 4,879              | 2.2            |
| <b>Own funds</b>                    | <b>1,739,220</b> | <b>1,707,936</b> | <b>31,284</b>      | <b>1.8</b>     |
| CET1 capital ratio (CET1)           | 16.21 %          | 16.09 %          | 0.12 %             | 0.7            |
| Surplus of CET1 capital (CET1)      | 1,055,021        | 1,033,070        | 21,951             | 2.1            |
| T1 capital ratio (T1)               | 16.76 %          | 16.65 %          | 0.11 %             | 0.7            |
| Surplus of T1 capital               | 969,851          | 949,361          | 20,490             | 2.2            |
| Total capital ratio                 | 19.30 %          | 19.16 %          | 0.14 %             | 0.7            |
| Surplus of total capital            | 1,018,209        | 994,812          | 23,397             | 2.4            |

The shareholders of Hypo Vorarlberg Bank AG as of 31 December 2024:

| Shareholders                                    | Total<br>shareholding | Voting Rights     |
|-------------------------------------------------|-----------------------|-------------------|
| Vorarlberger Landesbank-Holding                 | 76.8732 %             | 76.8732 %         |
| Austria Beteiligungsgesellschaft mbH            | 23.1268 %             | 23.1268 %         |
| - Landesbank Baden-Württemberg                  | 15.4179 %             |                   |
| - Landeskreditbank Baden-Württemberg Förderbank | 7.7089 %              |                   |
| <b>Share capital</b>                            | <b>100.0000 %</b>     | <b>100.0000 %</b> |

| Ratings               | Standard & Poor's | Moody's |
|-----------------------|-------------------|---------|
| Long-term senior debt | A+                | A3      |
| Short-term            | A-1               | P-2     |
| Outlook               | negative          | stable  |



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**HYPO VORARLBERG**



**WILFRIED AMANN**  
MEMBER OF THE MANAGING BOARD

**MICHEL HALLER**  
CHAIRMAN OF THE MANAGING BOARD

**PHILIPP HÄMMERLE**  
MEMBER OF THE MANAGING BOARD

# FOREWORD

## BY THE MANAGING BOARD

Hypo Vorarlberg has been a reliable and consistent partner to its customers for over 125 years – no matter how the world around them changes.

Dear customers, business partners and shareholder representatives,

The current environment is dominated by the ongoing recession in Europe, the turnaround in interest rate policy, global geopolitical tension and trade conflicts, and the changes resulting from climate change and digital transformation.

In these challenging times for our customers and for us as a Bank, it is all the more satisfying that Hypo Vorarlberg's solid and risk-conscious business model has again proven its worth. We closed the 2024 financial year successfully and improved our earnings before taxes compared with the previous year. Despite high administrative expenses, our strong customer business and lower loan loss provisions had a positive impact on our earnings situation.

Customer deposits (savings, demand and term deposits) account for around EUR 5.1 billion of our total assets of EUR 15.3 billion, which represents a slight year-on-year decline. Despite the turbulence on the stock markets, Asset Management business developed positively in 2024, with both the number of mandates and the total volume of assets under management increasing compared with the previous year.

Regular awards serve as an endorsement of our chosen path of being a bank that offers individual, high-quality advice. Our innovative, contemporary products and solutions help customers to more effectively address the challenges of the capital markets, the regulatory situation and the huge overall cost pressure.

We are continuing to play our role as a strong financing partner for private individuals and companies in the markets we serve, although the private residential lending volume declined slightly to EUR 2.2 billion in the reporting year. Demand for lending among companies increased year-on-year to EUR 7.7 billion, although this remains below the average for the past ten years.

With the environment remaining uncertain and volatile, it is all the more important for us to be a reliable and consistent partner. This is underlined once more by our business performance and our excellent ratings (A+ and A3).

2025 will see further changes:

After around eight years, Wilfried Amann will step down from the Managing Board to retire. He will be succeeded by Stephan Sausgruber, a highly experienced manager from within the Bank's own ranks who will take over as the new Managing Board member with responsibility for Sales on 1 May 2025. We look forward to working with him as we tackle the challenges that lie ahead.

I would like to take this opportunity to express my gratitude to the more than 900 employees throughout the Group for their dedication and hard work in the past financial year. Thank you for playing an important part in what we have achieved. We intend to continue on the successful path Hypo Vorarlberg has established for itself and keep achieving great things together with our customers.

The Managing Board



Michel Haller  
Chairman of the Managing Board



Wilfried Amann  
Member of the Managing Board



Philipp Hämmerle  
Member of the Managing Board

# ORGANISATIONAL CHART

## MANAGING BOARD

### MICHEL HALLER

CHAIRMAN OF THE MANAGING BOARD

#### Credit Management – Corporate Customers

Stefan Germann

- Credit Management FK / St. Gallen
- Credit Management Banks & Leasing
- Balance Sheet Analysis
- Credit support

#### Credit Management – Private Customers

Martin Heinzle

- Credit Management – Private Customers
- Certification / Collateralization
- Credit Service
- Collateral Management
- Housing Construction Aids

#### Group Risk Controlling

Markus Seeger

#### Law

Klaus Diem

- Central Loan Monitoring Corporate / Private Customers
- Contract Law

#### Ombudsperson\*

Martha Huster

#### Human Resources

Bianca Dünser

- HR development

#### Communication & Marketing

Sabine Nigsch-Gaethke

- Sponsoring / Events

#### Compliance & Outsourcing\*

Reinhard Kaindl

- BWG Compliance & Outsourcing
- WAG Compliance
- Prevention of money laundering and terrorist financing
- ICS

#### Strategic Bank Management

David Blum

#### Corporate and Internal Audit\*

Christoph Schwaninger

#### St. Gallen Branch Office

Thomas Reich

Eliane Knellwolf

#### Hypo Vorarlberg Leasing, Italy

Michael Meyer (market succession)

#### Immo Italia, Italy

Alexander Ploner

### WILFRIED AMANN

MEMBER OF THE MANAGING BOARD

#### Corporate Customers Sales

Stephan Sausgruber

- Branch Offices Corporate Customers
- International Services / Correspondent Banking
- Syndication / Structured Financing
- Financial Aids Department

#### Private Customers Sales / Private Banking

Markus Felder

- Branch Offices Private Customers / Private Banking

#### Sales Vienna

Roswitha Klein

- Corporate Customers
- Private Customers / Private Banking

#### Sales Support

Stephan Modler

- Product Management
- Marketing Management
- CSC – Banking Applications
- CSC – Payment Transactions
- CSC – Sales Department

#### Treasury

Florian Gorbach

- Funding & Investor Relations
- APM & Investments
- Money, Foreign Exchange and Interest Derivatives Trading
- Securities Customer Trading

#### Participation Administration

Egmont Schwärzler

#### St. Gallen Branch Office

Walter Ernst

Simon Schier

Gerardino Lamorte

#### Hypo Vorarlberg Leasing, Italy

Christian Fischnaller (Vertrieb)

#### Hypo Immobilien & Leasing

Wolfgang Bösch

Peter Scholz

### PHILIPP HÄMMERLE

MEMBER OF THE MANAGING BOARD

#### Finance

Bernhard Egger

- Bookkeeping / Supervisory Reporting
- Account Management
- Data and Document Management

#### Controlling

Peter Holzer

#### Sustainability

Susanne Fünck

#### Asset Management

Karl-Heinz Strube

- Portfolio Management
- Back Office Asset Management
- Advisory Desk

#### Mid- and Backoffice Fonds, Securities and Derivatives

Johannes Tschanhenz

- OTC Derivatives and Money Market Management
- Fonds Service
- Securities Settlement

#### IT

Jörg Ruwe

- Application Development
- Bank Steering
- Project Management Office

Johannes Lutz

- Banking Application
- Infrastructure

#### IT GRC

Ferdinand Gabriel

#### Data Protection\*

Daniel Oberauer

#### Logistics

Wilhelm Oberhauser

- Facility and Materials Administration

## BRANCH OFFICES OF HYPO VORARLBERG

---

### Vienna Branch Office

Roswitha Klein, RM  
Robert Glasner, HPC CC  
Hans-Jürgen Spitzer, HCC  
Katharina Jantschgi, HPC PB  
Christine Staber, HSC

### Graz Branch Office

Ernst Albegger, RM  
Gerhard Vollmann, HPC PB

### Wels Branch Office

Thomas Hofer, RM  
Iris Paar, HPC PB

### Salzburg Branch Office

Peter Gassner, RM

### Bludenz Branch Office

Martin Flachsmann, BOH  
Hannes Bodenlenz, BOM  
Christoph Gebhard, HPB

### Feldkirch Branch Office

Martin Schieder, BOM  
Stefan Kreiner, HBL  
LKH-Feldkirch Branch Office  
Rankweil Branch Office

### Götzis Branch Office

Franz Altstätter, BOM

### Hohenems Branch Office

Andreas Fend, BOH

### Lustenau Branch Office

Graham Fitz, BOH  
Stefan Ritter, BOM

### Höchst Branch Office

Klaus Meusburger, BOM

### Bregenz Private Customers Branch Office

Stefan Schmitt, BOH  
Stephan Spies, SPC  
Stephan Bohle, HPB  
Alexander Walterskirchen, HPL

### Bregenz Corporate Customers Branch Office

(incl. Bregenzerwald)  
Simon Ruff, BOH

### Germany Corp. Customers Branch Office

Markus Schmid, BOH

### Dornbirn Branch Office

Richard Karlinger, BOH  
Egon Gunz, BOH PC  
Simone Küng, SPC  
Messepark

### Riezlern Branch Office

Artur Klauser, BOH  
Josef Wirth, SPC

### Schruns Branch Office

Hannes Bodenlenz, BOM

### Lech Branch Office

Michael Fritz, BOH / BOM

### Egg Branch Office

Wolfgang Fend, BOM

|        |                                               |
|--------|-----------------------------------------------|
| RM     | Regional Manager                              |
| BOH    | Branch Office Head                            |
| BOH PC | Branch Office Head Private Customers          |
| BOM    | Branch Office Manager                         |
| HCC    | Head of Corporate Customers                   |
| HPB    | Head of Private Banking                       |
| HPC PB | Head of Private Customers and Private Banking |
| SPC    | Head of Service and Private Customers         |
| HSC    | Head of Service Customers                     |
| HPL    | Head of Private Loans                         |
| HPC CC | Head of Private and Commercial Customers      |

\* Subordinate to the Board of Directors

As of April 2025



# EXECUTIVE BODIES

## MANAGING BOARD

---

**Michel Haller**

Chairman of the Managing Board, Tett nang

**Wilfried Amann**

Member of the Managing Board, Bludesch

**Philipp Hämmerle**

Member of the Managing Board, Lustenau

## SUPERVISORY BOARD

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**Jodok Simma**

Chairman, Chairman of the Managing Board (retired), Bregenz

**Alfred Geismayr**

Deputy Chairman, Chartered Accountant and Tax Advisor, Dornbirn

**Astrid Bischof**

Entrepreneur, Göfis

**Karl Fenkart**

Civil servant, Lustenau

**Eduard Fischer**

Managing Director of Offsetdruckerei Schwarzach Gesellschaft mbH (retired), Dornbirn

**Johannes Heinloth**

Member of the Board of Managing Directors of L-Bank, Karlsruhe

**Karl Manfred Lochner**

Member of the Board of Managing Directors of Landesbank Baden-Württemberg (LBBW) (retired), Burgthann

**Karlheinz Rüdiss**

Deputy State Governor of Vorarlberg (retired), Lauterach

**Birgit Sonnbichler**

Entrepreneur, Dornbirn

**Petra Winder**

Managing Director, Bregenz

**Veronika Moosbrugger**

Chairwoman of the Works Council, Works Council delegate

**Elmar Köck**

Works Council delegate

**Gerhard Köhle**

Works Council delegate

**Peter Niksic**

Works Council delegate

**Andreas Hinterauer (until 20 May 2024)**

Works Council delegate

**Judith Österle (from 20 May 2024)**

Works Council delegate

## COMITTEES ESTABLISHED BY THE SUPERVISORY BOARD

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### **Loan committee**

Jodok Simma, Chairman  
Alfred Geismayr, Deputy Chairman  
Karl Fenkart  
Eduard Fischer  
Johannes Heinloth

### **Risk committee**

Karlheinz Rüdisser, Chairman  
Karl Fenkart, Deputy Chairman  
Jodok Simma  
Petra Winder

### **Audit committee**

Alfred Geismayr, Chairman  
Jodok Simma, Deputy Chairman  
Karl Fenkart  
Astrid Bischof  
Karl Manfred Lochner

### **Nomination committee**

Birgit Sonnbichler, Chairwoman  
Karl Manfred Lochner, Deputy Chairman  
Jodok Simma  
Karl Fenkart

### **Remuneration committee**

Birgit Sonnbichler, Chairwoman  
Karl Manfred Lochner, Deputy Chairman  
Jodok Simma  
Karl Fenkart



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# MACROECONOMIC CONDITIONS

## Global economy and euro area

In the final quarter of 2023, the US economy enjoyed better than expected growth compared with the previous quarter. Although other US economic indicators also delivered some surprises, the data was mixed on the whole. Nevertheless, the recession that had been forecast by many experts failed to materialise. The situation in Europe was rather different. Following stagnation in the previous quarters, the German economy contracted across all sectors in the final quarter of 2023. Within the European Monetary Union, Germany has been significantly outperformed by Spain, France and Italy since the coronavirus pandemic. The Economic Sentiment Index also declined overall.

However, the second quarter of 2024 saw surprisingly positive figures for German industry, with sentiment in Germany and the euro area picking up as a result. With the slowdown in inflation proving stubborn, expectations among market participations concerning the first key interest rate cuts were gradually shifted into the second half of the year and considerably fewer rate cuts were priced in than had been the case at the start of the year. As such, inflation and the corresponding interest rate policy on the part of the central banks remained key topics. As previously, the high level of inflation was driven by price rises for services in particular. Various central banks, including in Switzerland, Canada and Sweden, had already lowered their interest rates. The European Central Bank (ECB) announced its first rate cut since 2019 – from 4.50 % to 4.25 % – ahead of its meeting in June, meaning it had to deliver on its promise.

China's economic growth in the past year was only just above the government target of 5 %, as the expected catch-up effects following the lifting of lockdown restrictions failed to materialise. The real estate sector remained under pressure, while consumer demand deteriorated in June. Consumer sentiment in Germany declined again following the major sporting events in the summer, as rising unemployment figures and company insolvencies accompanied by planned workforce reductions at many companies left consumers feeling more pessimistic. In August, the Munich-based ifo Institute's Employment Barometer fell to its lowest level for more than three years. Economic momentum dwindled in both Europe and the United States. With inflation continuing to slowly fall, the central banks found themselves with more scope for lowering key interest rates. The ECB took advantage of this situation in late August, while the US Federal Reserve (Fed) resolved a cut of 50 bp at its meeting in September – the first change in the federal funds rate since July 2023. In both cases, the central banks stated that the risks of achieving their inflation and employment targets were now balanced and emphasised that future decisions will be made based on the available data.

The Chinese government responded to the country's weak economic performance with the first monetary and fiscal stimulus measures since the coronavirus pandemic. This included support for socially disadvantaged groups, new purchase incentives for consumer and industrial goods, a reduction in the interest burden for home loans, and a strong commitment on the part of the country's leadership to halt the downward trend on the real estate market. There was a clear decline in inflation in the euro area at start of the fourth quarter. The ECB resolved its third interest rate cut of the year, while the Fed made its second such cut in early November. Contrary to expectations, an intensive campaign concluded with the outcome of the US presidential election in November becoming known very quickly. Sentiment in the United States improved in the wake of Donald Trump's victory, with the economic gap between the Europe and the United States becoming even more pronounced. The annualised GDP growth rate of 2.80 %

in the United States in the third quarter was all the more impressive given the considerably lower growth rates in other economies including the euro area, the United Kingdom and Japan. In Germany, the economically important automotive industry struggled, while overall sentiment continued to deteriorate. The central banks remained active as the year came to a close. As expected, the Fed cut interest rates by 0.25 % in December. Although the ECB lowered the deposit facility to 3.00 %, this had already been priced in given the weak economic outlook and dwindling concerns around inflation. However, the Swiss National Bank (SNB) sprang a surprise by lowering its policy rate by 50 bp to 0.50 %.

## Stock and bond markets

On the stock markets, good performance was forecast for second-line and third-line stocks at the start of 2024 in light of the expected key interest rate cuts. The AI effect, which had already boosted share prices in the final quarter of 2023, pushed the US stock markets to new record highs. As previously, the continuous growth in the Nasdaq and S&P 500 indexes was driven by a small handful of tech companies. The majority of companies saw a decline in real profits because of high inflation, but valuations remained high.

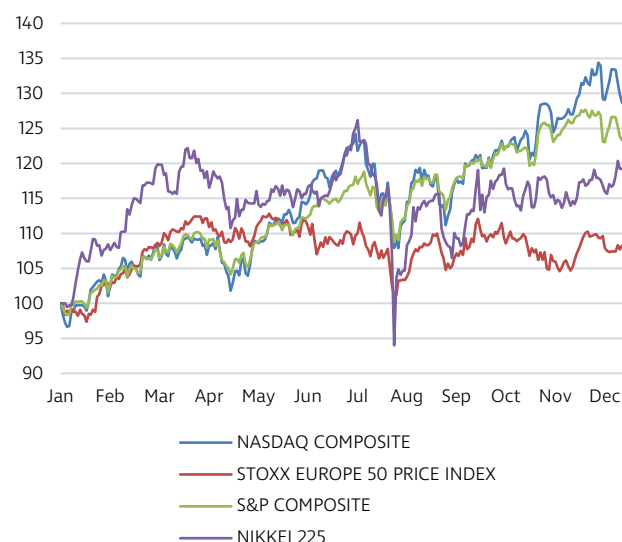
The markets quickly moved on from a brief correction in April triggered by the reporting season. There was no change in investor preferences, with the US mega tech stocks continuing to lead the way. The DAX climbed to almost 18,900 points in mid-May before developments diverged, as US share prices continued to rise while European stocks saw weaker performance. President Emmanuel Macron's announcement of snap elections in France led to further uncertainty on the markets in June.

The European stock market indexes saw slightly more muted performance in the second half of 2024 than their US counterparts, with the French benchmark index being particularly hard hit by the political uncertainty. The markets were unaffected by geopolitical tension and the further deterioration in the economic environment. However, early August did see share price corrections, especially in Japan. European and US stocks also suffered substantial losses. This development was triggered by a combination of factors. Warnings of worsening conditions and long payback periods for AI investments had already been having an effect on the markets. When this was followed by an intensification of the crisis in the Middle East, a further interest rate rise in Japan and weak US labour market data, the tension that had built up was finally discharged. The S&P 500 lost half of the gains it had made since the start of the year in the space of just three days. However, it recovered shortly afterwards on the back of positive US economic data.

The Fed's interest rate cut in September was well received by the financial markets. The stock markets in both the United States and Germany hit new record highs in the fourth quarter. In spite of the economic concerns, the DAX broke through the historical 20,000-point barrier for the first time. As well as benefiting the European markets, the significant growth in valuations saw US stocks approaching an all-time high in terms of their price-to-earnings ratios. On the bond market, financial market participants downscaled their interest rate expectations considerably. In December 2023, the first cuts had been priced in for April, but these were repeatedly pushed backward. As a result, yields on government bonds and investment-grade corporate bonds rose slightly in the first quarter. The risk premiums for corporate bonds compared to government bonds continued to decline. The EU elections had repercussions on the financial markets in June. Following Emmanuel Macron's decision to dissolve the French parliament and call a snap election, spreads for French government bonds increased

significantly compared to their German counterparts. In the second half of the year, too, the political turbulence in France temporarily propelled the yield spread between 10-year French and German government bonds to a new high for the year. With market participants concerned about delays to the urgently required fiscal consolidation, risk premiums for France remained at a high level. By contrast, Italy enjoyed unexpected stability under the Giorgia Meloni-led government, meaning there were no contagion effects.

#### Global stock market development in 2024 (in EUR)



(Source: Thomson Reuters Datastream)

#### Commodities and currencies

Following sideways movement in the first quarter of 2024, the commodity market increasingly recovered as the first half of the year progressed. This encouraging development was driven by the precious metals gold and silver. The price of gold exceeded USD 2,400 in May on the back of extensive central bank purchases and stable consumer demand, although it fell back a little by the end of the quarter. By contrast, the price of silver picked up again from mid-May onwards. Industrial metals took a few months to gain momentum but also made an important contribution to the recovery of the market as a whole.

The price of North Sea Brent oil broke through the USD 90 barrier for the first time since the previous winter. It then declined steadily to below USD 76 before trading at around USD 85 at the end of June. Political turbulence declined again following the shock in the Middle East, while the decision by the OPEC+ countries to maintain the current production level delivered a further boost to oil prices in late May.

Following sensational performance in the fourth quarter, the price of gold reached a new all-time high of USD 2,790 per troy ounce. Silver enjoyed similarly positive development to gold in 2024, reaching a new twelve-year high of USD 34.90. Investors were buyers of silver via ETC investments, while the sustained boom in photovoltaics resulted in increased demand for silver.

Brent oil moved within a narrow trading range in the final quarter of the year. Donald Trump's announcements that he intends to increase US oil production are likely to broadly curb the price of oil.

In the first months of the year, the dollar traded at between EUR 1.06 and EUR 1.09. The greenback was supported by the growing yield gap between the dollar and the euro and the considerable attractiveness of the United States as a location. With the SNB no longer actively supporting the Swiss franc, the euro performed more strongly against the Swiss currency, with the exchange rate

almost reaching parity in May before the Swiss franc strengthened again.

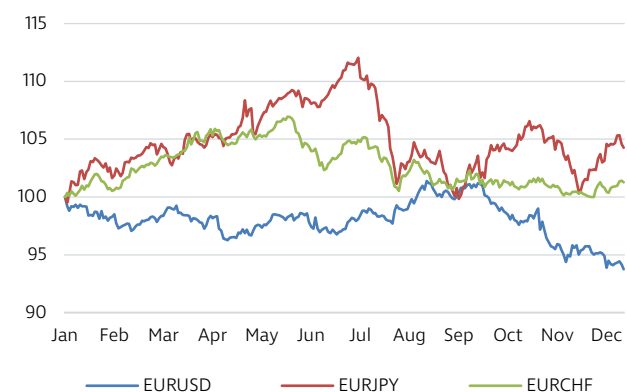
The Japanese yen continued on its depreciation path that began prior to the coronavirus crisis and that was supported by ultra-low interest rates. Following a 17-year gap, the Bank of Japan raised its key interest rate slightly in March 2024 followed by a second rate rise in late July. The yen saw a clear response, continuing its consolidation in the final quarter of the year and recording stable performance against the euro. The US dollar appreciated considerably against the euro in the final quarter. The depreciation of the euro was driven by the expansion of the yield advantage enjoyed by the United States in short maturity ranges, which itself was due to the changed expectations of market participants regarding interest rate cuts. The extremely robust growth in the United States meant the Fed was considered to have less in the way of scope for lowering interest rates. The euro saw only minimal fluctuation against the Swiss franc in the final quarter of the year.

#### Gold price development in 2024 (in USD)



(Source: Thomson Reuters Datastream)

#### Currency development against the euro in 2024



(Source: Thomson Reuters Datastream)

## Austria

According to a forecast by the Austrian Institute for Economic Research (WIFO) in December 2024, the phase of weakness in the Austrian economy was more pronounced and more sustained than originally assumed. The growth prospects for the domestic economy were hindered by structural challenges in particular, with economic output contracting by 0.9 % in 2024 (2023: -0.8 %). This makes Austria one of the weakest performers in the EU when it comes to economic growth.

Second year of recession: Manufacturing, construction and trade were particularly hard hit by the recession in 2024. The current industrial recession is the second-longest crisis in the last 20 years. Only the crisis in the early 2000s lasted for longer, and the downturn in production during that time was considerably less pronounced. Following this sustained period of industrial recession, the WIFO is forecasting stagnation in 2025. Some service sectors saw better performance in 2024, with financial and insurance services enjoying growth of 6.1 %. The situation in construction (+0.5 %) and trade (0.6 %) is expected to improve slightly in 2025.

According to Statistics Austria, the government debt ratio also increased to 83.2 % of GDP in the third quarter of 2024 (2023: 78.2 %).

The recession and the resulting weak demand for labour also affected the Austrian employment market. However, it proved to be robust, with unemployment increasing only slightly to 7.0 % in 2024 (2023: 6.4 %). A further increase in unemployment to 7.4 % is forecast for 2025.

Although HICP inflation in Austria was above the ECB target in 2024, it more than halved to 3.0 % (WIFO) or 2.9 % (IHS) compared with the previous year (2023: 7.5 %). However, the increase in electricity grid fees is one reason why inflation is expected to remain above the ECB target in 2025.

## Vorarlberg

According to the quarterly business climate index for the industrial sector in Vorarlberg as published by the Vorarlberg Chamber of Commerce on the basis of its economic survey, the economic outlook remains extremely muted.

In the latest survey in the fourth quarter of 2024, the index declined from +0.90 points in the previous quarter to -9.40 points, indicating that economic sentiment in the state has deteriorated further. Having most recently seen a tentative increase, this means the index has fallen sharply again to the level previously recorded two years ago. For context, the business climate index recorded an all-time high of +52.50.

Only 5 % of companies consider the current business situation to be good or improving, with almost 90 % describing their current order backlog as average or poor. The same is true for foreign orders, which 91 % of companies rate as average or poor. The assessment of the current earnings situation has also deteriorated further compared with the previous quarter, with 49 % of companies describing it as poor or getting worse.

This strained situation is also reflected on the labour market in Vorarlberg: In September 2024, the Employment Market Service (AMS) recorded 967 more unemployed people than in the previous year (+10.5 %). Although many industrial companies continued to look for skilled workers, the employment situation remains difficult. The sector results published by the Vorarlberg Chamber of Commerce focus on the flagship of Vorarlberg's industry, namely mechanical engineering and metalworking. Eight out of ten companies surveyed consider the current business situation to be unchanged, while nine out of ten companies expect their workforce to be unchanged in three months' time and their business and earnings situation to be unchanged in six months' time. Eight out of ten companies consider their current earnings and order situation to be poor, while 85 % are reporting fewer orders from abroad. Expectations for production activity in three months' time have deteriorated dramatically, from +7 points to -64 points – the biggest downturn across the entire survey.

# THE AUSTRIAN BANKING SECTOR

## IN 2024

In 2024, the Austrian economy found itself in a recession for the second year in succession. Despite this challenging environment, the Austrian banking sector generated high profits according to statistics from the Austrian National Bank (OeNB) and demonstrated its resilience. Expert opinion is divided when it comes to the impact of the strict provisions of the Bank Real Estate Financing Measures Regulation (KIM-V). As the risks in connection with commercial real estate lending are continuing to rise, they will be limited by means of an additional capital buffer from mid-2025 onwards.

According to the OeNB, the consolidated total assets of the Austrian banking system amounted to EUR 1,243.43 billion in the second quarter of 2024 (Q2 2023: EUR 1,231.58 billion).

Until mid-2022, bank lending in Austria was driven by high demand for residential property and corporate liquidity. Since then, however, credit growth has slowed as demand for loans has declined in the face of rising interest rates, the stricter provisions of KIM-V and lower financing requirements on the part of companies. Corporate lending grew by 1.7 % as at the end of June 2024 (compared to the same period of the previous year), while lending to private households fell by 1.2 %.

Residential real estate lending saw a return to moderate growth momentum, with affordability improving thanks to rising incomes and a slight decline in financing costs. Furthermore, the inverted yield curve meant there was a reduction in the share of newly issued loans with variable interest rates. There is a particular regulatory focus on these loans due to the interest rate risk for borrowers.

Credit quality deteriorated in the first half of 2024. The pronounced weakness of the domestic economy meant the share of non-performing loans (NPL ratio) increased from 2.0 % in the previous year to 2.7 %, with commercial real estate and SME loans seeing particularly sharp rises. However, the recognition of loan loss provisions failed to keep pace with this development in all areas. Irrespective of this, a stress test conducted by the OeNB with an adverse scenario that simulates falling interest rates (and margins) and a deterioration in commercial real estate credit quality found the Austrian banking system to be highly resilient against potential shocks.

The measures taken in the area of foreign currency loans continued to have a positive effect, as shown by the declining volume of these loans to private households and non-financial enterprises since 2008. In the second quarter of 2024, loans to private households in foreign currency (primarily Swiss francs) totalled EUR 6,489.37 million (Q2 2023: EUR 7,900.74 million). According to the OeNB, the foreign currency loans no longer represent a systemic risk to the banking system.

The household saving ratio increased sharply from 6.1 % in the second quarter of 2022 to 12.8 % in the second quarter of 2024. This was due to growth in real incomes – especially transfer payments by the government to households to help cushion energy price rises – as well as weak real consumer spending.

With net interest income remaining high, the Austrian banking sector recorded net profits of EUR 7 billion in the first half of 2024, down only slightly on the record figure in the same period of the previous year (H1 2023: EUR 7.3 billion). This was driven to a large extent by foreign business, which accounted for more than 40 % of total assets.

Banks' net profits for the period (after taxes and non-controlling interests) were lower than in the same period of the previous year, totalling EUR 6,966.14 million as at the end of the second quarter of 2024 (Q2 2023: EUR 7,286.57 million).

### Solid capitalisation

The capitalisation of Austrian banks has improved steadily since the onset of the financial crisis in 2008. Banks have increased their resilience by retaining profits. As at 30 June 2024, the banks subject to reporting requirements in Austria reported a common equity tier 1 (CET 1) ratio of 17.71 % (Q2 2023: 16.58 %) and a total capital ratio of 20.73 % (Q2 2023: 19.56 %), meaning that Austria's major banks were above the European average. In view of the worsening macroeconomic conditions, exercising due caution when handling profit distributions remains advisable.

### Consolidated earnings situation of Austrian banks:

| EUR million          | Q2/2024 | Q4/2023 | Q2/2023 | Q4/2022 | Q2/2022 |
|----------------------|---------|---------|---------|---------|---------|
| Net interest in-     | 12,829  | 25,465  | 12,302  | 19,304  | 8,738   |
| Operating profit     | 9,144   | 18,869  | 9,132   | 4,145   | 7,045   |
| Earnings after taxes | 6,966   | 18,869  | 7,287   | 9,835   | 3,548   |

(Source: OeNB)

### Deposit protection

The Austrian Federal Act on Deposit Protection and Investor Compensation at Banks (ESAEG), which came into force in August 2015, removed the government protection for a portion of the deposits with effect from 2019. The legal conditions are based on the principle that the financial consequences of a default are to be borne by the banks themselves, not by taxpayers.

Any payments in the event of a default are financed from deposit protection funds that were endowed annually by the protection schemes' member banks until 2024; the target level has now been reached.

*Note: Due to the available data from the Austrian National Bank, data for the second quarter was applied in preparing this report.*

# BUSINESS MODEL

## OF HYPO VORARLBERG

For decades, the three cornerstones of “corporate banking”, “residential construction banking” and “investment banking” have formed the basis on which Hypo Vorarlberg Bank AG (hereinafter: Hypo Vorarlberg) operates sustainably and successfully. The Bank’s core expertise relates in particular to residential construction financing, corporate customer business, investment advice and asset management. It operates as a universal bank in its home market of Vorarlberg, offering its customers the full range of products and services, whereas it focuses on selected niches in its core markets outside Vorarlberg.

The Bank’s clear objective is to remain the number one in its home market of Vorarlberg. In its core markets outside Vorarlberg, the Group aims to achieve profitable growth. The Managing Board attaches great importance to a risk-conscious lending and business policy. Profitability and stability take precedence over growth at Hypo Vorarlberg. The company takes care to ensure that value added predominantly stays in the regions where it operates. Hypo Vorarlberg offers its employees secure jobs, thereby making an important contribution to the stability and effectiveness of the economic system in its core markets.

In addition, Hypo Vorarlberg assumes its social responsibility by supporting culture and sport in the markets it serves in the form of sponsorship and long-term partnerships. With the Hypo Vorarlberg donation fund, the Bank also provides financial assistance to people experiencing personal hardship and supports various social institutions and regional cultural projects.

### BUSINESS SEGMENTS

**Corporate Customers** One focus of Hypo Vorarlberg’s business activities is corporate customer business. Vorarlberg and the surrounding regions are characterised by a very SME-dominated economic structure with a high export ratio. Hypo Vorarlberg supports these companies in all financial issues that are relevant to them. The Bank has particular expertise in the areas of investment and project financing, subsidies, foreign services, working capital financing and as a provider of alternative forms of financing and in investment.

### Private Customers and Private Banking

Hypo Vorarlberg offers private customers extensive services with a focus on residential construction financing, pension advice and investment advice. Customers benefit from individual, flexible solutions as well as fair and transparent conditions. Regular recommendations by customers motivate the Bank to continue on the path it has adopted moving forward.

The varied product range is oriented towards customers’ needs in all areas and offers contemporary solutions through the use of flexible optimisation concepts adapted to the market situation in asset management, the use of viable alternatives to the money market in the investment business, further developments in online banking in payment transactions and, not least, through tailored financing.

### Treasury / Financial Markets

The Financial Markets business segment is responsible for securities investments for Hypo Vorarlberg’s own account, asset/liability management and funding via the money and capital markets, money and foreign exchange trading, and custodian bank activities for investment funds. It also provides a wide range of services for customers and different groups within the Bank, including the trading and settlement of securities and money, foreign exchange and interest rate derivatives. Hypo Vorarlberg does not engage in any proprietary trading that is not connected to customer business.

### Corporate Centre

The Corporate Centre essentially bundles the subsidiaries and holdings that expand the Bank’s service range with banking-related products. In particular, it includes the property and leasing subsidiaries in Austria and Italy and the shareholdings in comit Versicherungsmakler GmbH and MASTERINVEST Kapitalanlage GmbH.

### CORE MARKETS

In addition to its headquarters in Bregenz and 14 other branches in Vorarlberg, Hypo Vorarlberg has additional locations in Vienna, Graz, Wels and Salzburg, as well as a branch in St. Gallen, Switzerland.

Details on the branches can be found on the last page of the annual report.

Through these locations, Hypo Vorarlberg is represented in the main economic regions of Austria and in eastern Switzerland. Other core markets are located in southern Germany (Bavaria, Baden-Württemberg). Outside Vorarlberg, Hypo Vorarlberg focuses on niches in corporate customer business, property financing and investment advice.

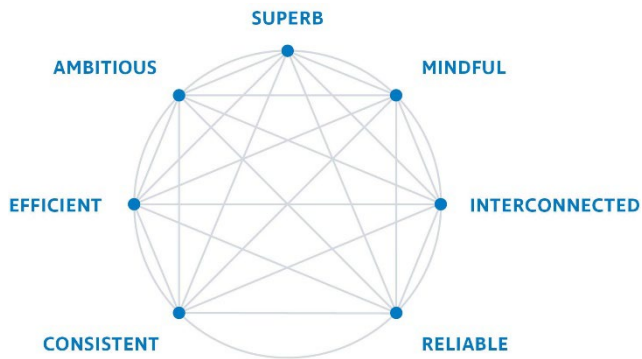
In addition to the traditional banking products, customers can also use other banking-related products and services in the property, leasing and insurance sectors. The subsidiary Hypo Immobilien & Leasing GmbH, based in Dornbirn and Vienna, offers expert knowledge under the Hypo Vorarlberg brand. Hypo Vorarlberg Leasing AG in Bolzano, Italy, develops leasing solutions and also has a branch in Como. Hypo Vorarlberg Immo Italia GmbH offers commercial properties in northern Italy and a range of services in the property sector, including property valuation.

Through its shareholding in comit Versicherungsmakler GmbH, Hypo Vorarlberg’s customers benefit from independent insurance solutions. In the investment business, MASTERINVEST Kapitalanlage GmbH acts as a partner and fund manager for Hypo Vorarlberg. The company has been managing investment funds for over 30 years, with customers benefiting from its expertise in fund administration, risk management and reporting.

## VALUES

Hypo Vorarlberg's seven core brand values provide guidance for employees, managers and members of the Managing Board.

### Hypo Vorarlberg's brand values



#### AMBITIOUS

We are continuously developing further while pursuing demanding goals and striving for top performance.

#### SUPERB

We offer excellent services every day and are delighted that they are recognised and recommended.

#### MINDFUL

We are attentive, have a genuine interest and ensure a stable environment thanks to our forward-looking approach. We only do business that we are happy to represent to the outside world.

#### CONSISTENT

From the beginning we have remained true to ourselves, focused on our core business and pursued continuous, sustainable growth.

#### EFFICIENT

We seek intelligent solutions to enable us to achieve the best possible results as efficiently as possible.

#### INTERCONNECTED

We are a key part of the region and make a specific contribution to the well-being of the people and companies in our markets. Internally, we are interconnected and operate as one bank.

#### RELIABLE

We have been a trustworthy partner for our customers, our employees and the state for over 125 years.

Together with its subsidiaries, Hypo Vorarlberg puts its identity and values into practice both internally and externally. A clear brand architecture and uniform design guidelines are aimed at ensuring that brand awareness in Vorarlberg and the other core markets is strengthened and expanded.

### Positioning

Based on its core competencies, Hypo Vorarlberg is positioned as follows: "As the entrepreneurial bank from Vorarlberg, we offer corporate and private customers a forward-looking financial solution for everyone with a plan and who is focused on achieving their objectives and aspirations thanks to our proximity to people, our superior advice in a private setting and our excellent financial products."



# SUCCESSFUL BUSINESS DEVELOPMENT

## GOOD RESULTS IN 2024

### INCOME DEVELOPMENT

Hypo Vorarlberg recorded encouraging growth in its earnings before taxes in 2024. Net interest income remained almost unchanged compared with the extremely high prior-year level despite the turnaround in interest rate policy, while there was a year-on-year increase in fee and commission income in particular. Despite the inflation-driven rise in administrative expenses of around 13.8 %, the Group's earnings before taxes were 9.4 % higher than in the previous year and amounted to TEUR 58,058 (2023: TEUR 53,057). Among other things, this was due to lower expenses for loan loss provisions and impairments of financial assets. Net income for the year after taxes amounted to TEUR 42,450 in 2024 (2023: TEUR 40,099).

The year-on-year development of the individual income statement items is as follows:

| TEUR                                                    | 2024     | 2023     | Change  |
|---------------------------------------------------------|----------|----------|---------|
| Net interest income                                     | 233,693  | 233,661  | 0.0 %   |
| Net fee and commission in-                              | 38,950   | 35,403   | 10.0 %  |
| Administrative expenses                                 | -132,564 | -116,507 | 13.8 %  |
| Loan loss provisions and impairment of financial assets | -66,209  | -78,486  | -15.6 % |
| Impairment of non-financial assets                      | -666     | -1,006   | -33.8 % |
| Earnings before taxes                                   | 58,058   | 53,057   | 9.4 %   |
| Net income for the year                                 | 42,450   | 40,099   | 5.9 %   |

### Net interest income

The impact of the ECB's key interest rate cuts since June can also be seen in interest income and expenses. The change compared with the previous year was not as pronounced as in 2023. As a consequence, net interest income was essentially unchanged year-on-year at TEUR 233,693 (2023: TEUR 233,661).

### Net interest income in TEUR



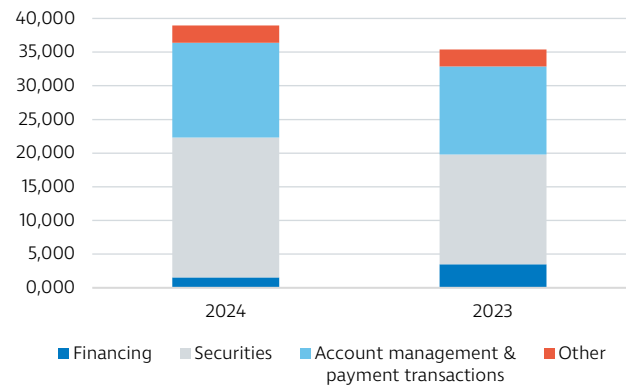
### Net fee and commission income

Hypo Vorarlberg's net fee and commission income increased by 10.0 % year-on-year to TEUR 38,950 in 2024 (2023: TEUR 35,403).

Due to a slightly lower business volume, fee and commission income in lending business was down on the previous year's level in terms of guarantee commission, falling by 3.6 % to TEUR 5,647 (2023: TEUR 5,856). By contrast, fee and commission income from securities business saw a substantial year-on-year increase of 25.3 % to TEUR 23,272 in 2024 (2023: TEUR 18,571) thanks to the successful performance of the customer assets managed by the Bank as well as inflation-related price adjustments. Fee and commission income from account management and payment transactions developed positively compared with the previous year, amounting to TEUR 15,484 (2023: TEUR 14,457). Total fee and commission income increased by 13.4 %, from TEUR 41,571 in 2023 to TEUR 47,139 in 2024.

At the same time, fee and commission expenses increased due to higher guarantee commission in connection with a newly issued tranche for the synthetic securitisation of Hypo Vorarlberg's loans and advances.

### Structure/development of net fee and commission income in TEUR



### Net result from financial instruments at fair value

In the previous year, the net result from financial instruments at fair value was massively influenced by the change in interest rates and the associated offsetting measurement effects. Economic interest rate hedges at portfolio level and not included in macro-hedge accounting had a negative effect on the net result from financial instruments at fair value. The measurement effects for interest rate swaps not included in macro-hedge accounting amounted to TEUR -11,812 in 2024 (2023: TEUR -6,914). The nominal volume of these interest rate swaps was TEUR 1,147,378 as at 31 December 2024 (2023: TEUR 691,658). Interest rate options entered into to hedge interest limit loans also are not included in macro-hedge accounting. The volume of collars was TEUR 227,004 as at 31 December 2024 (2023: TEUR 235,894). The measurement effect for interest rate options entered into to hedge against interest rate risks was TEUR -5,796 in 2024 (2023: TEUR -8,911). By contrast, the negative effects from the change in credit spreads for financial assets measured at fair value through profit or loss were significantly lower than in the previous year at TEUR -10,314 (2023: TEUR -16,903). The measurement of holdings and other equity interests resulted in a positive measurement effect of TEUR 7,291 in 2024.

### Other income/expenses

Other income includes income from operating leases, operating cost income or gains on the disposal of non-financial assets. Total other income amounted to TEUR 19,533 as at 31 December 2024 (2023: TEUR 53,482). The reduction is due in particular to the reversal of provisions for operational risks in the previous year.

Other expenses also decreased year-on-year to TEUR 25,086 (2023: TEUR 30,304). This amount includes the stability fee of TEUR 2,810 (2023: TEUR 2,895). The decrease in other expenses was because there were no further mandatory allocations to the resolution and deposit protection fund in 2024, as the banks had already made sufficient allocations to these statutory funds in the previous years to the extent that the statutory requirements were fulfilled.

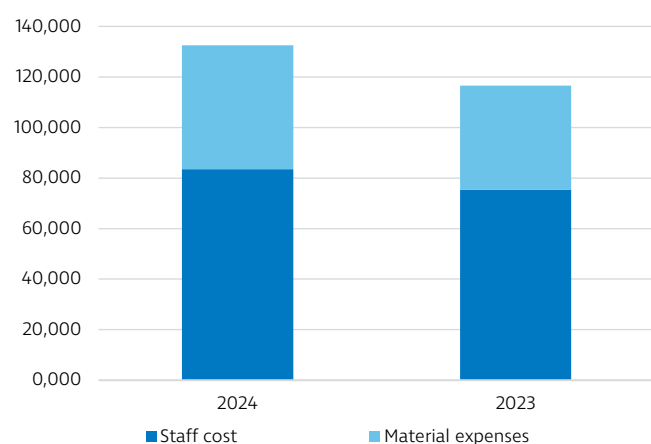
### Administrative expenses

The Managing Board pays great attention to keeping corporate structures as lean as possible in order to ensure that costs develop at a constant rate. Nonetheless, administrative expenses increased

by 13.8 % year-on-year to TEUR 132,564 (2023: TEUR 116,507) as a result of inflation.

Staff costs in the reporting year were also higher than the previous year's level at TEUR 83,484 (2023: TEUR 75,386). The wages and salaries included in this item increased from TEUR 56,641 to TEUR 63,020. Materials expenses rose faster than staff costs with growth of 19.4 % year-on-year. This increase was due to higher expenditure in the areas of building expenses, data processing and project consulting costs.

#### Structure/development of administrative expenses in TEUR



The number of branches and locations in Austria did not change in the reporting year and was 19 as at the end of 2024. There is also a branch in St. Gallen, Switzerland. Details on Hypo Vorarlberg's existing locations can be found on the last page of the annual report.

#### Employees

Hypo Vorarlberg is an advisory bank and stands out thanks to its high-quality consulting and support for customers. In the interest of sustainable staff development, importance is attached to sound training and development. As a major employer in its core markets, the Hypo Vorarlberg Group employs more than 900 people. The average number of employees (full-time equivalents) increased from 739 to 761 in 2024.

#### Key employee figures (Group)

|                                                                  | 2024   | 2023   | Change  |
|------------------------------------------------------------------|--------|--------|---------|
| Average number of employees for the year (full-time equivalents) | 761    | 739    | 3.0 %   |
| of which apprentices                                             | 6      | 7      | -14.3 % |
| of which part-time                                               | 156    | 148    | 5.4 %   |
| Employees at end of year (headcount)                             | 938    | 897    | 4.6 %   |
| of which women                                                   | 528    | 510    | 3.5 %   |
| of which men                                                     | 410    | 387    | 5.9 %   |
| Proportion of women (incl. ap-)                                  | 56.3 % | 56.9 % | -1.0 %  |
| Proportion of men (incl. ap-)                                    | 43.7 % | 43.1 % | 1.3 %   |
| Average length of service in years                               | 12.0   | 12.1   | -0.8 %  |
| Average age in years                                             | 42.5   | 42.5   | 0.0 %   |

#### Depreciation and amortisation

At TEUR 8,184, depreciation and amortisation was only minimally higher than in the previous year (2023: TEUR 8,180).

#### Loan loss provisions and impairment of financial assets

Hypo Vorarlberg concentrates on the business areas whose mechanisms and rules it understands and only takes risks that it can manage on its own. The Group has recognised adequate provisions for all discernible risks.

Due to rising interest rates, the situation on the real estate market and high inflation – albeit at a lower level than in the previous year – expenses for loan loss provisions in lending business in 2024 were still significantly above the average for the past ten years. Since 2018, loan loss provisions have been recognised in accordance with the accounting logic of IFRS 9, which requires impairment to be recognised on the credit portfolio even with good credit ratings. An allocation of TEUR 66,209 was required for loan loss provisions and impairment of financial assets in 2024 compared with an allocation of TEUR 78,486 in 2023.

#### Impairment of non-financial assets

Impairment of non-financial assets, including the valuation of properties in South Tyrol, declined slightly year-on-year to TEUR -666 as at 31 December 2024 (2023: TEUR -1,006).

### Earnings before/after taxes

The Hypo Vorarlberg Group closed 2024 successfully. Due to the effects described above, earnings before taxes increased significantly by 9.4 % to TEUR 58,058 as at 31 December 2024 (2023: TEUR 53,057). Earnings after taxes amounted to TEUR 42,450, representing a year-on-year increase of 5.9 % (2023: TEUR 40,099).

In addition to the current tax expense for corporate income tax, the amounts reported under taxes on income primarily relate to deferred tax assets and liabilities. Tax expenses for 2024 amounted to TEUR 15,608 (2023: TEUR 12,958).

### Attributable to non-controlling interests

In total, TEUR 16 (2023: TEUR 2) of the net income for the year after taxes of TEUR 42,450 (2023: TEUR 40,099) is attributable to the minority shareholders of the Group subsidiaries.

### Dividends of Hypo Vorarlberg

The net profit according to UGB reported by Hypo Vorarlberg for the 2024 financial year amounted to TEUR 52,027 (2023: TEUR 54,441). After the allocation to reserves and including the profit carried forward from the previous year, the net retained profit available for appropriation amounted to TEUR 10,136 (2023: TEUR 4,434). Subject to approval by the Annual General Meeting and taking further developments up until the time of this resolution into account, a dividend of EUR 32 per eligible share is proposed based on the share capital of TEUR 162,152. This results in a total distribution of TEUR 10,136 for 316,736 shares.

### Key management indicators

|                         | 2024    | 2023    | Change |
|-------------------------|---------|---------|--------|
| Return on equity (ROE)  | 3.98 %  | 3.75 %  | 6.1 %  |
| Cost-income ratio (CIR) | 53.07 % | 41.81 % | 26.9 % |
| Return on total assets  | 0.27 %  | 0.26 %  | 3.8 %  |
| T1 capital ratio (T1)   | 16.76 % | 16.65 % | 0.7 %  |
| Total capital ratio     | 19.30 % | 19.16 % | 0.7 %  |

In its financial reporting, the Group also uses alternative key indicators that are not defined in the IFRS or CRR regulations to present its financial position and results of operations. These key indicators should not be considered in isolation, but rather as supplementary information. They are often used in the financial sector to analyse and describe companies' financial position and results of operations. However, it should be noted that the definitions can vary from company to company. For this reason, the key indicators used by the Group are defined below.

**Cost-income ratio (CIR)** – This shows a company's costs in relation to its income, thus providing a clear picture of its operating efficiency. Banks use this key indicator for corporate management and to compare their efficiency with that of other banks. The CIR is calculated as the ratio of administrative expenses and depreciation and amortisation to operating income. In order to reflect operating efficiency as accurately as possible, measurement effects from financial instruments are largely excluded from this calculation based on the method prescribed by the Austrian Banking Act (BWG).

**Return on equity (ROE)** – This is a profitability indicator for management and investors that is calculated as the ratio of earnings before taxes as reported in the income statement to available equity at the beginning of the financial year less the planned distribution amount. ROE shows the Bank's profitability in relation to the available equity for the year.

**Return on assets (ROA)** – This is a profitability indicator that measures how effectively a company can manage its assets in a given period. It represents the ratio of earnings before taxes to average assets (based on the average of total assets at the current reporting date and at the time of the last consolidated financial statements).

### BALANCE SHEET DEVELOPMENT

#### Changes in assets

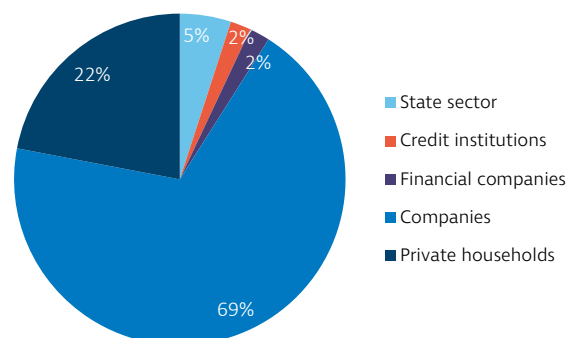
As a strong financing partner for the people and companies in its core markets, loans and advances to customers constituted the largest item of Hypo Vorarlberg's assets. In the 2024 financial year, Hypo Vorarlberg's total consolidated assets decreased slightly by 3.0 % year-on-year to TEUR 15,250,325 as at 31 December 2024 (2023: TEUR 15,726,535). This was due in particular to the planned repayment of the last TLTRO III tranche accompanied by a reduction in loans and advances to banks and central banks.

#### Financial assets

As at 31 December 2024, loans and advances to customers across all measurement categories totalled TEUR 11,137,709 (2023: TEUR 11,089,798), most of which was accounted for at amortised cost.

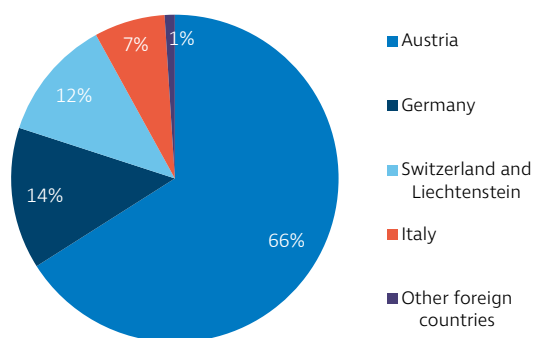
In the reporting year, loans and advances to banks decreased by 43.8 % to TEUR 235,195 (2023: TEUR 418,305). This was due to a decline in cash collateral provided to counterparties, which was no longer required on account of the lower market values of derivatives, as well as to a reduction in medium-term money market investments. Financial assets also include bonds, whose volume amounted to TEUR 2,687,907 as at 31 December 2024 (2023: TEUR 2,547,763).

#### Loans and advances to customers and banks – by sector



Loans and advances of TEUR 11,372,904 in total across all measurement categories predominantly consist of loans and advances to companies and private households and were 1.2 % lower than in the previous year (2023: TEUR 11,508,103). While financing for companies increased, there was a decline in loans and advances to private households.

## Loans and advances to customers and banks – by region



The largest part of Hypo Vorarlberg's lending business is in Austria with a share of 66 %, followed by Germany with 14 %. The remaining loans and advances to customers primarily relate to customers from Switzerland and Italy (mainly leasing).

The issue of Swiss franc loans at locations other than the St. Gallen branch has been extremely limited in recent years, especially in the Private Customers segment. As at 31 December 2024, Hypo Vorarlberg reported loans and advances to customers in Swiss francs totalling TEUR 1,572,657 (2023: TEUR 1,536,043). Most of these loans and advances to customers relate to the St. Gallen branch and thus do not represent a foreign currency risk. Cross-border commuters in Vorarlberg should also be taken into account, which further reduces the economic view of this risk. The share of foreign currency financing in the Private Customers segment (predominantly in CHF) is steadily decreasing, with the increase in the reporting year being due to credit growth at the branch in St. Gallen.

### Cash reserve

The cash reserve includes cash on hand and balances with central banks. This item declined from TEUR 976,271 in the previous year to TEUR 509,933 as at 31 December 2024, mainly on account of a lower balance at the OeNB.

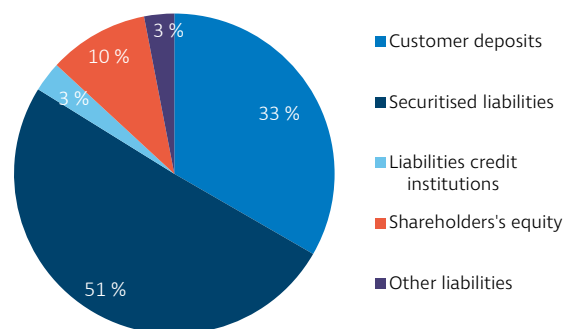
### Trading assets

In the reporting year, trading assets decreased from TEUR 117,735 to TEUR 104,076 due to the measurement of derivatives. The fall in market values was attributable to the observable decline in long-term interest rates.

### Changes in liabilities

Financial liabilities at amortised cost – which account for the largest share of the liabilities in the balance sheet – decreased by 2.6 % to TEUR 12,543,471 (2023: TEUR 12,872,355). While deposits from customers fell by 3.2 % to TEUR 4,969,759, securitised liabilities saw particular growth due to increased issuing activity.

## Balance sheet structure / balance sheet liabilities



This graph illustrates Hypo Vorarlberg's sustainably established and balanced refinancing structure. TEUR 5,082,038 of the total liabilities of TEUR 15,250,325 related to deposits from customers (savings, demand and term deposits) as at 31 December 2024, representing a year-on-year reduction of 3.4 % across all measurement categories.

In the reporting year, securitised liabilities – which are predominantly mortgage bonds and bonds – increased from TEUR 7,618,734 to TEUR 7,805,145.

Shareholders' equity increased by 2.3 % year-on-year to TEUR 1,496,857 (2023: TEUR 1,463,532). The remaining share of liabilities amounted to TEUR 427,236 (2023: TEUR 601,236). This decrease was also mainly due to measurement effects relating to derivatives as a result of the flattening yield curve.

### CHANGES IN OWN FUNDS

#### Composition of own funds according to CRR and capital ratios

| TEUR                              | 31.12.2024       | 31.12.2023       | Change       |
|-----------------------------------|------------------|------------------|--------------|
| <b>Total risk exposure amount</b> | <b>9,012,648</b> | <b>8,914,050</b> | <b>1.1 %</b> |
| Common equity tier 1 capital      | 1,460,589        | 1,434,202        | 1.8 %        |
| Additional core capital (AT1)     | 50,020           | 50,002           | 0.0 %        |
| <b>Tier 1 capital (T1)</b>        | <b>1,510,609</b> | <b>1,484,204</b> | <b>1.8 %</b> |
| Tier 2 capital (T2)               | 228,611          | 223,732          | 2.2 %        |
| <b>Own funds</b>                  | <b>1,739,220</b> | <b>1,707,936</b> | <b>1.8 %</b> |
| CET1 capital ratio (CET1)         | 16.21 %          | 16.09 %          | 0.7 %        |
| Surplus of CET1 capital (CET1)    | 1,055,021        | 1,033,070        | 2.1 %        |
| T1 capital ratio (T1)             | 16.76 %          | 16.65 %          | 0.7 %        |
| Surplus of T1 capital (T1)        | 969,851          | 949,361          | 2.2 %        |
| Total capital ratio               | 19.30 %          | 19.16 %          | 0.7 %        |
| Surplus of total capital          | 1,018,209        | 994,812          | 2.4 %        |

The Managing Board ensures a sound and sustainable capital structure at Hypo Vorarlberg through ongoing optimisation measures.

All in all, tier 1 capital (T1) rose to TEUR 1,510,609 as at 31 December 2024 (2023: TEUR 1,484,204), while eligible tier 2 capital (T2) also increased to TEUR 228,611 (2023: TEUR 223,732). Hypo Vorarlberg's total own funds increased by 1.8 % year-on-year to TEUR 1,739,220 as at 31 December 2024 (2023: TEUR 1,707,936). This means they are well in excess of the minimum required by law (CRR). As a result, the total capital ratio increased to 19.30 % (2023: 19.16 %). The core capital (T1) ratio also rose to 16.76 % at year-end (2023: 16.65 %), while the common equity tier 1 (CET 1) ratio increased from 16.09 % to 16.21 %. The total risk exposure increased slightly from TEUR 8,914,050 to TEUR 9,012,648. Hypo Vorarlberg intends to further increase its capitalisation in future in line with the Managing Board's plans for sustainable growth and the expectation of new regulatory requirements.

#### DISCLOSURE IN ACCORDANCE WITH SECTION 243A OF THE AUSTRIAN COMMERCIAL CODE (UGB)

##### Share capital and share denominations

Hypo Vorarlberg's subscribed capital is unchanged at TEUR 162,152. As at 31 December 2024, the number of no-par value shares issued was unchanged at 316,736.

##### Shareholder structure

The percentage breakdown of Hypo Vorarlberg's capital as at 31 December 2024 was unchanged against the previous year as follows:

| Shareholders                                    | Total shares      |
|-------------------------------------------------|-------------------|
| Vorarlberger Landesbank-Holding                 | 76.8732 %         |
| Austria Beteiligungsgesellschaft mbH            | 23.1268 %         |
| - Landesbank Baden-Württemberg                  | 15.4179 %         |
| - Landeskreditbank Baden-Württemberg Förderbank | 7.7089 %          |
| <b>Share capital</b>                            | <b>100.0000 %</b> |

#### HYPO VORARLBERG RATINGS

##### Moody's

Since February 2018, the rating agency Moody's has rated Hypo Vorarlberg as A3 (outlook: stable). This rating was confirmed again on 20 August 2024. A subordinated debt rating of Baa3 has been issued, while the short-term rating is P-2. The rating confirms that the Bank is stable and resilient in spite of weaker credit quality. Moody's considered the Bank's sound capital ratios and improved liquidity situation to be particularly positive factors.

##### Standard & Poor's

Standard & Poor's (S&P) has been rating the Bank's creditworthiness since October 2015. In May 2018, S&P assigned Hypo Vorarlberg an "A+" rating for non-current liabilities and an "A-1" rating for current liabilities. The rating agency evaluated the Bank's stable ownership structure positively, as well as the clear commitment of its majority owner (the state of Vorarlberg). Hypo Vorarlberg is classified as a government-related entity, so the very good credit rating of the state of Vorarlberg, which is rated AA+ by S&P, is also a positive factor.

On 12 December 2023, the outlook was downgraded to negative in response to the increased risks to European commercial real estate and the associated risk of higher loan losses. S&P cited Hypo Vorarlberg's considerable exposures in the construction industry and property development. However, the research update on 22 October 2024 emphasised that the Bank still has a strong equity base.

With these two ratings, Hypo Vorarlberg remains one of Austria's best-rated banks.

Hypo Vorarlberg has also been given a very good assessment in terms of sustainability. ESG ratings play a particularly important role in this respect and are used by investors to compare companies' sustainability assessments.

##### ISS ESG

In its rating process, the sustainability rating agency ISS ESG gathers and assesses information on companies' social and environmental performance. In May 2017, Hypo Vorarlberg improved its grade to "C" and no controversies were identified by ISS ESG in any relevant business activities. Since then, the underlying score has steadily improved. Hypo Vorarlberg is thus in the prime segment and among the top 10 % in the "public-sector and regional banks" sector. This very good rating illustrates Hypo Vorarlberg's sustainability performance in a quantified form, which can help investors in making investment decisions. Regular updates ensure that the ratings remain current.

A detailed list of all ratings in this area can be found in Hypo Vorarlberg's non-financial report.

##### Significant events after the end of the reporting period

No events of particular significance occurred after the end of the reporting period.

# DEVELOPMENT

## BY BUSINESS SEGMENT

### CORPORATE CUSTOMERS

As a corporate bank, Hypo Vorarlberg primarily positions itself within the Corporate Customers segment as a banking partner for real estate companies, industrial companies and mid-sized businesses. This segment also supports self-employed persons and municipal customers. With its particular expertise in investment and project financing, real estate financing, developer financing, subsidies, foreign services and working capital financing, Hypo Vorarlberg has established itself in its core markets of Vorarlberg, Vienna, Lower Austria, Styria, Upper Austria, Salzburg, Southern Germany and Eastern Switzerland and is the leading corporate bank in Vorarlberg.

The 2024 financial year was a difficult one for the Corporate Customers segment at Hypo Vorarlberg. Persistently weak economic development in the core markets and higher interest rates had a pronounced adverse effect on investment activity and increasingly led to many companies finding themselves in economic difficulties. Demand for lending in 2024 remained below the average for the past ten years. It became necessary to recognise significant loan loss provisions for outstanding loans as a growing number of companies saw a deterioration in their creditworthiness over the course of 2024.

The difficult market environment also had an impact on the earnings situation in the Corporate Customers segment. Loans and advances to customers increased slightly year-on-year to TEUR 7,719,874 (2023: TEUR 7,598,150).

Net interest income amounted to TEUR 104,361 as at 31 December 2024, down 5.9 % on the previous year (2023: TEUR 110,953). Net fee and commission income increased slightly year-on-year to TEUR 14,878 (2023: TEUR 14,255).

Loan loss provisions remained high, although they did decrease slightly compared with 2023. All in all, earnings before taxes in the Corporate Customers segment therefore totalled TEUR -17,816 (2023: TEUR -15,490).

### PRIVATE CUSTOMERS

In the Private Customers segment, Hypo Vorarlberg offers extensive services with a focus on residential construction financing, securities investment, pension advice and investment advice. Customers benefit from individual, flexible solutions as well as fair and transparent conditions. The focus is not on selling products, but rather on providing an overall solution that is tailored to the customer. The claim "Best advice for everyone with a plan" is aimed at emphasising the Bank's consistent customer focus.

One key area of Hypo Vorarlberg's private customer business is residential construction financing. Although lending for housing finance has seen a clear slowdown since the Bank Real Estate Financing Measures Regulation (KIM-V) came into force in summer 2022, demand for lending picked up again in 2023 as interest rates fell. However, this also meant increased pressure on conditions. The above factors meant there was a slight improvement in 2023, but the figures remain well below where they were prior to the introduction of KIM-V.

As a result, the total volume of loans in the Private Customers segment declined by TEUR 58,810 year-on-year to TEUR 2,227,287 (2023: TEUR 2,286,097).

Hypo Vorarlberg again issued its own bonds on the retail market in 2024 with considerable success.

In 2024, Hypo Vorarlberg generated net interest income of TEUR 81,178 in the Private Customers segment, which represented an increase as against the previous year (2023: TEUR 80,219). Net fee and commission income enjoyed encouragingly strong year-on-year growth to TEUR 24,620 in 2024 (2023: TEUR 20,298). Overall, Hypo Vorarlberg generated earnings before taxes of TEUR 46,849 in the Private Customers segment in 2024 (2023: TEUR 51,149).

To cater to customers' changing needs and requirements, Hypo Vorarlberg also offers supplementary online services in addition to its regionally differentiated physical presence on the market. It does this using an omnichannel strategy under which online solutions are available to supplement branch operations. Hypo Vorarlberg continues to put customer satisfaction at the heart of its work. This is also reflected in its customers' high level of willingness to recommend the Bank.

### Private Banking and Asset Management

Private Banking supports high-net-worth individuals, their families and selected institutional customers. The varied product range is oriented towards customers' needs in all areas and offers contemporary solutions through the use of flexible optimisation concepts adapted to the market situation in asset management and viable alternatives to the money market in the investment business. In terms of products and solutions, the most important assets are the high degree of professional qualification and dedication of the Bank's consultants and employees.

**As a result, Hypo Vorarlberg is one of the leading asset managers in the German-speaking region and was awarded the highest grade, "summa cum laude", by the trade journal Elite Report for the thirteenth time in a row.** This accolade is an endorsement of our chosen path of being a bank that provides individual and high-quality advice while also offering innovative, contemporary products and solutions to address the challenges of the capital markets and regulations as well as the huge overall cost pressure.

### Asset Management

Despite the stock market turbulence, Asset Management business developed positively in 2024. The attractive interest rates meant that customer demand was more focussed on fixed-income investments, which led to an outflow of TEUR -7,085 in 2024. A total of 2,437 mandates were managed as at 31 December 2024 (2023: 2,372). By contrast, total assets under management increased on the back of good portfolio management services and a generally positive capital market environment, amounting to TEUR 1,110,051 at the end of 2024 (2023: TEUR 983,516).

As an asset manager, Hypo Vorarlberg has set itself the goal of taking account of environmental, social and governance-related sustainability criteria (ESG). Hypo Vermögensverwaltung integrates these ESG factors in its selection of target funds and individual securities. In particular, exclusion and quality criteria are applied when selecting securities, meaning that the asset management strategies and Hypo Vorarlberg funds currently on offer take environmental and social aspects as defined in Article 8 of Regulation (EU) No. 2019/2088 into account. To this end, Asset Management has prepared and published its own ESG investment approach.

### FINANCIAL MARKETS/TREASURY

Despite the prevailing political and economic uncertainty, 2024 was a successful year for the capital markets. Rising yield spreads for fixed-interest securities offered plenty of opportunities for attractive investments. With money market rates falling, the interest rate structure contribution saw encouraging development and is



well above target. Having initiated a turnaround in interest policy in June, the ECB lowered its key interest rates several times. The number of newly concluded hedges for fixed-interest loans in customer business decreased in line with demand. Interest rate development meant that demand for interest limit loans was very low.

#### **APM & Investments**

A net volume of approximately TEUR 463,982 was invested in bonds by the APM & Investments unit in 2024 as a whole (2023: TEUR 420,900). The weighted remaining term of these new investments was 12.9 years (2023: 6.8). The average asset swap spread of the securities purchases was 57 bp (2023: 42 bp), while the average rating for the new purchases was AA-.

Major decision-making criteria for new investments included LCR or ECB eligibility and eligibility for the public cover pool.

#### **Funding & investor relations**

In the reporting period, 25 (2023: 21) new issues were placed with a total volume of around TEUR 859,738 (2023: TEUR 1,532,785).

These included two publicly placed bonds with a volume of approximately TEUR 606,000. A 3.5-year senior preferred bond with a total value equivalent to approximately TEUR 106,000 was placed on the CHF market with a value date of 23 January 2024. It was issued with a re-offer premium of SARON mid-swap + 100 bp. The second issue was a 6-year, TEUR 500,000 mortgage-backed bond, which was placed with a re-offer premium of mid-swap + 40 bp.

14 private placements with a volume of TEUR 148,700 were issued, twelve of which were issued via the EMTN program. One was documented as a registered bond, while one took the form of a global loan.

In addition, nine new retail bonds with a total volume of TEUR 105,050 were issued. These included five fixed-interest bonds and three fixed-interest housing construction bank bonds, with the five fixed-interest bonds being placed as tap issues. In June 2024, a subordinated capital bond with a volume of TEUR 22,500 was placed via the Bank's own branch network.

#### **Money, foreign exchange and interest rate derivatives trading**

Between the end of 2023 and the end of 2024, readily accessible short-term liquidity decreased by around TEUR 510,000 to TEUR 420,000 (2023: TEUR 930,000). In addition, extensive collateral is available for repo and tender transactions in money market

trading. Hypo Vorarlberg thus has a sufficient liquidity buffer. As usual, there was a very wide fluctuation range for readily accessible short-term liquidity. This was due to large-volume transactions such as issuances, partial repayments of the TLTRO III operations and major customer transactions.

#### **Customer securities trading**

Customer securities turnover amounted to approximately TEUR 1,491,992 in 2024 (2023: TEUR 1,147,868). This meant that customer securities turnover increased by TEUR 344,124 or 30.0 % compared with the previous year.

#### **Fund service**

The custodian bank volume under management increased from TEUR 10,102,109 to TEUR 10,977,614, corresponding to year-on-year growth of TEUR 875,505 or 8.7 %. In the past reporting period, two special funds (AIF) and one mutual fund (UCITS) were wound up. One mutual fund (UCITS) was acquired by another custodian bank. In addition, one new special fund (AIF) was launched and two mutual funds (UCITS) were merged with other mutual funds.

#### **OTC Derivatives and Money Market Management**

As at the end of 2024, the OTC Derivatives and Money Market Management unit managed 1,446 (2023: 1,419) swaps, interest rate options and currency options with a nominal volume of around TEUR 15,192,186 (2023: TEUR 14,501,470). This represents an increase of TEUR 690,716 as compared to 2023. In the same period, the value of cash collateral increased by TEUR 134,140 to TEUR 82,694 in 2024 (2023: TEUR -51,446). A negative collateral balance indicates that collateral has been provided to the counterparty, while a positive collateral balance indicates that collateral has been provided by the counterparty.

Net interest income in the Financial Markets segment increased to TEUR 20,218 in 2024 (2023: TEUR 17,577). Net fee and commission income saw a slight decline of TEUR 101 to TEUR 2,140 (2023: TEUR 2,241). Segment earnings before taxes amounted to TEUR 4,291 (2023: TEUR 1,249).

#### **CORPORATE CENTRE**

In addition to the business segments listed above, the Corporate Centre segment includes finance lease business, real estate administration and management and the Group's other holdings. This segment's earnings contribution developed positively and amounted to TEUR 24,734 in 2024 (2023: TEUR 16,149). The increase is due to higher net interest income from leases as well as positive effects from the measurement of holdings.

# SUBSIDIARIES AND HOLDINGS

## **HYPO IMMOBILIEN & LEASING GMBH**

Hypo Vorarlberg's entire Austrian and Swiss leasing and real estate business is combined in the Hypo Immobilien & Leasing subgroup. Hypo Immobilien & Leasing GmbH offers services within the Group and to its customers ranging from real estate brokerage through property valuation, construction and property management to facility management. It offers financing solutions for private customers, corporate customers and the public sector in the areas of vehicle, movable asset and real estate leasing. Hypo Immobilien & Leasing GmbH has its headquarters at the Hypo Office in Dornbirn.

Real estate brokerage services are offered at the locations in Bregenz, Dornbirn, Bludenz and Feldkirch. Leasing customers in Austria and Switzerland are supported by the product specialists and sales teams in Dornbirn and Vienna, while Hypo Vorarlberg's consultants offer the full range of leasing solutions to customers. A property valuation team is also based in Vienna and in Vorarlberg. The team performs valuations for Hypo Vorarlberg, particularly for financing purposes. As at 31 December 2024, the company had a headcount of 48 employees (2023: 48).

For 2024, Hypo Immobilien & Leasing GmbH reported earnings before taxes of TEUR 551 (2023: TEUR 717). The consolidated earnings before taxes attributable to the companies of the Hypo Immobilien & Leasing subgroup included in the consolidated financial statements amounted to TEUR 5,341 as at 31 December 2024 (2023: TEUR 6,296).

## **HYPO VORARLBERG LEASING AG, BOLZANO** **HYPO VORARLBERG IMMO ITALIA GMBH, BOLZANO**

Hypo Vorarlberg Leasing AG, based in Bolzano, develops leasing solutions in the areas of real estate, renewable energy and movable assets. The company has been offering its products and services on the northern Italian market for more than 30 years and also has a branch in Como.

In 2024, the Italian leasing market reported a decline in new business of 3.9 % from EUR 34.8 billion to EUR 33.4 billion in total. Real estate leasing – which is the most important area for Hypo Vorarlberg Leasing AG – grew by 5.3 % throughout Italy. By contrast, vehicle leasing declined by 2.5 % and machinery leasing fell by 9.5 %.

In this challenging market environment, Hypo Vorarlberg Leasing AG generated a new volume of EUR 81.2 million in 2024 (2023: EUR 76.6 million). As in previous years, particular emphasis was placed on top-quality lessees, leased assets with good recoverability and appropriate advance payments and collateral. The focus was on real estate and movable asset leasing projects in Trentino-South Tyrol, Verona and Lombardy. In 2024, Hypo Vorarlberg Leasing AG generated net interest income of TEUR 12,392 (2023: TEUR 14,206). Its profit before taxes amounted to TEUR 4,852 (2023: TEUR 8,242).

The company continued to intensively address ESG issues in 2024, with a particular focus on the comprehensive recording of energy performance certificates, the wide-scale georeferencing of the portfolio, and participating in a data capture project for physical risks organised by the association of leasing companies.

In 2024, Hypo Vorarlberg Leasing AG enhanced the digitalisation and automation of workflows. Furthermore, a project to document internal processes and revise work instructions continued. The implementation of the European Digital Operational Resilience Act (DORA) for the financial sector is in progress and is expected to be completed by autumn 2025.

A new volume of EUR 120 million is intended in 2025 in line with strict risk criteria. Major initiatives such as continued increased involvement in the leasing of machinery and equipment for producing renewable energy as well as intensive support for the Trentino and Verona market region are intended to enable the ambitious new customer volume to be achieved. Starting from this year, support can also be provided for the other provinces in Veneto region, as well as for investment projects throughout northern Italy initiated by customers from Trentino-South Tyrol.

## **Hypo Vorarlberg Immo Italia GmbH**

Demand for commercial real estate on the northern Italian market was healthy in the first half of 2024 before slowing slightly in the second half of the year. As the available supply on the market is moderate, prices are still stable. Second-hand real estate remains attractive in light of the sharp rise in costs for new builds. The expectations for 2025 can be described as cautiously optimistic.

In the reporting year, Hypo Vorarlberg Immo Italia GmbH sold a total of 19 properties with a value equivalent to TEUR 5,600 (2023: TEUR 7,501). This meant the volume of properties still to be sold was reduced further. The number of properties let was also slightly lower than in the previous year. The average rental yield is now over 10 %.

Hypo Vorarlberg Immo Italia GmbH reported a net loss before taxes of TEUR -657 for the 2024 financial year (2023: TEUR -343).

## **COMIT VERSICHERUNGSMAKLER GMBH**

comit is the biggest regional insurance broker and can therefore cope better with the growing market and competitive pressure and the stricter regulatory conditions.

Hypo Vorarlberg holds a 40 % share in comit Versicherungsmakler GmbH; the other owners are VLV (40 %) and Wälderversicherung (20 %).

# OUTLOOK

## FOR THE 2025 FINANCIAL YEAR

### CURRENT ENVIRONMENT

Austria's economic output has been declining since early 2023. The last two years have been characterised by falling investment and exports combined with stagnation in consumer spending. 2025 is set to be the third successive year with lower investment (-0.4 % vs. 2024). This is a worrying prospect, as investment forms the basis for future economic growth.

At the start of the year, the Austrian Economic Chambers (WKO) forecast a weak start to 2025 for the Austrian economy. In other words, there are no signs of a turnaround just yet. Sentiment among companies remains broadly pessimistic, although a slight upturn can be seen among non-industrial companies. The expected rise in energy prices at the start of 2025 in response to higher grid fees had a further adverse effect on consumer confidence. Global industrial activity and the worldwide trade in goods are only starting to slowly pick up again. The Austrian economy is expected to see growth of just 0.6 % in 2025. The overall situation is reinforcing the impression that Austria is falling behind its international peers. According to the Austrian Institute for Economic Research (WIFO), the euro area is set to outperform the Austrian economy in terms of annual economic growth by 0.2 percentage points in the medium term, while itself being outperformed by the United States by almost 1 percentage point.

Although expectations of interest rate cuts and falling inflation are likely to have a positive impact over the coming months, Austria's growth prospects continue to be impeded by structural factors. The need for fiscal consolidation is also having an adverse effect on growth. This is exacerbated by considerable geopolitical and trade policy risks and uncertainties, as Austria is also experiencing a high degree of economic policy uncertainty at present. The new federal government will face the challenge of wide-ranging budget consolidation, the impact of which is not yet foreseeable.

### PRIORITIES FOR 2025

While Hypo Vorarlberg is a price taker in many areas of its business activities, its profitability can be significantly influenced by systematic cost management.

The Managing Board therefore pays great attention to making corporate structures as lean as possible and making processes and workflows as efficient as possible. Optimisation and rationalisation projects are implemented at regular intervals, including with a view to tackling the difficult situation on the labour market as requirements increase further. Opportunities presented by digitalisation are also to be leveraged. In future, there will be a particular focus on analysing processes and increasing efficiency in this area by way of automation, optimisation and modernisation. Despite increased requirements for IT, organisation and personnel – partly due to regulatory provisions – Hypo Vorarlberg still has a low cost-income ratio.

Its capital ratios and capital buffers have improved significantly in recent years, allowing Hypo Vorarlberg to act as a reliable partner to its customers even in the currently challenging situation. Owing to ongoing major uncertainty as a result of the current crises, as well as to facilitate further sustainable growth, there is a continued focus on optimising and improving capitalisation (including by way of guarantee agreements, e.g. with the EIF/EIB Group). Regulatory developments, e.g. in the context of MREL or Basel IV, are also to be taken into account proactively at an early stage.

Hypo Vorarlberg's strategic alignment is based on the following guidelines:

- The company's internal financing capacity is to be increased in order to further strengthen its equity.
- A cost-optimised liquidity supply is to be ensured for the long term.
- Profitability in customer business is to be increased further. In particular, core expertise is to be harnessed even more effectively. This includes strategic and improved cross-selling in business with both private customers and corporate customers in Vorarlberg, as well as targeted, sustainable growth in the market areas outside Vorarlberg.
- Risk diversification is intended and cluster risks will be avoided. In line with the definition of large loans under the CRR, no risk exposures exceeding 10 % of the core capital are to be actively taken on in customer business.

Based on these guidelines and objectives, the following strategic priorities have been set for the current strategy cycle and are taken into account accordingly in the strategic alignment of the individual business segments and in the functional strategies:

### Continuity and reliability

In the interests of a reliable partnership with its customers, Hypo Vorarlberg's existing successful business model is to be improved further. The focus will remain on customer business. No significant changes in the market and regional portfolio are planned, but the Bank's presence in growth markets outside its home market of Vorarlberg is to be increased, such as with the addition of the most recent location in Salzburg.

### Organic and sustainable growth

Hypo Vorarlberg aims to keep growing organically and sustainably in the Corporate Customers and Public-Sector Institutions and Private Customers business segments. The growth regions are primarily the core markets outside Vorarlberg, but growth potential in Vorarlberg is to be harnessed as well. In addition, there is a strategic focus on margins and income in all lending business. Given the change in the interest rate environment, deposit business is also increasingly important again.

### Private Banking

Building on the good development in Private Banking and in asset management, the top segment for investment business with companies, entrepreneurs and high-net-worth private customers is being expanded.

### Digitalisation

With regard to digitalisation, the strategic focus is on the further development and modernisation of digital applications and processes. The primary goal is to increase efficiency in market cultivation and in processing banking business, firstly in response to changes in customers' expectations in an online environment and secondly to optimise internal processes. Furthermore, digitalisation is an important prerequisite for meeting the constantly increasing regulatory requirements efficiently. The digital transformation is largely driven by a strong IT system that is anchored in the Bank, with the operation of the core banking system and other key banking applications supported by Accenture as a strong international partner that also provides fresh stimulus for innovation and digitalisation.

### Productivity and efficiency

The Managing Board continues to attach great importance to productivity and efficiency, particularly in the current banking industry environment with its significant pressure on margins, high expenses for regulatory and IT requirements and high tax burden.

## Sustainability

The issue of sustainability is a high priority for Hypo Vorarlberg, and the Bank is aware of its key role in the fight for a social, environmental and economic future. The importance of this issue for the financial sector is reflected not least in the numerous regulatory requirements (e.g. Taxonomy, CSRD) that continuously need to be screened and implemented proactively. In order to integrate sustainability even more strongly in core business, there is a focus on updating the strategic sustainability guidelines and incorporating sustainability more deeply in governance.

## Research and development

With no independent planned research having been conducted to obtain new scientific or technical knowledge, and no upstream development work for commercial production or use having been carried out, Hypo Vorarlberg does not perform any research and development activities. However, it reviews the effects of economic and market developments on the development of its net assets, financial position and results of operations on an ongoing basis. To survive among the competition, it is not enough just to know the current market conditions; it is also necessary to consider future scenarios. For years, there has been a close partnership with Vorarlberg University of Applied Sciences for the purposes of ongoing development. The cooperation covers issues such as optimising calculation of the cover pool assets, optimum allocation of securities collateral and calculation of stress scenarios and restructuring measures in accordance with the Austrian Federal Act on the Restructuring and Resolution of Banks (BaSAG).

Before the detailed development of a new product or the inclusion of a third-party product in Hypo Vorarlberg's product range, a product and business introduction process is defined to guarantee an orderly approach and identify potential risks in advance.

## CURRENT DEVELOPMENTS

In December 2023, the COFAG (COVID-19 Financing Agency) Inquiry Committee was established at the request of 46 members of the Austrian National Council (SPÖ and FPÖ). The Committee on Rules of Procedure of the Austrian National Council subsequently adopted a resolution to take evidence, listing the institutions and companies required to submit files and documents to the Inquiry Committee. These included the OeNB and the Austrian Financial Market Authority (FMA), which submitted audit reports and documents of Hypo Vorarlberg to the Inquiry Committee.

In early 2024, documents that are also required to be handled confidentially by the Inquiry Committee were unlawfully passed on to Austrian media. This led to increased media reactions and political debate with regard to Hypo Vorarlberg during the course of 2024. Thanks to a partial suspension of banking secrecy, Hypo Vorarlberg endeavoured to bring more transparency to the matter with an active communication strategy and to correct statements that had in some cases been taken out of context or misinterpreted. In addition, the FMA filed charges against persons unknown on suspicion of breaching business, banking and official secrecy.

On 8 March 2024, the parties in the Vorarlberg Landtag (state parliament) agreed that the State Audit Office would audit Hypo Vorarlberg. Hypo Vorarlberg expressly welcomed the audit, which was still in progress at the time this report was prepared.

## EXPECTED EARNINGS DEVELOPMENT FOR HYPO VORARLBERG IN 2025

Hypo Vorarlberg is a very well positioned company that pursues a risk-conscious business model with a strategic focus on the market areas in Austria, Switzerland, Germany and northern Italy.

For 2025, Hypo Vorarlberg expects falling interest rates to lead to a cautious economic recovery in the markets served by the Bank, thereby providing a certain degree of support for corporate customer business. This more positive market environment should offer growth opportunities in the areas of financing, deposits and fee and commission income, as well as lower risk costs. The Corporate Customers segment is expected to return to making a significant contribution to the Bank's total earnings in 2025.

Developer financing will undoubtedly be affected by the persistently muted economic environment. With the number of insolvencies remaining high, it is hard to forecast how risk costs will develop between now and the end of 2025.

In terms of lending to private customers, the announcement that the Bank Real Estate Financing Measures Regulation (KIM-V) will expire in June 2025 is expected to lead to a slight recovery in demand for housing loans. Although KIM-V is set to expire, the Austrian Financial Market Stability Board recommends continued compliance with the expectations of the regulatory authority and the reporting requirements, and potentially even the creation of additional capital buffers for this business segment. Lower interest rates will certainly lead to increased demand for residential construction financing in 2025.

At present, there are numerous indicators that the ECB will lower interest rates further in 2025. If inflation allows, we expect the ECB to aim for a key interest rate of below 2 % in the course of 2025. It remains to be seen how this situation will affect the number and volume of new loans concluded.

In addition to a sound equity base, Hypo Vorarlberg also has sufficient liquidity reserves and a diversified funding structure, meaning that there are no significant cluster risks where its funding is concerned. 2025 will see capital market maturities of around TEUR 790,000 and a planned issue volume of around TEUR 875,000. The liquidity under the TLTRO program was repaid in full in 2024. Thanks to the reserves it has recognised and its stable equity position, Hypo Vorarlberg can look to the future with confidence even in the current challenging economic situation.

Hypo Vorarlberg has performed well in the first months of the 2025 financial year, with net interest income and net fee and commission income continuing to make an important contribution to earnings. Staff costs and material expenses in particular are expected to increase. As mentioned previously, risk costs depend to a large extent on the economic and political developments in Hypo Vorarlberg's core markets in the course of 2025.

The Managing Board currently assumes that the company will continue to operate as a going concern based on the measures described above.

# RISK MANAGEMENT

## AT HYPO VORARLBERG

Hypo Vorarlberg addresses specific banking risks through conservative lending policies, strict valuation rules for loans and advances and appropriate recognition of valuation allowances. The subsidiaries generally use the same rating tools as the parent company. This provides for uniform credit ratings Group-wide. Valuation allowances are recognised for credit risks in connection with loans and advances to customers and banks in accordance with uniform Group criteria.

The reporting year was characterised by uncertainty on the money and capital markets. The value at risk (99 %/10 days) reached monthly average levels of up to TEUR 29,945 (2023: TEUR 38,225).

The main market risks at the Bank are interest rate risk and credit spread risk. Share price and foreign currency risks are of minor significance only. The Bank does not have a significant trading book. Regarding the use of financial instruments in accordance with section 243 (3) no. 5 UGB, please refer to the disclosures under V. Notes, section A, note (3).

Hypo Vorarlberg utilises the money market for refinancing only to a limited extent. In previous years, the Bank participated in the ECB's medium-term refinancing operations.

Further explanations with regard to financial risks and risk management at Hypo Vorarlberg can be found in the notes. The full disclosure on the organisational structure, risk management and the risk capital situation according to CRR are published on the internet at [www.hypovbg.at](http://www.hypovbg.at).

### INTERNAL CONTROL AND RISK MANAGEMENT SYSTEM WITH REGARD TO THE ACCOUNTING PROCESS

At Hypo Vorarlberg, responsibility for establishing and designing the internal control and risk management system (ICS) lies with the entire Managing Board. Hypo Vorarlberg is distinguished by a clear organisational, corporate, control and monitoring function, which includes in particular the dual control principle, IT-assisted controls, and decision-making powers and monitoring instruments geared towards inherent risk.

The existing internal control system is optimised on a continuous basis. Further/new processes are included in the documented ICS in accordance with an assessment of materiality and the level of risk for Hypo Vorarlberg.

#### Control environment

The Finances unit at Hypo Vorarlberg, which also serves as the Group Accounting function, comprises Bookkeeping/Account Management, Accounting/Reporting, Data and Document Management, and Taxes. The close cooperation between the Finances unit and the Controlling and Group Risk Controlling departments enables uniform and aligned Bank reporting, both internally and externally. The reporting process, together with control measures, are regulated by work instructions, internal process descriptions, ICS documentation and in the Group Manual.

#### Risk assessment and control measures

As part of the ICS, processes are checked for inherent risk and the existence of traceable, effective and efficient risk mitigation measures and controls, adjusted and, if necessary, supplemented on an ongoing basis at least once a year. Moreover, a continuous control and effectiveness analysis is performed, and any potential improvements identified are implemented.

The financial reporting process is not limited to internal and external reporting but also uses guidelines and methods to govern the

collection of data, creation of entries, recognition of transactions and valuation of business and is supported by various software solutions (Arctis, Geos, SAP, B&S, PMS, etc.) in the preliminary stages. These programs offer automatic assistance and checks for correct entry and use. In addition, ongoing manual checks are made in daily business. The propriety, transparency, effectiveness and efficiency of these checks are ensured by ICS monitoring.

#### Information and communication

Bank reporting takes place almost exclusively on an automated basis using downstream systems and automatic interfaces. This ensures current data for controlling, profit calculations and other assessments. As a result of the close cooperation between the Finances unit and the Controlling and Group Risk Controlling departments, target-actual comparisons are implemented on an ongoing basis. Reciprocal control and coordination between the departments is assured.

Bank decision-makers receive a large number of reports for their monitoring and control functions on a regular basis, e.g. weekly statements, monthly P&L forecasts with interest margin calculations, earnings extrapolations at branch office, unit and Bank level, target-actual comparisons, data on volume and income, ALM, risk and Treasury reports, quarterly costings, and various statistics and analyses.

Periodic reports are submitted to the Supervisory Board on the above basis. At the end of the year, the Bank's annual financial statements are prepared in accordance with the Austrian Commercial Code (UGB)/Austrian Banking Act (BWG) and the Bank's consolidated financial statements are prepared in accordance with IFRS. There are also ongoing supervisory reporting obligations to the OeNB/FMA.

An ICS report is prepared for the Managing Board twice a year and for the Audit Committee once a year containing information on the work performed as part of the ICS. ICS reporting has a bottom-up approach. The records on the implemented controls are completed by the person responsible for the process as they are carried out on an operating basis. Together with the results of the control and effectiveness analysis, these records are combined in the ICS report. They are combined with the findings of Internal Audit to enable a statement to be made on the effectiveness of the ICS.

#### Monitoring

The quality of the ICS is continually assessed by Internal Audit regarding the reliability, propriety and legality of the accounting process and reporting. Internal Audit cooperates closely with the members of the Bank's Managing Board and the managing directors of the subsidiaries and reports periodically to the Audit Committee of the Supervisory Board and to the Supervisory Board itself.



## COMPLIANCE AND PREVENTION OF MONEY LAUNDERING

Hypo Vorarlberg's Compliance department reports directly to the Managing Board. It is tasked with monitoring compliance with statutory supervisory requirements, particularly those under the Austrian Banking Act (BWG), the Austrian Securities Supervision Act (WAG), the Austrian Stock Exchange Act (BoerseG) and the Federal Act on the Prevention of Money Laundering and Terrorist Financing in Financial Markets (FM-GwG).

### Compliance

All employees are obliged to comply with the provisions of Hypo Vorarlberg's compliance guidelines. These guidelines are based on the Standard Compliance Code of the Austrian banking industry, the WAG and the BoerseG. Compliance with the regulations is ensured by way of regular, documented audits. New employees receive a comprehensive induction as part of the Hypo Basics, which usually take place on the first two days of the first month of employment. All employees are trained on an ongoing basis, must take a brief test every year and are informed accordingly in the event of changes.

The Compliance department regularly evaluates compliance with the provisions of the Markets in Financial Instruments Directive (MiFID II) along with regulations which were also implemented in the WAG and implements any necessary changes in conjunction with the specialist departments. These regulations protect investors and serve the efficiency and integrity of the market. Regular, documented checks are also carried out.

### Prevention of money laundering

Hypo Vorarlberg aims to prevent every form of money laundering and financing of terrorism in connection with its business operations. To achieve this aim, three computer programmes and additional audits are used to check for money laundering. These support employees when classifying customers with regard to money laundering risk and help them to flag suspicious payments. In addition, they ensure compliance with the legal requirements to carry out embargo checks and checks for politically exposed persons.

All employees complete a comprehensive training programme in which they are familiarised with the legal provisions regarding the prevention of money laundering and the financing of terrorism as well as suspicious circumstances that could indicate the existence of such cases. In addition, all new employees receive training as part of their basic induction. All employees who have contact with customers must pass a refresher test every year. In further training, employees are taught about specific provisions and types of money laundering so that suspicious transactions can be recognised. Regular checks are performed at the branch offices, including by Internal Audit.

## DATA PROCESSING/IT

Hypo Vorarlberg has outsourced key IT services to Accenture GmbH in Austria (Accenture). Based on a corresponding customer contract, Accenture performs the IT services that were previously performed for Hypo Vorarlberg and other banks by Allgemeines Rechenzentrum GmbH (ARZ) in Innsbruck over many years. In 2022, Accenture acquired the core business of ARZ and the associated assets for performing IT services from the owner banks, which also included Hypo Vorarlberg with a relatively small indirect share. As a competence centre for IT services in the banking industry, Accenture supported key business processes of all banks that were previously customers of ARZ.

As previously, Hypo Vorarlberg's strategy involves bundling key IT services in a banking data centre with other banks in order to generate economies of scale and synergies and harness potential efficiencies through technology.

At the same time, this is reducing the complexity of the Bank's own IT infrastructure, allowing it to concentrate its IT resources on internal optimisation and digital transformation.

In the customer contract, Accenture has undertaken to provide services under a banking-as-a-service model. These services must be provided in compliance with the regulatory requirements and using state-of-the-art technology. ARZ's assets for operating the data centre have been transferred to the Accenture subsidiary TiGital. As previously at ARZ, the central system in the TiGital data centre for day-to-day banking business is the ARCTIS software solution, supplemented by standard solutions such as GEOS, SAP, B+S and others. TiGital is responsible for operating the core banking systems and IT infrastructure.

In addition, a key element of the new customer contract with Accenture is an extensive investment programme to modernise the IT systems in the acquired data centre. Accenture was chosen as the new partner partly because it will cover part of this investment itself and because, as a major international IT provider, it has the necessary expertise and resources to ensure that the modernisation goals are achieved. The main investment programmes relate to the areas of IT security, financial and risk architecture and collaboration systems, as well as enabling the use of cloud services and opening up the core banking system via interfaces.

At Hypo Vorarlberg itself, IT and digitalisation expertise are bundled in a high-performance IT division that takes account of the growing strategic importance of IT for banking business. Pooling expertise in this way increases operating efficiency, while IT is also expected to provide significant impetus for the Bank's digital transformation. With around 70 highly qualified employees, Hypo Vorarlberg IT has the resources to manage the outsourcing partner Accenture, respond to the challenges of digitalisation, identify risks and take advantage of opportunities.

A corresponding IT strategy was adopted in 2021 and is continuously refined. The core of this strategy is the understanding that, in the age of digitalisation, IT plays a central role as a business enabler, especially in the financial sector. This is also the case at Hypo Vorarlberg. This transformation from an internal service provider to an equal business partner goes hand in hand with establishing an agile stance as well as introducing correspondingly agile tools.

Another part of the IT strategy is the systematic enhancement of the IT systems – both the Bank's internal systems and the Accenture systems – through the aforementioned investment programmes. For its own IT solutions, Hypo Vorarlberg has established the more intensive use of the cloud as a fundamental goal of its IT strategy. The continued aim is to sound out what the strict regulatory conditions allow and which applications are suitable for cloud operation.

Hypo Vorarlberg expects the use of AI to be particularly important over the coming years. It is starting by identifying suitable use cases, including in cooperation with strong partners. The necessary legal basis will be established at the Bank before AI goes into use. This applies in particular to the provisions arising from the EU AI Act. The introduction of AI serves as a particularly good illustration of the complex and conflicting priorities facing banks, with a highly dynamic technological environment on the one hand and early and comprehensive regulation on the other.

The following section provides examples of the numerous change-the-bank projects in 2024, some of which will take several years on account of their scope:

- Modernisation of the Bank's management systems in an "Integrated financial and risk architecture" program lasting several years on the basis of SAP R/4HANA and Wolters Kluwer OneSumX.
- Modernisation of the digitalisation architecture with the establishment of the "digital backbone", including the changeover of applications to an operating infrastructure based on modern cloud technology.



- Regulatory projects still account for a significant portion of the change-the-bank portfolio, with examples including Basel IV, DORA and the EU action plan for financing sustainable growth. The need to implement Basel IV by 1 January 2025 and DORA by 17 January 2025 tied up considerable resources in 2024, placing a significant burden on the Bank as a whole and its IT in particular.
- Modernising the workplace is also important to Hypo Vorarlberg. For example, a modern collaboration platform, Jira/Confluence, is in use and the transition to M365 was successfully completed in early 2024. In addition, Accenture has been commissioned with the comprehensive modernisation of the IT working environment for employees ("Workplace 2.0"). The rollout will begin in early 2025 and is expected to be complete by mid-2025.
- In addition, Hypo Vorarlberg continuously invests in digital channels, particularly due to the constant further development of online banking, along with complementary functions such as digital signatures and video consulting.

Accenture's systems and processes are regularly reviewed by Internal Audit and an external auditing firm. These audits and controlling measures are conducted on the basis of "ISAE 3402 Type 2" and "IWP/PE 14 Type 2" standards and are continuously adapted to reflect changes in conditions. The most recent audits did not give rise to any significant objections. The data centre and Hypo Vorarlberg counter information technology risks with measures such as backup systems, failover mechanisms and suitable security concepts and by providing intensive information to employees. Clear authority and access regulations, the dual control principle and an internal control system are established. Hypo Vorarlberg also focuses on systematic standardisation to reduce complexity and increase cost efficiency in order to remain innovative.

The Digital Operational Resilience Act (DORA) is a new European regulation for the effective and comprehensive management of digital risks in financial markets. It applies to more than 22,000 financial entities and ICT service providers operating within the EU, including Hypo Vorarlberg. DORA came into force on 17 January 2023 and has been applied since 17 January 2025. The aim of this standardised regulation is to ensure the resilience of financial entities in the face of cyber threats and to enable them to respond rapidly and in a targeted manner when serious ICT-related incidents occur. In 2024, Hypo Vorarlberg established a number of new guidelines relating to the implementation of DORA and is gradually implementing them throughout the Group. Implementation will be accompanied by further internal information and training measures.

The St. Gallen branch still has an IT system that is designed primarily for Swiss requirements and is independent from the overall bank.

IT operations at the St. Gallen branch are provided by a Swiss standard software solution, "FINNOVA". The "FINNOVA" inventory management system is supplemented by other peripheral systems that support processes in specific areas.

At the end of 2022, a change in the main IT service provider was made together with three other Swiss regional banks, although the core banking application itself remains "FINNOVA".

The project lasted a good 18 months and was successfully completed at the beginning of 2023. The system has been running without disruption ever since. The associated investment will allow for the further development of the St. Gallen branch in future. While the previous IT environment primarily supported Swiss regional banks, the new partners enable us to press ahead with our own developments and to implement EU regulations in Switzerland as well. It is also planned to use the new levels of freedom to provide better support for customers in the German-speaking region and to facilitate cooperation with the headquarters in Brezgenz.

Standard software systems are also used at the subsidiary Hypo Immobilien & Leasing and at the leasing company in Bolzano.

# DISCLOSURE OF INFORMATION

## ON REMUNERATION POLICY AND PRACTICES IN 2024

Hypo Vorarlberg's remuneration policy is consistent with its strategy, goals and values and its long-term interests. It corresponds to the size, internal organisation, type, scope and complexity of Hypo Vorarlberg's business. For risk bearers ("identified staff"), the special remuneration regulations in accordance with the annex to section 39b of the Austrian Banking Act (BWG) apply.

The remuneration policy is compatible with sound and effective risk management. The Remuneration Committee of Hypo Vorarlberg held a total of three meetings in 2024. In addition to the Supervisory Board – particularly the Remuneration Committee headed by Birgit Sonnlichler – the Internal Audit department acts as a controlling body for the remuneration policy. On behalf of the Supervisory Board, it is entrusted with auditing the implementation of the principles of the remuneration policy.

Employees at Hypo Vorarlberg are remunerated exclusively in line with market conditions in the form of collectively agreed fixed salaries as well as overpayment if necessary.

### **Remuneration policy for Managing Board members**

The Chairman of the Managing Board, Michel Haller, and the other Managing Board members, Wilfried Amann and Philipp Hämmerle, received a fixed annual basic salary for 2024 that was paid out in fourteen instalments. Besides the remuneration payments agreed in the Managing Board contracts, there are no bonus agreements.

Detailed disclosures on the remuneration policy in accordance with Article 450 of Regulation (EU) No. 575/2013 (CRR) on remuneration policy and practice can be found online at [www.hypovbg.at](http://www.hypovbg.at).

Bregenz, 27 March 2025

**Hypo Vorarlberg Bank AG**  
The Managing Board



Michel Haller  
Chairman of the Managing Board



Wilfried Amann  
Member of the Managing Board



Philipp Hämmerle  
Member of the Managing Board

# **NON-FINANCIAL STATEMENT**

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## ESRS 2 GENERAL DISCLOSURES

### BASIS FOR PREPARATION

#### DISCLOSURE REQUIREMENT BP-1 – GENERAL BASIS FOR PREPARATION OF THE NON-FINANCIAL STATEMENT

Hypo Vorarlberg Bank AG ("Hypo Vorarlberg" for short) is an Austrian regional bank headquartered in Bregenz. The Hypo Vorarlberg Group also includes domestic and foreign companies that are authorised to operate by the relevant supervisory authorities in their country of domicile. This non-financial statement fulfils the obligations under sections 243b and 267a of the Austrian Commercial Code (UGB). The company is also reporting in accordance with the requirements of the Corporate Sustainability Reporting Directive (CSRD) using the European Sustainability Reporting Standards (ESRS) for the first time.

The Austrian Sustainability and Diversity Improvement Act (NaDiVeG), which transposed EU Directive 2014/95/EU into Austrian law, has required large public-interest entities to publish non-financial information relating to environmental, social and employee matters, respect for human rights and combating corruption and bribery since the 2017 financial year. The respective policies and their results, the due diligence processes applied, the material risks and the key performance indicators must be disclosed. It has been ensured that the requirements of the NaDiVeG are met. A list of where these points are covered in the non-financial statement can be found under data point ESRS 2 IRO-2.56. In addition to the content, the NaDiVeG governs the duties of the Managing Board and the Supervisory Board with regard to the non-financial statement. The Supervisory Board is the ultimate reviewing body. Although it is not obliged to do so, Hypo Vorarlberg has had its report audited externally every year since 2018. The Supervisory Board is responsible for deciding which auditor assumes this task.

Since 2021, Article 8 of Regulation (EU) 2020/852 requires banks to disclose how and to what extent the company's activities are linked to economic activities that qualify as environmentally sustainable economic activities. In accordance with the legal requirements, this disclosure can be found in the "Disclosures on the EU taxonomy" section.

The information in this non-financial statement covers the 2024 financial year (1 January to 31 December). The figures and tables shown may contain rounding differences.

#### 5a) Consolidated or individual basis of preparation for the sustainability statement

The scope of consolidation for the non-financial statement is consistent with the financial reporting and was prepared on a consolidated basis.

#### 5bi) Confirmation of consistency with the annual financial statements or reasons for deviations

As a matter of principle, the non-financial statement includes those companies that were also fully consolidated in the consolidated financial statements.

The emissions caused by leased and rented property, plant and equipment in accordance with Scope 3.13 are calculated for the following subsidiaries. As they do not have any employees, they are not taken into account beyond this.

| Fully consolidated companies:                        | Equity interest |
|------------------------------------------------------|-----------------|
| Hypo Immobilien Besitz GmbH, Dornbirn                | 100.00 %        |
| Hypo Immobilien Bankgebäudemanagement GmbH, Dornbirn | 100.00 %        |
| Hypo Immobilien Investment GmbH, Dornbirn            | 100.00 %        |
| Edeltraud Lampe GmbH & Co KG, Dornbirn               | 100.00 %        |
| Hypo Immobilien Cinemabetriebs GmbH, Dornbirn        | 100.00 %        |
| LD-Leasing GmbH, Dornbirn                            | 100.00 %        |

For the following fully consolidated companies, Scope 1 and 2 are determined using the equity method and counted towards the Group's Scope 3 figures.

| Companies consolidated using the equity method: | Equity interest |
|-------------------------------------------------|-----------------|
| comit Versicherungsmakler GmbH, Dornbirn        | 40.00 %         |
| MASTERINVEST Kapitalanlage GmbH, Vienna         | 37.50 %         |

#### 5bii) Subsidiaries excluded from the non-financial statement

The following companies included in the consolidated financial statements are not included in the non-financial statement as they have no employees, office buildings or aspects relevant to reporting.

| Fully consolidated companies:                                  | Equity interest |
|----------------------------------------------------------------|-----------------|
| "Hypo-Rent" Beteiligungs GmbH, Bregenz                         | 100.00 %        |
| HYPO EQUITY Beteiligungs GmbH, Bregenz                         | 100.00 %        |
| KUFA GmbH, Bregenz                                             | 100.00 %        |
| HYPO VORARLBERG HOLDING (ITALY) G.m.b.H, Bolzano (Italy)       | 100.00 %        |
| VKL VI PBZ Korneuburg Leasinggesellschaft m.b.H.               | 100.00 %        |
| "HERA" Grundstücksverwaltungsgesellschaft m.b.H., Dornbirn     | 100.00 %        |
| D. TSCHERNE Gesellschaft m.b.H., Vienna                        | 100.00 %        |
| "POSEIDON" Grundstücksverwaltungsgesellschaft m.b.H., Dornbirn | 100.00 %        |
| HIL Mobilienleasing GmbH & Co KG, Dornbirn                     | 100.00 %        |
| HYPO EQUITY Unternehmensbeteiligungen AG, Bregenz              | 100.00 %        |
| HIL Immobilien GmbH, Dornbirn                                  | 100.00 %        |

| Fully consolidated companies:                                 | Equity interest |
|---------------------------------------------------------------|-----------------|
| HIL BETA Mobilienverwertung GmbH, Dornbirn                    | 100.00 %        |
| HIL Baumarkt Triester Straße Immobilienleasing GmbH, Dornbirn | 100.00 %        |
| HIL Real Estate alpha GmbH, Dornbirn                          | 100.00 %        |
| HIL Kommunalleasing GmbH, Dornbirn                            | 100.00 %        |
| VKL IV Leasinggesellschaft mbH, Dornbirn                      | 100.00 %        |
| VKL V Immobilien Leasinggesellschaft m.b.H, Dornbirn          | 100.00 %        |
| METIS – Beteiligungs und Verwaltungs GmbH, Bregenz            | 100.00 %        |
| “HSL-Lindner” Traktorenleasing GmbH, Dornbirn                 | 76.00 %         |

### 5c) Discussion of coverage of the upstream and downstream value chain

The upstream and/or downstream value chain is addressed in the non-financial statement depending on the respective topic.

This includes the following core areas:

- Upstream value chain: procurement, suppliers and infrastructure
- Own business operations
- Downstream value chain: private and corporate customers

Hypo Vorarlberg's business activities and its value chain have been analysed to identify potential impacts, risks and opportunities related to environmental, social and governance issues. As a non-production company, resources and consumption play a minor role. The focus is on analysing and reporting on the downstream value chain.

Further information on the strategy, business model and value chain can be found under ESRS 2, SBM-1.

### 5d) Disclosure on omission of information on intellectual property, know-how and the results of innovation

No information is knowingly omitted from the reporting.

### 5e) Disclosure on the exemption relating to the annual financial statements, consolidated financial statements and related reports

The exemption provided by Articles 19a (3) and 29a (3) of Directive 2013/34/EU was not applied.

## DISCLOSURE REQUIREMENT BP-2 – DISCLOSURES IN RELATION TO SPECIFIC CIRCUMSTANCES

### 9a) Definitions of medium- or long-term time horizons

The time horizons of short-term (up to 1 year), medium-term (1-5 years) and long-term (over 5 years) as defined in the ESRS are generally applied in the non-financial statement.

The observation period in the risk inventory is currently 3 years for sustainability risks. Developments beyond this 3-year period are extremely uncertain in terms of their likelihood of occurrence and amount. From 2025 onwards, risk management will adapt the approach in the risk inventory to reflect the proposed ESRS periods (up to 1 year, 1-5 years and over 5 years).

### 9b) Discussion of the reasons for applying those definitions

Different time horizons are applied due to regulatory requirements and market standards. To ensure uniform allocation and comparability, the next step involves aligning these to the ESRS time horizons in risk management and sustainability reporting in order to ensure a consistent view in future.

## 10) Utilisation of indirect data (e.g. sector averages, approximate values) from the upstream and downstream value chain

### OWN BUSINESS OPERATIONS

The upstream value chain is relevant when analysing operational consumption.

#### Data sources used in calculating “gross GHG emissions”

Different data sources were used in preparing assessments. All of these sources come from reputable institutions. The data sources used are described below:

| Data source                                                                                                  | Relevance                    | Application         |
|--------------------------------------------------------------------------------------------------------------|------------------------------|---------------------|
| Environment Agency Austria                                                                                   | Fuels/purchased energy       | E1 – Climate change |
| Environment Agency Austria                                                                                   | Vehicle fleet                | E1 – Climate change |
| Verkehrsauskunft Österreich, mobitool                                                                        | Mobility                     | E1 – Climate change |
| Öko-Institut e.V., manufacturer information, ifeu Institute for Energy and Environmental Research Heidelberg | Purchased goods and services | E1 – Climate change |

### DOWNSTREAM VALUE CHAIN

The situation is different for the downstream value chain, which is material on account of invested or financed portfolios (Scope 3.15) and leasing and rental (Scope 3.13) and is analysed in the following areas: financing, leasing and own-account investments.

For financed and invested portfolios, estimates are made for operational consumption and analyses of CO<sub>2</sub> emissions, biodiversity, air pollution and the circular economy. All approximations in the area of financed and invested portfolios are carried out using the recognised method proposed by the Partnership for Carbon Accounting Financials (PCAF) depending on the selected data quality score. As a financial institution, Hypo Vorarlberg is aware that it has a significant influence on the budget of its financed emissions (Scope 3.15) in addition to emissions within the scope of its own business activities.

## MEASUREMENT OF GREENHOUSE GAS INTENSITIES (IN ACCORDANCE WITH THE RISK STRATEGY)

To measure the transition risk, the greenhouse gas intensities for each industry and country were allocated to the Bank's corporate financing (excluding real estate financing and securities). Where no customer data was available, industry averages<sup>1</sup> were used. The leasing subsidiary in Bolzano also began analysing its greenhouse gas intensity (t CO<sub>2</sub> per EUR million of revenue) in 2023.

## GREENHOUSE GAS ACCOUNTING (PCAF MEASUREMENT)

### Financed emissions

In addition to analysing greenhouse gas intensities in accordance with the risk strategy, the Group-wide carbon footprint (excluding Hypo Vorarlberg Immo Italia) was calculated using the PCAF methodology for the first time in 2024. Financed emissions are defined as the portion of emissions by companies, projects or properties that are financed by Hypo Vorarlberg. This corresponds to the logic of the Greenhouse Gas Protocol (GHG Protocol) and the "follow the money" approach.

### PCAF asset classes

PCAF distinguishes between seven different asset classes, which are presented in the PCAF standard in the form of a decision tree. The calculation methods differ depending on the asset class, which is why the correct allocation is important. Depending on availability, the correct PCAF asset class was determined for each item (e.g. financing, investment, etc.) using different parameters (e.g. industry, intended use, etc.). It was possible to allocate the portfolio items to the PCAF asset classes on the basis of the decision tree. Allocation to the "Project finance" asset class was not possible due to first-time application and the associated data quality and data scope issues. The classification of the other asset classes was possible in the lending, leasing and own-account investment portfolios, although it should be noted that the "sovereign debt" and "listed equity" asset classes were only classified within the own-account investment portfolio.

### Data pool

The accuracy of the calculation of financed emissions depends on the availability of the relevant data. In accordance with the PCAF methodology, the data used should always be that which enables the most accurate calculation of financed emissions. The PCAF methodology uses a data quality score to evaluate and prioritise the data. This is used to determine which emissions data should be used if several different pieces of data are available. The data quality score is expressed on a scale from 1 to 5, with 5 representing the least accurate data quality. The better (lower) the value, the more it can be safely assumed that the calculated emissions correspond to the actual emissions. For example, actual measured or reported emissions should generally be used rather than approximated emissions based on energy consumption. Emission factors should generally be as specific as possible. In the case of real estate, for example, emission factors measured in CO<sub>2</sub> per m<sup>2</sup> should be used in the calculation rather than emission factors measured in CO<sub>2</sub> per property.

When using emission factors measured in CO<sub>2</sub> per property, average property sizes for each building type are assumed by PCAF based on international studies. This can lead to inaccuracies in the calculation of financed emissions. This was observed in the leasing portfolios in particular: Among other things, these finance commercial real estate (such as large-scale retail facilities) to an above-average extent. Calculating the emissions on the basis of average property sizes means the emissions are only a fraction of the actual emissions (which were unknown at the time of calculation). As the financing of these large commercial properties involves multi-million euro amounts but the emissions were calculated on the basis of average commercial real estate (CRE) sizes, this resulted in a notably low emissions intensity for individual sub-portfolios (e.g. leasing CRE: 1 t CO<sub>2</sub>/EUR million). The planned measures to improve the accuracy of future calculations are discussed under ESRs 2 BP-2.10d.

### Data sources used in calculating "gross GHG emissions"

Emission factors from the "PCAF European building emission factor database" (as of August 2023) are used for real estate financing. Emission factors from the "PCAF emission factor database" (as of September 2024) are used for the remaining financing. Energy performance certificates and emission factors from the "PCAF European building emission factor database" (as of August 2023) are used for rented buildings.

## NON-CLIMATE NATURE RISK ANALYSIS (NCNR ANALYSIS)

An analysis at sector level to determine environmental risks in the portfolio was carried out for the first time in 2024. The analysis covered the material topics of E2, E4 and E5 with a view to calculating robust "environmental scores" for the relevant portfolios (asset management, own-account investments, lending) and to analyse the composition of the portfolio. The results were categorised in risk classes using a five-point scale. The analysis was carried out separately for each portfolio, taking into account the three key environmental topics.

### NACE classification

A classification of exposures at NACE sector level is necessary in order to calculate the individual environmental risks at both individual and aggregated level. A mapping between the NACE classification system and the classification systems for the individual portfolios is carried out as required.

### Data sources used in calculating "environmental scores"

Different data sources were used in preparing sector-specific assessments for each environmental risk. All of these sources are free of charge, publicly accessible and come from reputable institutions. The data sources used are described below:

| Data source                                                       | Relevance                            | Application                            |
|-------------------------------------------------------------------|--------------------------------------|----------------------------------------|
| ENCORE                                                            | Biodiversity (dependency and impact) | E4 – Biodiversity and ecosystems       |
| EXIOBASE                                                          | Air pollutants                       | E2 – Pollution                         |
| Publication "Study on the Critical Raw Materials for the EU 2023" | Critical raw materials               | E5 – Resource use and circular economy |
| Publication "Air Pollution (WHO)"                                 | Air pollutants                       | E2 – Pollution                         |

### 10a) Estimated metrics for the upstream and downstream value chain

#### OWN BUSINESS OPERATIONS (SCOPE 1 AND 2)

Estimates are used for locations with no data on energy or water consumption (e.g. in the case of all-inclusive rental agreements). There are also no records of residual waste or coffee for these locations, hence this data was also estimated (see 10b).

<sup>1</sup> Source: Eurostat

### **OWN BUSINESS OPERATIONS (SCOPE 3.13 LETTING)**

CO<sub>2</sub> emissions are generally calculated on the basis of energy performance certificates (e.g. energy certificates in Italy). If a certificate is missing, the calculation is performed using sector averages.

### **DOWNSTREAM VALUE CHAIN (SCOPE 3.15 FINANCED EMISSIONS)**

The most important parameters for calculating financed emissions using the PCAF methodology are:

- Quantitative portfolio data (especially exposure volumes)
- Qualitative portfolio data (properties of financing)
- Reported emissions data
- Data from emission factor databases (for approximation where emissions data is unavailable)

The portfolio data was already available within the Bank and was validated and prepared for the calculation. The emissions data was obtained via third-party providers, and in particular databases provided by PCAF. The combination of this data to calculate financed emissions is discussed in separate internal documents outlining the methodology.

### **DOWNSTREAM VALUE CHAIN (NCNR ANALYSIS)**

The most important parameters for the calculation are:

- Sector-specific figures for environmental risks (E2, E4, E5) from publicly available data sources
- NACE 2 sector classifications (portfolio-based industry categorisation by Hypo Vorarlberg)
- Exposures for each portfolio (exposure in monetary units for each counterparty of Hypo Vorarlberg)

### **10b) Description of the basis for the preparation of the estimated data**

#### **OWN BUSINESS OPERATIONS (SCOPE 1 AND 2)**

Average figures for heating energy, electricity and water were calculated on the basis of historical data. For residual waste, an estimate of 45 kg per employee per year is applied. For coffee, an estimate of one cup of coffee per employee per day is applied (220 days per year), with one cup of coffee requiring 10 g of coffee powder.

#### **DOWNSTREAM VALUE CHAIN (SCOPE 3.13 LEASED ASSETS)**

For buildings for which no energy performance certificate is available, CO<sub>2</sub> emissions are calculated on the basis of floor area, the type of use of the building and PCAF emission factors.

### **DOWNSTREAM VALUE CHAIN (SCOPE 3.15 FINANCED EMISSIONS)**

The environmental topics identified as material for Hypo Vorarlberg form the basis for the calculation of the financed emissions. E1 Climate change, which includes greenhouse gas accounting as a key requirement, has been identified as material. Hypo Vorarlberg has already prepared its own emissions budget using the GHG Protocol for Scopes 1 and 2. For this year, the focus is also on financed emissions, as Hypo Vorarlberg has a significant influence on this category of emissions as a credit institution. Financed emissions were measured in accordance with the "Global GHG Accounting and Reporting Standard" prescribed by PCAF.

### **DOWNSTREAM VALUE CHAIN (NCNR ANALYSIS)**

The topics identified as material for Hypo Vorarlberg and the portfolio data form the basis for carrying out this analysis. In terms of subject matter, the databases listed above and the studies presented were taken into account.

### **10c) Description of the resulting level of accuracy of the estimated data**

#### **OWN BUSINESS OPERATIONS (SCOPE 1 AND 2)**

The total energy consumption for buildings and the vehicle fleet for 2024 was 4,576 MWh (2023: 4,691 MWh). Of this figure, 71 % is measured data, 25 % is calculated data (pro rata measurements based on square metres) and 4 % is estimated data. In the case of estimates, average consumption figures per square metre are calculated for recent years and applied for locations whose consumption data is not known.

#### **DOWNSTREAM VALUE CHAIN (SCOPE 3.13 LETTING)**

For 51 % of the GHG emissions from rented property, plant and equipment, the calculation was based on a data quality score of 2 and PCAF Option 1b. This means the energy consumption of the buildings is known and the emissions were calculated using specific average emission factors. The energy consumption of the buildings is not known for 39 % of the GHG emissions from rented property, plant and equipment, so the calculation was based on a data quality score of 4 and PCAF Option 2b. This means energy consumption is estimated based on building type and location-specific data and calculated using average emission factors.

### **DOWNSTREAM VALUE CHAIN (SCOPE 3.15 FINANCED EMISSIONS)**

The different data quality scores involve different degrees of measurement (un)certainty. This is also the first time that the PCAF asset classes have been applied to the Bank's portfolios. Complete coverage was not possible on this first occasion, as there is still scope for the data pool to be improved. It should also be noted that the methodology proposed by PCAF does not yet cover all financial instruments. Guidelines on other financial products are still under development. Some of the products not currently taken into account include:

- Consumer loans whose intended use is unknown
- Green bonds
- Securitisations
- Exchange-traded funds (ETFs)
- Derivatives (futures, options, swaps)
- Underwriting for initial public offerings (IPOs)

### **DOWNSTREAM VALUE CHAIN (NCNR ANALYSIS)**

The procedure for substantiating materiality in the affected environmental topics is being applied for the first time. The results obtained provide an initial indication of the relevance of environmental risks in the portfolio. In addition, a methodology manual has been compiled that describes the assumptions and implementation steps in detail. The procedure for identifying potential areas of action is planned to be performed again. It should then also be possible to make quantitative assessments.

#### **10d) Description of the planned actions to improve measurement accuracy**

##### **OWN BUSINESS OPERATIONS (SCOPE 1 AND 2)**

Potential for improvement has been recognised and continuously realised in recent years. No further potential for improvement has been identified at present.

##### **DOWNSTREAM VALUE CHAIN (SCOPE 3.15 FINANCED EMISSIONS)**

The calculation of financed emissions must be carried out regularly in order to calculate Scope 3.15. Actions are already planned to ensure an improvement in the data pool (degree of portfolio coverage, improvement in PCAF data quality score) when the procedure is next performed. The increase in the accuracy of Group-wide measurement is not only due to the continuous development of the PCAF standard, but is also expected to be driven by the increasingly detailed and precise analysis of the portfolio data over the course of the next reporting periods. The topic of data collection and data availability also plays a major role, particularly with regard to the loan portfolio (see E1-3, E1-6.AR 41).

##### **DOWNSTREAM VALUE CHAIN (NCNR ANALYSIS)**

All of the "environmental scores" received constitute direct scores for the respective industry. Possible next steps for when the analysis is conducted again include the addition of i) geographical data and ii) an approximation of the supply chain. Hypo Vorarlberg has already planned actions for the next reporting period (see E2-2, E4-3, E5-2).

In addition, Hypo Vorarlberg has already worked intensively on improving data quality in the past, and sustainability-related customer information has been collected from the Bank's corporate customers since mid-2023 using the OeKB ESG DataHub questionnaire. Good data availability and quality provide the basis for meaningful measurements. This is the only way to successfully manage topics on the basis of measurements and derive targets in the long term.

#### **11a) Quantitative metrics and monetary amounts subject to a high level of measurement uncertainty**

##### **OWN BUSINESS OPERATIONS (SCOPE 1 AND 2)**

Only 4 % of total energy consumption is based on estimates. These estimates are not subject to a high level of measurement uncertainty (see BP-2.10c Own operations (Scope 1 and 2)).

##### **DOWNSTREAM VALUE CHAIN (SCOPE 3.13 LEASING)**

10 % of emissions from rented property, plant and equipment were calculated on the basis of energy performance certificates. For 51 % of the emissions, energy consumption data was available on the basis of energy performance certificates and was applied with an emission factor (t CO<sub>2</sub>/MWh) for average building data with a PCAF data quality score of 2. For 39 % of the emissions, the calculation was determined entirely using average building data (t CO<sub>2</sub>/m<sup>2</sup>) with a PCAF data quality score of 4.

##### **DOWNSTREAM VALUE CHAIN (SCOPE 3.15 FINANCED EMISSIONS)**

It is not possible to limit measurement uncertainty to specific figures for the purpose of this analysis. The sources of measurement uncertainty are the current limits for portfolio recording by PCAF for certain financial instruments and the available data pool for Hypo Vorarlberg's portfolios.

##### **DOWNSTREAM VALUE CHAIN (NCNR ANALYSIS)**

It is not possible to limit measurement uncertainty to specific figures for the purpose of this analysis. The sources of measurement uncertainty and the fundamental assumptions are presented under BP-2.11b.

#### **11bi) Information on the sources of measurement uncertainty**

##### **OWN BUSINESS OPERATIONS (SCOPE 1 AND 2)**

Measurement (Scope 1 and 2) depends on whether measuring devices (e.g. heat meters, etc.) are available so that measurements can be taken and how rental agreements are structured and whether billing is based on square metres (see BP-2.10c Own business operations (Scope 1 and 2)).

##### **DOWNSTREAM VALUE CHAIN (SCOPE 3.13 LEASING)**

For Scope 3.13, missing energy performance certificates are calculated in full using factors provided by PCAF.

##### **DOWNSTREAM VALUE CHAIN (SCOPE 3.15 FINANCED EMISSIONS)**

The sources of measurement uncertainty for the calculation of financed emissions under PCAF are described in 2.10c and 2.11a.

##### **DOWNSTREAM VALUE CHAIN (NCNR ANALYSIS)**

The analysis currently only includes direct "environmental scores" for the respective sector, meaning that geographical data at country level and the customer's supply chain are not included. It should also be noted that data from public sources (e.g. ENCORE, EXIOBASE, etc.) is constantly updated, which serves to increase the dynamism of the data pool.

#### **11bii) Disclosure of assumptions, approximations and judgements applied to measurement by the undertaking**

##### **OWN BUSINESS OPERATIONS (SCOPE 1, 2 AND 3)**

Since 2016, average figures have been used for heating energy, electricity (kWh/m<sup>2</sup>) and water (m<sup>3</sup>/m<sup>2</sup>) and calculated on the basis of floor area. Coffee consumption was determined and extrapolated based on practical experience. The volume of waste produced was analysed for individual sites and a conservative estimate of waste per employee per year was determined.

### DOWNSTREAM VALUE CHAIN (SCOPE 3.13 LETTING)

PCAF data quality score 2 (primary data) was mainly applied in calculating Scope 3.13.

### DOWNSTREAM VALUE CHAIN (SCOPE 3.15 FINANCED EMISSIONS)

The applicability of calculating financed emissions using PCAF was trialled in the reporting year. The methodological steps were followed by defining the scope, validating the data to the greatest possible extent and transferring it to the asset classes prescribed by PCAF. These activities form the basis for the calculation and have a significant influence on the results. Approximate figures (company-specific and sector-specific "proxies") were used in areas where PCAF is still under development or where there is still scope for improving the Bank's data supply. The sources of measurement uncertainty and the potential for enhancing the data pool have been documented and established as a planned action for the next reporting period.

### DOWNSTREAM VALUE CHAIN (NCNR ANALYSIS)

The NCNR analysis is being applied for the first time this year to obtain "environmental scores" for the environmental risks from E2, E4 and E5. The scope of measurement was initially limited to direct figures for the portfolio.

### 13a) Discussion of changes and the reasons why the metric used provides more accurate information

#### OWN BUSINESS OPERATIONS:

As a result of the new reporting guidelines, the scope of consolidation was adjusted to include less significant energy areas that were not previously included. The Scope 3 categories in particular had to be recalculated. In addition, the "turn to zero" initiative was wound up at the end of 2024, meaning that the emission factors previously used were no longer available. As many of these factors originated from sources requiring a licence, they have now been researched and selected from publicly available sources.

For better comparability and to calculate actions, the year 2023 was recalculated and set as the base year. Only Scope 3.15 has been added for 2024. This comprises the emissions of the core business as well as two holdings accounted for using the equity method (MASTERINVEST, comit).

### 13b) Disclosure of revised comparative figures

| Scope      | Adjustments                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Scope 2    | <ul style="list-style-type: none"><li>Electricity consumption at the locations of external ATMs was calculated and included (37,834 kWh)</li><li>For parking garages, electricity consumption of 10 kWh/a per parking space was calculated and included (760 kWh)</li><li>Scope 2 market-based green electricity was broken down by tariff (electricity from EVK Riezler, previously green electricity)</li><li>The electricity consumption of the supplier Energieversorgung Kleinwalsertal, which was previously included in the green electricity calculation, is now shown separately and calculated using a market-based method</li><li>Adjustment of emission factors based on publicly available sources, own calculations (market-based electricity) or direct delivery from suppliers (e.g. illwerke vkw). Of the 83 emission and calculation factors used, 61 emission factors have changed</li></ul> |
|            | <p>In some cases, this required the conversion of units or the categorisation of the underlying data:</p> <ul style="list-style-type: none"><li>Conversion from coffee cups (units) to coffee powder (kg)</li><li>Conversion from toner (units) and printers (units) to Minolta printers (Scope 3.8 Leased property, plant and equipment with LC factors)</li><li>Hotel accommodation – no more star category for hotels</li><li>Flight kilometres – new categorisation: Flight kilometres within Europe and intercontinental – previously classified as short-haul, medium-haul and long-haul</li></ul>                                                                                                                                                                                                                                                                                                        |
| Scope 3.13 | (Rented buildings) was recalculated and included for 2023                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

### 13c) Disclosure of the difference between the figures disclosed in the prior period and the revised comparative figures

#### OWN BUSINESS OPERATIONS (SCOPE 1, 2 AND 3)

The data pool (consumption figures) for 2023 is unchanged with the exception of the information listed under ESRS 2 BP-2.13b. 38,594 kWh was recognised for electricity in Scope 2 (including external ATMs and parking spaces in parking garages). Flight kilometres and hotel nights remained unchanged; only the categorisation has been adjusted. The recording of printers and toner has been replaced by a life cycle analysis.

#### The change in the emission factors resulted in the following differences in CO<sub>2</sub> emissions for 2023:

| Scope                              | Change in metric tons of CO <sub>2</sub> |
|------------------------------------|------------------------------------------|
| Scope 1                            | 0                                        |
| Scope 2 (market-based)             | -3                                       |
| Scope 3                            | 5,075                                    |
| Of which in Scope 3.13             | 5,112                                    |
| Scope 3 excluding Scope 3.13       | -37                                      |
| Total GHG emissions                | 5,072                                    |
| GHG emissions excluding Scope 3.13 | -40                                      |

### DOWNSTREAM VALUE CHAIN (SCOPE 3.15)

The calculation of financed emissions using the methodology proposed by PCAF was applied for the first time in the 2024 reporting year. As a result, no comparative figures are available for the previous year.

### 14a) Disclosure of the nature of material errors in prior periods

There were no material errors in the calculations compared with the prior period. The differences result from the emission factors or system limits.

### 15) Disclosures on other legislation or standards

Pursuant to sections 243b and 267a UGB, this non-financial statement has been prepared as part of the management report in the consolidated financial statements in accordance with the requirements of NaDiVeG and included as part of the Group management report in the consolidated financial statements. Information is reported for the Group, Austria, Switzerland and Italy and, where relevant, with a note in the footer for the Bank, which includes all of the banking locations in Austria and the St. Gallen branch. The non-financial statement has also been prepared in accordance with ESRS in preparation for the reporting obligation under the CSRD. As the report is fully ESRS-compliant for the first time, changes compared to the previous year are not reported as the reporting base is not comparable. Hypo Vorarlberg records additional information and key figures on the basis of the Taxonomy Regulation (EU) 2020/852. In accordance with the statutory requirements, this information is disclosed in the "Disclosures on the EU taxonomy" section.

### 16) List of affected ESRS disclosure requirements

No information has been incorporated into the non-financial statement by reference.

## GOVERNANCE

### DISCLOSURE REQUIREMENT GOV-1 – THE ROLE OF THE ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

Hypo Vorarlberg has well-founded regulations for business conduct and control and a clear organisational structure. The responsibilities are clear, transparent and logical. Efficient procedures have been established for managing, identifying, monitoring and reporting risks. In addition, adequate control mechanisms are in place with the necessary administrative and accounting procedures. The remuneration policy and the corresponding practices are aligned with and conducive to risk management.

### 21a) Disclosures on the number of executive and non-executive members

#### EXECUTIVE MEMBERS

The Managing Board consists of three members and is responsible for managing the company, representing it in and out of court and conducting its business.

| Managing Board   |                                |           |
|------------------|--------------------------------|-----------|
| Michel Haller    | Chairman of the Managing Board | Tetttnang |
| Wilfried Amann   | Member of the Managing Board   | Bludesch  |
| Philipp Hämmerle | Member of the Managing Board   | Lustenau  |

#### NON-EXECUTIVE MEMBERS

The current Supervisory Board of Hypo Vorarlberg consists of fifteen Supervisory Board members, ten of whom are shareholder representatives and five of whom are employee representatives delegated by the Works Council.

#### Supervisory Board

| Shareholder representatives |                                                                                         |           |
|-----------------------------|-----------------------------------------------------------------------------------------|-----------|
| Jodok Simma                 | Chairman, Chairman of the Managing Board of Hypo Vorarlberg (retired)                   | Bregenz   |
| Alfred Geismayr             | Deputy Chairman, Chartered Accountant and Tax Advisor                                   | Dornbirn  |
| Astrid Bischof              | Entrepreneur                                                                            | Göfis     |
| Karl Fenkart                | Civil servant                                                                           | Lustenau  |
| Eduard Fischer              | Managing Director of Offsetdruckerei Schwarzach Gesellschaft mbH (retired)              | Dornbirn  |
| Johannes Heinloth           | Member of the Board of Managing Directors of L-Bank                                     | Karlsruhe |
| Karl Manfred Lochner        | Former member of the Board of Managing Directors of Landesbank Baden-Württemberg (LBBW) | Burgthann |
| Karlheinz Rüdissler         | Deputy State Governor of Vorarlberg (retired)                                           | Lauterach |
| Birgit Sonnbichler          | Entrepreneur                                                                            | Dornbirn  |
| Petra Winder                | Managing Director                                                                       | Bregenz   |

| Works Council        |                                                         |  |
|----------------------|---------------------------------------------------------|--|
| Veronika Moosbrugger | Chairwoman of the Works Council, Works Council delegate |  |
| Judith Österle       | Works Council delegate                                  |  |
| Elmar Köck           | Works Council delegate                                  |  |
| Peter Niksic         | Works Council delegate                                  |  |
| Gerhard Köhle        | Works Council delegate                                  |  |

### 21b) Representation of employees and other workers

The legal basis for Works Council activities is governed by the Austrian Labour Constitution Act. Through the Works Council, employees have the right to participate in the organisation of company policies that directly affect them. In addition to representing the employees as a whole and individual employees, the Works Council performs an information, control and communication function within the company. It serves as a link between the workforce and company management. Employee representatives make up one-third of the entire Supervisory Board and are therefore also involved in important decisions and participate directly in any operational changes and plans discussed by this body.

### 21c) Details of experience relevant to sectors, products and geographical locations

It is ensured that the composition of the supervisory body reflects a broad spectrum of knowledge, skills and experience. The members of the Managing Board and Supervisory Board are assessed in terms of their educational background, professional career, industry expertise and diversity aspects such as gender and age.



The collective aptitude assessment for the Supervisory Board and the Managing Board is carried out prior to each change in personnel and as part of re-evaluations. The actual knowledge and experience (actual) is compared with the requirements for collective aptitude (target).

When making appointments to the specialist committees (Nomination, Risk, Credit, Audit and Remuneration Committees), it is ensured that the members have the necessary detailed specialist knowledge to properly cover the required expertise and fulfil their duties with due care.

Although there are currently no Supervisory Board members specially selected for the topic of sustainability, this area is addressed as part of the recurring Fit & Proper training courses for Managing Board members, Supervisory Board members and key employees in order to ensure that the necessary knowledge is communicated. The sustainability skills of the individual Supervisory Board members will be expanded further in future. The members also continuously engage with specialist aspects of sustainability in fulfilling their tasks in the specialist committees.

#### 21d) Gender diversity and independent members of the administrative, management and supervisory bodies

|                                       | Number of women | Number of men | Proportion of women |
|---------------------------------------|-----------------|---------------|---------------------|
| Managing Board                        | 0               | 3             | 0.00 %              |
| Supervisory Board incl. Works Council | 5               | 10            | 33.33 %             |

#### 21e) Disclosure of the percentage of independent board members

The Supervisory Board of Hypo Vorarlberg must have a sufficient number of independent members. The Fit & Proper policy sets out the independence review in writing. Eight of the ten shareholder representatives are currently categorised as independent. Hypo Vorarlberg therefore fulfils the minimum requirement of two independent members as prescribed by section 28a (5a) (2) of the Austrian Banking Act (BWG).

#### 22a) Names of the relevant committee members responsible for monitoring impacts, risks and opportunities

The identification, effective management and monitoring of impacts, risks and opportunities is one of the most important tasks of sustainability management. Responsibility and monitoring therefore lies with the Managing Board, the Sustainability Group, Group Risk Controlling and the experts in the respective specialist departments. The Managing Board was involved in the materiality analysis process and subsequently examined the impacts as well as the risks and opportunities and approved them along with the material topics.

In future, the Managing Board and experts from the relevant specialist departments will take sustainability aspects and the associated environmental, social and governance impacts, risks and opportunities into account when developing and implementing strategies.

The tasks of the Supervisory Board include monitoring and constructively criticising the strategies, particularly with regard to sustainability aspects. These tasks are performed by the Supervisory Board in its role as a non-executive management body. The material topics resulting from the materiality analysis were reported to the Supervisory Board, which is regularly informed about current sustainability issues at Supervisory Board meetings. The Supervisory Board also receives the non-financial statement in February for review and approval at the Supervisory Board meeting in April. The annual sustainability risk report is submitted to the Supervisory Board for acknowledgement in December.

#### 22b) Responsibilities of individual bodies or individuals for impacts, risks and opportunities in mandates and strategies

Hypo Vorarlberg embodies its understanding of sustainability in all aspects of day-to-day business in respect of its customers, partners and employees. The Managing Board, managers and employees are encouraged to establish a corresponding sense of responsibility for these sustainability issues within the company in line with the core brand value of "mindful". For Hypo Vorarlberg, "mindful" means: "We are attentive, have a genuine interest and ensure a stable environment thanks to our forward-looking approach."

Responsibility lies with the Managing Board, the Sustainability Group, Group Risk Controlling, Asset Management and the respective specialist departments and subsidiaries.

The "Hypo Effect" sustainability strategy, which was approved by the Managing Board and submitted to the Supervisory Board for acknowledgement, defines the binding Group-wide topics of emissions, fair employer, financing and investment, ESG risks, customers and society, and transformation. The purpose of the sustainability strategy is to minimise negative impacts on sustainability aspects, support positive impacts and pursue opportunities arising in particular from the transition to a sustainable future. As a company with strong ties to people and the region, Hypo Vorarlberg strives to minimise the potential impact on people and the environment.

Group Risk Controlling is responsible for risk controlling, which comprises the annual revision of the risk strategy including the performance of the risk inventory and the development of risk models. One aspect of this is the identification of sustainability risks. An annual sustainability risk report (reporting date 30 June) is prepared on the basis of the strategic guidelines, presented to the Managing Board and submitted to the Supervisory Board for acknowledgement. Sustainability risks also form part of the risk strategy, which is presented in detail to the Risk Committee each year and acknowledged by the Risk Committee and the Supervisory Board.

#### 22ci) Disclosure of the responsible position/committee and the oversight structure

Hypo Vorarlberg's structure promotes effective and prudent management on a single-entity, subgroup and consolidated basis. After the Managing Board and the Supervisory Board, responsibility for monitoring, managing and overseeing impacts, risks and opportunities lies with the Sustainability Group. An executive department, the Sustainability Group reports directly to the Managing Board member responsible for sustainability. As the impacts, risks and opportunities relate to topics from different areas, the Sustainability Group is responsible for coordinating and organising these topics on a company-wide basis. To this end, each specialist department affected has appointed a sustainability officer.

The Sustainability Group is also responsible for organising and conducting the annual materiality review and the comprehensive materiality analysis process that takes place every three years. The relevant specialist departments are responsible for the further consideration of the impacts, risks and opportunities identified as material and the subsequent implementation and operationalisation of topics. They are also responsible for identifying measures and setting targets. The Sustainability Group supports the specialist departments with its expertise. The identified topics and the current status and further development of the topics as well as the impacts, risks and opportunities can be found in the annual non-financial statement.

**22cii) Information about the reporting lines to the members of the administrative, management and supervisory bodies**

Hypo Vorarlberg's sustainability team comprises the Managing Board, the Sustainability Group and the officers from the specialist departments. The team engages in continuous coordination in the form of topic-specific project meetings, working group meetings or the larger gatherings of the "sustainability team jour fixe". The regular meetings include reports on developments and progress regarding identified impacts, risks and opportunities. In turn, the Managing Board reports to the Supervisory Board on key issues and progress in this area.

At the regular Supervisory Board meetings, reports from the specialist departments are submitted to the Supervisory Board for acknowledgement. This includes the sustainability strategy, the sustainability risk report and the risk strategy. The Supervisory Board also receives the non-financial statement for review in February and for approval in April, as well as the annual sustainability risk report in December for acknowledgement.

These documents contain a detailed discussion of the impacts, risks and opportunities identified as material and include sufficient information to provide readers with a clear picture of the current status, planned measures and further developments within Hypo Vorarlberg where these topics are concerned.

**22ciii) Disclosure of specific controls/procedures for managing impacts, risks and opportunities and their internal integration**

As internal standard-setting bodies, the Managing Board and the Supervisory Board are familiar with the structure of Hypo Vorarlberg's organisation, and hence also its development and limits. The organisational framework is documented in the organisational chart, which includes a clear presentation of the responsibilities. The organisational chart is available both internally and to the public.

As an executive department reporting directly to the Managing Board, the Sustainability Group is responsible for coordinating and organising sustainability issues at Hypo Vorarlberg.

The Sustainability Group is also responsible for conducting the annual materiality review and the comprehensive materiality analysis process that takes place every three years. This process guarantees a secure procedure for the continuous updating and further development of the material impacts, risks and opportunities. The relevant specialist departments are responsible for the further consideration of the impacts, risks and opportunities identified as material and the subsequent implementation and operationalisation of topics. They are also responsible for identifying measures and setting targets. The Sustainability Group supports the specialist departments with its expertise.

As part of the annual sustainability reporting process, which will also form part of the internal control system from 2025, there is a continuous, documented dialogue with the relevant specialist departments that makes it possible to track whether and how the impacts, risks and opportunities have developed over the course of the reporting year. The identified topics as well as the current status and further development of the topics can be found in the annual non-financial statement. This systematic assessment allows all of the management functions involved to obtain a comprehensive picture and take any necessary management or control actions.

**Organisational chart (as at 1 January 2025)**

| <b>Chairman of the Managing Board<br/>Michel Haller</b>       | <b>Member of the Managing Board<br/>Wilfried Amann</b> | <b>Member of the Managing Board<br/>Philipp Hämmerle</b>     |
|---------------------------------------------------------------|--------------------------------------------------------|--------------------------------------------------------------|
| Credit Management – Corporate and Private Customers           | Corporate and Private Customer Sales                   | Finance                                                      |
| Group Risk Controlling                                        | Sales Vienna                                           | Controlling                                                  |
| Law                                                           | Sales Support                                          | Sustainability                                               |
| Human Resources                                               | Treasury                                               | Asset Management                                             |
| Communication and Marketing                                   | Participation Management                               | Mid and Back Office Funds, Securities and Derivatives        |
| Compliance and Outsourcing                                    | St. Gallen Branch (Sales)                              | IT (IT Core Banking, IT Digital Banking, IT Operations)      |
| Strategic Bank Management                                     | Hypo Vorarlberg Leasing, Italy (Sales)                 | Data Protection                                              |
| Corporate and Internal Audit                                  | Hypo Real Estate & Leasing                             | Logistics (Facilities Engineering, Materials Administration) |
| St. Gallen Branch (Risk Management)                           |                                                        |                                                              |
| Hypo Vorarlberg Leasing, Italy (Back Office, Risk Management) |                                                        |                                                              |
| Hypo Vorarlberg Immo Italia                                   |                                                        |                                                              |

**22d) Role of the executive bodies and management in setting and monitoring targets related to material impacts, risks and opportunities**

The Sustainability Group is responsible for coordinating and monitoring sustainability issues at Hypo Vorarlberg. The relevant specialist departments are responsible for considering the impacts, risks and opportunities identified as material and for the subsequent implementation and operationalisation of topics. They are also responsible for identifying measures and setting targets. The Sustainability Group supports the specialist departments with its expertise.

The Managing Board is closely involved in the process of developing targets and measures and critically scrutinises and reviews the proposals, explanations and information presented when exercising its discretion and making decisions. In its operational management function, the

Managing Board prepares the basis for decision-making on issues requiring the approval of the Supervisory Board in accordance with the Articles of Association and the rules of procedure, ensuring the greatest possible transparency and comprehensibility, and submits these to the Supervisory Board for resolution.

The Managing Board is responsible for implementing the strategies. It fulfils this task as part of the annual resolution on the business, sustainability and risk strategy. When developing and implementing strategies, the Managing Board takes account of sustainability aspects and the associated environmental, social and governance impacts, opportunities and risks. These strategies are discussed and acknowledged or approved annually by the Supervisory Board. The strategies are regularly monitored to ensure that undesirable developments are identified at an early stage and measures can be immediately taken to control them.

The Supervisory Board is responsible for monitoring and overseeing that the strategic objectives, organisational structure and risk strategy (including sustainability risks), including the risk appetite and the risk management framework, as well as other policies and the disclosure requirements are implemented consistently.

### **23a) Sustainability-related expertise of the bodies, including access to experts or training**

The Nomination Committee conducts an assessment of the knowledge, skills and experience of the Managing Board and Supervisory Board members, both individually and collectively, at least once a year and makes proposals for changes if necessary. These proposed changes may include training, changes to processes, measures to minimise conflicts of interest and the appointment of members with particular areas of expertise.

Regular training and professional development measures are organised with a view to ensuring the suitability of the members of the Supervisory Board and the Managing Board. Examples include Fit & Proper training on the FMA/ECB/EBA audit priorities for 2024, an update on the Digital Operational Resilience Act (DORA) outlining the expectations of the authorities for 2024, a governance update on the FMA's governance deep dives, and an ESG update on the topics of the non-financial statement, sustainability risk management and the green asset ratio. In addition, training must be provided in particular in the event of changes in external circumstances (e.g. changes to business activities or the organisational structure, new regulatory requirements) that could affect the suitability of one or more members of the Managing Board or Supervisory Board.

The experts from the Sustainability Group and Group Risk Controlling, as well as external consultants if required, are available to advise the Managing Board members, Supervisory Board members, specialist departments and subsidiaries with their sustainability expertise.

### **23b) Description of how skills and expertise relate to material impacts, risks and opportunities**

The combination of specialist expertise and sustainability skills (provided by the Sustainability Group) ensures that the interrelationships between the company's impacts, risks and opportunities can be reliably identified, analysed and addressed. Continuous professional development and a good dialogue within the organisation and with external experts also contribute to this.

Professional development measures have already been offered in the past and are geared specifically towards the management bodies in the form of the Fit & Proper training courses for all Managing Board members, Supervisory Board members and key functions. The company is also examining whether the training and professional development programme can be expanded in future. Irrespective of this, the members of the Managing Board and Supervisory Board regularly undergo further training on their own initiative, including in the form of training courses, specialised reading, webinars, etc.

### **G1-GOV-1.5a) Role of administrative, management and supervisory bodies related to business conduct**

The Managing Board is responsible for managing the company, representing it in and out of court and conducting its business. It consists of three members. The Managing Board must report to the Supervisory Board regularly, and in any case at least once a quarter, on the course of business and the situation of the company. It is responsible for implementing the strategies. It fulfils this task as part of the annual resolution on the business, sustainability and risk strategy.

The Supervisory Board monitors the activities of the Managing Board. The members of the Supervisory Board are not bound by any instructions and must exercise their function with strict impartiality. The Supervisory Board consists of the Chairman, the Deputy Chairman and four to eight other Supervisory Board members as well as employee representatives delegated by the Works Council. The Supervisory Board meets as required and regularly, and in any case at least once a quarter. The Supervisory Board is authorised to form committees from among its members and to determine their tasks and powers. Decision-making powers of the Supervisory Board may also be transferred to the committees. The provisions for the Supervisory Board also apply to its committees.

Among other things, the Supervisory Board performs the following tasks in its function as a non-executive management body:

- Supervising and monitoring the decision-making processes and actions of the Managing Board and effectively controlling the Managing Board, including monitoring and reviewing its individual and collective performance and the implementation of the strategy and objectives;
- Providing constructive criticism and reviewing proposals and information from the Managing Board;
- Considering the principle of proportionality and the appropriate fulfilment of the duties and functions of the established committees;
- Ensuring and regularly reviewing the effectiveness of the internal governance framework and taking appropriate steps to remedy any deficiencies identified;
- Monitoring and overseeing that the strategic objectives, organisational structure and risk strategy (including sustainability risks), including the risk appetite and the risk management framework, as well as other policies and disclosure requirements are implemented consistently;
- Monitoring the consistent implementation of the risk culture;
- Supervising the implementation and maintenance of a Code of Conduct or comparable and effective policies for identifying, managing and mitigating actual and potential conflicts of interest;
- Monitoring the integrity of financial information and accounting and internal control policies, including an effective and robust risk management framework;
- Ensuring the independence of the heads of the internal control functions.

### **G1-GOV-1.5b) Disclosure of expertise of the administrative, management and supervisory bodies on business conduct matters**

As a minimum, the members of the Supervisory Board must fulfil the legal and regulatory requirements ("Fit & Proper"). The Nomination Committee is responsible for determining the requirements and assessing their fulfilment. The members of the Supervisory Board must be

professionally qualified and regularly participate in further training by completing relevant studies and courses (professional or academic studies in economics, law or natural sciences) and external or internal training courses or corresponding training and professional development. This ensures that they can fulfil their supervisory duties as prescribed by law and the Articles of Association and rules of procedure.

## **DISCLOSURE REQUIREMENT GOV-2 – INFORMATION PROVIDED TO AND SUSTAINABILITY MATTERS ADDRESSED BY THE UNDERTAKING'S ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES**

### **26a) Disclosures on how the administrative, management and supervisory bodies are informed about material impacts, risks and opportunities related to sustainability aspects**

The Sustainability Group reports directly to the Managing Board, which is kept informed through regular meetings (monthly) and reports on current issues (regulatory updates, project-related information, etc.). In turn, the Managing Board reports to the Supervisory Board on key issues and progress (at regular Supervisory Board meetings).

Under the NaDiVeG, the Managing Board and the Supervisory Board have clear responsibilities in connection with the preparation of the non-financial statement (annually). The Managing Board approves the non-financial statement and submits it to the Supervisory Board for review. The Supervisory Board reports to the Annual General Meeting.

The business, risk and sustainability strategies are subject to an annual update process. These strategies are approved by the Managing Board and submitted to the Supervisory Board for resolution or acknowledgement. The sustainability risk report is also presented annually to the Managing Board and the Supervisory Board.

The Head of Group Risk Controlling attends the meetings of the Risk Committee at least once a year and reports on the risk types defined in section 39 (2b) BWG as well as sustainability risks relating to climate, environment and social issues and the risk situation of the credit institution. This includes drawing attention to risky developments that have or could have an impact on the credit institution.

All of the units involved are provided with sufficient information to give them a clear picture of the Group's overall objectives, strategies and risk profile, as well as their integration into the Group's structure and business operations. This information and corresponding revisions are documented and made available to the key functions concerned.

Regular discussions on a wide range of sustainability issues take place at various meetings.

| Stakeholder group                    | Members                                                                                                      | Meeting frequency          |
|--------------------------------------|--------------------------------------------------------------------------------------------------------------|----------------------------|
| Owners                               | Supervisory Board                                                                                            | 5 x per year               |
|                                      | Annual General Meeting                                                                                       | Annually                   |
| Supervisory Board                    | Supervisory Board meetings                                                                                   | 5 x per year               |
| Employees                            | Internal communication (regular information by e-mail, employee magazine, intranet, presentation of results) | Regularly                  |
|                                      | Employee events (Christmas party, winter activity day, etc.)                                                 | Regularly                  |
|                                      | Works Council                                                                                                | Regularly                  |
|                                      | Staff appraisals                                                                                             | Annually                   |
|                                      | Whistleblowing                                                                                               | As required                |
|                                      | Mindful Cooperation (anonymous reporting platform for employees)                                             | As required                |
| Customers                            | Personal contact with advisors                                                                               | Regularly                  |
|                                      | Customer communication                                                                                       | Regularly                  |
|                                      | Customer service centre                                                                                      | Regularly                  |
|                                      | Customer events (customer concert, business breakfast)                                                       | Regularly                  |
|                                      | Complaints management                                                                                        | As required                |
|                                      | Am Puls investor magazine, VORHABEN magazine                                                                 | Regularly                  |
|                                      | Social media channels, website, newsletter                                                                   | Regularly                  |
|                                      | Customer surveys                                                                                             | Regularly                  |
| Media and PR                         | Extensive press and public relations                                                                         | Regularly                  |
|                                      | Press conferences, interviews                                                                                | Regularly                  |
| Suppliers/external service providers | Business contacts                                                                                            | Regularly                  |
|                                      | Code of Conduct                                                                                              | Regularly                  |
| Politics and administration          | Supervisory Board                                                                                            | 5 x per year               |
| Investors                            | Investor relations (e.g. roadshows)                                                                          | When products are released |
|                                      | Extensive press and public relations                                                                         | Regularly                  |

### **26b) Discussion of how the administrative, management and supervisory bodies consider impacts, risks and opportunities when overseeing the undertaking's strategy, major transactions and risk management**

The Managing Board is responsible for implementing the strategies. It fulfils this task as part of the annual resolution on the business, sustainability and risk strategy. When developing and implementing strategies, the Managing Board takes account of sustainability aspects and the associated environmental, social and corporate governance impacts, opportunities and risks. These strategies are acknowledged or approved annually by the Supervisory Board.

As internal standard-setting bodies, the Managing Board and the Supervisory Board are familiar with the structure of the organisation, and hence also its development and limits. The dual management body has a precise understanding of Hypo Vorarlberg's legal, organisational and operational structure and ensures that these correspond to the approved business strategy, risk strategy and risk appetite. The business strategy is resolved by the Managing Board and subsequently approved by the Supervisory Board.

The Supervisory Board has established a Risk Committee whose responsibilities include:

- Supporting the Supervisory Board in monitoring actual and future risk appetite as well as the overall risk strategy, taking into account all risk types to ensure that they are consistent with Hypo Vorarlberg's business strategy, objectives, corporate culture and values;
- Supporting the Supervisory Board in monitoring the implementation of the risk strategy and the corresponding defined limits;
- Monitoring the implementation of the strategies for capital, liquidity and sustainability management as well as for all other relevant risks in order to assess their appropriateness with regard to the defined risk appetite and the defined risk strategy.

## 26c) List of the material impacts, risks and opportunities addressed by the administrative, management and supervisory bodies or their relevant committees during the reporting period

The results of the double materiality assessment were presented to the full Managing Board and approved. A detailed list can be found under IRO-1.

## DISCLOSURE REQUIREMENT GOV-3 – INTEGRATION OF SUSTAINABILITY-RELATED PERFORMANCE IN INCENTIVE SCHEMES

### 29a-e) Policies concerning sustainability-linked incentive and remuneration systems for members of the administrative, management and supervisory bodies

Hypo Vorarlberg generally has no variable incentive or remuneration systems. Hypo Vorarlberg's remuneration policy is based on regulatory requirements and ensures equal treatment and the prevention of conflicts of interest. The established fixed remuneration system does not incentivise transactions that fall outside the business and risk strategy or risks that are inconsistent with Hypo Vorarlberg's risk appetite.

### E1-GOV-3.13) Disclosures on climate-related considerations in the remuneration of members of the executive bodies, including link to GHG reduction targets and percentage of climate-related remuneration recognised

Climate-related considerations are not currently included in the remuneration of members of the administrative, management and supervisory bodies (see ERS 2 GOV-3.29).

## DISCLOSURE REQUIREMENT GOV-4 – STATEMENT ON DUE DILIGENCE

### 30, 32) Discussion of the implementation of due diligence in the non-financial statement for the presentation of actual business practice

The following table provides an overview of where the key elements of the due diligence process can be found in the non-financial statement. This process comprises the processes established by Hypo Vorarlberg to identify, assess and manage impacts, risks and opportunities.

| Core elements of due diligence                                            | Paragraphs in the non-financial statement                                             |
|---------------------------------------------------------------------------|---------------------------------------------------------------------------------------|
| Embedding due diligence in governance, strategy and business model        | GOV-1; GOV-2; GOV-5; SBM-1; SBM-3                                                     |
| Engaging with affected stakeholders in all key steps of the due diligence | GOV-2; SBM-2; IRO-1; E1-2; E2-1; E4-2; E5-1; S1-1; S1-2; S3-1; S3-2; S4-1; S4-2; G1-1 |
| Identifying and assessing adverse impacts                                 | SBM-3; IRO-1                                                                          |
| Taking actions to address those adverse impacts                           | E1-3; E2-2; E4-3; E5-2; S1-3; S1-4; S3-3; S3-4; S4-3; S4-4; G1-4                      |
| Tracking the effectiveness of these efforts and communicating             | E1-3; E1-4; E2-2; E4-3; E5-2; S1-5; S3-4; S4-3; S4-4; G1-4                            |

## DISCLOSURE REQUIREMENT GOV-5 – RISK MANAGEMENT AND INTERNAL CONTROLS OVER THE NON-FINANCIAL STATEMENT

### 36a) Scope, main features and components of the risk management and internal control systems in relation to the non-financial statement

The Managing Board of Hypo Vorarlberg considers it essential to minimise not only traditional financial risks, but also risks that could undermine confidence in the company. This includes the risk of potential reputational damage to the Hypo Vorarlberg brand because activities are perceived by stakeholders as inappropriate, unethical or contrary to the brand values.

The preparation of the non-financial statement should therefore also fulfil the high standards that Hypo Vorarlberg sets itself in respect of its activities and on which stakeholders can rely. To this end, various precautions have been taken to counteract any potential loss of confidence. For example, an IT solution has been developed that enables tasks to be processed, delegated and monitored in an organised manner. Close-knit update meetings are held to ensure that everyone involved is informed promptly. Questions relating to the applicable regulations are considered and clarified at an early stage with the support of an external consultant. All of these measures serve to reduce the risk of errors. Finally, the non-financial statement is audited externally, which represents a further control layer.

The process of preparing the non-financial statement is also included in the internal control system (ICS). Responsibility for establishing and organising the ICS and ensuring its continued effectiveness lies with the Managing Board as a whole. The benefits of an ICS include quality assurance, ensuring ongoing controls and automatic control mechanisms in the company's day-to-day work and processing. It encourages the active examination of the risks inherent in the respective business and hence serves to minimise risk.

Process documentation limits the loss of information and expertise in the event of staff changes and ensures transparency and clear responsibilities. Accordingly, the inclusion of the preparation of the non-financial statement as a separate process in the ICS is intended to help ensure that it complies with regulatory requirements.

### 36b) Risk assessment approach, including risk prioritisation methodology

As part of the ICS, the processes are reviewed continuously, and in any case at least once a year, in terms of their risk content and the existence of comprehensible, effective and efficient measures and controls for reducing risk and expanded and adjusted as necessary. In addition, a control and effectiveness analysis is carried out regularly, potential improvements are identified and the resulting measures are implemented. The inclusion of additional or new processes in the documented ICS is based on the assessment of materiality and risk content for Hypo Vorarlberg.

### 36c) Disclosures on the main risks identified and their mitigation strategies including related controls

The company engages in a continuous dialogue with external consultants, internal specialist departments and its auditors in order to minimise the risk potential during the process of preparing the non-financial statement. Hypo Vorarlberg also uses IT solutions to ensure that topics are handled properly.

Under the NaDiVeG, the Managing Board and the Supervisory Board have clear responsibilities in connection with the preparation of the non-financial statement. The Managing Board approves the non-financial statement and submits it to the Supervisory Board for review. To increase transparency, the Supervisory Board has engaged an external auditor to perform an annual audit of the non-financial statement (limited assurance audit) since 2018 even though there is no statutory obligation to do so.

#### **36d) Integration of the risk assessment and internal controls into functions and processes in relation to the non-financial statement**

An ICS report containing information on the work performed as part of the ICS is prepared every six months for the Managing Board and annually for the Audit Committee of the Supervisory Board. ICS reporting follows a bottom-up approach, i.e. the records on the implemented controls are completed by the respective process owners as they are carried out on an operating basis. These records are compiled in the reports along with the findings of the control and effectiveness analysis. They are combined with the findings of Internal Audit to enable a statement to be made on the effectiveness of the ICS. If necessary, the Managing Board arranges for appropriate measures to be taken to rectify deficiencies. The Audit Committee of the Supervisory Board monitors the effectiveness of the ICS.

#### **36e) Description of the periodic reporting of the aforementioned findings to the administrative, management and supervisory bodies**

The ICS Committee, whose members include the full Managing Board and the Compliance department, meets at least once a year to approve the findings, take note of risk assessments and make continuous ICS core process decisions.

### **STRATEGY**

#### **DISCLOSURE REQUIREMENT SBM-1 – STRATEGY, BUSINESS MODEL AND VALUE CHAIN**

##### **40a) Description of the elements of the strategy that relate to or affect sustainability aspects, the business model and the value chain (see AR 12-13)**

##### **40ai) Description of the most significant groups of products and/or services offered, including changes in the reporting period**

For decades, the three cornerstones of “corporate banking”, “residential construction banking” and “investment banking” have formed the basis on which Hypo Vorarlberg Bank AG operates sustainably and successfully. The Bank’s core expertise relates in particular to residential construction financing, corporate customer business, investment advice and asset management. Hypo Vorarlberg’s products and services can be broken down into the following groups:

#### **INVESTMENT BUSINESS**

Based on the ESG investment approach (see E1-2), the Asset Management department takes sustainability risks and adverse impacts into account when making investment decisions. Since November 2021, all Hypo Vorarlberg funds and asset management strategies that are actively offered have been classified as financial products within the meaning of Article 8 of Regulation (EU) 2019/2088 (Sustainable Finance Disclosure Regulation) and take into account environmental or social characteristics.

#### **GREEN BOND**

In autumn 2017, Hypo Vorarlberg became the first Austrian bank to issue a green bond with a total volume of EUR 300 million. The proceeds were used to (re)finance energy-efficient residential buildings and commercial properties in Vorarlberg. Together with the Energy Institute Vorarlberg, suitable projects were selected and a method for calculating CO<sub>2</sub> savings was developed. A second bond with a total volume of EUR 500 million was issued after the first bond matured. In spring 2020, Hypo Vorarlberg successfully placed its first Swiss franc-denominated green bond on the market. The issue volume was CHF 125 million. The proceeds are being used to (re)finance energy-efficient residential and non-residential buildings in Switzerland.

#### **FINANCING**

In terms of financing, Hypo Vorarlberg offers two products: the Hypo-Klima-Schnell-Kredit (with a term of up to 10 years) and the Hypo-Klima-Kredit (with a term of up to 35 years). In the lending business, the “Ethics and sustainability criteria for financing” policy (see E1-2) are applied when granting loans. If an exclusion criterion is identified, the loan is not granted. In addition to the exclusion criteria, employees examine whether new business in sensitive business segments is conducted in a controversial or morally objectionable manner or in a way that is harmful to the environment or the climate (e.g. crude oil and natural gas extraction through fracking, etc.). Transactions affecting such business segments require close scrutiny and are categorised as requiring monitoring or are rejected.

There were no significant changes during the reporting period.

##### **40aaii) Description of significant markets and/or customer groups served, including changes in the reporting period (new/removed markets and/or customer groups)**

There were no changes in the markets or customer groups served in the reporting period.

#### **CORE MARKETS**

In addition to its headquarters in Bregenz and branches in Vorarlberg, Hypo Vorarlberg has additional locations in Vienna, Graz, Wels and Salzburg, as well as a branch in St. Gallen, Switzerland. Through these locations, Hypo Vorarlberg is represented in the most important economic regions of Austria and in eastern Switzerland. Other core markets are located in southern Germany (Bavaria, Baden-Württemberg). Outside Vorarlberg, Hypo Vorarlberg focuses on niches in corporate customer business, property financing and investment advice. In addition to traditional banking products, customers can take advantage of other banking-related products and services in the property, leasing and insurance sectors. The subsidiary Hypo Immobilien & Leasing GmbH, based in Dornbirn and Vienna, offers expert knowledge under the Hypo Vorarlberg brand. Hypo Vorarlberg Leasing AG in Bolzano, Italy, develops leasing solutions and also has a branch in Como. Hypo Vorarlberg Immo Italia GmbH offers commercial properties in northern Italy and a range of services in the real estate sector, including property valuation. Through its shareholding in comit Versicherungsmakler GmbH, Hypo Vorarlberg’s customers benefit from independent insurance solutions. In the investment business, MASTERINVEST Kapitalanlage GmbH acts as a partner and fund manager for Hypo Vorarlberg.

#### **CORPORATE CUSTOMERS**

One focus of Hypo Vorarlberg’s business activities is corporate customer business. The company has particular expertise in the areas of investment and project financing, subsidies, foreign services, working capital financing and as a provider of alternative forms of financing and in investment.



## PRIVATE CUSTOMERS AND PRIVATE BANKING

Hypo Vorarlberg offers private customers extensive services with a focus on residential construction financing, pension advice and investment advice.

## TREASURY/FINANCIAL MARKETS

The Financial Markets business segment is responsible for asset/liability management, Hypo Vorarlberg's refinancing and various services for customers and different groups, including money market, foreign exchange and interest rate derivatives as well as securities trading for customers. Hypo Vorarlberg does not engage in any proprietary trading that is not connected to customer business.

## CORPORATE CENTRE

The Corporate Centre essentially bundles the subsidiaries and holdings that expand the Bank's service range with banking-related products. In particular, it includes the property and leasing subsidiaries in Austria and Italy and the shareholdings in comit Versicherungsmakler GmbH and MASTERINVEST Kapitalanlage GmbH.

### 40aiii) Number of employees by geographical area

|                                                            | Group |      | Austria |      | Switzerland |      | Italy |      |
|------------------------------------------------------------|-------|------|---------|------|-------------|------|-------|------|
|                                                            | 2024  | 2023 | 2024    | 2023 | 2024        | 2023 | 2024  | 2023 |
| Total employees (active and passive) per capita            | 938   | 897  | 848     | 816  | 38          | 29   | 52    | 52   |
| Total employees (active and passive) per capita on average | 916   | 891  | 831     | 811  | 32          | 28   | 52    | 52   |

Information on the Bank (including the St. Gallen branch) can be found in the footer <sup>2</sup>

### 40aiv) Description of material products and services banned in certain markets

There are no products that are banned in certain markets.

### 40b) Breakdown of total revenue as included in the financial statements by significant ESRS sectors

A breakdown of total revenue by ESRS sectors is not possible in the current reporting period as no list of ESRS sectors has been published.

### 40di-iv) Breakdown of related revenues from specific sectors (e.g. coal, oil, chemicals production, etc.)

This data point, including sub-points, is designed for manufacturing companies and hence is not included in reporting.

### 40e) Sustainability-related goals in terms of significant products, customers, regions and relationships with stakeholders

Hypo Vorarlberg's business activities are expressly oriented towards the United Nations Sustainable Development Goals (UN SDGs) and the goals of the Paris Agreement. Regional and national measures, such as the Energieautonomie+ and MissionZeroV+ strategies of the state of Vorarlberg, also shape Hypo Vorarlberg's business activities. The company also wants to make an important contribution to improving the human rights situation and is committed to the Universal Declaration of Human Rights, the core labour standards of the International Labour Organisation (ILO) and the Guidelines for Multinational Enterprises of the Organisation for Economic Co-operation and Development (OECD). These principles are continuously enhanced in the operational processes.

The Managing Board is particularly keen to ensure that negative impacts on the climate and society are reduced, especially those resulting from its core business of financing and investment. Hypo Vorarlberg will continue to take responsibility in its financing and investment business and work to improve its impact on the environment, the climate and people. It aims to reinforce its commitment to the climate targets adopted and demonstrate this through appropriate disclosure rates (e.g. taxonomy eligibility, taxonomy alignment, GAR, etc.) to the greatest possible extent. Investment decisions that take environmental, social and governance issues into account (= positive criteria) are prioritised, while Hypo Vorarlberg rejects transactions that do not meet the defined criteria (= exclusion criteria). Hypo Vorarlberg intends to develop new financial products with sustainability aspects and examine the addition of sustainability aspects to existing products in order to pursue market opportunities and ensure mindful business practices.

Hypo Vorarlberg does not currently have any derived quantitative targets for product groups. It intends to define robust targets, KPIs and actions in the areas of the environment, social affairs and corporate governance in line with the regulatory requirements and taking into account the strategic guidelines. This should enable it to visualise developments in greater detail, measure targets and perform topic-specific management. The comprehensive operationalisation of the sustainability strategy for the individual departments will be advanced with the help of ESG policies or ESG aspects in the existing policies.

In addition, Hypo Vorarlberg will continue to take social responsibility and support its regions through extensive social engagement (charitable fund, sponsorship) and targeted cooperation with regional suppliers and service providers (see E1-2). Hypo Vorarlberg's seven brand values are enshrined in the corporate culture and the company has formulated an explicit focus on the local region and society. Hypo Vorarlberg's efforts are also reflected in its sustainability ratings:

## ISS ESG

In its rating process, ISS ESG gathers and assesses information on companies' social and environmental performance. Hypo Vorarlberg has Prime status and is among the top 10 % in the "public-sector and regional banks" sector. This very good rating illustrates Hypo Vorarlberg's sustainability performance in a quantified form, which can help investors in making investment decisions. Regular updates ensure that the ratings remain current.

## SUSTAINALYTICS

Morningstar Sustainalytics is a leading independent ESG and corporate governance research, ratings and analytics firm. Hypo Vorarlberg took advantage of the available feedback in 2023 and was able to significantly improve its rating. Current rating: Medium Risk, ESG Risk Rating 26.1 (last updated 30 August 2023).

<sup>2</sup> 2024 Bank incl. St. Gallen branch: Total employees (active and passive) per capita: 838 (2023: 797); total employees (active and passive) per capita on average: 785 (2023: 763).



#### 40f) Assessment of significant products, markets and customer groups in relation to sustainability goals

No sustainability-related goals for products and services, markets and customer groups were adopted in the current reporting period. As already described under data point SBM-1.40e, the company plans to implement these more specific goals in the near future.

#### 40g) Elements of the strategy relating to sustainability, including challenges, solutions and projects

The Managing Board is particularly committed to shaping a sustainable future. In order to achieve this goal, the company has emphasised the reconcilability of economic success, social aspects and environmental compatibility for many years, and it seeks to achieve as harmonious a balance as possible between these three dimensions of sustainability. These guidelines are also expressed in Hypo Vorarlberg's vision and mission statement and are supplemented by its seven core brand values.

The purpose of the sustainability strategy is to minimise negative impacts on sustainability aspects, support positive impacts and pursue opportunities arising in particular from the transition to a sustainable future. Nearly all elements of the sustainability strategy relate to sustainability aspects and also take the resulting challenges into account (listed below as examples).

The "Hypo Effect" topics are divided into the following areas:

- Emissions: Group-wide data collection and reduction in emissions. Challenge: Data quality and availability; definition of an implementable decarbonisation strategy (see ESRS 2 BP-2.10 et seq.)
- Fair employer: Promotion of a social corporate culture and compliance with human rights standards in the value chain
- Financing and investment: Continued strict application of exclusion and positive criteria. Development/enhancement of new and existing products to include sustainability aspects. Challenge: Designing attractive products to include sustainability aspects while taking economic efficiency into account; avoidance of greenwashing
- ESG risks: Consideration of material environmental risks and establishment of a robust data pool for the long term (see E1 SBM-3.18 et seq.). Challenge: Data availability and methodological approach in topic-specific areas; establishment of expertise (e.g. evaluation of biodiversity-related transmission channels and their measurability)
- Customers and communities: Obtaining and taking into account extensive stakeholder opinions and assuming social responsibility through comprehensive social engagement. Challenge: Continuous dialogue to fulfil sustainability-specific regulatory requirements in economically challenging times
- Transformation: Supporting all relevant stakeholders on the path to an economic, environmental and social future. Challenge: Impartially communicating knowledge about sustainability to all relevant stakeholders; expanding implementation in all departments and governance structures (see e.g. topic-specific information under E1-2, E2-1; E4-2, E5-1)

In addition, upcoming challenges always form part of project work on specific sustainability aspects (e.g. the question of how to handle incentives when it comes to expanding the sustainable product range). A comprehensive materiality analysis, supplemented by expert workshops and with the involvement of relevant stakeholders, was used to identify key focal points. Customers, suppliers and employees were given the opportunity to have a direct influence on Hypo Vorarlberg's sustainability strategy. In this way, the company is pressing ahead with the necessary change despite the regulatory challenges.

Future challenges include reviewing the findings from the materiality analysis and evaluating them from a corporate perspective, including combining them with the existing sustainability strategy as necessary, and subsequently implementing or operationalising them within the company.

One approach to ensuring that topics are handled in a structured manner is to establish projects for major material topics. This ensures the orderly discussion of the topics, with the resulting findings forming an important basis for strategic considerations and decisions.

#### **41) Disclosure of a list of ESRS sectors that are significant to the undertaking**

**If the company exercises an EU exemption under Article 18 (1) (a) of Directive 2013/34/EU, it may omit the breakdown of revenue by significant ESRS sector but must nevertheless disclose the ESRS sectors that are significant to the company.**

As no list of ESRS sectors has been published to date, no response is provided for this data point.

#### **42) Description of the business model and value chain**

Based on its core competencies, Hypo Vorarlberg is positioned as follows: "As the entrepreneurial bank from Vorarlberg, we offer corporate and private customers a forward-looking financial solution for everyone with a plan and who is focused on achieving their objectives and aspirations thanks to our proximity to people, our advice in a private setting and our excellent financial products."

#### **42a) Description of the inputs of the business model and value chain and the approach to gathering, developing and securing these inputs**

Hypo Vorarlberg owes its economic success in particular to the expertise, commitment and motivation of its employees. As one of the largest employers in its home market of Vorarlberg, the company considers retaining jobs both in the region and beyond to be a core task.

Hypo Vorarlberg's sustainability strategy is based on a comprehensive understanding of sustainability that encompasses the economic, social and environmental dimensions. These three areas carry equal weight, and the company seeks to achieve an optimum balance between them in its day-to-day activities.

#### **ECONOMY**

First of all, sustainability means economic sustainability: Instead of speculation and profit maximisation, Hypo Vorarlberg places the greatest emphasis on security and conserving the value of customer funds. Hypo Vorarlberg is a strong and reliable partner for the population and the economy in its market areas. Negative impacts on the environment and society must be reduced and positive impacts promoted. The company is therefore increasingly focusing on sustainable investment solutions and measures in its lending business. The range of sustainable products and services is to be continuously expanded.

#### **SOCIETY**

As an important employer in the region, Hypo Vorarlberg promotes open and respectful interaction and ensures positive conditions through gender equality in recruitment and salary, flexible working time models and workplace health promotion. In the interests of sustainable personnel development, it places an emphasis on continuous training and professional development and trains its own junior staff. Hypo Vorarlberg shares its economic success with the surrounding area by maintaining long-term partnerships and sponsorship schemes in culture and sport and supporting individuals and non-profit projects through its own charitable fund.

#### **ENVIRONMENT**

##### **Own business operations**

Hypo Vorarlberg continuously makes its employees aware of issues such as resource consumption, waste separation and conscious mobility. The company's aim is to reduce its energy and resource consumption and hence its operational CO<sub>2</sub> emissions. Hypo Vorarlberg also ensures that its value chain remains in the region. It works with service providers, suppliers and partners to improve its environmental impact.

##### **Downstream value chain**

As Hypo Vorarlberg operates as a service provider in the financial sector, operational emissions only play a minor role. However, the financed and invested portfolios have been identified as material. Extensive analyses were carried out in 2024 to find out how high the CO<sub>2</sub> emissions of the portfolios are and what impact the portfolios have on biodiversity, for example. The initial insights gained as a result will be further expanded in 2025.

##### **Core business**

Hypo Vorarlberg also fulfils its ethical and social responsibility when it comes to its financing and its products. It offers products that have a clear social or environmental connection or purpose. To avoid greenwashing, the Bank complies with legal requirements when fulfilling its environmental contribution and has its products certified by third parties where possible. Specific indicators can be found in the applicable frameworks (such as the Green Bond Framework). The EU taxonomy, a classification system for sustainable economic activities, also serves as a guide. It defines an activity as sustainable if it contributes substantially to one or more of the six environmental objectives while also not jeopardising or significantly harming any of these objectives.

#### **42b) Description of outputs and outcomes in terms of current and expected benefits for customers, investors and other stakeholders**

People and companies in Vorarlberg, in selected regions of Austria and in eastern Switzerland and southern Germany are customers of Hypo Vorarlberg. Hypo Vorarlberg focuses on its core competencies.

#### **BUSINESS MODEL**

Hypo Vorarlberg's business model is based on its customers' trust. This means that discretion and the protection of the data entrusted to it are crucially important for the company's economic success. Customer satisfaction is a top priority for Hypo Vorarlberg, which is why the company continuously invests in its locations and in training its employees. This allows it to live up to its aspiration of providing the best advice for everyone with a plan. As an advisory bank, Hypo Vorarlberg's customers are central to everything it does. Rather than offering standardised solutions, it concentrates on conscientious advice and careful product selection in order to satisfy its customers' needs. Regular awards confirm the high level of customer focus and customer satisfaction. The Private Customer and Corporate Customer Sales departments are responsible for this area.

Through its financial products, Hypo Vorarlberg can exert a significant influence over other economic players and contribute to the advancement of a socially, environmentally and economically responsible economy. While it used to be primarily institutional investors who wanted to invest their money sustainably, now private customers are also increasingly asking which companies and projects their money is being invested in. For Hypo Vorarlberg, this development represents both an opportunity and a challenge. On the one hand, it opens up the possibility of addressing new customer groups with sustainable products and services, thereby remaining economically competitive. On the other hand, it is essential to keep pace with regulatory developments. Hypo Vorarlberg masters this balancing act by also fulfilling its responsibility on the product side, i.e. by reducing adverse impacts on the sustainability factors and effectively managing sustainability risks.

Hypo Vorarlberg continuously adapts its range of products and services to customer needs and the state of the art. Although digitalisation is opening up new opportunities for contacting customers, Hypo Vorarlberg also retains a clear commitment to its locations.

## SOCIAL ENGAGEMENT

Hypo Vorarlberg's social engagement is based on the two pillars of donations and sponsorship. In 2014, Hypo Vorarlberg established a dedicated fund for supporting charitable projects. Every year, part of the profit generated is transferred to this fund. Hypo Vorarlberg pays attention to regionality and diversity in all its engagements and generally seeks to ensure a long-term relationship. Further requirements include the personal commitment of the project operators and the professionalism of the projects to be supported.

### 42c) Main features of the value chain and the undertaking's position, as well as key players and their relationships

As a financial institution, the downstream value chain (customer business) is material and is the focus of the analyses and the non-financial statement.

The analysis of the reportable topics takes account of the value chain, which comprises the following core areas:

- Upstream value chain: procurement, suppliers and infrastructure
- Own business operations
- Downstream value chain: customers

| Core brand values of Hypo Vorarlberg AG                                                                                                                                                                                                                                          |                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                      |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Excellent, Mindful, Interconnected, Reliable, Consistent, Efficient, Ambitious                                                                                                                                                                                                   |                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                      |
| Upstream value chain                                                                                                                                                                                                                                                             | Hypo Vorarlberg                                                                                                                                                                                                                                                                                                                | Downstream value chain                                                                                                                                                                               |
| <b>Procurement/suppliers/infrastructure:</b><br>Workplace equipment (hardware/software)<br>Office equipment<br>Advertising materials and customer gifts<br>Mobility and logistics<br>Construction, maintenance and operation of buildings, technology and security installations | <b>Management:</b><br>Corporate management<br>Strategic bank management<br>Group risk controlling<br>Compliance and outsourcing<br>Products and services:<br>Investment business<br>Financing/leasing<br><b>Support:</b><br>Human resources<br>IT<br>Law<br>Marketing and communication<br>Sales support<br>Project management | <b>Customers:</b><br>Financed/invested portfolios<br>Portfolio analyses (CO <sub>2</sub> emissions, biodiversity, air pollution)<br>Financing/leasing<br>Asset management<br>Own-account investments |

## DISCLOSURE REQUIREMENT SBM-2 – INTERESTS AND VIEWS OF STAKEHOLDERS

### 45ai) Description of the undertaking's key stakeholders

The following stakeholders have been identified:

- Owners, affected
- Supervisory Board, affected
- Employees, affected and interested
- Customers, (potentially) affected and interested
- Media, interested
- Suppliers and external service providers, (potentially) affected and interested
- Politics and administration, (potentially) affected and interested
- Investors, (potentially) affected and interested
- Rating agencies, interested
- Interest groups and industry associations, interested
- Public, (potentially) affected and interested
- NGOs, (potentially) affected and interested

### 45aii) Engagement with and categorisation of stakeholders

The identified stakeholders were surveyed using an online questionnaire on the topics specified by ESRS 1 in order to understand which stakeholders are affected by Hypo Vorarlberg's business activities and upstream and downstream value chain or could be affected in future. The stakeholders were also categorised into two groups: affected or interested stakeholders of the non-financial statement.

### 45aiii) Organisation of stakeholders

The respondents firstly rated the topics in relation to Hypo Vorarlberg from 1 (not relevant) to 4 (highly relevant). They were then able to provide information on additional impacts in the open text fields. There were no responses to the questionnaire in the stakeholder groups "Media" and "Rating agencies". The stakeholders were not prioritised. To determine the qualitative outcomes, all of the feedback was analysed and examined for (potential) impacts. These were harmonised with the list of impacts already drawn up and new impacts were evaluated by the Sustainability Group for their materiality.

#### 45aiv) Purpose of engagement

Engaging with stakeholders means that their interests are taken into account and their views on the relevant impacts of Hypo Vorarlberg's business activities on people and the environment are obtained. This is important when it comes to ensuring the completeness of the identified impacts. The questionnaire comprises a quantitative and a qualitative section.

#### 45av) Consideration of outcomes

After final identification and a materiality assessment taking account of the results of the online questionnaire, the material sustainability topics were derived using the principle of double materiality in accordance with ERS 1 section 3.3. In future, the material topics will be taken into account in the company's strategy and business activities and reported on in the annual non-financial statement.

#### 45b) Understanding of stakeholder engagement

Stakeholder engagement took place as part of the materiality analysis. Using an online questionnaire, stakeholders were given the opportunity to express their interests and opinions. Stakeholders who are familiar with Hypo Vorarlberg's business model were nominated. The outcomes of the survey were taken into account for those topics that were identified as not clearly material or immaterial during the expert workshop. However, it was not possible for an outcome to change a non-material topic into a material topic or a material topic into a non-material topic. Any topic that either has a material impact or entails material risks and opportunities is considered to be material. The material topics influence the sustainability strategy, which is continuously enhanced on the basis of the material topics.

#### 45ci-iii) Changes to policies and/or business models

The materiality analysis did not result in any adjustments to the business model. To date, there have also been no changes to the strategies. The findings of the materiality analysis will be taken into account in future strategic considerations.

#### 45d) Disclosure of whether and how the administrative, management and supervisory bodies are informed about stakeholder engagement

The Managing Board and Group managers were involved in the materiality analysis process from the outset. They participated in the workshops and, as stakeholders, also had the opportunity to respond to the online survey. The main topics were reported to the Supervisory Board. The Supervisory Board also receives the non-financial statement for review and approval. The Managing Board analysed the impacts as well as the risks and opportunities and subsequently approved them together with the material topics.

#### S1 SBM-2.12) Interests, views and rights of people in the undertaking's own workforce

Hypo Vorarlberg uses a materiality analysis to regularly determine which sustainability issues are of particular relevance. In addition to experts from the company, this process involves all employees directly via an online survey. This ensures that their interests and views are taken into account. In turn, the findings of the materiality analysis are taken into account in the sustainability strategy.

Employees are the most important resource for a successful company. Hypo Vorarlberg therefore pays particular attention to human rights matters that affect its employees. To prevent negative impacts and thus enable employees to contribute to the company and develop to their full potential, there is no discrimination on the basis of gender, age, nationality, ethnic and social origin, religion or ideology, marital status, personal limitations, sexual orientation or identity, either when employees are recruited or in their everyday working life.

The Group's sites are located in countries where fundamental human rights are both enshrined in law and actively practised in everyday life and business operations. Hypo Vorarlberg also wants to make an important contribution to improving the human rights situation. The Code of Conduct sets out its commitment to the Universal Declaration of Human Rights, the ILO core labour standards and the OECD Guidelines for Multinational Enterprises and to continuously developing these aspects within the company's operational processes.

### DISCLOSURE REQUIREMENT SBM-3 – MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

The consolidation of the individual IROs results in overarching categories that are listed in the tables below. These relate to all of the topic areas – E, S and G – and will be taken into account in future decision-making and analysis processes on key sustainability topics.

#### Material environmental impacts, risks and opportunities

##### 48a) Disclosure of material impacts, risks and opportunities

| Topic | Sub-sub-topic                                | IRO description                                                                                                                             | IRO type* | Value chain             |
|-------|----------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|-----------|-------------------------|
| E1    | Renewable energies/climate change adaptation | Reduction in GHG emissions: Positive impact on climate change through the financing of sustainable properties                               | I+        | Downstream              |
| E1    | Climate change mitigation                    | Increase in GHG emissions: Negative impact on the climate due to GHG emissions from business operations and vehicle fleet                   | I-        | Own business operations |
| E1    | Climate change mitigation                    | Increase in GHG emissions: Negative impact on the climate due to GHG emissions resulting from financing in connection with land-use changes | I-        | Downstream              |
| E1    | Climate change adaptation                    | Reputational risk: Transactions in connection with fossil fuels                                                                             | R         | Downstream              |
| E1    | Renewable energies/climate change adaptation | Market opportunity: Transactions (= new financing) in connection with renewable energies                                                    | O         | Downstream              |
| Topic | Sub-sub-topic                                | IRO description                                                                                                                             | IRO type* | Value chain             |
| E1    | Climate change adaptation                    | Reputational opportunity: Transactions in connection with measures to increase energy efficiency and reduce energy consumption              | O         | Downstream              |
| E1    | Climate change adaptation                    | Credit risk: Failure of collateral due to extreme weather conditions or environmental disasters                                             | R         | Downstream              |
| E2    | Air pollution                                | Increase in air pollutants: Negative impact on air quality due to financing and investments in pollutant-intensive industries               | I-        | Downstream              |

|    |                                                                                                                              |                                                                                                                                                                                                                |    |            |
|----|------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|------------|
| E2 | Air pollution                                                                                                                | Credit risk: Business with companies in specific industrial sectors with high emissions of air pollutants                                                                                                      | R  | Downstream |
| E4 | Impact on the extent and condition of ecosystems                                                                             | Reduction in biodiversity: Negative impact on biodiversity/extent and condition of ecosystems due to financing and investments in certain industries (real estate and construction)                            | I- | Downstream |
| E4 | Direct impact drivers of biodiversity loss/impacts on the state of species/impacts on the extent and condition of ecosystems | Reputational opportunity: Transactions that make a positive contribution to biodiversity (within the value chain) and environmental projects (endangered animal and plant species, conservation of ecosystems) | O  | Downstream |
| E5 | Resource inflows                                                                                                             | Increase in resource consumption: Negative impact on the environment due to financing of resource-intensive companies without measures to reduce consumption                                                   | I- | Downstream |
| E5 | Resource inflows                                                                                                             | Reduction in resource consumption: Positive impact on the environment due to financing that contributes to a sustainable circular economy                                                                      | I+ | Downstream |
| E5 | Resource inflows/waste                                                                                                       | Reputational opportunity: Transactions with a positive contribution to minimising resource consumption                                                                                                         | O  | Downstream |

\*I+ = positive impact; I- = negative impact; R = risk; O = opportunity

#### 48b) Effects of material impacts, risks and opportunities on the business model, value chain, strategy and decision-making

The material impacts, risks and opportunities do not affect the fundamental business model, but will affect the value chain, strategy and decision-making in the area of sustainability in future. The impacts, risks and opportunities are identified annually as part of the materiality analysis; in future, they will be checked against the risk inventory to ensure consistency. The results will also be taken into account in future strategic development. The analysis is updated regularly in response to new developments and to take account of relevant risks and opportunities.

A large proportion of the material environmental aspects relate to negative impacts such as greenhouse gas (GHG) emissions from business operations, the vehicle fleet and land-use changes, emissions from investments in pollutant-intensive industries, the loss of biodiversity through industry investments, soil sealing in the construction sector and the financing of resource-intensive companies without measures to reduce consumption.

The risk inventory has found that Hypo Vorarlberg is exposed to physical and transition risks. The inventory shows physical risks from flooding and possible medium-term strategic risks from rising temperatures. The risk inventory shows transition risks from changes in the legal framework (e.g. carbon taxes, legal requirements in areas such as disclosures). The legislators in Austria and Germany are pushing for changes in areas such as the replacement of fossil fuel heating systems. Other points include the temporary abolition of VAT on photovoltaic systems and the abolition of subsidies for oil and gas in housing subsidies. In the medium term, there are strategic risks due to changes in customer behaviour. In the private sector, high investment costs (reduced by subsidies) are offset by possible savings in operations. The risks of higher electricity prices remain in place.

#### 48c) Disclosure of impacts on people and the environment related to the strategy

##### 48ci) Material positive and negative impacts on people or the environment

Positive impacts result in particular from the promotion of renewable energies and the financing of energy efficiency measures. These contribute directly to the reduction in greenhouse gas emissions and support climate change adaptation. Financing and investments in projects that make a positive contribution to air quality, biodiversity and the circular economy promote the protection of ecosystems and the conservation of resources. On the other hand, greenhouse gas emissions from the company's own operations and vehicle fleet as well as land-use changes in the downstream value chain have negative impacts. In addition, investments in pollutant-intensive industries (such as the construction sector) contribute to a potential loss of biodiversity and soil sealing.

##### 48cii) Connection between the impacts and the undertaking's strategy and business model

The positive and negative impacts identified are closely connected to the corporate strategy and business model. Investments in renewable energies and sustainable projects support the company's strategic goals in the area of environmental and climate protection. The implementation of measures to reduce GHG emissions and for climate change adaptation serves to strengthen the resilience of the business model and ensure long-term competitiveness.

##### 48ciii) Time horizons of the impacts

The positive impacts of financing and investments in sustainable industries and projects are particularly effective in the medium to long term, as they promote the transition to a climate-friendly economy based on responsible resource management. Conversely, negative impacts such as greenhouse gas emissions from the company's own business operations or from transactions with companies from non-sustainable industries can cause operational challenges in the short term and contribute to the exacerbation of global environmental problems in the long term.

##### 48civ) Involvement of the undertaking in the material impacts

Hypo Vorarlberg influences identified impacts by channelling financial resources in particular. Positive impacts result from the targeted financing of sustainable projects, such as investments in renewable energies, energy efficiency measures and projects to promote biodiversity and the circular economy. At the same time, the company is also involved in negative impacts through its lending and investment decisions. This includes emissions caused by the financing of pollutant-intensive industries or resource-intensive companies, as well as indirect environmental impacts such as the loss of biodiversity or soil sealing in the construction sector.

#### 48d) Disclosure of current financial effects of the material risks and opportunities

There are no current financial effects of the material risks and opportunities at present, as this data has yet to be comprehensively quantified and recorded.

#### 48f) Disclosures on the resilience of the undertaking's strategy and business model regarding its ability to manage risks and pursue opportunities

Hypo Vorarlberg understands resilience as a systematic assessment of changes, crises and risks with the aim of evaluating financial impacts and improving risk-bearing capacity.

A structured process for identifying and managing sustainability risks is carried out annually. Risks recognised as material are assessed in greater depth, control measures are allocated them as necessary and the risks are reported in the sustainability risk report. Strategic risks are addressed in the business and sustainability strategy. The sustainability risk report does not currently identify any short-term material risks for the Bank.

Through this annual process, Hypo Vorarlberg ensures its resilience regarding its ability to manage material risks and guarantees that its strategies are continuously refined. For further information see also: E1: Climate change – material impacts, risks and opportunities and their interaction with strategy and business model.

In addition, an analysis of further risks at portfolio level was initiated in 2024. The focus was on CO<sub>2</sub> emissions and non-climate-related risks (GHG accounting (PCAF), air pollution, biodiversity and the circular economy). For further information see also: ESRs 2: General information – BP-2.10 et seq.; E1-E5: Management of impacts, risks and opportunities, E1-3, E2-2, E4-3, E5-2.

This review process not only minimises risks and their impacts, e.g. by applying exclusion criteria, but also allows opportunities to be identified and pursued. Exclusion criteria apply to transactions that do not meet the specified criteria. Hypo Vorarlberg rejects these transactions. The launch of new products that have a clear social or environmental connection and make a positive environmental or social contribution represents a potential opportunity. For further information see also: E1-E5: Management of impacts, risks and opportunities, exclusion criteria/selection criteria/positive criteria: E1-2, E1-3, E2-1, E2-2, E4-2, E4-3, E5-1, E5-2.

Hypo Vorarlberg assesses its resilience on the basis of the approach described as well as financial, operational, regulatory and strategic factors. In view of its solid capitalisation and liquidity position, Hypo Vorarlberg considers itself to be resilient and well equipped to engage in stable operations even in challenging market conditions.

#### 48g) Changes to material impacts, risks and opportunities compared to the previous reporting period

In 2023, a materiality analysis to identify the fundamental environmental aspects, risks and opportunities was carried out in accordance with the ESRs requirements. This analysis served as the starting point for a more detailed assessment, which was finalised in 2024. Future changes are taken into account through annual update processes.

#### 48h) Description of impacts, risks and opportunities covered by ESRs disclosure requirements compared to additional entity-specific disclosures

Hypo Vorarlberg has no additional entity-specific disclosures regarding the impacts, risks and opportunities that go beyond the statutory requirements of the ESRs.

#### Material social impacts, risks and opportunities

##### 48a) Discussion of material impacts, risks and opportunities

| Topic | Sub-sub-topic                                   | IRO description                                                                                                                                                | IRO type* | Value chain             |
|-------|-------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------|-------------------------|
| S1    | Working conditions                              | Physical and mental health problems caused by negative working conditions have a negative impact on the company's own workforce                                | I-        | Own business operations |
| S1    | Working conditions                              | Reputational opportunity: Creation of attractive workplaces by enabling an appropriate work-life balance                                                       | O         | Own business operations |
| S1    | Working conditions                              | Contributions to work-life balance and reconciling career and family have a positive influence on the working conditions for the company's own employees       | I+        | Own business operations |
| S1    | Equal treatment and equal opportunities for all | Reputational opportunity: Creation of attractive jobs through training and professional development opportunities                                              | O         | Own business operations |
| S1    | Working conditions                              | Training and professional development opportunities contribute to the creation of attractive jobs and have a positive influence on the company's own workforce | I+        | Own business operations |
| S1    | Working conditions                              | Employment law and social security in the form of remuneration and healthcare provision have a positive influence on the company's own workforce               | I+        | Own business operations |
| S1    | Working conditions                              | Reputational opportunity: Creation of attractive and secure jobs (e.g. fair pay, adequate healthcare provision)                                                | O         | Own business operations |

| Topic | Sub-sub-topic                                   | IRO description                                                                                                                        | IRO type* | Value chain             |
|-------|-------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------|-----------|-------------------------|
| S1    | Equal treatment and equal opportunities for all | Initiatives to reduce inequalities have a positive impact on equal opportunities and diversity                                         | I+        | Own business operations |
| S3    | Economic, social and cultural rights            | Positive impact on affected communities through contribution to regional economic responsibility (e.g. sponsorship, local procurement) | I+        | Own business operations |
| S3    | Economic, social and cultural rights            | Reputational opportunity: Creation of jobs in the region through local and regional value creation                                     | O         | Own business operations |
| S3    | Economic, social and cultural rights            | Reputational opportunity: Support for regional initiatives through the charitable fund and sponsorship                                 | O         | Own business operations |

|    |                                                            |                                                                                                                                                                    |    |                         |
|----|------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|-------------------------|
| S3 | Economic, social and cultural rights                       | Operational opportunity: Contribution to local and regional value creation through the use of regional services and products                                       | O  | Upstream                |
| S3 | Economic, social and cultural rights                       | Operational opportunity: Promotion of positive relationships between companies and affected communities                                                            | O  | Own business operations |
| S4 | Social inclusion of consumers and/or end-users             | Positive impact on the social inclusion of consumers by making banking and financial services accessible                                                           | I+ | Own business operations |
| S4 | Social inclusion of consumers and/or end-users             | Market opportunity: Customer acquisition through active involvement of disadvantaged groups                                                                        | O  | Own business operations |
| S4 | Information-related impacts for consumers and/or end-users | Damage caused by data protection violations and hacker attacks have a negative impact on customers                                                                 | I- | Own business operations |
| S4 | Personal safety of consumers and/or end-users              | Reputational and operating cost risk due to data loss and hacker attacks                                                                                           | R  | Own business operations |
| S4 | Personal safety of consumers and/or end-users              | Positive impact on the personal security of customer data through the creation of internal monitoring bodies                                                       | I+ | Own business operations |
| S4 | Information-related impacts for consumers and/or end-users | Operational opportunity: Investments in data protection and information security                                                                                   | O  | Own business operations |
| S4 | Information-related impacts for consumers and/or end-users | Positive impact on consumers and end-users through transparent labelling of products and services                                                                  | I+ | Downstream              |
| S4 | Information-related impacts for consumers and/or end-users | Responsible communication in sales and marketing has a positive influence on customers' decision-making processes                                                  | I+ | Own business operations |
| S4 | Information-related impacts for consumers and/or end-users | Reputational and market opportunity: Clear decision-making principles, transparent communication and secure products increase customer appeal and strengthen trust | O  | Own business operations |

\*I+ = positive impact; I- = negative impact; R = risk; O = opportunity

#### 48b) Effects of material impacts, risks and opportunities on the business model, value chain, strategy and decision-making

As part of the double materiality assessments, positive impacts and opportunities were identified with regard to the company's own workforce in particular. The contribution to improved working conditions, equal opportunities and the social integration of employees into the business process plays a central role. The continuous promotion of these aspects increases employee satisfaction, which is reflected in positive feedback in employee surveys and appraisals. The low staff turnover rate and the high utilisation of further training opportunities are expected to lead to a stronger sense of solidarity within the workforce. Employee retention also promotes trust in the company and supports employees by providing secure conditions for their life planning and financial stability.

At the same time, negative impacts and risks have been identified, such as mental and physical stress in the workplace and operational risk in the event of staff shortages or a negative reputation, e.g. due to data loss or hacker attacks. Such risks create uncertainties that can potentially lead to employee dissatisfaction. The findings of the double materiality analysis have been identified as important in terms of development potential and will be taken into account in future.

#### 48c) Disclosure of impacts on people and the environment related to the strategy

##### 48ci) Material positive and negative impacts on people or the environment

The promotion of working conditions and targeted employee development contribute to a positive corporate culture and increased employee loyalty. Equal opportunities and diversity measures promote an inclusive working environment, which strengthens long-term social sustainability and makes the company more attractive as an employer. On the other hand, physical and mental stress in the workplace can have a negative impact on employee health and the efficiency of the company.

The company contributes to regional value creation by strengthening regional economic responsibility and promoting local services and products. This reinforces relationships with local communities and supports social integration at a regional level.

By giving disadvantaged groups access to financial services, the company actively contributes to social inclusion. Conversely, data protection violations and data protection violations represent potential negative impacts that can jeopardise both the personal security of end-users and the reputation of the company. Investments in data protection controls and security measures are necessary to preventively counteract these risks.

##### 48cii) Connection between the impacts and the undertaking's strategy and business model

The positive and negative impacts described are closely connected to the corporate strategy and business model. Strategic initiatives to improve working conditions and equal opportunities, increase data security and promote social inclusion are strengthening the resilience of the business model. These measures help to secure the trust of employees and customers for the long term and ensure the company's success.

##### 48ciii) Time horizons of the impacts

The positive impacts, such as increasing employee loyalty or promoting diversity, are particularly effective in the medium to long term. On the other hand, negative impacts such as staff shortages or data protection violations can lead to operational challenges in the short term, as well as having long-term consequences for the corporate culture and the company's reputation.

##### 48civ) Involvement of the undertaking in the material impacts

The company contributes directly to creating a positive impact through its activities, e.g. by shaping working conditions, complying with data protection standards and promoting diversity. The findings from the double materiality analysis underline the company's responsibility for actively managing these impacts through preventive and proactive measures.



#### 48d) Disclosure of current financial effects of the material risks and opportunities

There are no current financial effects of the material risks and opportunities at present, as this data has yet to be comprehensively quantified and recorded. However, this is planned for the future.

#### 48f) Information on the resilience of the undertaking's strategy and business model regarding its ability to manage material impacts and risks and pursue material opportunities

The identified negative impacts of physical and mental workload are counteracted by various preventive measures, thereby building resilience. For example, employees undergo mandatory training on safety in the workplace. A company doctor and an occupational psychologist are also available if required. A Health Committee is responsible for designing and enhancing the programme for strengthening mental and physical health. The effectiveness of the measures is monitored using key figures such as sick days and the staff turnover rate. The prevention measures also serve as an opportunity for Hypo Vorarlberg to position itself as an attractive employer. The needs and expectations of employees are addressed during employee appraisals and subsequently supported with specific measures (e.g. training and professional development).

No negative impacts or risks have been identified in relation to affected communities, which is why no resilience monitoring was carried out in this area.

With regard to customers and consumers, material negative impacts and risks have been identified in relation to data protection and information security. The secure handling of sensitive data of all customer and consumer groups is extremely important to Hypo Vorarlberg. To this end, it continuously invests in and expands security measures in order to meet all regulatory requirements and customer expectations and needs and to avoid being susceptible to the dangers of constantly increasing cyber crime. Resilience is monitored using key figures on data protection violations.

In the coming reporting period, further targeted measures to minimise these risks will be developed on the basis of the data collected.

#### 48g) Disclosure of changes to material impacts, risks and opportunities compared to the previous year

An initial double materiality assessment was carried out in 2023. This identified the fundamental environmental aspects, risks and opportunities. This analysis served as the starting point for a more detailed assessment, which was finalised in 2024. Future changes will be taken into account.

#### 48h) Description of impacts, risks and opportunities covered by ESRS disclosure requirements compared to additional entity-specific disclosures

Hypo Vorarlberg does not disclose any additional entity-specific information on the impacts, risks and opportunities that goes beyond the ESRS requirements.

#### Material impacts and opportunities in the area of governance

##### 48a) Discussion of material impacts, risks and opportunities

| Topic | Sub-sub-topic                                       | IRO description                                                                                                                | IRO type* | Value chain             |
|-------|-----------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------|-----------|-------------------------|
| G1    | Corporate culture                                   | Strengthening the corporate culture: Positive impact on the company and society through contribution to corporate culture      | I+        | Own business operations |
| G1    | Corporate culture                                   | Operational opportunity: Promotion of a trust-based working culture (e.g. shared values, mission, Code of Conduct)             | O         | Own business operations |
| G1    | Protection of whistleblowers/corruption and bribery | Positive impact on society through conscientious compliance and integrity within the company                                   | I+        | Own business operations |
| G1    | Corruption and bribery                              | Negative impact due to lack of risk-minimising measures in business activities with a heightened risk of corruption or bribery | I-        | Own business operations |

| Topic | Sub-sub-topic                                                | IRO description                                                                                | IRO type* | Value chain             |
|-------|--------------------------------------------------------------|------------------------------------------------------------------------------------------------|-----------|-------------------------|
| G1    | Supplier relationship management                             | Reputational opportunity/market opportunity: Contribution to local and regional value creation | O         | Own business operations |
| G1    | Supplier relationship management including payment practices | Positive impact on society through sustainable procurement criteria                            | I+        | Upstream                |

\*I+ = positive impact; I- = negative impact; R = risk; O = opportunity

#### 48b) Effects of material impacts, risks and opportunities on the business model, value chain, strategy and decision-making

The corporate culture is a central component of Hypo Vorarlberg's corporate strategy and is reflected in the processes of its business model. It promotes solidarity and trust in the company throughout the entire value chain. This culture is summarised in the Code of Conduct. In addition to the corporate culture, the Code of Conduct includes binding rules of conduct for day-to-day business, including anti-corruption and anti-bribery policies. Other aspects include the promotion of a safe working environment, the establishment of procedures for reporting violations and policies governing regular employee training. In particular, potential incidents of corruption and bribery can have serious consequences for the company and its employees, resulting in financial losses and negative impacts in the value chain.

Consistent compliance and integrity within the company serve to ensure a higher degree of security and counteract these negative impacts. This is based on the guarantee of anonymity, protection for whistleblowers and internal control systems. The contribution to local and regional value creation has also been identified as a valuable opportunity in the company's own business operations. Integrating corresponding processes into everyday business life helps to strengthen the local economy, create jobs and support infrastructure. The Code of Conduct is regularly reviewed and will be further revised in 2025 to ensure that it meets changing legal requirements and stakeholder expectations. Detailed information on the corporate culture can be found under G1-1 Corporate culture.

#### **48c) Disclosure of impacts on people and the environment related to the strategy**

##### **48ci) Material positive and negative impacts on people or the environment**

Hypo Vorarlberg's corporate culture has a positive impact on employees, society and relationships with stakeholders. Consistent compliance ensures adherence to legal provisions and strengthens the trust of customers and relevant stakeholders. Negative impacts can occur if no risk-minimising measures are in place, particularly in areas with a heightened risk of corruption.

##### **48cii) Connection between the impacts and the undertaking's strategy and business model**

The impacts are closely connected to the corporate strategy and business model. Promoting a strong corporate culture characterised by integrity, transparency and ethical conduct is a key component. The Code of Conduct forms the basis for decisions and actions and thus promotes sustainable business conduct. Stakeholder relationship management contributes to risk minimisation and long-term value creation. This helps the Bank to position itself as a responsible and sustainable organisation in a highly competitive market environment.

##### **48ciii) Time horizons of the impacts**

The positive impacts in the area of governance, such as strengthening the corporate culture through ethical business practices and adherence to compliance standards, are particularly effective in the medium to long term. They support sustainable innovation, strengthen the trust of stakeholders and create competitive advantages. Conversely, negative impacts such as incidents of corruption or bribery or the inadequate implementation of compliance measures can lead to legal and operational challenges in the short term, as well as causing long-term damage to the company's reputation and relationships with stakeholders.

##### **48civ) Involvement of the undertaking in the material impacts**

Hypo Vorarlberg influences the material impacts both directly through its business conduct and indirectly through its business relationships. Direct responsibility is reflected in the creation of a strong corporate culture, adherence to compliance requirements and the promotion of regional value creation. Indirectly, the company contributes to the implementation of social and environmental standards through its cooperation with suppliers and partners.

##### **48d) Disclosure of current financial effects of the material risks and opportunities**

There are no current financial effects of the material risks and opportunities at present, as this data has yet to be comprehensively quantified and recorded. However, this is planned for the future.

##### **48f) Information on the resilience of the undertaking's strategy and business model regarding its ability to manage material impacts and risks and pursue material opportunities**

Material impacts in connection with bribery and corruption were identified in the course of the materiality analysis. All employees are provided with an insight into and initial information on these topics during the onboarding process. In addition, mandatory training courses take place every year and particularly affected risk groups have been defined. By clearly defining responsibilities in a Managing Board directive that applies to Hypo Vorarlberg, specific measures to minimise risk have been established including employee training at all levels and the (further) development of emergency plans and systems (e.g. the whistleblowing system). These measures are continuously improved in order to further strengthen the prevention of bribery and corruption. Hypo Vorarlberg's resilience is demonstrated by the fact that it has not received any penalties in connection with bribery and corruption.

##### **48g) Disclosure of changes to material impacts, risks and opportunities compared to the previous year**

An initial double materiality assessment was carried out in 2023. This identified the fundamental environmental aspects, risks and opportunities. This analysis served as the starting point for a more detailed assessment, which was finalised in 2024. Future changes will be taken into account.

#### **48h) Description of impacts, risks and opportunities covered by ESRS disclosure requirements compared to additional entity-specific disclosures**

Hypo Vorarlberg does not disclose any additional entity-specific information on the impacts, risks and opportunities that goes beyond the ESRS requirements.

### **IMPACT, RISK AND OPPORTUNITY MANAGEMENT**

#### **DISCLOSURE REQUIREMENT IRO-1 – DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES**

##### **53a) Description of the methodologies and assumptions applied in the described process**

Under the CSRD, a double materiality assessment in accordance with the requirements of ESRS 1 section 3.3 must be carried out for the purpose of the sustainability statement. The ESRS set out the sustainability information that a company must disclose in accordance with Directive 2013/34/EU as amended by the CSRD. In accordance with the principle of double materiality, a sustainability aspect must be reported if it is material in terms of its impact on people and the environment or from a financial perspective. In order for this materiality to be determined, a list of potential and actual impacts, risks and opportunities (IROs) must be prepared. This is supplemented by information from internal experts and relevant external stakeholders. The IROs are then evaluated and the reportable material topics are derived for the sustainability statement.

##### **53bi) Overview of the procedure regarding activities, relationships, geographies and factors giving rise to a heightened risk of adverse impacts as part of the due diligence process**

The basis for the materiality analysis is the joint determination of the status quo. All of the relevant information on Hypo Vorarlberg's business model, value chain, business relationships and internal processes was collected for this purpose. In 2022, a status quo analysis was carried out to record the actual situation in accordance with the GRI standards as compared to the ESRS. In addition, documents on the business model, value chain and scope of consolidation were included in the data pool. A status quo analysis was carried out again at the start of the 2024 project. In future, a status quo analysis will be carried out at the beginning of each reporting cycle and will form the basis for the new reporting cycle.

A detailed overview of the fully consolidated subsidiaries, their business activities and their significance for the Group as a whole was prepared in order to identify potential deviations from the parent company. There were no significant deviations or factors indicating a heightened risk of adverse impacts.

##### **53bii) Consideration of the impacts with which the undertaking is involved through its own operations or as a result of its business relationships**

To identify the IROs, Hypo Vorarlberg's business activities and its value chain were analysed and potential impacts, risks and opportunities relating to environmental, social and governance issues were formulated. The list of topics in accordance with ESRS 1 AR 16 served as the basis, with sub-sub-topics being used for a detailed breakdown where necessary.

Working with external consultants, actual and potential negative and positive impacts as well as risks and opportunities from the company's own operations or from the upstream and downstream value chain were identified for each topic. In particular, operational activities include the operation of branches and office buildings with an impact on environmental aspects such as heating, mobility and IT procurement. In addition, Hypo Vorarlberg can influence the sustainability of projects and companies in its role as a lender and provider of investment products and services.

The risks and opportunities were assessed taking into account the financial impact of environmental, social and governance issues. This involved analysing Hypo Vorarlberg's dependencies on natural and social resources that could have a long-term impact on the financial position, financial performance, cash flows, access to funds or cost of capital. The risks and opportunities were also classified as market, reputational, operational, strategic or regulatory risks or opportunities.

##### **53biii) Disclosure of consultations with stakeholders and external experts**

#### **VALUATION**

The assessment of the impacts, risks and opportunities to evaluate their materiality was carried out by internal experts in workshops on 5 July 2023 that were facilitated by a consulting firm. A review took place in September 2024 with experts from the key specialist departments.

#### **WORKSHOPS**

The participants were divided into groups based on the focus areas of environmental, social and governance. The topics identified were critically discussed and evaluated within these groups. Adjustments or additions are made to the list of impacts, risks and opportunities as required.

#### **STAKEHOLDER ENGAGEMENT**

In order to fulfil the duty of care, the identified stakeholders were asked about the topics using a questionnaire. Engaging with stakeholders means that their interests are taken into account and their views on the relevant impacts of Hypo Vorarlberg's business activities on people and the environment are obtained. This is important when it comes to ensuring the completeness of the identified impacts.

##### **53biv) Disclosure of the severity and likelihood of adverse impacts and assumptions for the material sustainability aspects**

#### **ASSESSMENT METHODOLOGY**

The workshop began with an introduction to the assessment methodology according to ESRS 1 sections 3.4 and 3.5.

Sustainability-related impacts emanate from the company and its activities and business operations and affect people or the environment. They may be actual or potential, negative or positive, short-term or long-term, intended or unintended, and reversible or irreversible. The materiality of actual and potential impacts is determined by the degree of severity, based on the magnitude, scope and remediability. Potential impacts also take into account the likelihood of their occurrence. In the case of positive impacts, the magnitude and scope (actual) or the magnitude, scope and likelihood (potential) are decisive. Risks and opportunities are assessed based on the likelihood of occurrence and the potential financial magnitude.

After the workshops were completed, a quality assurance process was carried out to check the assessment for completeness and plausibility. Any adjustments should be seen as a continuous improvement process to ensure an accurate assessment. Finally, the evaluations were aggregated

and analysed. To analyse the results, the sum of the severity parameter (on a scale from 1 to 5) and the recoverability parameter (where applicable) was determined, divided by the number of applicable parameters and multiplied by the likelihood of occurrence. The maximum of the three time periods (short, medium and long term) was then applied in determining the overall assessment for an IRO.

## STAKEHOLDER ENGAGEMENT

The stakeholder questionnaire comprises a quantitative and a qualitative section. The respondents to the questionnaire firstly rated the topics in relation to Hypo Vorarlberg from 1 (not relevant) to 4 (highly relevant). Stakeholders were then able to provide information on additional impacts in the open text fields. The stakeholders were not prioritised. To determine the qualitative outcomes, all of the feedback was analysed and examined for (potential) impacts. These were harmonised with the list of impacts already drawn up and new impacts were evaluated by the Sustainability Group for their materiality.

### 53c) Disclosures on the process used to identify, assess and monitor risks and opportunities with financial effects

#### 53ci) Consideration of the interrelationships between impacts, dependencies, risks and opportunities

After final identification and a materiality assessment taking account of stakeholder involvement, the material sustainability topics were derived using the principle of double materiality in accordance with ESRS 1 section 3.3. Any topic that either has a material impact or entails material risks and opportunities is considered to be material.

The assessments of impact materiality and financial materiality are connected and the interdependencies between these two dimensions are taken into account. In general, the starting point is the assessment of impacts, although there may also be material risks and opportunities that are not related to the undertaking's impacts. A sustainability impact may be financially material from inception or become financially material when it could reasonably be expected to affect the undertaking's financial position, financial performance, cash flows, its access to finance or cost of capital over the short, medium or long term.

#### 53cii) Assessment of the likelihood, magnitude and nature of risks and opportunities

##### DISCUSSION OF THE EFFECT OF THE MATERIALITY CORRIDOR

The materiality corridor is used in the double materiality assessment to classify an organisation's material sustainability topics more precisely. Topics that lie within this corridor may be evaluated by the company in greater detail. By contrast, topics that are assessed as being significantly above or below the corridor in the materiality analysis must be categorised as material or immaterial.

Strategically relevant topics that will become more important in future may also be recognised as material at an early stage. If an impact exceeds the threshold of  $> 2.1/5$  for impact materiality and a risk or opportunity exceeds the threshold of  $> 1.4/5$  for financial materiality, it is considered material for Hypo Vorarlberg and must be included in the CSRD sustainability report in accordance with the ESRS requirements. IROs relating to human rights that are located within the defined corridor are included in the process. Even if the likelihood of occurrence is lower, it is crucial to assess the magnitude of the potential impairment for the people affected. This approach ensures that the protection of human rights has top priority in the risk assessment and that no serious consequences are overlooked.

##### CALCULATION OF THE MATERIALITY CORRIDOR

The materiality corridor is calculated separately for impact materiality and financial materiality, with the same methodology being used for both.

- Based on the quantitative results of the materiality assessment, the arithmetic mean of all results is calculated. Results below 0.1 are excluded in order to prevent the distortion of the average by these very low values.
- The arithmetic mean is then modified by 20 % in each direction by multiplying it by the factors 0.8 and 1.2. This results in the materiality corridor.

### 53ciii) Prioritisation of sustainability risks relative to other risks, including the use of risk assessment tools

Sustainability risks have not been prioritised.

### 53d) Description of the decision-making process and the related internal control procedures

In order to decide which issues are material, the impacts, risks and opportunities were assessed on a scale according to their magnitude, extent and likelihood of occurrence. The results were summarised and subjected to quality assurance by external consultants. Identified topics are continuously checked for plausibility and adjusted as required. The materiality analysis is updated as part of an annual review. A new analysis is conducted every three years to ensure that it is up-to-date and relevant.

### 53e) Process to identify and manage impacts and risks in the undertaking's risk management system

The handling of sustainability risks at Hypo Vorarlberg is comprehensively regulated. Group Risk Controlling is responsible for risk controlling, which comprises the annual revision of the risk strategy including the performance of the risk inventory, the annual sustainability risk report and the development of risk models. One aspect of this is the identification of sustainability risks. Group Risk Controlling focuses on identifying potential risks, recognising and avoiding cluster risks and building up a data pool and expertise. Risks in the Internal Capital Adequacy Assessment Process (ICAAP), the Internal Liquidity Adequacy Assessment Process (ILAAP) and sustainability risks are generally assessed using models that take into account the business strategy, the portfolios in question, the respective risk appetite and the respective perspective. Group Risk Controlling must maintain a model inventory containing all key information on the models used (in risk controlling). The risks recognised as material are handled in the risk strategy for the respective risk type. Strategic risks are addressed in the business and sustainability strategy.

## SUSTAINABILITY RISK INVENTORY

The risk inventory for sustainability risks is prepared as follows:

- An assessment is made for each risk in accordance with section 39 (2b) BWG (ICAAP) and for the ILAAP in order to determine whether the sustainability risk factors could have a material impact on the company. Findings from the ICAAP risk inventory must be taken into account.
- Legal and reputational risks must also be taken into account.
- Risk types or risk factors for which no sustainability risks or transmission channels are identified do not need to be analysed further.
- A simplified assessment may be performed for non-material ICAAP risks.
- Potential transmission channels must be defined. Transmission channels describe how the impacts of risk factors relating to customers or assets specifically materialise in the Group's balance sheet or income statement.

## SUSTAINABILITY RISK APPETITE

- Hypo Vorarlberg seeks to actively manage and limit the average financed greenhouse gas intensity in its portfolio. The aim is to reduce the financed greenhouse gas intensity in the medium term.
- Plausible scenarios with physical climate risks that are expected to occur with a high likelihood should not lead to a breach of the stress test requirements in the short term.
- Plausible scenarios with transitional climate risks that are expected to occur with a high likelihood should not lead to an erosion of the equity base in the long term.

A comparison of the risks identified in the risk inventory and the impacts, risks and opportunities identified in the materiality analysis took place in 2024.

### 53f) Disclosure of the extent and manner in which opportunities are integrated into the general management process

At Hypo Vorarlberg, the process for identifying, evaluating and managing opportunities is integrated into the management process as follows: Opportunities are systematically identified, approved, strategically integrated and operationalised.

## MATERIALITY ANALYSIS

As part of the materiality analysis, opportunities (e.g. market opportunities, reputational opportunities, operational opportunities) were identified in the areas E1, E4, E5, S1, S3, S4 and G1 in particular. In addition to external stakeholders, internal stakeholders (employees, managers, Managing Board) in particular provided valuable input. This ensured that the opportunities identified were comprehensive and relevant. Through their involvement in the process, these were made available to a large number of stakeholders.

## APPROVAL

The opportunities identified are approved by the full Managing Board. This ensures that opportunities are recognised and supported at the highest level.

## STRATEGY

The overarching assignment of the areas E1, E4, E5, S1, S3, S4 and G1 to the existing "Hypo Effect" topics is also intended to lay the foundations for the operationalisation of opportunities for the specialist departments. The company plans to evaluate the identified opportunities on an ongoing basis in the 2025 reporting year and to review their in-depth strategic consideration and allocation.

## REPORTING

Internal stakeholders, especially specialist departments, compared the opportunities identified in the 2024 reporting year with the existing policies in order to design the minimum disclosure requirements (policies and actions) and fulfil the ESRS disclosure requirements. This enabled the first projects, policies and measures to be allocated to the identified opportunities, thereby confirming the results of the materiality analysis and improving the Group's sustainability reporting.

Opportunities are integrated into the management process in order to minimise negative impacts on sustainability aspects, support positive impacts and pursue opportunities arising in particular from the transition to a sustainable future. The continuous enhancement of strategies, business models, processes and services is essential.

### 53g) Details of the input parameters used (for example, data sources, the scope of operations covered and the detail used in assumptions)

Experts from the respective specialist departments were invited to the workshops to provide input. An online survey was conducted to incorporate stakeholder perspectives. As nature itself cannot act as a stakeholder, environmental organisations were involved in order to contribute ecological concerns and perspectives to the process. No other sources were used.

### 53h) Disclosure of whether and how the process has changed compared to the previous period and future revision dates

The materiality analysis was carried out in accordance with ESRS as the basis for satisfying the ESRS disclosure requirements. It should be noted that experts from specialist departments were involved to a greater extent and that the annual review ensures a close-knit update process. The next planned update will take place with the review process in 2025. Alternatively, an earlier revision will be carried out in the event of regulatory changes (sector-specific standards). A comprehensive revision takes place every three years at the latest.

### General declaration for E1 IRO-1.20a to E5 IRO-1.11b

For all of the following points, the consideration of the operational area and the company's own locations is not material for Hypo Vorarlberg as a financial corporation and only the E1 topics address the operational perspective to a limited extent. The downstream value chain was identified as material, namely financing and investment business and own-account investments.

## TOPICAL DISCLOSURE REQUIREMENTS: E1 CLIMATE CHANGE

### E1-20a) Disclosures on the impacts of climate change, in particular the undertaking's greenhouse gas emissions

To determine the greenhouse gas emissions, the defined Scope 1 to 3 emissions were recorded for the company's own business activities and for the value chain. Hypo Vorarlberg has been regularly recording, calculating and reporting its own emissions for several years. Scope 1 represents direct emissions, Scope 2 indirect emissions (e.g. purchased electricity), and Scope 3 those emissions that do not fall under the first two scopes and that are covered by Hypo Vorarlberg's value chain. In addition to other significant categories in Scope 3, category 15 (financed emissions) is extremely important for a credit institution.

### OWN BUSINESS OPERATIONS

As a financial institution, the downstream value chain is material and is the focus of the analyses.

However, GHG emissions are calculated annually for all of the Group's operating sites on the basis of energy consumption, bills, database analyses, documentation and publicly available emission factors. The GHG Protocol is used as the standard. More detailed descriptions can be found under BP-2.10 and BP-2.11.

### DOWNSTREAM VALUE CHAIN (SCOPE 3.15)

The greenhouse gas intensity for selected portfolio components was previously assessed by Group Risk Controlling. The corporate portfolio (excluding commercial real estate financing) was presented in a heat map by rating and NACE code based on Eurostat data. In 2024, greenhouse gas accounting in accordance with the PCAF methodology was carried out in parallel for the first time.

### GHG ACCOUNTING (PCAF MEASUREMENT)

The loan, own-account investment and leasing portfolios were used for the calculation in order to obtain robust initial results. These results are included in the preparation of GHG accounting under E1-6. Hypo Vorarlberg has obtained an initial indication of the composition of its financed emission budget from the portfolios analysed, and it has planned measures to take action in this area over the next reporting periods. The calculation of financed emissions is now an annual task and represents the first step towards a decarbonisation strategy through the identification of potential decarbonisation levers (see E1-3.29, 29a). A more detailed description of the procedure for applying the PCAF methodology can be found under BP-2.10 and BP-2.11 and in the methodology documents.

### E1-20b including AR 11) Description of the process used to identify and assess climate-related physical risks in own operations and the value chain

#### OWN BUSINESS OPERATIONS

Climate-related physical risks are assessed every six months by the internal Safety Committee, which identifies potential risks and recommends preventive measures as necessary. No material risks are currently observable, as the introduction of mobile working equipment allows employees to work flexibly at different locations. Annual workplace analyses from Business Continuity Management (BCM) ensure the necessary staffing to maintain business operations. The branch network also enables the flexible distribution of customer service if individual locations are unavailable.

The effects of climate change are typically gradual and hence easier to observe and assess. The regular maintenance of buildings and heating, ventilation and cooling systems helps to ensure value retention, operational safety and utilisation.

#### GROUP RISK CONTROLLING

Hypo Vorarlberg examines whether assets and business activities are exposed to climate-related risks. In performing this assessment, Group Risk Controlling has focused on a medium-term three-year perspective to date. In future, this will be expanded to include further dimensions (short and long term).

The risk inventory identifies potential existing risks from flooding and potential medium-term strategic risks from rising temperatures.

#### The most important physical climate risks identified:

| Risk pursuant to section 39 (2b) BWG                                                        | Risk factors        | Physical risks                                                                                                                                          | Transmission channel                                                                                                    | Assessment                                                                                                                                                                                                                                                                                                                                                             |
|---------------------------------------------------------------------------------------------|---------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Credit risk and counterparty default risk                                                   | Flooding            | Natural disasters reduce the value of real estate                                                                                                       | Reduction in the value of collateral requiring the recognition of higher provisions                                     | See measurement of flooding risk in Austria                                                                                                                                                                                                                                                                                                                            |
| Credit risk and counterparty default risk                                                   | Flooding            | Natural disasters reduce customers' ability to bear debt                                                                                                | Deterioration in customer creditworthiness requiring the recognition of higher provisions/leading to increased defaults | See measurement of flooding risk in Austria                                                                                                                                                                                                                                                                                                                            |
| Concentration risk                                                                          | Flooding            | Natural disasters reduce the value of real estate in an entire region                                                                                   | Reduction in the value of collateral requiring the recognition of higher provisions                                     | See measurement of flooding risk in Austria                                                                                                                                                                                                                                                                                                                            |
| Risk from the business model, taking into account the effects of diversification strategies | Rising temperatures | Drought and water shortages can have a variety of effects (supply chain disruptions, problems with refrigeration, problems in food production, tourism) | There are many conceivable impacts for the Bank                                                                         | This is an established medium- to long-term risk. In winter destinations, there is a growing risk that existing business models will be negatively impacted in the medium term. Hydropower (pumped storage power plants, run-of-river power plants) could be negatively impacted. The expected long period gives customers and the Bank the opportunity to adapt their |

Quantitative measurement methods have been established for both physical and transition risks.

| Area                       | Transition risks                                                                                        | Physical risks                           | Other sustainability risks |
|----------------------------|---------------------------------------------------------------------------------------------------------|------------------------------------------|----------------------------|
| Treasury                   | Strategy for using the ESG rating                                                                       |                                          |                            |
| Private customer financing | Data collection for energy performance certificates                                                     |                                          |                            |
| Corporate financing        | Data collection for energy performance certificates, questionnaire, GHG intensity limit in new business | Red zone aspects, HQ100 for new business | Exclusion criteria         |
| Real estate financing      | Data collection for energy performance certificates                                                     |                                          |                            |

## MEASUREMENT OF FLOODING RISK IN AUSTRIA

As Vorarlberg was most recently affected by wide-scale flooding in 2005 and the state-wide damage amounted to around EUR 180 million according to media reports, the risk of flooding was at the centre of the initial investigations into physical risks. An analysis of the risk reports from the time shows only low valuation allowances for real estate financing, while there are no indications of increased valuation allowances in the annual report for 2005. In other words, even wide-scale flooding in its home market had no significant impact on Hypo Vorarlberg's business operations and results. Extensive flood control measures were subsequently taken in Vorarlberg up until 2015, with the public sector investing EUR 300 million.

The first step was to quantify the financed volume in Vorarlberg in red and yellow zones (HQ100 = flood events with an average likelihood of occurrence of once every 100 years when viewed statistically). This analysis has since been extended to cover the whole of Austria.

In Vorarlberg, concentrations of customers at risk of flooding can be found in Lech and Dornbirn in particular. The latter is mainly due to the potential for flooding in Rohrbach and Steinebach. According to the water management department of the state of Vorarlberg, however, the existing hazard situation in Dornbirn has already been reduced by means of construction measures and will be further reduced in the near future. Apart from this, the remaining exposure at risk is distributed fairly evenly across numerous municipalities in the state, meaning that the existing geographical diversification within the customer portfolio can be regarded as adequate. Even a massive flood event in a valley would not affect the Bank materially. There was no significant change in the exposure in Vorarlberg compared to the previous year. Potential hazards affecting collateral (e.g. due to its location in a hazard zone) and the mitigation of these hazards (typically conditions imposed by the building authorities) are determined as part of the valuation of the collateral (building survey) and taken into account in determining the market value by means of appropriate market discounts. The increase in the volume of collateral at risk of flooding is due to newly obtained collateral. The HQ100 exposure or the collateral volume at risk of flooding in Austria excluding Vorarlberg is concentrated in a small number municipalities.

At the subsidiary Hypo Vorarlberg Leasing AG in Bolzano, the flooding risks for large exposures were analysed individually and no cluster risk was identified.

## E1-20c including AR 12) Identification and assessment of climate-related transformation risks and opportunities in own operations and in the value chain

### RISK INVENTORY (SEE ESRS 2 IRO-1.53E)

Hypo Vorarlberg examines whether assets and business activities are exposed to climate-related risks. In performing this assessment, Group Risk Controlling has focused on a medium-term three-year perspective to date. In future, this will be expanded to include further dimensions (short and long term).

### The most important transitional climate risks identified:

| Risk pursuant to section 39 (2b) BWG                                                        | Risk factors                                               | Transitional risks                                                                                                  | Transmission channel                                                                                                                               | Assessment                                                                                                                                              |
|---------------------------------------------------------------------------------------------|------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|
| Credit risk and counterparty default risk                                                   | Changes to the legal framework                             | Increased expenditure by debtors due to carbon taxes                                                                | Deterioration in customer creditworthiness requiring the recognition of higher provisions/leading to increased defaults                            | See measurement of greenhouse gas intensity                                                                                                             |
| Credit risk and counterparty default risk                                                   | Changes to the legal framework                             | Decline in property values due to ban on oil or gas heating or higher operating costs                               | Recognition of higher provisions due to increase in unsecured portions                                                                             | See measurement of greenhouse gas intensity                                                                                                             |
| Concentration risk                                                                          | Changes to the legal framework                             | Rising costs for emission certificates can lead to a disproportionate increase in burdens for individual industries | Deterioration in the creditworthiness of an entire group of customers requiring the recognition of higher provisions/leading to increased defaults | See measurement of greenhouse gas intensity                                                                                                             |
| Credit risk and counterparty default risk                                                   | Technological developments                                 | Increased investment in new, riskier technologies. Potential bad investments, sunk costs                            | Deterioration in customer creditworthiness requiring the recognition of higher provisions/leading to increased defaults                            | The Group welcomes technical advances to address climate change and will finance corresponding projects to an appropriate extent. This may entail risks |
| Risk from the business model, taking into account the effects of diversification strategies | Changes in consumer behaviour (incl. investment behaviour) | Lack of engagement with sustainability risks resulting in incorrect pricing or an                                   | Erosion of earnings power, higher defaults                                                                                                         | The prevailing opinion is that sustainability risks will have a major impact on the                                                                     |



|                                               |                              |                                                               |
|-----------------------------------------------|------------------------------|---------------------------------------------------------------|
| unfavourable portfolio structure, for example | than the industry as a whole | economy in general and banks in particular in the medium term |
|-----------------------------------------------|------------------------------|---------------------------------------------------------------|

## MEASUREMENT OF GREENHOUSE GAS INTENSITY

The pricing of greenhouse gas emissions leads to higher energy and fuel costs, for example. This means the financial burden for customers is increasing. In order to manage this risk, the Bank needs to identify industries and customers with a higher greenhouse gas intensity and a lower credit rating.

To measure the transition risk, the greenhouse gas intensities per industry and country were mapped to the Bank's corporate financing (excluding real estate financing and securities) in 2022, 2023 and 2024.

A large part of the portfolio has a relatively low greenhouse gas intensity. The highest intensities are seen in the energy supply sector in Germany, although an analysis of the individual customers suggests that the Eurostat data overestimate the intensities for some customers. In Austria, the manufacturing industry has comparatively high figures with significant volumes in relatively good rating classes. Other portfolios with high greenhouse gas intensity and mostly good ratings can be found in the transport and storage and agriculture and forestry sectors.

The average greenhouse gas intensity of the Bank's entire corporate financing portfolio in 2024 was 38.7 metric tons of CO<sub>2</sub> (2023: approx. 36 metric tons of CO<sub>2</sub>) per EUR million of customer revenue.

The leasing subsidiary in Bolzano has also begun analysing greenhouse gas intensity. Based on this analysis, the portfolio has an average greenhouse gas intensity of 62.17 metric tons of CO<sub>2</sub> per EUR million of customer revenue. This calculation is based on the most recent available data from Eurostat for each NACE (as at July 2024) and the outstanding portfolio as at 31 August 2024.

## ENERGY PERFORMANCE CERTIFICATES

Energy performance certificates have been obtained for real estate financing for some years now. The energy performance certificates include key figures that are each converted into a score from A++ to G. The information from the energy performance certificates is required to be able to estimate the extent to which customers are exposed to a risk from higher energy costs, for example.

Customers that have a lower credit rating and occupy a property with poor energy performance are affected by rising energy costs to a greater extent than other customers. Increased energy costs also impact the value of properties with high energy consumption to a greater extent than properties with lower energy consumption. The risk of rising energy costs is currently being mitigated by extensive government subsidy programmes that are lessening the potential impact.

An analysis of loans in the Bank's Private Customers segment comparing the customer rating with the energy performance score showed that the energy performance certificates mostly have a score of B or better. There is only a weak correlation between the customer rating and the energy performance score.

Hypo Vorarlberg Leasing AG, Bolzano, began obtaining energy performance certificates in 2023 and continued to do so in 2024.

## IMPROVEMENT IN DATA QUALITY

Hypo Vorarlberg has worked intensively to improve data quality in the past. Since mid-2023, sustainability-related customer information has been collected from the Bank's corporate customers using the OeKB ESG DataHub questionnaire. Hypo Vorarlberg's leasing subsidiary in Italy is considering the purchase of a comparable tool. Good data availability and data quality form the basis for meaningful measurements. This is the only way in which topics can be managed and goals derived successfully in the long term.

## E1-21) Discussion of how the climate-related scenario analysis was used to identify and assess physical and transition risks and opportunities

The scenarios and models of the Network for Greening the Financial System (NGFS) form the basis for the ESG scenarios. Two scenarios are selected for stress testing, namely the scenarios that are expected to have the greatest impact on physical risks and transition risks respectively. These are the Current Policies scenario (for physical risks) and the Divergent Net Zero (1.5 °C) scenario (for transition risks). The analysis for the scenarios below was performed using the key macroeconomic variables (NIGEM NGFS v1.21 | Austria). No specific portfolio data was used (see also E1 SBM-3.19c).

## CURRENT POLICIES

The scenario assumes that only currently implemented political measures are preserved, leading to high physical risks. Global warming will reach 3 °C by 2080 and cause severe physical risks. Among other things, sea levels are expected to rise. This scenario leads to the "hot house world" and can help banks and supervisory authorities to consider long-term risks.

The scenario has a higher GDP level than the Divergent Net Zero (1.5 °C) scenario, but growth rates are low. Overall, however, the figures are unremarkable. A slump in share prices is clearly expected in the medium term. Inflation is low, as are interest rates. The macroeconomic figures, the scenario description and past experience of occurrences of flooding do not justify a quantitative simulation at the present time.

In the long term, the occurrence of physical risks in a form that would have a sustained negative impact on Hypo Vorarlberg cannot be ruled out. There are no indications of such an impact in the medium term. The assessment is that no significant impacts can arise from physical risks based on the current composition of the portfolio and the current business strategy. To assess the potential risks, Hypo Vorarlberg determines the financed volume in the red zone (flooding risk).

## DIVERGENT NET ZERO (1.5 °C)

In this scenario, net zero (balanced CO<sub>2</sub> emissions) is achieved in 2050, but with sector-dependent policy measures and the faster phase-out of fossil fuels. The measures are more dramatic in the transport and construction sectors. The lack of coordination of the measures results in a greater impact for consumers than for industry. With the measures taken, there is a 50 % probability that global warming will be limited to 1.5 °C by the end of the century. The scenario involves higher transition risks (compared to Net Zero 2050), but the lowest physical risks.

Minor effects are to be expected in the observation period for stress testing. Overall, the model anticipates relatively low GDP growth and relatively low interest rate rises. There is no critical trend in terms of either unemployment or inflation. House prices are expected to move sideways for long periods of time. Based on the figures and the scenario description, no additional short-term and medium-term effects are expected that would justify a quantitative simulation of the scenario.

In the long term, it should be noted that the scenario is characterised by relatively low GDP growth. Share price performance (as an indicator of company values) is generally weak. In the medium term, the costs of poorly coordinated policies therefore have a negative impact on economic growth, and hence on prosperity. The impact on the profitability and creditworthiness of companies and demand for credit can be seen in the medium term. Negative impacts on the creditworthiness of companies (depending on the respective industry) cannot be ruled out.

AR 15 The climate scenarios selected in the non-financial statement are compatible with the climate-related assumptions made in the financial statements.

## **TOPICAL DISCLOSURE REQUIREMENTS: E2 POLLUTION**

### **E2-11a) Discussion of the methodologies and tools used to identify impacts, risks and opportunities in the value chain**

#### **DOWNSTREAM VALUE CHAIN (NCNR ANALYSIS)**

In the course of the materiality analysis, the sub-topic of air pollution was identified as material for E2. It was established that the company's own business activities are not directly affected. In accordance with its business model, Hypo Vorarlberg focuses on the portfolios (asset management, own-account investments, lending) in order to identify potential impacts, risks and opportunities in respect of the value chain in connection with investments and/or financing.

The methodology used to determine this is the NCNR analysis, in which the portfolios are assessed individually for the material environmental topics based on an estimate of the environmental performance for each economic sector. Recognised publicly available sources that provide sector-specific data on the environmental topics concerned at NACE code level 2 are used for this purpose. The values are based on the pollutants defined by the WHO, which collectively include air pollution. The data used represents aggregated values ("environmental scores") for each economic sector (emissions by the economic sector), which can be classified on a scale from 1 to 5 ("very low" to "very high"). The higher the environmental score on this scale, the higher the potential impact and risks from the respective sector. In addition, sectors that score "very low" on the scale can be seen as potential opportunities.

In order to obtain an analysis based on the portfolios, the environmental scores are combined with the Bank's exposures in conjunction with the sector classifications (NACE 2). The results provide information on how the portfolios are composed with regard to potential environmental risks and

opportunities. The combination of information on a sector's performance in the various environmental categories with Hypo Vorarlberg's exposure to each economic sector can deliver perspectives for handling opportunities and risks in compliance with existing investment approaches. This analysis was carried out by Hypo Vorarlberg for the first time in 2024 and provides initial indications for the future. Ways of potentially expanding the analysis have been identified and will be pursued in the next reporting year. Specific measures have already been planned in this respect (see E2-2).

### **E2-11b) Disclosure of whether and how consultations (in particular with affected communities) formed part of this process**

#### **DOWNSTREAM VALUE CHAIN (NCNR ANALYSIS)**

No consultations were conducted in the current reporting period.

A sector analysis and a dialogue with companies are planned for the future. Three categories of interaction are to be considered:

- Supporting companies to pursue joint opportunities ("seek out")
- Engaging in dialogue with companies to obtain sufficient information ("engage")
- Engaging in dialogue with companies to obtain the necessary data to minimise risks ("challenge") (see E2-2, E4-3, E5-2).

### **E2-AR 9a) List of relevant locations with significant air pollution in the value chain**

#### **DOWNSTREAM VALUE CHAIN**

As a financial institution, Hypo Vorarlberg's financing decisions can have a direct or indirect influence on relevant environmental topics. In the materiality analysis, air pollution was found to be a relevant topic with regard to the core business. The lending portfolio, asset management and own-account investments were subject to a more detailed analysis using the procedure described under ESRs 2 BP-2.10. As a result, various industries and the associated opportunities and risks related to air pollution were identified. For example, a positive impact on this topic could be achieved in the financial sector or in the area of warehousing and other transportation services.

### **E2-AR 9b) List of business activities associated with material air pollution impacts, risks and opportunities**

The materiality analysis identified material impacts from the business activities of financing certain industrial sectors (such as waste management, agriculture, mobility, construction, coal industry, etc.) that cause emissions of air pollutants (SO<sub>2</sub>, NO<sub>x</sub>, NMVOCs, PM). Transactions with specific industrial sectors that cause high emissions of air pollutants also represent a significant credit risk.

The business activities associated with material air pollution impacts and risks are limited to Hypo Vorarlberg's core business as a financial institution. Hypo Vorarlberg endeavours to minimise the impacts and risks through its policies and the measures it has taken and planned. For the financing business, own-account investments (Treasury: APM & Investments) and portfolio management (Asset Management), these can be found in the topic-specific standard E2 Pollution under the policies relating to air pollution (see E2-1) and the actions relating to air pollution (see E2-2).

## TOPICAL DISCLOSURE REQUIREMENTS: E4 BIODIVERSITY AND ECOSYSTEMS

### E4-17a) Identification and assessment of impacts on biodiversity and ecosystems in the value chain, including criteria used

As part of the materiality analysis, the actual and potential impacts and opportunities in respect of biodiversity and ecosystems were analysed for the company's own business activities and for the downstream value chain. The following sub-topics of the topic-specific standard E4 were taken into account: direct impact drivers of biodiversity loss, impacts on the state of species, impacts on the extent and condition of ecosystems, impacts and dependencies on ecosystem services. The topics defined as material (materiality solely in the context of the downstream value chain) can be found in the impacts, risks and opportunities listed under SBM-3.

### OWN BUSINESS ACTIVITIES

The Bank's own business activities were analysed in terms of biodiversity and ecosystems in relation to branch locations and office buildings. To verify the results of the materiality analysis, Hypo Vorarlberg analysed its branch locations and office buildings with regard to potential impacts and dependencies on biodiversity.

For the purposes of this evaluation, the specific address data was checked using the following publicly available online tools:

- WWF Risk Filter platform<sup>3</sup> (see E4 SBM 3.16a.ii, iii, b, c)
- Natura 2000 Viewer<sup>4</sup>

As Hypo Vorarlberg's branches are located in the centre of towns and cities, the Bank's operating activities have no negative impact on the state of species in ecosystems (e.g. loss of species, reduction in population size).

Details of the results can be found under E4 SBM-3.16a.ii, iii, b, c.

### DOWNSTREAM VALUE CHAIN (NON-CLIMATE NATURE RISK ANALYSIS)

As part of the NCNR analysis, the topic of biodiversity was also subjected to a qualitative assessment in order to analyse Hypo Vorarlberg's portfolios on the basis of environmental scores. The data for biodiversity-related risks is provided by ENCORE, a publicly available database that helps organisations to find out about their exposure to nature-related risks. ENCORE was developed by renowned institutions such as UNEP FI and UNEP-WCMC. ENCORE assesses economic activities in terms of their dependency and impact on various biodiversity categories on a scale from "very low" to "very high". The higher the environmental score on this scale, the higher the potential impacts and risks for biodiversity and ecosystems from the respective sector. In addition, sectors that score "very low" on the scale can be seen as potential opportunities. A comparison of the portfolios and ENCORE's data pool was performed in order to analyse the composition of the three portfolios in terms of biodiversity measured against the Bank's exposure. Ways of potentially expanding the analysis will be pursued in the next reporting year (see E4-3). For an additional description of the assumptions and assessment criteria used in the NCNR analysis, see BP-2.10 and BP-2.11.

### E4-17b) Assessment of the dependencies on biodiversity and ecosystems at locations and in the value chain

As a financial institution, Hypo Vorarlberg's financing decisions can have a direct or indirect influence on relevant environmental topics, for example. In the materiality analysis, biodiversity and ecosystems was found to be a relevant topic with regard to the core business. The lending portfolio, asset management and own-account investments were also subject to a more detailed analysis (NCNR analysis) using the procedure described under ESRS 2 BP-2.10. As a result, various industries and the associated opportunities and risks related to biodiversity and ecosystems were identified. For example, a positive impact on this topic could be achieved in the financial sector or in the area of property and housing.

### E4-17c) Assessment of transition and physical risks and opportunities related to biodiversity and ecosystems, including criteria applied

Risks related to biodiversity and ecosystems were analysed in 2023 as part of the risk inventory. As the transmission channels were still unclear, the risk was categorised as low at this time. The Bank's portfolios (including loan and financing portfolios and own-account investments) were also subjected to an initial specific analysis (NCNR analysis) to determine the extent to which impacts and dependencies exist in relation to biodiversity and ecosystems.

Based on the FMA guidelines on handling sustainability risks, further data collection will be required to take place in 2025. The comprehensive analyses of the portfolios with regard to the NCNR analysis will also be taken into account (see NCNR, E4 IRO-1.17a, BP-2.10, BP-2.11). Specific aspects related to transition risks in biodiversity and ecosystems were not taken into account.

### E4-17d) Consideration of systemic risks

The Bank's portfolios – including loan and financing portfolios and own-account investments – were subjected to an initial specific analysis (NCNR analysis) to determine the extent to which impacts and dependencies exist in relation to biodiversity and ecosystems (see NCNR, E4 IRO-1.17a, BP-2.10, BP-2.11). Economic sectors were also analysed in terms of their dependency and impact on the aforementioned topics.

### E4-17ei) Identification of locations or raw material sourcing with potentially negative impacts on biodiversity, ecosystems and communities

The analysis of the branch locations and office buildings has found them to have no serious negative impact on biodiversity and ecosystems. Consequently, the impact on affected communities was not determined.

### E4-17eii) Involvement of affected communities in the materiality assessment

Stakeholder surveys including aspects related to biodiversity and ecosystems were conducted as part of the materiality analysis.

### E4-17eiii) Disclosure of how negative impacts on relevant ecosystem services are avoided, minimised or mitigated

No material negative impacts were identified in connection with the company's own business activities.

### E4-19a) Locations in biodiversity-sensitive areas and potentially negative impacts

No material negative impact is assumed based on the location analysis of all branches and office buildings. The analyses were conducted using the Biodiversity Risk Filter<sup>5</sup> and the Natura 2000 database<sup>6</sup>. Hypo Vorarlberg does not engage in any activities that have a negative impact on these areas.

<sup>3</sup> <https://riskfilter.org/biodiversity/explore/map>

<sup>4</sup> <https://natura2000.eea.europa.eu/>

<sup>5</sup> <https://riskfilter.org/biodiversity/explore/map>

<sup>6</sup> <https://natura2000.eea.europa.eu/>

#### **E4-19b) Biodiversity mitigation measures**

No mitigation measures were identified as necessary based on the analyses conducted.

#### **TOPICAL DISCLOSURE REQUIREMENTS: E5 RESOURCE USE AND CIRCULAR ECONOMY**

##### **E5-11) Description of the process to identify material impacts, risks, and opportunities related to resource use and circular economy**

As part of the materiality analysis (see ESRS 2 IRO-1.53a et seq.), potential impacts, risks and opportunities related to resource use and the circular economy were systematically discussed, analysed and documented. One identified risk relates to the financing of companies in resource-intensive industries such as the property and construction sector that do not take active measures to reduce their resource consumption.

##### **E5-11a) Screening of assets and activities for impacts, risks and opportunities in own operations and value chain**

###### **DOWNSTREAM VALUE CHAIN (NCNR ANALYSIS)**

The screening of the company's own business activities was already excluded by the findings of the materiality analysis and is not assessed further. In addition to the materiality analysis, the procedure used to identify the material impacts, risks and opportunities related to the circular economy and resource use is also the NCNR analysis. The data on resource scarcity comes from the EU-funded "Study on the critical raw materials for the EU", which defines a list of critical raw materials, the economic sectors depending on these raw materials and the associated supply risk assessment for each critical raw material. The publicly available data has been classified on a five-point scale from "very low" to "very high". These represent aggregated environmental scores for each industry. The higher the environmental score on this scale, the higher the potential impacts and risks, as the sector is more dependent on critical raw materials. In addition, sectors that score "very low" on the scale can be seen as potential opportunities. A comparison with the three portfolios was performed in order to analyse their composition in terms of the circular economy and resource use measured against the Bank's exposure. Ways of potentially expanding the analysis will be pursued in the next reporting year (see E5-2). For an additional description of the assumptions and methodologies, see BP-2.10 and BP-2.11.

##### **E5-11b) Conducting consultations, in particular with affected communities**

###### **NCNR ANALYSIS**

No consultations were conducted in the current reporting period. One measure has already been planned for 2025 (see E5-2).

#### **TOPICAL DISCLOSURE REQUIREMENTS: G1 BUSINESS CONDUCT**

##### **G1-6) Relevant criteria (e.g. location, activity, sector, transaction structure) used in the process to identify material impacts, risks and opportunities**

The basis for conducting the materiality analysis is the joint determination of the status quo. All of the necessary information must be collected in order to gain a comprehensive understanding of Hypo Vorarlberg's business model, value chain, business relationships and internal processes. To this end, a status quo analysis was carried out in 2022 and documents on Hypo Vorarlberg's business model, value chain and scope of consolidation were also included in the data pool.

To identify the IROs, Hypo Vorarlberg's business activities and its value chain were analysed and potential impacts, risks and opportunities relating to environmental, social and governance issues were formulated. The list of topics in ESRS 1 AR16 serves as the basis. Where it was deemed appropriate to do so, the sub-sub-topics were also used for a detailed breakdown. Working with experts from Deloitte, actual and potential negative and positive impacts as well as risks and opportunities from the company's own operations or from the upstream and downstream value chain were identified for each topic. A clear distinction was made depending on whether the IROs originate internally or from transactions entered into by Hypo Vorarlberg. Operational activities primarily include the operation of branches and office buildings, which has an impact on the environment due to heating, mobility and the procurement of IT equipment, for example.

As a lender, Hypo Vorarlberg also decides which companies and projects to finance. Furthermore, Hypo Vorarlberg has an influence on sustainability aspects through the investment products and services it offers to customers. When identifying risks and opportunities, the financial impacts of environmental, social and governance issues were considered and Hypo Vorarlberg's dependencies on natural and/or social resources, which could have a negative impact on the company's financial position, financial performance, cash flows, access to funds or cost of capital over time, were taken into account. An additional breakdown of the risks and opportunities into market, reputational, operational, strategic or regulatory risks or opportunities was introduced. Finally, the final list was discussed with the ESG team and evaluated for completeness.

## DISCLOSURE REQUIREMENT IRO-2 – DISCLOSURE REQUIREMENTS IN ESRS COVERED BY THE UNDERTAKING'S NON-FINANCIAL STATEMENT

56) Relevant criteria (e.g. location, activity, sector, transaction structure) in the process for determining material impacts, risks and opportunities

The following is a list of disclosure requirements prepared on the basis of Hypo Vorarlberg's materiality analysis:

| Data point                                     | Disclosure requirement                                                                                                              | Page     |
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| <b>ESRS 2 General disclosures</b>              |                                                                                                                                     |          |
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| Data point                                       | Disclosure requirement                                                                                                                                                                        | Page     |
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The following is a list of data points referring to other EU legislation:

| Disclosure requirement and related data points                                                                               | Reference to other EU legislation                                                                                                                                                                                                                                                                                                                                                                              | Page          | Materiality  |
|------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|--------------|
| <b>ESRS 2</b>                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                |               |              |
| ESRS 2 GOV-1 (ESRS 2.21 (d))<br>Board gender diversity                                                                       | SFDR: Indicator no. 13 in Annex I Table 1<br>Benchmark Regulation reference: Commission Delegated Regulation (EU) 2020/1816, Annex II                                                                                                                                                                                                                                                                          | 44            | Material     |
| ESRS 2 GOV-1 (ESRS 2.21 (e))<br>Percentage of board members who are independent                                              | Benchmark Regulation reference: Commission Delegated Regulation (EU) 2020/1816, Annex II                                                                                                                                                                                                                                                                                                                       | 44            | Material     |
| ESRS 2 GOV-4 (ESRS 2.30)<br>Statement on due diligence                                                                       | SFDR: Indicator no. 10 in Annex I Table 3                                                                                                                                                                                                                                                                                                                                                                      | 48            | Material     |
| ESRS 2 SBM-1 (ESRS 2.40 (d) (i))<br>Involvement in activities related to fossil fuels                                        | SFDR: Indicator no. 4 in Annex I Table 1<br>Pillar 3: Article 449a of Regulation (EU) No 575/2013;<br>Commission Implementing Regulation (EU) 2022/2453, Table 1: Qualitative information on Environmental risk and Table 2: Qualitative information on Social risk<br>Benchmark Regulation reference: Delegated Regulation (EU) 2020/1816, Annex II                                                           | Not specified | Not material |
| ESRS 2 SBM-1 (ESRS 2.40 (d) (ii))<br>Involvement in activities related to chemical production                                | SFDR: Indicator no. 9 in Annex I Table 2<br>Benchmark Regulation reference: Delegated Regulation (EU) 2020/1816, Annex II                                                                                                                                                                                                                                                                                      | Not specified | Not material |
| ESRS 2 SBM-1 (ESRS 2.40 (d) (iii))<br>Involvement in activities related to controversial weapons                             | SFDR: Indicator no. 14 in Annex I Table 1<br>Benchmark Regulation reference: Delegated Regulation (EU) 2020/1818, Article 12 (1) Delegated Regulation (EU) 2020/1816, Annex II                                                                                                                                                                                                                                 | Not specified | Not material |
| ESRS 2 SBM-1 (ESRS 2.40 (d) (iv))<br>Involvement in activities related to cultivation and production of tobacco              | Benchmark Regulation reference: Delegated Regulation (EU) 2020/1818, Article 12 (1) Delegated Regulation (EU) 2020/1816, Annex II                                                                                                                                                                                                                                                                              | Not specified | Not material |
| <b>ESRS E1</b>                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                |               |              |
| ESRS E1-1 (ESRS E1.14)<br>Transition plan to reach climate neutrality by 2050                                                | EU Climate Law: Regulation (EU) 2021/1119, Article 2 (1)                                                                                                                                                                                                                                                                                                                                                       | Not specified | Material     |
| ESRS E1-1 (ESRS E1.16 (g))<br>Undertakings excluded from Paris-aligned Benchmarks                                            | Pillar 3: Article 449a<br>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<br>Benchmark Regulation reference: Delegated Regulation (EU) 2020/1818, Article 12 (1) (d) to (g) and Article 12 (2)                                               | Not specified | Material     |
| ESRS E1-4 (ESRS E1.34)<br>GHG emission reduction targets                                                                     | SFDR: Indicator no. 4 in Annex I Table 2<br>Pillar 3: Article 449a Regulation (EU) No 575/2013; Commission Implementing Regulation (EU) 2022/2453, Template 3: Banking book – Climate change transition risk: alignment metrics<br>Benchmark Regulation reference: Delegated Regulation (EU) 2020/1818, Article 6                                                                                              | 154           | Material     |
| ESRS E1-5 (ESRS E1.38)<br>Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors) | SFDR: Indicator no. 5 in Annex I Table 1, Indicator no. 5 in Annex I Table 2                                                                                                                                                                                                                                                                                                                                   | Not specified | Not material |
| ESRS E1-5 (ESRS E1.37)<br>Energy consumption and mix                                                                         | SFDR: Indicator no. 5 in Annex I Table 1                                                                                                                                                                                                                                                                                                                                                                       | 156           | Material     |
| ESRS E1-5 (ESRS E1.40, 43)<br>Energy intensity associated with activities in high climate impact sectors                     | SFDR: Indicator no. 6 in Annex I Table 1                                                                                                                                                                                                                                                                                                                                                                       | Not specified | Not material |
| ESRS E1-6 (ESRS E1.44)<br>Gross Scopes 1, 2 and 3 and total GHG emissions                                                    | SFDR: Indicators no. 1 and 2 in Annex I Table 1<br>Pillar 3: 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<br>Benchmark Regulation reference: Delegated Regulation (EU) 2020/1818, Article 5 (1), Article 6 and Article 8 (1) | 156           | Material     |
| <b>ESRS E1</b>                                                                                                               |                                                                                                                                                                                                                                                                                                                                                                                                                |               |              |
| ESRS E1-6 (ESRS E1.53-55)<br>Gross GHG emissions intensity                                                                   | SFDR: Indicator no. 3 in Annex I Table 1<br>Pillar 3: Article 449a of Regulation (EU) No 575/2013;                                                                                                                                                                                                                                                                                                             | 160, 161      | Material     |

|                                                                                                                                                                                               |                                                                                                                                                                                                                                                                              |               |                     |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|---------------------|
|                                                                                                                                                                                               | Commission Implementing Regulation (EU) 2022/2453, Template 3:<br>Banking book – Climate change<br>transition risk: alignment metrics<br>Benchmark Regulation reference: Delegated Regulation (EU)<br>2020/1818,<br>Article 8 (1)                                            |               |                     |
| ESRS E1-7 (ESRS E1.56)<br>GHG removals and carbon credits                                                                                                                                     | EU Climate Law: Regulation (EU) 2021/1119, Article 2 (1)                                                                                                                                                                                                                     | 161           | Material            |
| ESRS E1-9 (ESRS E1.66)<br>Exposure of the benchmark portfolio to climate-related physical risks                                                                                               | Benchmark Regulation reference: Delegated Regulation (EU)<br>2020/1818, Annex II<br>Delegated Regulation (EU) 2020/1816, Annex II                                                                                                                                            | Not specified | Material (phase-in) |
| ESRS E1-9 (ESRS E1.66 (a))<br>Disaggregation of monetary amounts by acute and chronic physical risk<br>ESRS E1-9 (ESRS E1.66 (c))<br>Location of significant assets at material physical risk | Pillar 3: Article 449a of Regulation (EU) No 575/2013;<br>Commission Implementing Regulation (EU) 2022/2453, paragraphs 46 and 47; Template 5: Banking book – Climate change<br>physical risk: Exposures subject to physical risk.                                           | Not specified | Material (phase-in) |
| ESRS E1-9 (ESRS E1.67 (c))<br>Disaggregation of the carrying amount of its real estate assets by energy efficiency class                                                                      | Pillar 3: Article 449a of Regulation (EU) No 575/2013;<br>Commission Implementing Regulation (EU) 2022/2453, paragraph 34;<br>Template 2: Banking book – Climate change transition risk: Loans collateralised by immovable property –<br>Energy efficiency of the collateral | Not specified | Material (phase-in) |
| ESRS E1-9 (ESRS E1.69)<br>Degree of exposure of the portfolio to climate-related opportunities                                                                                                | Benchmark Regulation reference: Delegated Regulation (EU)<br>2020/1818, Annex II                                                                                                                                                                                             | Not specified | Material (phase-in) |
| <b>ESRS E2</b>                                                                                                                                                                                |                                                                                                                                                                                                                                                                              |               |                     |
| ESRS E2-4 (ESRS E2.28)<br>Amount of each pollutant listed in Annex II to the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil              | SFDR: Indicator no. 8 in Annex I Table 1, Indicator no. 2 in Annex I Table 2, Indicator no. 1 in Annex I Table 2, Indicator no. 3 in Annex I Table 2                                                                                                                         | Not specified | Not material        |
| <b>ESRS E3</b>                                                                                                                                                                                |                                                                                                                                                                                                                                                                              |               |                     |
| ESRS E3-1 (ESRS E3.9)<br>Water and marine resources                                                                                                                                           | SFDR: Indicator no. 7 in Annex I Table 2                                                                                                                                                                                                                                     | Not specified | Not material        |
| ESRS E3-1 (ESRS E3.13)<br>Dedicated policy                                                                                                                                                    | SFDR: Indicator no. 8 in Annex I Table 2                                                                                                                                                                                                                                     | Not specified | Not material        |
| ESRS E3-1 (ESRS E3.14)<br>Sustainable oceans and seas                                                                                                                                         | SFDR: Indicator no. 12 in Annex I Table 2                                                                                                                                                                                                                                    | Not specified | Not material        |
| ESRS E3-4 (ESRS E3.28 (c))<br>Total water recycled and reused                                                                                                                                 | SFDR: Indicator no. 6.2 in Annex I Table 2                                                                                                                                                                                                                                   | Not specified | Not material        |
| ESRS E3-4 (ESRS E3.29)<br>Total water consumption in m <sup>3</sup> per net revenue on own operations                                                                                         | SFDR: Indicator no. 6.1 in Annex I Table 2                                                                                                                                                                                                                                   | Not specified | Not material        |
| <b>ESRS E4</b>                                                                                                                                                                                |                                                                                                                                                                                                                                                                              |               |                     |
| ESRS 2 SBM-3 (E4.16 (a) (i))                                                                                                                                                                  | SFDR: Indicator no. 7 in Annex I Table 1                                                                                                                                                                                                                                     | 171           | Material            |
| ESRS 2 SBM-3 (E4.16 (b) (i))                                                                                                                                                                  | SFDR: Indicator no. 10 in Annex I Table 2                                                                                                                                                                                                                                    | 171           | Material            |
| ESRS 2 SBM-3 (E4.16 (c))                                                                                                                                                                      | SFDR: Indicator no. 14 in Annex I Table 2                                                                                                                                                                                                                                    | 171           | Material            |
| ESRS E4-2 (ESRS E4.24 (b))<br>Sustainable land/agriculture practices or policies                                                                                                              | SFDR: Indicator no. 11 in Annex I Table 2                                                                                                                                                                                                                                    | 177           | Material            |
| ESRS E4-2 (ESRS E4.24 (c))<br>Sustainable oceans/seas practices or policies                                                                                                                   | SFDR: Indicator no. 12 in Annex I Table 2                                                                                                                                                                                                                                    | 177           | Material            |
| ESRS E4-2 (ESRS E4.24 (d))<br>Policies to address deforestation                                                                                                                               | SFDR: Indicator no. 15 in Annex I Table 2                                                                                                                                                                                                                                    | 177           | Material            |

|                                                                                                                                              |                                                                                                                                                                                                                        |               |                     |
|----------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|---------------------|
| <b>ESRS E5</b>                                                                                                                               |                                                                                                                                                                                                                        |               |                     |
| ESRS E5-5 (ESRS E5.37 (d))<br>Non-recycled waste                                                                                             | SFDR: Indicator no. 13 in Annex I Table 2                                                                                                                                                                              | Not specified | Not material        |
| ESRS E5-5 (ESRS E5.39)<br>Hazardous waste and radioactive waste                                                                              | SFDR: Indicator no. 9 in Annex I Table 1                                                                                                                                                                               | Not specified | Not material        |
| <b>ESRS S1</b>                                                                                                                               |                                                                                                                                                                                                                        |               |                     |
| ESRS 2 SBM3 – S1.14 (f)<br>Risk of incidents of forced labour                                                                                | SFDR: Indicator no. 13 in Annex I Table 3                                                                                                                                                                              | Not specified | Not material        |
| ESRS 2 SBM3 – S1.14 (g)<br>Risk of incidents of child labour                                                                                 | SFDR: Indicator no. 12 in Annex I Table 3                                                                                                                                                                              | Not specified | Not material        |
| ESRS S1-1 (ESRS S1.20)<br>Human rights policy commitments                                                                                    | SFDR: Indicator no. 9 in Annex I Table 3, Indicator no. 11 in Annex I Table 1                                                                                                                                          | 196           | Material            |
| ESRS S1-1 (ESRS S1.21)<br>Due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8 | Benchmark Regulation reference: Delegated Regulation (EU) 2020/1816, Annex II                                                                                                                                          | 197           | Material            |
| ESRS S1-1 (ESRS S1.22)<br>Processes and measures for preventing trafficking in human beings                                                  | SFDR: Indicator no. 11 in Annex I Table 3                                                                                                                                                                              | Not specified | Not material        |
| ESRS S1-1 (ESRS S1.23)<br>Workplace accident prevention policy or management system                                                          | SFDR: Indicator no. 1 in Annex I Table 3                                                                                                                                                                               | 197           | Material            |
| ESRS S1-3 (ESRS S1.32 (c))<br>Grievance/complaints handling mechanisms                                                                       | SFDR: Indicator no. 5 in Annex I Table 3                                                                                                                                                                               | 198           | Material            |
| ESRS S1-14 (ESRS S1.88 (b), (c))<br>Number of fatalities and number and rate of work-related accidents                                       | SFDR: Indicator no. 2 in Annex I Table 3<br>Benchmark Regulation reference: Delegated Regulation (EU) 2020/1816, Annex II                                                                                              | 204           | Material            |
| ESRS S1-14 (ESRS S1.88 (e))<br>Number of days lost to injuries, accidents, fatalities or illness                                             | SFDR: Indicator no. 3 in Annex I Table 3                                                                                                                                                                               | Not specified | Material (phase-in) |
| ESRS S1-16 (ESRS S1.97 (a))<br>Unadjusted gender pay gap                                                                                     | SFDR: Indicator no. 12 in Annex I Table 1<br>Benchmark Regulation reference: Delegated Regulation (EU) 2020/1816, Annex II                                                                                             | 204           | Material            |
| ESRS S1-16 (ESRS S1.97 (b))<br>Excessive CEO pay ratio                                                                                       | SFDR: Indicator no. 8 in Annex I Table 3                                                                                                                                                                               | 204           | Material            |
| ESRS S1-17 (ESRS S1.103 (a))<br>Incidents of discrimination                                                                                  | SFDR: Indicator no. 7 in Annex I Table 3                                                                                                                                                                               | 205           | Material            |
| ESRS S1-17 (ESRS S1.104 (a))<br>Non-compliance with United Nations Guiding Principles on Business and Human Rights and OECD guidelines       | SFDR: Indicator no. 10 in Annex I Table 1, Indicator no. 14 in Annex I Table 3<br>Benchmark Regulation reference: Delegated Regulation (EU) 2020/1816, Annex II<br>Delegated Regulation (EU) 2020/1818, Article 12 (1) | 205           | Material            |
| <b>ESRS S2</b>                                                                                                                               |                                                                                                                                                                                                                        |               |                     |
| ESRS 2 SBM3 – S2.11 (b)<br>Material risk of child labour or forced labour in the value chain                                                 | SFDR: Indicators no. 12 and 13 in Annex I Table 3                                                                                                                                                                      | Not specified | Not material        |
| ESRS S2-1 (ESRS S2.17)<br>Human rights policy commitments                                                                                    | SFDR: Indicator no. 9 in Annex I Table 3, Indicator no. 11 in Annex I Table 1                                                                                                                                          | Not specified | Not material        |
| ESRS S2-1 (ESRS S2.18)<br>Policies related to value chain workers                                                                            | SFDR: Indicators no. 11 and 4 in Annex I Table 3                                                                                                                                                                       | Not specified | Not material        |
| ESRS S2-1 (ESRS S2.19)<br>Non-compliance with United Nations Guiding Principles on Business and Human Rights and OECD guidelines             | SFDR: Indicator no. 10 in Annex I Table 1<br>Benchmark Regulation reference: Delegated Regulation (EU) 2020/1816, Annex II<br>Delegated Regulation (EU) 2020/1818, Article 12 (1)                                      | Not specified | Not material        |
| ESRS S2-1 (ESRS S2.19)<br>Due diligence policies on issues addressed by the fundamental International Labour Organisation Conventions 1 to 8 | Benchmark Regulation reference: Delegated Regulation (EU) 2020/1816, Annex II                                                                                                                                          | Not specified | Not material        |
| <b>ESRS S2</b>                                                                                                                               |                                                                                                                                                                                                                        |               |                     |
| ESRS S2-4 (ESRS S2.36)<br>Human rights issues and incidents connected to the upstream and downstream value chain                             | SFDR: Indicator no. 14 in Annex I Table 3                                                                                                                                                                              | Not specified | Not material        |

| ESRS S3                                                                                                                                         |                                                                                                                                                                                   |               |          |
|-------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|----------|
| ESRS S3-1 (ESRS S3.16)<br>Human rights policy commitments                                                                                       | SFDR: Indicator no. 9 in Annex I Table 3, Indicator no. 11 in Annex I Table 1                                                                                                     | 208           | Material |
| ESRS S3-1 (ESRS S3.17)<br>Non-compliance with United Nations Guiding Principles on Business and Human Rights, ILO principles or OECD guidelines | SFDR: Indicator no. 10 in Annex I Table 1<br>Benchmark Regulation reference: Delegated Regulation (EU) 2020/1816, Annex II<br>Delegated Regulation (EU) 2020/1818, Article 12 (1) | 209           | Material |
| ESRS S3-4 (ESRS S3.36)<br>Human rights issues and incidents                                                                                     | SFDR: Indicator no. 14 in Annex I Table 3                                                                                                                                         | 211           | Material |
| ESRS S4                                                                                                                                         |                                                                                                                                                                                   |               |          |
| ESRS S4-1 (ESRS S4.16)<br>Policies related to consumers and end-users                                                                           | SFDR: Indicator no. 9 in Annex I Table 3, Indicator no. 11 in Annex I Table 1                                                                                                     | 219           | Material |
| ESRS S4-1 (ESRS S4.17)<br>Non-compliance with United Nations Guiding Principles on Business and Human Rights and OECD guidelines                | SFDR: Indicator no. 10 in Annex I Table 1<br>Benchmark Regulation reference: Delegated Regulation (EU) 2020/1816, Annex II<br>Delegated Regulation (EU) 2020/1818, Article 12 (1) | 219           | Material |
| ESRS S4-4 (ESRS S4.35)<br>Human rights issues and incidents                                                                                     | SFDR: Indicator no. 14 in Annex I Table 3                                                                                                                                         | 224           | Material |
| ESRS G1                                                                                                                                         |                                                                                                                                                                                   |               |          |
| ESRS G1-1 (ESRS G1.10 (b))<br>United Nations Convention against Corruption                                                                      | SFDR: Indicator no. 15 in Annex I Table 3                                                                                                                                         | Not specified | Material |
| ESRS G1-1 (ESRS G1.10 (d))<br>Protection of whistleblowers                                                                                      | SFDR: Indicator no. 6 in Annex I Table 3                                                                                                                                          | 228           | Material |
| ESRS G1-4 (ESRS G1.24 (a))<br>Fines for violation of anti-corruption and anti-bribery laws                                                      | SFDR: Indicator no. 17 in Annex I Table 3<br>Benchmark Regulation reference: Delegated Regulation (EU) 2020/1816, Annex II                                                        | 231           | Material |
| ESRS G1-4 (ESRS G1.24 (b))<br>Standards of anti-corruption and anti-bribery                                                                     | SFDR: Indicator no. 16 in Annex I Table 3                                                                                                                                         | 231           | Material |

#### INFORMATION ON NADIVEG CONFORMITY

Since the 2017 financial year, the Austrian Sustainability and Diversity Improvement Act (NaDiVeG) has extended the reporting obligation for non-financial information (environmental, social and employee matters, human rights, corruption, diversity) in the management report. The following table provides an overview of where the NaDiVeG requirements can be found in the report.

| NaDiVeG requirement                                                                                                                                                                                                                            | Reference to non-financial statement (section)                                                                         |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------|
| 1 Brief description of the undertaking's business model                                                                                                                                                                                        | ESRS 2 General disclosures: SBM-1, SBM-3                                                                               |
| 2/3/4/6 Description of the policies pursued by the undertaking (2), the outcomes of those policies (3) and due diligence processes applied (4)                                                                                                 | ESRS 2 General disclosures: GOV-4                                                                                      |
| Environmental performance indicators (6)                                                                                                                                                                                                       | Information pursuant to the Taxonomy Regulation; E1-E5 Environmental information                                       |
| Social and employee matters (incl. diversity) (6)                                                                                                                                                                                              | S1 Own workforce                                                                                                       |
| Respect for human rights (6)                                                                                                                                                                                                                   | ESRS 2 General information, S1 Own workforce, S3 Affected communities, S4 Consumers and end-users, G1 Business conduct |
| Combating corruption and bribery (6)                                                                                                                                                                                                           | G1 Business conduct                                                                                                    |
| 5 Material risks that are likely to have a negative impact on these matters and the Group's management of these risks, namely<br>a) from its own business activities<br>b) from its business relationships, products or services (if relevant) | ESRS 2 General disclosures: SBM-3                                                                                      |

#### 59) Discussion of how material information on impacts, risks and opportunities was determined, including the use of thresholds and/or ESRS 1 section 3.2 criteria

The process for determining materiality and the definition and use of thresholds are described in detail under ESRS 2 IRO-1.53a to ESRS 2 IRO-1.53c ii.

## DISCLOSURES PURSUANT TO ARTICLE 8 OF REGULATION (EU) 2020/852 (TAXONOMY REGULATION)

The EU taxonomy lies at the heart of the European Union's action plan for financing sustainable growth and is a major instrument for achieving climate neutrality in Europe by 2050. It creates a standardised classification system for environmentally sustainable economic activities and thus a common understanding of sustainability in the EU. The aim is to create greater transparency in the market and drive forward the redirection of capital flows towards sustainable investments.

An economic activity is considered taxonomy-aligned if it makes a substantial contribution (SC) to one of the six environmental objectives and does not significantly harm any of the other objectives ("Do No Significant Harm", DNSH).

The six environmental objectives are:

- Climate change mitigation
- Climate change adaptation
- Sustainable use and protection of water and marine resources
- Transition to a circular economy
- Pollution prevention and control
- Protection and restoration of biodiversity and ecosystems

Taxonomy-aligned economic activities of companies must also be carried out in compliance with the Minimum Safeguards, which provide a minimum level of protection in the area of fundamental employment and human rights standards.

The most important performance indicator to be disclosed for credit institutions is the green asset ratio (GAR), which expresses the ratio of taxonomy-aligned assets to the total assets covered. For taxonomy alignment, it must be examined whether the underlying economic activity fulfils the technical screening criteria defined in the EU taxonomy.

### Legal basis

Regulation (EU) 2020/852 (hereinafter referred to as the Taxonomy Regulation) contains, among other things, material definitions of terms and obligations for reporting companies. Of particular importance is Article 8 of the Taxonomy Regulation, which sets out the reporting obligations for financial and non-financial undertakings. Delegated Regulation (Del. Reg.) (EU) 2021/2178 specifies the content and presentation of the information to be published.

On 13 June 2023, the European Commission presented Del. Reg. (EU) 2023/2485 and Del. Reg. (EU) 2023/2486 supplementing the Taxonomy Regulation. Among other things, these included amendments and expansions of the existing economic activities, definitions of the technical screening criteria for the four non-climate-related environmental objectives and adjustments to the templates to be used. For the 2023 and 2024 financial years, simplifications are provided for financial undertakings with regard to the four new environmental objectives and the new economic activities which limit the required disclosures to information on taxonomy eligibility.

The third Commission Notice (C/2024/6691) of 8 November 2024 addresses questions on the application and interpretation of certain legal provisions regarding taxonomy reporting by financial undertakings. The purpose of the Commission Notices is to clarify the applicable legal provisions. They do not extend the rights and obligations of the companies concerned under these legal provisions, but rather are merely intended to support them in implementing the applicable legal provisions.

### Implementation and methodology

In accordance with section 1.1.2. of Annex V to Del. Reg. (EU) 2021/2178, the disclosure requirements cover the following accounting categories of financial assets, including loans and advances, debt securities, equity holdings and repossessed collateral:

- Financial assets at amortised cost
- Financial assets at fair value through other comprehensive income
- Investments in subsidiaries
- Joint ventures and associates
- Financial assets designated at fair value through profit or loss and non-trading financial assets mandatorily at fair value through profit or loss
- Real estate collateral obtained by Hypo Vorarlberg by taking possession in exchange for the cancellation of debt

Excluded from disclosure are:

- Exposures to sovereigns, central banks and supranational issuers (excluding multilateral development banks)
- Exposures to undertakings that are not obliged to publish non-financial information pursuant to Article 19a or 29a of Directive 2013/34/EU
- Short-term interbank loans
- Financial assets held for trading
- Derivatives

The counterparties to be included in the disclosure are limited to households, cities and municipalities, financial undertakings and non-financial corporations that are themselves subject to non-financial reporting obligations.

To determine the counterparties subject to reporting obligations, both internal and publicly available information relating to the following criteria was used:

- The undertaking belongs to the banking/insurance industry or issues tradable securities on a regulated market in the EU ("public interest entity" criterion) and
- the company employs more than 500 people based on an annual average ("number of employees" criterion)

### Taxonomy assessment for general transactions (use of proceeds unknown)

For Hypo Vorarlberg as a credit institution, the determination of the most important key figures to be disclosed is generally based on information from the counterparty, as it is the financed economic activities that are assessed rather than activities in the Bank's own operations. In the case of lending where the use of proceeds is unknown, the key performance indicators (KPIs) reported by the counterparty are used to determine taxonomy alignment.

There are still differences between the reporting companies when it comes to the methods used and the articles of disclosure. For example, not all companies disclose their KPIs using the mandatory templates, which enable a breakdown based on the contribution to each environmental

objective. The ratios for companies that did not disclose a breakdown by environmental objective were allocated to the first environmental objective, climate change mitigation. In cases where no distinction was made between revenue-based and capital expenditure (CapEx)-based ratios, the KPIs were included equally in the revenue-based and CapEx-based disclosures. KPIs of counterparties that were not publicly available or were incorrect and that could not be collected either from the previous years or bilaterally were entered as "0" pursuant to question 5 of the third Commission Notice.

As estimates are not permitted in the mandatory reporting under the Taxonomy Regulation, no data based on estimates and no data published in a voluntary taxonomy report was used.

#### Taxonomy assessment of transactions whose use of proceeds use is known

If the use of proceeds is known, the way in which the financed project finances a taxonomy-aligned economic activity is examined. The assessment of whether this requirement is met is generally based on the information provided by the counterparty about the project or activities for which the proceeds are used.

In order to determine the taxonomy alignment of private customer financing, the Bank checked whether the financed economic activities fulfil the technical screening criteria set out in sections 6.5, 7.1, 7.2, 7.3, 7.4, 7.5, 7.6 and 7.7 of Annex I and Annex II to Del. Reg. (EU) 2021/2139 of the European Commission or sections 3.1 and 3.2 of Annex II to Del. Reg. (EU) 2023/2486.

According to the wording of Article 18 of the Taxonomy Regulation, compliance with the social minimum safeguards must be assessed "by an undertaking that is carrying out an economic activity". Question 37 of the third Commission Notice also excludes retail clients and public authorities from compliance with the minimum safeguards. However, question 37 suggests that, in order for these counterparties to comply with the minimum safeguards, those undertakings from which retail clients or public authorities purchase products or services must be assessed. There is no corresponding legal basis for these additional requirements of the third Commission Notice. Paragraph 1.2.1.3. of Del. Reg. (EU) 2021/2178 also refers solely to compliance with the technical screening criteria in the case of retail exposures. An upstream check of the minimum safeguards at the manufacturer or service provider is not defined in the wording of the law. As a result, no assessment of the social minimum safeguards was performed for retail clients and public authorities.

As part of the check of the taxonomy alignment of real estate financing provided to retail clients, a review of the entire portfolio was completed as at 31 December 2024. The most important basis for the valuation of real estate financing was the energy performance certificate. Financing where no energy performance certificate or no valid energy performance certificate was available was classified as not taxonomy-aligned. This applies in particular to financing from prior to 2017.

The detailed requirements for evidencing compliance with the DNSH criteria for retail clients are often still a challenge. According to the third Commission Notice, credit institutions can provide evidence of compliance with the technical screening criteria for transactions with retail clients and public authorities by means of evidence obtained directly from the client or in the form of independent and reliable verifications by third parties. For these counterparties, Hypo Vorarlberg performs the climate risk analysis required by Appendix A of Annex I to Del. Reg. (EU) 2021/2139 with the support of ESG software.

#### Completing the templates

Pursuant to Article 4 of Del. Reg. (EU) 2021/2178, the templates in Annex VI to the regulation should be used by credit institutions to report how and to what extent the undertaking's activities are associated with economic activities that can be classified as environmentally sustainable. The templates are completed in millions of euro (EUR million).

Pursuant to the KPIs required by Annex V to Del. Reg. (EU) 2021/2178, a division is made at row level in Template 3 "GAR KPI stock" and Template 4 "GAR KPI flow". For example, the GAR for lending to non-financial corporations is calculated from the proportion of loans and advances to non-financial corporations that finance taxonomy-aligned economic activities in respect of the individual environmental objectives compared to the total loans and advances to non-financial corporations.

The proportion of total assets covered is derived from the assets covered in the numerator and denominator compared to the total assets. This applies accordingly to the proportion of total new assets covered in Template 4.

The gross carrying amounts of the receivables newly entered into during the year prior to the disclosure reference date were used to complete Template 4 "GAR KPI flow" without deducting the amounts of loan repayments or disposals of debt/equity instruments that took place during the year prior to the disclosure reference date. The definition of new business is thus based on the guidelines set out in question 65 of the third Commission Notice.

All assets under management (AuM) are disclosed with regard to their taxonomy alignment both at the reporting date and on the basis of annual new business in Template 5 "KPI off-balance-sheet exposures".

#### Disclosure pursuant to Article 8 of the Taxonomy Regulation

(see Template 0. Summary of KPIs to be disclosed by credit institutions under Article 8 of the Taxonomy Regulation)

| % coverage of total assets |                               | Revenue-based | CapEx-based |
|----------------------------|-------------------------------|---------------|-------------|
| Main KPI                   | Green asset ratio (GAR) stock | 0.66 %        | 0.73 %      |
| Additional KPI             | GAR (flow)                    | 1.13 %        | 1.21 %      |

#### Results

The scope of consolidation applied corresponds to the regulatory scope of consolidation pursuant to Title II Chapter 2 Section 2 of Regulation (EU) 575/2013.

The proportion of taxonomy-aligned assets in the total assets covered (green asset ratio) was 0.66 % (revenue-based) and 0.73 % (CapEx-based) as at 31 December 2024, which corresponds to a financial volume of EUR 91.54 million (revenue-based) and EUR 103.54 million (CapEx-based). The taxonomy-aligned assets mainly comprise exposures to financial and non-financial corporations subject to the Non-Financial Reporting Directive (NFRD), based on the taxonomy-aligned CapEx and revenue KPIs of the counterparties. Taxonomy-aligned loans to households collateralised by residential immovable property are also included.

At the reporting date, the proportion of taxonomy-eligible assets was 17.13 % (revenue-based) and 16.82 % (CapEx-based). This includes loans collateralised by residential immovable property, building renovation loans and vehicle loans to households, taxonomy-eligible risk exposures to cities and municipalities as well as financial and non-financial corporations subject to the NFRD. The majority of all risk exposures evaluated for which the use of proceeds was known were allocable to an economic activity from the construction and real estate sector belonging to the first environmental objective, climate change mitigation. A small number of exposures to public authorities corresponded to the activities of environmental objectives three to six or the new activities of the two climate-related environmental objectives.

Due to Hypo Vorarlberg's customer structure with its focus on customer groups including medium-sized corporate customers, 61.11 % of assets are excluded from the green asset ratio numerator. A further 9.27 % of total assets relate to sovereigns, central banks and supranational issuers, which are also excluded from the EU taxonomy.

As at the reporting date 31 December 2024, Hypo Vorarlberg did not have any holdings of repossessed real estate collateral.

#### **Disclosures on activities in the nuclear and gas sectors**

In 2022, the European Commission included economic activities in the nuclear energy and fossil gas sectors in the EU taxonomy as transitional activities. Separate screening criteria and separate reporting requirements have been defined for these activities. The revenue and CapEx KPIs of the relevant counterparties were used to calculate the KPIs. Only the information disclosed in the templates in Annex XII to Del. Reg. (EU) 2021/2178 was used. For some counterparty KPIs, the use of denominators other than those required by the templates appears to have led to the partial distortion of the ratios. Accordingly, these were recalculated using absolute values in the event of anomalies.

Disclosure took place in accordance with the third Commission Notice, meaning that the templates were provided based on revenue and CapEx at the reporting date for the portfolio and on the basis of annual new business for both the lending business and off-balance-sheet assets. Detailed key figures can be found in the templates at the end of this section, which are completed in millions of euro (EUR million).

#### **Disclosures on the trading book**

Hypo Vorarlberg maintains only a small trading book pursuant to the Capital Requirements Regulation (CRR – Regulation (EU) No. 575/2013). As at 31 December 2024, the trading book contained assets amounting to EUR 0.15 million. These comprise an investment fund in liquidation and smaller items (unit size less than 10) relating to MSCI ETFs for settling fractions for fund savers. The assets of the fund in liquidation are credit balances at Hypo Vorarlberg as the custodian of the fund, meaning that these assets are not affected by Regulation (EU) 2020/852. There are no plans to perform trading activities on a larger scale in future.

#### **Sustainability strategy**

The EU taxonomy plays an important role in the redirection of capital flows towards sustainable investments. In particular, it contributes to realising the overarching objective of a climate-neutral EU by 2050. Hypo Vorarlberg therefore continues to align its activities with the criteria of the EU taxonomy to the greatest possible extent and also takes these into account in the Group-wide "Hypo Effect" sustainability strategy (the "sustainability strategy" for short). The sustainability strategy was revised in 2024 and expanded to include qualitative targets and measures relating to the EU taxonomy. The Bank's stated aim is to reinforce its commitment to the climate targets adopted and to confirm this through corresponding disclosure rates to the greatest possible extent. Investment decisions that take environmental, social and governance issues into account (= positive criteria) are prioritised. Hypo Vorarlberg intends to develop new financial products with sustainability aspects and examine the addition of sustainability aspects to existing products in line with the requirements of the EU taxonomy.

The Bank can already support financing for energy-efficient renovations, photovoltaic systems, solar systems, new heating systems and thermal insulation as well as investments in e-mobility with the Hypo-Klimakredit and the Hypo-Klima-Schnell-Kredit. One of the conditions for receiving this financing is an intended use that is taxonomy-eligible. As demand for relevant project financing in the real estate sector is also steadily growing, the expansion of the product range to include a green loan is currently under review. As with the existing green asset portfolio, the focus is on financing or refinancing buildings with excellent energy efficiency. The aim is to align the lending criteria with the taxonomy criteria in the form of positive criteria<sup>7</sup>, thereby contributing to a gradual increase in taxonomy-eligible and taxonomy-aligned assets. The topic of the EU taxonomy is also highly relevant when it comes to the utilisation of funds from Hypo Vorarlberg's green bonds. Hypo Vorarlberg will successfully adapt its green asset portfolio to the EU taxonomy criteria over the coming years with the aim of ensuring compliance with the EU taxonomy.

Hypo Vorarlberg intends to ensure that its portfolio of green assets in Austria is geared towards the criteria described in the EU taxonomy for the first EU environmental objective, climate change mitigation. The aim is to contribute to climate change mitigation by funding energy-efficient buildings while not significantly harming any of the other five environmental objectives of the EU taxonomy.

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<sup>7</sup> Ethics and sustainability criteria (financing business, E1-2, E2-1, E4-2, E5-1, E1-3, E2-2, E4-3, E5-2)



# **TEMPLATES IN ACCORDANCE WITH ANNEX VI TO DELEGATED REGULATION (EU) 2021/2178 ON THE TAXONOMY REGULATION (EU) 2020/852**

## **0. Summary of KPIs to be disclosed by credit institutions under Article 8 of the Taxonomy Regulation**

|          |                               | Total environmentally sustainable assets (revenue-based) in EUR million | Total environmentally sustainable assets (CapEx-based) in EUR million | KPI (revenue-based) | KPI (CapEx-based) | % coverage (of total assets)*** | % of assets excluded from the numerator for GAR calculation (Article 7 (2) and (3) and Annex V, section 1.1.2) | % of assets excluded from the denominator for GAR calculation (Article 7 (1) and Annex V, section 1.2.4) |
|----------|-------------------------------|-------------------------------------------------------------------------|-----------------------------------------------------------------------|---------------------|-------------------|---------------------------------|----------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|
| Main KPI | Green asset ratio (GAR) stock | 91.54                                                                   | 103.54                                                                | 0.66 %              | 0.73 %            | 29.63 %                         | 61.11 %                                                                                                        | 9.27 %                                                                                                   |

|                |                             | Total environmentally sustainable assets (revenue-based) in EUR million | Total environmentally sustainable assets (CapEx-based) in EUR million | KPI (revenue-based) | KPI (CapEx-based) | % coverage (of total assets) | % of assets excluded from the numerator for GAR calculation (Article 7 (2) and (3) and Annex V, section 1.1.2) | % of assets excluded from the denominator for GAR calculation (Article 7 (1) and Annex V, section 1.2.4) |
|----------------|-----------------------------|-------------------------------------------------------------------------|-----------------------------------------------------------------------|---------------------|-------------------|------------------------------|----------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|
| Additional KPI | GAR (flow)                  | 31.70                                                                   | 34.18                                                                 | 1.13 %              | 1.21 %            | 10.09 %                      | 84.47 %                                                                                                        | 5.44 %                                                                                                   |
|                | Trading book*               | 0.00                                                                    | 0.00                                                                  | 0.00 %              | 0.00 %            |                              |                                                                                                                |                                                                                                          |
|                | Financial guarantees        | 0.78                                                                    | 0.52                                                                  | 0.27 %              | 0.18 %            |                              |                                                                                                                |                                                                                                          |
|                | Assets under management     | 6.99                                                                    | 12.82                                                                 | 6.93 %              | 12.70 %           |                              |                                                                                                                |                                                                                                          |
|                | Fee and commission income** | 0.00                                                                    | 0.00                                                                  | 0.00 %              | 0.00 %            |                              |                                                                                                                |                                                                                                          |

\* For credit institutions that do not meet the conditions of Article 94 (1) or Article 325a (1) of the Capital Requirements Regulation

\*\* Fee and commission income from services other than lending and AuM Institutions shall disclose forward-looking information for these KPIs, including information in the form of targets, together with relevant explanations of the methodology applied.

\*\*\* % of assets covered by the KPI as a proportion of the banks' total assets

Note: The "Fee and commission income" and "Trading book" KPIs will only apply from 2026.

## 1. Assets for the calculation of GAR (revenue-based)

|                                                        |                                                                                                                    | a                                          | b                                                         | c     | d     | e    | f                        | g                                                         | h                            | i                                                       | j    | k                                                         | l                        | m                            | n    |
|--------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------|--------------------------------------------|-----------------------------------------------------------|-------|-------|------|--------------------------|-----------------------------------------------------------|------------------------------|---------------------------------------------------------|------|-----------------------------------------------------------|--------------------------|------------------------------|------|
| EUR million                                            |                                                                                                                    | Disclosure reference date 31 December 2024 |                                                           |       |       |      |                          |                                                           |                              |                                                         |      |                                                           |                          |                              |      |
|                                                        |                                                                                                                    | Total [gross] carrying amount              | Climate change mitigation (CCM)                           |       |       |      |                          | Climate change adaptation (CCA)                           |                              |                                                         |      | Water and marine resources (WTR)                          |                          |                              |      |
|                                                        |                                                                                                                    |                                            | Of which in taxonomy-relevant sectors (taxonomy-eligible) |       |       |      |                          | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                              |                                                         |      | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                          |                              |      |
|                                                        |                                                                                                                    |                                            | Of which environmentally sustainable (taxonomy-aligned)   |       |       |      | Of which use of proceeds | Of which transitional activities                          | Of which enabling activities | Of which environmentally sustainable (taxonomy-aligned) |      |                                                           | Of which use of proceeds | Of which enabling activities |      |
|                                                        |                                                                                                                    |                                            |                                                           |       |       |      |                          |                                                           |                              |                                                         |      |                                                           |                          |                              |      |
| GAR – Assets covered in both numerator and denominator |                                                                                                                    |                                            |                                                           |       |       |      |                          |                                                           |                              |                                                         |      |                                                           |                          |                              |      |
| 1                                                      | Loans and advances, debt securities and equity instruments not held for trading (HFT) eligible for GAR calculation | 4,523.05                                   | 2,350.62                                                  | 91.49 | 16.23 | 8.48 | 35.09                    | 3.32                                                      | 0.05                         | 0.00                                                    | 0.00 | 0.40                                                      | 0.00                     | 0.00                         | 0.00 |
| 2                                                      | Financial corporations                                                                                             | 2,082.15                                   | 352.67                                                    | 30.77 | 0.00  | 2.98 | 1.25                     | 0.21                                                      | 0.05                         | 0.00                                                    | 0.00 | 0.05                                                      | 0.00                     | 0.00                         | 0.00 |
| 3                                                      | Credit institutions                                                                                                | 1,813.02                                   | 346.29                                                    | 28.65 | 0.00  | 2.98 | 0.96                     | 0.21                                                      | 0.05                         | 0.00                                                    | 0.00 | 0.05                                                      | 0.00                     | 0.00                         | 0.00 |
| 4                                                      | Loans and advances                                                                                                 | 184.81                                     | 21.23                                                     | 0.59  | 0.00  | 0.01 | 0.08                     | 0.01                                                      | 0.00                         | 0.00                                                    | 0.00 | 0.03                                                      | 0.00                     | 0.00                         | 0.00 |
| 5                                                      | Debt securities, including UoP                                                                                     | 1,618.86                                   | 325.04                                                    | 28.06 | 0.00  | 2.97 | 0.89                     | 0.21                                                      | 0.05                         | 0.00                                                    | 0.00 | 0.02                                                      | 0.00                     | 0.00                         | 0.00 |
| 6                                                      | Equity instruments                                                                                                 | 9.35                                       | 0.03                                                      | 0.00  |       | 0.00 | 0.00                     | 0.00                                                      | 0.00                         |                                                         | 0.00 | 0.00                                                      | 0.00                     |                              | 0.00 |
| 7                                                      | Other financial corporations                                                                                       | 269.14                                     | 6.38                                                      | 2.12  | 0.00  | 0.00 | 0.29                     | 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 |
| 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 |
| 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 |
| 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 |
| 12                                                     | of which management companies                                                                                      | 265.87                                     | 6.38                                                      | 2.12  | 0.00  | 0.00 | 0.29                     | 0.00                                                      | 0.00                         | 0.00                                                    | 0.00 | 0.00                                                      | 0.00                     | 0.00                         | 0.00 |
| 13                                                     | Loans and advances                                                                                                 | 206.06                                     | 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 |
| 14                                                     | Debt securities, including UoP                                                                                     | 58.91                                      | 6.37                                                      | 2.12  | 0.00  | 0.00 | 0.29                     | 0.00                                                      | 0.00                         | 0.00                                                    | 0.00 | 0.00                                                      | 0.00                     | 0.00                         | 0.00 |
| 15                                                     | Equity instruments                                                                                                 | 0.90                                       | 0.00                                                      | 0.00  |       | 0.00 | 0.00                     | 0.00                                                      | 0.00                         |                                                         | 0.00 | 0.00                                                      | 0.00                     |                              | 0.00 |
| 16                                                     | of which insurance undertakings                                                                                    | 3.27                                       | 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 |
| 17                                                     | Loans and advances                                                                                                 | 3.27                                       | 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 |
| 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 |
| 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 |
| 20                                                     | Non-financial corporations                                                                                         | 448.78                                     | 140.19                                                    | 44.50 | 0.00  | 5.51 | 33.83                    | 2.83                                                      | 0.00                         | 0.00                                                    | 0.00 | 0.01                                                      | 0.00                     | 0.00                         | 0.00 |
| 21                                                     | Loans and advances                                                                                                 | 371.61                                     | 107.43                                                    | 27.57 | 0.00  | 5.36 | 19.26                    | 1.92                                                      | 0.00                         | 0.00                                                    | 0.00 | 0.01                                                      | 0.00                     | 0.00                         | 0.00 |
| 22                                                     | Debt securities, including UoP                                                                                     | 77.16                                      | 32.76                                                     | 16.93 | 0.00  | 0.15 | 14.57                    | 0.91                                                      | 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 |
| 24                                                     | Households*                                                                                                        | 1,748.28                                   | 1,732.54                                                  | 16.23 | 16.23 | 0.00 | 0.00                     | 0.00                                                      | 0.00                         | 0.00                                                    | 0.00 |                                                           |                          |                              |      |
| 25                                                     | of which loans collateralised by residential immovable property                                                    | 1,555.32                                   | 1,550.91                                                  | 13.66 | 13.66 | 0.00 | 0.00                     | 0.00                                                      | 0.00                         | 0.00                                                    | 0.00 |                                                           |                          |                              |      |
| 26                                                     | of which building renovation loans                                                                                 | 122.82                                     | 122.21                                                    | 0.00  | 0.00  | 0.00 | 0.00                     | 0.00                                                      | 0.00                         | 0.00                                                    | 0.00 |                                                           |                          |                              |      |
| 27                                                     | of which motor vehicle loans                                                                                       | 0.34                                       | 0.33                                                      | 0.00  | 0.00  | 0.00 | 0.00                     |                                                           |                              |                                                         |      |                                                           |                          |                              |      |

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\* Total loans to households collateralised by residential immovable property or granted for building renovation purposes or for the purchase of a motor vehicle. The remaining assets in respect of households are shown in row 47 "Other asset categories" (third Commission Notice (C/2024/6691), question 64).

|                                                                                |                                                                                           | a                                          | b                                                         | c                        | d                                | e                                                       | f     | g                                                         | h                        | i                                                       | j    | k                                                         | l                        | m                            | n    |
|--------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|--------------------------------------------|-----------------------------------------------------------|--------------------------|----------------------------------|---------------------------------------------------------|-------|-----------------------------------------------------------|--------------------------|---------------------------------------------------------|------|-----------------------------------------------------------|--------------------------|------------------------------|------|
| EUR million                                                                    |                                                                                           | Disclosure reference date 31 December 2024 |                                                           |                          |                                  |                                                         |       |                                                           |                          |                                                         |      |                                                           |                          |                              |      |
|                                                                                |                                                                                           | Total [gross] carrying amount              | Climate change mitigation (CCM)                           |                          |                                  |                                                         |       | Climate change adaptation (CCA)                           |                          |                                                         |      | Water and marine resources (WTR)                          |                          |                              |      |
|                                                                                |                                                                                           |                                            | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                          |                                  |                                                         |       | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                          |                                                         |      | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                          |                              |      |
|                                                                                |                                                                                           |                                            | Of which environmentally sustainable (taxonomy-aligned)   |                          |                                  | Of which environmentally sustainable (taxonomy-aligned) |       |                                                           |                          | Of which environmentally sustainable (taxonomy-aligned) |      |                                                           |                          |                              |      |
|                                                                                |                                                                                           |                                            |                                                           | Of which use of proceeds | Of which transitional activities | Of which enabling activities                            |       |                                                           | Of which use of proceeds | Of which enabling activities                            |      |                                                           | Of which use of proceeds | Of which enabling activities |      |
| 28                                                                             | Local government financing**                                                              | 243.84                                     | 125.22                                                    | 0.00                     | 0.00                             | 0.00                                                    | 0.00  | 0.27                                                      | 0.00                     | 0.00                                                    | 0.00 | 0.34                                                      | 0.00                     | 0.00                         | 0.00 |
| 29                                                                             | Housing finance                                                                           | 3.54                                       | 3.54                                                      | 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                                                          | 240.30                                     | 121.68                                                    | 0.00                     | 0.00                             | 0.00                                                    | 0.00  | 0.27                                                      | 0.00                     | 0.00                                                    | 0.00 | 0.34                                                      | 0.00                     | 0.00                         | 0.00 |
| 31                                                                             | Collateral obtained by taking possession: residential and 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                                                      | 0.00                     | 0.00                         | 0.00 |
| 32                                                                             | Assets excluded from the numerator for GAR calculation (covered in the denominator)       | 9,328.40                                   | 0.00                                                      | 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                                                                             | Financial and non-financial corporations                                                  | 7,690.83                                   |                                                           |                          |                                  |                                                         |       |                                                           |                          |                                                         |      |                                                           |                          |                              |      |
| 34                                                                             | SMEs and NFCs (other than SMEs) not subject to the NFRD disclosure obligations            | 6,162.86                                   |                                                           |                          |                                  |                                                         |       |                                                           |                          |                                                         |      |                                                           |                          |                              |      |
| 35                                                                             | Loans and advances                                                                        | 6,108.59                                   |                                                           |                          |                                  |                                                         |       |                                                           |                          |                                                         |      |                                                           |                          |                              |      |
| 36                                                                             | of which loans collateralised by commercial immovable property                            | 0.00                                       |                                                           |                          |                                  |                                                         |       |                                                           |                          |                                                         |      |                                                           |                          |                              |      |
| 37                                                                             | of which building renovation loans                                                        | 49.03                                      |                                                           |                          |                                  |                                                         |       |                                                           |                          |                                                         |      |                                                           |                          |                              |      |
| 38                                                                             | Debt securities                                                                           | 49.83                                      |                                                           |                          |                                  |                                                         |       |                                                           |                          |                                                         |      |                                                           |                          |                              |      |
| 39                                                                             | Equity instruments                                                                        | 4.44                                       |                                                           |                          |                                  |                                                         |       |                                                           |                          |                                                         |      |                                                           |                          |                              |      |
| 40                                                                             | Non-EU country counterparties not subject to NFRD disclosure obligations                  | 1,527.98                                   |                                                           |                          |                                  |                                                         |       |                                                           |                          |                                                         |      |                                                           |                          |                              |      |
| 41                                                                             | Loans and advances                                                                        | 1,157.02                                   |                                                           |                          |                                  |                                                         |       |                                                           |                          |                                                         |      |                                                           |                          |                              |      |
| 42                                                                             | Debt securities                                                                           | 352.88                                     |                                                           |                          |                                  |                                                         |       |                                                           |                          |                                                         |      |                                                           |                          |                              |      |
| 43                                                                             | Equity instruments                                                                        | 18.08                                      |                                                           |                          |                                  |                                                         |       |                                                           |                          |                                                         |      |                                                           |                          |                              |      |
| 44                                                                             | Derivatives                                                                               | 449.62                                     |                                                           |                          |                                  |                                                         |       |                                                           |                          |                                                         |      |                                                           |                          |                              |      |
| 45                                                                             | On-demand interbank loans                                                                 | 45.75                                      |                                                           |                          |                                  |                                                         |       |                                                           |                          |                                                         |      |                                                           |                          |                              |      |
| 46                                                                             | Cash and cash-related assets                                                              | 22.38                                      |                                                           |                          |                                  |                                                         |       |                                                           |                          |                                                         |      |                                                           |                          |                              |      |
| 47                                                                             | Other asset categories (e.g. goodwill, commodities etc.)                                  | 1,119.82                                   |                                                           |                          |                                  |                                                         |       |                                                           |                          |                                                         |      |                                                           |                          |                              |      |
| 48                                                                             | Total GAR assets                                                                          | 13,851.45                                  | 2,350.62                                                  | 91.49                    | 16.23                            | 8.48                                                    | 35.09 | 3.32                                                      | 0.05                     | 0.00                                                    | 0.00 | 0.40                                                      | 0.00                     | 0.00                         | 0.00 |
| 49                                                                             | Other assets not covered for GAR calculation                                              | 1,414.72                                   |                                                           |                          |                                  |                                                         |       |                                                           |                          |                                                         |      |                                                           |                          |                              |      |
| 50                                                                             | Sovereigns                                                                                | 972.71                                     |                                                           |                          |                                  |                                                         |       |                                                           |                          |                                                         |      |                                                           |                          |                              |      |
| 51                                                                             | Central bank exposures                                                                    | 428.03                                     |                                                           |                          |                                  |                                                         |       |                                                           |                          |                                                         |      |                                                           |                          |                              |      |
| 52                                                                             | Trading book                                                                              | 13.98                                      |                                                           |                          |                                  |                                                         |       |                                                           |                          |                                                         |      |                                                           |                          |                              |      |
| 53                                                                             | Total assets                                                                              | 15,266.17                                  | 2,350.62                                                  | 91.49                    | 16.23                            | 8.48                                                    | 35.09 | 3.32                                                      | 0.05                     | 0.00                                                    | 0.00 | 0.40                                                      | 0.00                     | 0.00                         | 0.00 |
| Off-balance-sheet exposures – companies subject to NFRD disclosure obligations |                                                                                           |                                            |                                                           |                          |                                  |                                                         |       |                                                           |                          |                                                         |      |                                                           |                          |                              |      |
| 54                                                                             | Financial guarantees                                                                      | 291.84                                     | 8.14                                                      | 0.78                     | 0.00                             | 0.00                                                    | 0.66  | 0.93                                                      | 0.00                     | 0.00                                                    | 0.00 | 0.02                                                      | 0.00                     | 0.00                         | 0.00 |
| 55                                                                             | Assets under management                                                                   | 100.95                                     | 20.01                                                     | 6.96                     | 0.00                             | 0.16                                                    | 3.79  | 0.42                                                      | 0.03                     | 0.00                                                    | 0.01 | 0.26                                                      | 0.00                     | 0.00                         | 0.00 |
| 56                                                                             | Of which debt securities                                                                  | 43.90                                      | 10.95                                                     | 3.68                     | 0.00                             | 0.12                                                    | 1.60  | 0.17                                                      | 0.01                     | 0.00                                                    | 0.00 | 0.24                                                      | 0.00                     | 0.00                         | 0.00 |
| 57                                                                             | Of which equity instruments                                                               | 57.05                                      | 9.06                                                      | 3.28                     | 0.00                             | 0.04                                                    | 2.19  | 0.24                                                      | 0.02                     | 0.00                                                    | 0.01 | 0.02                                                      | 0.00                     | 0.00                         | 0.00 |

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\*\* Total amount of financing of public housing and other activities and assets for which the use of proceeds in respect of local government is known. Assets for which the use of proceeds is unknown are shown in row 50 (third Commission Notice (C/2024/6691), question 64).

|             |                                                                                                 | o                                                         | p    | q                        | r                            | s                                                         | t    | u                        | v                            | w                                                         | x    | z                        | aa                           |
|-------------|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|
| EUR million |                                                                                                 | Disclosure reference date 31 December 2024                |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
|             |                                                                                                 | Circular economy (CE)                                     |      |                          |                              | Pollution prevention and control (PPC)                    |      |                          |                              | Biodiversity and ecosystems (BIO)                         |      |                          |                              |
|             |                                                                                                 | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              |
|             |                                                                                                 | Of which environmentally sustainable (taxonomy-aligned)   |      | Of which use of proceeds | Of which enabling activities | Of which environmentally sustainable (taxonomy-aligned)   |      | Of which use of proceeds | Of which enabling activities | Of which environmentally sustainable (taxonomy-aligned)   |      | Of which use of proceeds | Of which enabling activities |
|             |                                                                                                 |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
|             | GAR – Assets covered in both numerator and denominator                                          |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 1           | Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation | 18.17                                                     | 0.00 | 0.00                     | 0.00                         | 0.74                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 2           | Financial corporations                                                                          | 0.15                                                      | 0.00 | 0.00                     | 0.00                         | 0.15                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 3           | Credit institutions                                                                             | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 4           | 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                         |
| 5           | 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                         |
| 6           | Equity instruments                                                                              | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         |
| 7           | Other financial corporations                                                                    | 0.15                                                      | 0.00 | 0.00                     | 0.00                         | 0.15                                                      | 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                         |
| 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                         |
| 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                         |
| 11          | Equity instruments                                                                              | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         |
| 12          | of which management companies                                                                   | 0.15                                                      | 0.00 | 0.00                     | 0.00                         | 0.15                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 13          | Loans and advances                                                                              | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 14          | Debt securities, including UoP                                                                  | 0.15                                                      | 0.00 | 0.00                     | 0.00                         | 0.15                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 15          | Equity instruments                                                                              | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         |
| 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                         |
| 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                         |
| 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                         |
| 19          | Equity instruments                                                                              | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         |
| 20          | Non-financial corporations                                                                      | 17.62                                                     | 0.00 | 0.00                     | 0.00                         | 0.59                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 21          | Loans and advances                                                                              | 17.62                                                     | 0.00 | 0.00                     | 0.00                         | 0.53                                                      | 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                         | 0.06                                                      | 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                         |
| 24          | Households*                                                                                     | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 25          | of which loans collateralised by residential immovable property                                 | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 26          | of which building renovation loans                                                              | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 27          | of which motor vehicle loans                                                                    |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |

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|                                                                                       |                                                                                           | o                                                         | p    | q                        | r                            | s                                                         | t    | u                        | v                            | w                                                         | x    | z                        | aa                           |
|---------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|
| EUR million                                                                           |                                                                                           | Disclosure reference date 31 December 2024                |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
|                                                                                       |                                                                                           | Circular economy (CE)                                     |      |                          |                              | Pollution prevention and control (PPC)                    |      |                          |                              | Biodiversity and ecosystems (BIO)                         |      |                          |                              |
|                                                                                       |                                                                                           | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              |
|                                                                                       |                                                                                           | Of which environmentally sustainable (taxonomy-aligned)   |      |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |      |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |      |                          |                              |
|                                                                                       |                                                                                           |                                                           |      | Of which use of proceeds | Of which enabling activities |                                                           |      | Of which use of proceeds | Of which enabling activities |                                                           |      | Of which use of proceeds | Of which enabling activities |
| 28                                                                                    | Local government financing**                                                              | 0.39                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 29                                                                                    | Housing finance                                                                           | 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                                                          | 0.39                                                      | 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 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                     | 0.00                         |
| 32                                                                                    | Assets excluded from the numerator for GAR calculation (covered in the denominator)       | 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                                                                                    | Financial and non-financial corporations                                                  |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 34                                                                                    | SMEs and NFCs (other than SMEs) not subject to the NFRD disclosure obligations            |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 35                                                                                    | Loans and advances                                                                        |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 36                                                                                    | of which loans collateralised by commercial immovable property                            |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 37                                                                                    | of which building renovation loans                                                        |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 38                                                                                    | Debt securities                                                                           |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 39                                                                                    | Equity instruments                                                                        |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 40                                                                                    | Non-EU country counterparties not subject to NFRD disclosure obligations                  |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 41                                                                                    | Loans and advances                                                                        |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 42                                                                                    | Debt securities                                                                           |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 43                                                                                    | Equity instruments                                                                        |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 44                                                                                    | Derivatives                                                                               |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 45                                                                                    | On-demand interbank loans                                                                 |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 46                                                                                    | Cash and cash-related assets                                                              |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 47                                                                                    | Other asset categories (e.g. goodwill, commodities etc.)                                  |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 48                                                                                    | <b>Total GAR assets</b>                                                                   | 18.17                                                     | 0.00 | 0.00                     | 0.00                         | 0.74                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 49                                                                                    | Other assets not covered for GAR calculation                                              |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 50                                                                                    | Sovereigns                                                                                |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 51                                                                                    | Central bank exposures                                                                    |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 52                                                                                    | Trading book                                                                              |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 53                                                                                    | <b>Total assets</b>                                                                       | 18.17                                                     | 0.00 | 0.00                     | 0.00                         | 0.74                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| <b>Off-balance-sheet exposures – companies subject to NFRD disclosure obligations</b> |                                                                                           |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 54                                                                                    | Financial guarantees                                                                      | 2.31                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.93                                                      | 0.00 | 0.00                     | 0.00                         |
| 55                                                                                    | Assets under management                                                                   | 2.15                                                      | 0.00 | 0.00                     | 0.00                         | 1.51                                                      | 0.00 | 0.00                     | 0.00                         | 0.01                                                      | 0.00 | 0.00                     | 0.00                         |
| 56                                                                                    | Of which debt securities                                                                  | 1.07                                                      | 0.00 | 0.00                     | 0.00                         | 1.17                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 57                                                                                    | Of which equity instruments                                                               | 1.08                                                      | 0.00 | 0.00                     | 0.00                         | 0.34                                                      | 0.00 | 0.00                     | 0.00                         | 0.01                                                      | 0.00 | 0.00                     | 0.00                         |

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|                                                        |                                                                                                 | ab                                                        | ac    | ad    | ae                       | af                               | ag                                         | ah                                                        | ai                                                      | aj   | ak   | al                       |
|--------------------------------------------------------|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------|-------|-------|--------------------------|----------------------------------|--------------------------------------------|-----------------------------------------------------------|---------------------------------------------------------|------|------|--------------------------|
| EUR million                                            |                                                                                                 | Disclosure reference date 31 December 2024                |       |       |                          |                                  | Disclosure reference date 31 December 2023 |                                                           |                                                         |      |      |                          |
|                                                        |                                                                                                 | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                  |       |       |                          |                                  | Total [gross] carrying amount              | Climate change mitigation (CCM)                           |                                                         |      |      |                          |
|                                                        |                                                                                                 | Of which in taxonomy-relevant sectors (taxonomy-eligible) |       |       |                          |                                  |                                            | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                                                         |      |      |                          |
|                                                        |                                                                                                 | Of which environmentally sustainable (taxonomy-aligned)   |       |       | Of which use of proceeds | Of which transitional activities |                                            | Of which enabling activities                              | Of which environmentally sustainable (taxonomy-aligned) |      |      | Of which use of proceeds |
|                                                        |                                                                                                 |                                                           |       |       |                          |                                  |                                            |                                                           |                                                         |      |      |                          |
| GAR – Assets covered in both numerator and denominator |                                                                                                 |                                                           |       |       |                          |                                  |                                            |                                                           |                                                         |      |      |                          |
| 1                                                      | Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation | 2,373.25                                                  | 91.54 | 16.23 | 8.48                     | 35.09                            | 4,696.25                                   | 2,456.16                                                  | 20.22                                                   | 1.30 | 0.00 | 6.51                     |
| 2                                                      | Financial corporations                                                                          | 353.23                                                    | 30.82 | 0.00  | 2.98                     | 1.25                             | 2,253.53                                   | 384.47                                                    | 2.50                                                    | 0.00 | 0.00 | 0.92                     |
| 3                                                      | Credit institutions                                                                             | 346.56                                                    | 28.70 | 0.00  | 2.98                     | 0.96                             | 1,916.72                                   | 372.21                                                    | 0.40                                                    | 0.00 | 0.00 | 0.00                     |
| 4                                                      | Loans and advances                                                                              | 21.26                                                     | 0.59  | 0.00  | 0.01                     | 0.08                             | 310.65                                     | 36.80                                                     | 0.00                                                    | 0.00 | 0.00 | 0.00                     |
| 5                                                      | Debt securities, including UoP                                                                  | 325.26                                                    | 28.11 | 0.00  | 2.97                     | 0.89                             | 1,586.00                                   | 335.41                                                    | 0.40                                                    | 0.00 | 0.00 | 0.00                     |
| 6                                                      | Equity instruments                                                                              | 0.03                                                      | 0.00  |       | 0.00                     | 0.00                             | 20.08                                      | 0.00                                                      | 0.00                                                    |      | 0.00 | 0.00                     |
| 7                                                      | Other financial corporations                                                                    | 6.68                                                      | 2.12  | 0.00  | 0.00                     | 0.29                             | 336.81                                     | 12.26                                                     | 2.10                                                    | 0.00 | 0.00 | 0.92                     |
| 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                     |
| 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                     |
| 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                     |
| 11                                                     | Equity instruments                                                                              | 0.00                                                      | 0.00  |       | 0.00                     | 0.00                             | 0.00                                       | 0.00                                                      | 0.00                                                    |      | 0.00 | 0.00                     |
| 12                                                     | of which management companies                                                                   | 6.68                                                      | 2.12  | 0.00  | 0.00                     | 0.29                             | 333.37                                     | 12.26                                                     | 2.10                                                    | 0.00 | 0.00 | 0.92                     |
| 13                                                     | Loans and advances                                                                              | 0.01                                                      | 0.00  | 0.00  | 0.00                     | 0.00                             | 261.47                                     | 0.01                                                      | 0.00                                                    | 0.00 | 0.00 | 0.00                     |
| 14                                                     | Debt securities, including UoP                                                                  | 6.67                                                      | 2.12  | 0.00  | 0.00                     | 0.29                             | 69.76                                      | 12.25                                                     | 2.10                                                    | 0.00 | 0.00 | 0.92                     |
| 15                                                     | Equity instruments                                                                              | 0.00                                                      | 0.00  |       | 0.00                     | 0.00                             | 2.14                                       | 0.00                                                      | 0.00                                                    |      | 0.00 | 0.00                     |
| 16                                                     | of which insurance undertakings                                                                 | 0.00                                                      | 0.00  | 0.00  | 0.00                     | 0.00                             | 3.44                                       | 0.00                                                      | 0.00                                                    | 0.00 | 0.00 | 0.00                     |
| 17                                                     | Loans and advances                                                                              | 0.00                                                      | 0.00  | 0.00  | 0.00                     | 0.00                             | 3.44                                       | 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                     |
| 19                                                     | Equity instruments                                                                              | 0.00                                                      | 0.00  |       | 0.00                     | 0.00                             | 0.00                                       | 0.00                                                      | 0.00                                                    |      | 0.00 | 0.00                     |
| 20                                                     | Non-financial corporations                                                                      | 161.24                                                    | 44.50 | 0.00  | 5.51                     | 33.83                            | 323.85                                     | 108.66                                                    | 16.42                                                   | 0.00 | 0.00 | 5.56                     |
| 21                                                     | Loans and advances                                                                              | 127.51                                                    | 27.57 | 0.00  | 5.36                     | 19.26                            | 255.04                                     | 78.14                                                     | 2.44                                                    | 0.00 | 0.00 | 1.83                     |
| 22                                                     | Debt securities, including UoP                                                                  | 33.73                                                     | 16.93 | 0.00  | 0.15                     | 14.57                            | 68.82                                      | 30.52                                                     | 13.98                                                   | 0.00 | 0.00 | 3.74                     |
| 23                                                     | Equity instruments                                                                              | 0.00                                                      | 0.00  |       | 0.00                     | 0.00                             | 0.00                                       | 0.00                                                      | 0.00                                                    |      | 0.00 | 0.00                     |
| 24                                                     | Households*                                                                                     | 1,732.54                                                  | 16.23 | 16.23 | 0.00                     | 0.00                             | 1,847.35                                   | 1,832.70                                                  | 1.30                                                    | 1.30 | 0.00 | 0.02                     |
| 25                                                     | of which loans collateralised by residential immovable property                                 | 1,550.91                                                  | 13.66 | 13.66 | 0.00                     | 0.00                             | 1,627.22                                   | 1,625.39                                                  | 1.16                                                    | 1.16 | 0.00 | 0.02                     |
| 26                                                     | of which building renovation loans                                                              | 122.21                                                    | 0.00  | 0.00  | 0.00                     | 0.00                             | 133.41                                     | 132.77                                                    | 0.02                                                    | 0.02 | 0.00 | 0.02                     |
| 27                                                     | of which motor vehicle loans                                                                    | 0.33                                                      | 0.00  | 0.00  | 0.00                     | 0.00                             | 0.12                                       | 0.12                                                      | 0.00                                                    | 0.00 | 0.00 | 0.00                     |

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|                                                                                |                                                                                           | ab                                                        | ac    | ad                       | ae                                                      | af                           | ag                                         | ah                                                        | ai    | aj                       | ak                               | al                           |
|--------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|-----------------------------------------------------------|-------|--------------------------|---------------------------------------------------------|------------------------------|--------------------------------------------|-----------------------------------------------------------|-------|--------------------------|----------------------------------|------------------------------|
| EUR million                                                                    |                                                                                           | Disclosure reference date 31 December 2024                |       |                          |                                                         |                              | Disclosure reference date 31 December 2023 |                                                           |       |                          |                                  |                              |
|                                                                                |                                                                                           | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                  |       |                          |                                                         |                              | Total [gross] carrying amount              | Climate change mitigation (CCM)                           |       |                          |                                  |                              |
|                                                                                |                                                                                           | Of which in taxonomy-relevant sectors (taxonomy-eligible) |       |                          |                                                         |                              |                                            | Of which in taxonomy-relevant sectors (taxonomy-eligible) |       |                          |                                  |                              |
|                                                                                |                                                                                           | Of which environmentally sustainable (taxonomy-aligned)   |       |                          | Of which environmentally sustainable (taxonomy-aligned) |                              |                                            |                                                           |       |                          |                                  |                              |
|                                                                                |                                                                                           |                                                           |       | Of which use of proceeds | Of which transitional activities                        | Of which enabling activities |                                            |                                                           |       | Of which use of proceeds | Of which transitional activities | Of which enabling activities |
| 28                                                                             | Local government financing**                                                              | 126.23                                                    | 0.00  | 0.00                     | 0.00                                                    | 0.00                         | 271.51                                     | 130.33                                                    | 0.00  | 0.00                     | 0.00                             | 0.00                         |
| 29                                                                             | Housing finance                                                                           | 3.54                                                      | 0.00  | 0.00                     | 0.00                                                    | 0.00                         | 8.11                                       | 0.36                                                      | 0.00  | 0.00                     | 0.00                             | 0.00                         |
| 30                                                                             | Other local government financing                                                          | 122.69                                                    | 0.00  | 0.00                     | 0.00                                                    | 0.00                         | 263.40                                     | 129.97                                                    | 0.00  | 0.00                     | 0.00                             | 0.00                         |
| 31                                                                             | Collateral obtained by taking possession: residential and 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                                                                             | Assets excluded from the numerator for GAR calculation (covered in the denominator)       | 0.00                                                      | 0.00  | 0.00                     | 0.00                                                    | 0.00                         | 9,382.83                                   | 0.00                                                      | 0.00  | 0.00                     | 0.00                             | 0.00                         |
| 33                                                                             | Financial and non-financial corporations                                                  |                                                           |       |                          |                                                         |                              |                                            |                                                           |       |                          |                                  |                              |
| 34                                                                             | SMEs and NFCs (other than SMEs) not subject to the NFRD disclosure obligations            |                                                           |       |                          |                                                         |                              |                                            |                                                           |       |                          |                                  |                              |
| 35                                                                             | Loans and advances                                                                        |                                                           |       |                          |                                                         |                              |                                            |                                                           |       |                          |                                  |                              |
| 36                                                                             | of which loans collateralised by commercial immovable property                            |                                                           |       |                          |                                                         |                              |                                            |                                                           |       |                          |                                  |                              |
| 37                                                                             | of which building renovation loans                                                        |                                                           |       |                          |                                                         |                              |                                            |                                                           |       |                          |                                  |                              |
| 38                                                                             | Debt securities                                                                           |                                                           |       |                          |                                                         |                              |                                            |                                                           |       |                          |                                  |                              |
| 39                                                                             | Equity instruments                                                                        |                                                           |       |                          |                                                         |                              |                                            |                                                           |       |                          |                                  |                              |
| 40                                                                             | Non-EU country counterparties not subject to NFRD disclosure obligations                  |                                                           |       |                          |                                                         |                              |                                            |                                                           |       |                          |                                  |                              |
| 41                                                                             | Loans and advances                                                                        |                                                           |       |                          |                                                         |                              |                                            |                                                           |       |                          |                                  |                              |
| 42                                                                             | Debt securities                                                                           |                                                           |       |                          |                                                         |                              |                                            |                                                           |       |                          |                                  |                              |
| 43                                                                             | Equity instruments                                                                        |                                                           |       |                          |                                                         |                              |                                            |                                                           |       |                          |                                  |                              |
| 44                                                                             | Derivatives                                                                               |                                                           |       |                          |                                                         |                              |                                            |                                                           |       |                          |                                  |                              |
| 45                                                                             | On-demand interbank loans                                                                 |                                                           |       |                          |                                                         |                              |                                            |                                                           |       |                          |                                  |                              |
| 46                                                                             | Cash and cash-related assets                                                              |                                                           |       |                          |                                                         |                              |                                            |                                                           |       |                          |                                  |                              |
| 47                                                                             | Other asset categories (e.g. goodwill, commodities etc.)                                  |                                                           |       |                          |                                                         |                              |                                            |                                                           |       |                          |                                  |                              |
| 48                                                                             | Total GAR assets                                                                          | 2,373.25                                                  | 91.54 | 16.23                    | 8.48                                                    | 35.09                        | 14,079.08                                  | 2,456.16                                                  | 20.22 | 1.30                     | 0.00                             | 6.51                         |
| 49                                                                             | Other assets not covered for GAR calculation                                              |                                                           |       |                          |                                                         |                              |                                            |                                                           |       |                          |                                  |                              |
| 50                                                                             | Sovereigns                                                                                |                                                           |       |                          |                                                         |                              |                                            |                                                           |       |                          |                                  |                              |
| 51                                                                             | Central bank exposures                                                                    |                                                           |       |                          |                                                         |                              |                                            |                                                           |       |                          |                                  |                              |
| 52                                                                             | Trading book                                                                              |                                                           |       |                          |                                                         |                              |                                            |                                                           |       |                          |                                  |                              |
| 53                                                                             | Total assets                                                                              | 2,373.25                                                  | 91.54 | 16.23                    | 8.48                                                    | 35.09                        | 15,736.61                                  | 2,456.16                                                  | 20.22 | 1.30                     | 0.00                             | 6.51                         |
| Off-balance-sheet exposures – companies subject to NFRD disclosure obligations |                                                                                           |                                                           |       |                          |                                                         |                              |                                            |                                                           |       |                          |                                  |                              |
| 54                                                                             | Financial guarantees                                                                      | 12.34                                                     | 0.78  | 0.00                     | 0.00                                                    | 0.66                         | 366.54                                     | 8.76                                                      | 0.95  | 0.00                     | 0.00                             | 0.76                         |
| 55                                                                             | Assets under management                                                                   | 24.34                                                     | 6.99  | 0.00                     | 0.16                                                    | 3.81                         | 175.94                                     | 16.84                                                     | 3.40  | 0.00                     | 0.10                             | 1.44                         |
| 56                                                                             | Of which debt securities                                                                  | 13.59                                                     | 3.70  | 0.00                     | 0.12                                                    | 1.60                         | 79.22                                      | 4.71                                                      | 0.99  | 0.00                     | 0.07                             | 0.17                         |
| 57                                                                             | Of which equity instruments                                                               | 10.75                                                     | 3.29  | 0.00                     | 0.04                                                    | 2.20                         | 96.72                                      | 12.14                                                     | 2.41  | 0.00                     | 0.03                             | 1.27                         |

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|             |                                                                                                 | am                                                        | an   | ao                       | ap                           | aq                                                        | ar   | as                       | at                           | au                                                        | av   | aw                       | ax                           |
|-------------|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|
| EUR million |                                                                                                 | Disclosure reference date 31 December 2023                |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
|             |                                                                                                 | Climate change adaptation (CCA)                           |      |                          |                              | Water and marine resources (WTR)                          |      |                          |                              | Circular economy (CE)                                     |      |                          |                              |
|             |                                                                                                 | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              |
|             |                                                                                                 | Of which environmentally sustainable (taxonomy-aligned)   |      | Of which use of proceeds | Of which enabling activities | Of which environmentally sustainable (taxonomy-aligned)   |      | Of which use of proceeds | Of which enabling activities | Of which environmentally sustainable (taxonomy-aligned)   |      | Of which use of proceeds | Of which enabling activities |
|             |                                                                                                 |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
|             | GAR – Assets covered in both numerator and denominator                                          |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 1           | Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation | 0.29                                                      | 0.00 | 0.00                     | 0.00                         | 0.34                                                      | 0.00 | 0.00                     | 0.00                         | 0.39                                                      | 0.00 | 0.00                     | 0.00                         |
| 2           | Financial corporations                                                                          | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 3           | Credit institutions                                                                             | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 4           | 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                         |
| 5           | 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                         |
| 6           | Equity instruments                                                                              | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         |
| 7           | Other financial corporations                                                                    | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 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                         |
| 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                         |
| 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                         |
| 11          | Equity instruments                                                                              | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         |
| 12          | of which management companies                                                                   | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 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                         |
| 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                         |
| 15          | Equity instruments                                                                              | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         |
| 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                         |
| 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                         |
| 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                         |
| 19          | Equity instruments                                                                              | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         |
| 20          | Non-financial corporations                                                                      | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 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                         |
| 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                         |
| 23          | Equity instruments                                                                              | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         |
| 24          | Households*                                                                                     | 0.02                                                      | 0.00 | 0.00                     | 0.00                         |                                                           |      |                          |                              | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 25          | of which loans collateralised by residential immovable property                                 | 0.02                                                      | 0.00 | 0.00                     | 0.00                         |                                                           |      |                          |                              | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 26          | of which building renovation loans                                                              | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |                                                           |      |                          |                              | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 27          | of which motor vehicle loans                                                                    |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |

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|                                                                                       |                                                                                           | am                                                        | an   | ao                       | ap                           | aq                                                        | ar   | as                       | at                           | au                                                        | av   | aw                       | ax                           |
|---------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|
| EUR million                                                                           |                                                                                           | Disclosure reference date 31 December 2023                |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
|                                                                                       |                                                                                           | Climate change adaptation (CCA)                           |      |                          |                              | Water and marine resources (WTR)                          |      |                          |                              | Circular economy (CE)                                     |      |                          |                              |
|                                                                                       |                                                                                           | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              |
|                                                                                       |                                                                                           | Of which environmentally sustainable (taxonomy-aligned)   |      |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |      |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |      |                          |                              |
|                                                                                       |                                                                                           |                                                           |      | Of which use of proceeds | Of which enabling activities |                                                           |      | Of which use of proceeds | Of which enabling activities |                                                           |      | Of which use of proceeds | Of which enabling activities |
| 28                                                                                    | Local government financing**                                                              | 0.27                                                      | 0.00 | 0.00                     | 0.00                         | 0.34                                                      | 0.00 | 0.00                     | 0.00                         | 0.39                                                      | 0.00 | 0.00                     | 0.00                         |
| 29                                                                                    | Housing finance                                                                           | 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                                                          | 0.27                                                      | 0.00 | 0.00                     | 0.00                         | 0.34                                                      | 0.00 | 0.00                     | 0.00                         | 0.39                                                      | 0.00 | 0.00                     | 0.00                         |
| 31                                                                                    | Collateral obtained by taking possession: residential and 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                     | 0.00                         |
| 32                                                                                    | Assets excluded from the numerator for GAR calculation (covered in the denominator)       | 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                                                                                    | Financial and non-financial corporations                                                  |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 34                                                                                    | SMEs and NFCs (other than SMEs) not subject to the NFRD disclosure obligations            |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 35                                                                                    | Loans and advances                                                                        |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 36                                                                                    | of which loans collateralised by commercial immovable property                            |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 37                                                                                    | of which building renovation loans                                                        |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 38                                                                                    | Debt securities                                                                           |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 39                                                                                    | Equity instruments                                                                        |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 40                                                                                    | Non-EU country counterparties not subject to NFRD disclosure obligations                  |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 41                                                                                    | Loans and advances                                                                        |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 42                                                                                    | Debt securities                                                                           |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 43                                                                                    | Equity instruments                                                                        |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 44                                                                                    | Derivatives                                                                               |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 45                                                                                    | On-demand interbank loans                                                                 |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 46                                                                                    | Cash and cash-related assets                                                              |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 47                                                                                    | Other asset categories (e.g. goodwill, commodities etc.)                                  |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 48                                                                                    | <b>Total GAR assets</b>                                                                   | 0.29                                                      | 0.00 | 0.00                     | 0.00                         | 0.34                                                      | 0.00 | 0.00                     | 0.00                         | 0.39                                                      | 0.00 | 0.00                     | 0.00                         |
| 49                                                                                    | Other assets not covered for GAR calculation                                              |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 50                                                                                    | Sovereigns                                                                                |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 51                                                                                    | Central bank exposures                                                                    |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 52                                                                                    | Trading book                                                                              |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 53                                                                                    | <b>Total assets</b>                                                                       | 0.29                                                      | 0.00 | 0.00                     | 0.00                         | 0.34                                                      | 0.00 | 0.00                     | 0.00                         | 0.39                                                      | 0.00 | 0.00                     | 0.00                         |
| <b>Off-balance-sheet exposures – companies subject to NFRD disclosure obligations</b> |                                                                                           |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 54                                                                                    | Financial guarantees                                                                      | 0.95                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 55                                                                                    | Assets under management                                                                   | 16.74                                                     | 0.04 | 0.00                     | 0.02                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 56                                                                                    | Of which debt securities                                                                  | 4.72                                                      | 0.02 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 57                                                                                    | Of which equity instruments                                                               | 12.02                                                     | 0.02 | 0.00                     | 0.01                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |

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|             |                                                                                                 | ay                                                        | az   | ba                       | bb                           | bc                                                        | bd   | be                       | bf                           | bg                                                        | bh    | bi                       | bj                               | bk                           |
|-------------|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|-----------------------------------------------------------|-------|--------------------------|----------------------------------|------------------------------|
| EUR million |                                                                                                 | Disclosure reference date 31 December 2023                |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
|             |                                                                                                 | Pollution prevention and control (PPC)                    |      |                          |                              | Biodiversity and ecosystems (BIO)                         |      |                          |                              | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                  |       |                          |                                  |                              |
|             |                                                                                                 | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |       |                          |                                  |                              |
|             |                                                                                                 | Of which environmentally sustainable (taxonomy-aligned)   |      |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |      |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |       |                          |                                  |                              |
|             |                                                                                                 |                                                           |      | Of which use of proceeds | Of which enabling activities |                                                           |      | Of which use of proceeds | Of which enabling activities |                                                           |       | Of which use of proceeds | Of which transitional activities | Of which enabling activities |
|             | GAR – Assets covered in both numerator and denominator                                          |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 1           | Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 2457.19                                                   | 20.22 | 1.30                     | 0.00                             | 6.51                         |
| 2           | Financial corporations                                                                          | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 384.47                                                    | 2.50  | 0.00                     | 0.00                             | 0.92                         |
| 3           | Credit institutions                                                                             | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 372.21                                                    | 0.40  | 0.00                     | 0.00                             | 0.00                         |
| 4           | Loans and advances                                                                              | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 36.80                                                     | 0.00  | 0.00                     | 0.00                             | 0.00                         |
| 5           | Debt securities, including UoP                                                                  | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 335.41                                                    | 0.40  | 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                         |
| 7           | Other financial corporations                                                                    | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 12.26                                                     | 2.10  | 0.00                     | 0.00                             | 0.92                         |
| 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                         |
| 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                         |
| 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                         |
| 11          | Equity instruments                                                                              | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00  |                          | 0.00                             | 0.00                         |
| 12          | of which management companies                                                                   | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 12.26                                                     | 2.10  | 0.00                     | 0.00                             | 0.92                         |
| 13          | Loans and advances                                                                              | 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                         |
| 14          | Debt securities, including UoP                                                                  | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 12.25                                                     | 2.10  | 0.00                     | 0.00                             | 0.92                         |
| 15          | Equity instruments                                                                              | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00  |                          | 0.00                             | 0.00                         |
| 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                         |
| 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                         |
| 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                         |
| 19          | Equity instruments                                                                              | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00  |                          | 0.00                             | 0.00                         |
| 20          | Non-financial corporations                                                                      | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 108.66                                                    | 16.42 | 0.00                     | 0.00                             | 5.56                         |
| 21          | Loans and advances                                                                              | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 78.14                                                     | 2.44  | 0.00                     | 0.00                             | 1.83                         |
| 22          | Debt securities, including UoP                                                                  | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 30.52                                                     | 13.98 | 0.00                     | 0.00                             | 3.74                         |
| 23          | Equity instruments                                                                              | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00  |                          | 0.00                             | 0.00                         |
| 24          | Households*                                                                                     |                                                           |      |                          |                              |                                                           |      |                          |                              | 1832.72                                                   | 1.30  | 1.30                     | 0.00                             | 0.02                         |
| 25          | of which loans collateralised by residential immovable property                                 |                                                           |      |                          |                              |                                                           |      |                          |                              | 1625.41                                                   | 1.16  | 1.16                     | 0.00                             | 0.02                         |
| 26          | of which building renovation loans                                                              |                                                           |      |                          |                              |                                                           |      |                          |                              | 132.77                                                    | 0.02  | 0.02                     | 0.00                             | 0.02                         |
| 27          | of which motor vehicle loans                                                                    |                                                           |      |                          |                              |                                                           |      |                          |                              | 0.12                                                      | 0.00  | 0.00                     | 0.00                             | 0.00                         |

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|                                                                                       |                                                                                           | ay                                                        | az   | ba                       | bb                           | bc                                                        | bd   | be                       | bf                           | bg                                                        | bh    | bi                       | bj                               | bk                           |
|---------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|-----------------------------------------------------------|-------|--------------------------|----------------------------------|------------------------------|
| EUR million                                                                           |                                                                                           | Disclosure reference date 31 December 2023                |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
|                                                                                       |                                                                                           | Pollution prevention and control (PPC)                    |      |                          |                              | Biodiversity and ecosystems (BIO)                         |      |                          |                              | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                  |       |                          |                                  |                              |
|                                                                                       |                                                                                           | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |       |                          |                                  |                              |
|                                                                                       |                                                                                           | Of which environmentally sustainable (taxonomy-aligned)   |      |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |      |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |       |                          |                                  |                              |
|                                                                                       |                                                                                           |                                                           |      | Of which use of proceeds | Of which enabling activities |                                                           |      | Of which use of proceeds | Of which enabling activities |                                                           |       | Of which use of proceeds | Of which transitional activities | Of which enabling activities |
| 28                                                                                    | Local government financing**                                                              | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 131.34                                                    | 0.00  | 0.00                     | 0.00                             | 0.00                         |
| 29                                                                                    | Housing finance                                                                           | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.36                                                      | 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                         | 130.97                                                    | 0.00  | 0.00                     | 0.00                             | 0.00                         |
| 31                                                                                    | Collateral obtained by taking possession: residential and 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                     | 0.00                             | 0.00                         |
| 32                                                                                    | Assets excluded from the numerator for GAR calculation (covered in the denominator)       | 0.00                                                      | 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                                                                                    | Financial and non-financial corporations                                                  |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 34                                                                                    | SMEs and NFCs (other than SMEs) not subject to the NFRD disclosure obligations            |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 35                                                                                    | Loans and advances                                                                        |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 36                                                                                    | of which loans collateralised by commercial immovable property                            |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 37                                                                                    | of which building renovation loans                                                        |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 38                                                                                    | Debt securities                                                                           |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 39                                                                                    | Equity instruments                                                                        |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 40                                                                                    | Non-EU country counterparties not subject to NFRD disclosure obligations                  |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 41                                                                                    | Loans and advances                                                                        |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 42                                                                                    | Debt securities                                                                           |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 43                                                                                    | Equity instruments                                                                        |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 44                                                                                    | Derivatives                                                                               |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 45                                                                                    | On-demand interbank loans                                                                 |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 46                                                                                    | Cash and cash-related assets                                                              |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 47                                                                                    | Other asset categories (e.g. goodwill, commodities etc.)                                  |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 48                                                                                    | <b>Total GAR assets</b>                                                                   | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 2457.19                                                   | 20.22 | 1.30                     | 0.00                             | 6.51                         |
| 49                                                                                    | Other assets not covered for GAR calculation                                              |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 50                                                                                    | Sovereigns                                                                                |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 51                                                                                    | Central bank exposures                                                                    |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 52                                                                                    | Trading book                                                                              |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 53                                                                                    | <b>Total assets</b>                                                                       | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 2457.19                                                   | 20.22 | 1.30                     | 0.00                             | 6.51                         |
| <b>Off-balance-sheet exposures – companies subject to NFRD disclosure obligations</b> |                                                                                           |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 54                                                                                    | Financial guarantees                                                                      | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 9.71                                                      | 0.95  | 0.00                     | 0.00                             | 0.76                         |
| 55                                                                                    | Assets under management                                                                   | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 33.58                                                     | 3.44  | 0.00                     | 0.10                             | 1.45                         |
| 56                                                                                    | Of which debt securities                                                                  | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 9.43                                                      | 1.01  | 0.00                     | 0.07                             | 0.17                         |
| 57                                                                                    | Of which equity instruments                                                               | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 24.15                                                     | 2.43  | 0.00                     | 0.03                             | 1.28                         |

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## 1. Assets for GAR calculation (CapEx-based)

|                                                        |                                                                                                 | a                                          | b                                                         | c                        | d                                | e                            | f     | g                                                         | h                        | i                            | j    | k                                                         | l                        | m                            | n    |
|--------------------------------------------------------|-------------------------------------------------------------------------------------------------|--------------------------------------------|-----------------------------------------------------------|--------------------------|----------------------------------|------------------------------|-------|-----------------------------------------------------------|--------------------------|------------------------------|------|-----------------------------------------------------------|--------------------------|------------------------------|------|
| EUR million                                            |                                                                                                 | Disclosure reference date 31 December 2024 |                                                           |                          |                                  |                              |       |                                                           |                          |                              |      |                                                           |                          |                              |      |
|                                                        |                                                                                                 | Total [gross] carrying amount              | Climate change mitigation (CCM)                           |                          |                                  |                              |       | Climate change adaptation (CCA)                           |                          |                              |      | Water and marine resources (WTR)                          |                          |                              |      |
|                                                        |                                                                                                 |                                            | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                          |                                  |                              |       | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                          |                              |      | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                          |                              |      |
|                                                        |                                                                                                 |                                            | Of which environmentally sustainable (taxonomy-aligned)   |                          |                                  |                              |       | Of which environmentally sustainable (taxonomy-aligned)   |                          |                              |      | Of which environmentally sustainable (taxonomy-aligned)   |                          |                              |      |
|                                                        |                                                                                                 |                                            |                                                           | Of which use of proceeds | Of which transitional activities | Of which enabling activities |       |                                                           | Of which use of proceeds | Of which enabling activities |      |                                                           | Of which use of proceeds | Of which enabling activities |      |
| GAR – Assets covered in both numerator and denominator |                                                                                                 |                                            |                                                           |                          |                                  |                              |       |                                                           |                          |                              |      |                                                           |                          |                              |      |
| 1                                                      | Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation | 4,523.05                                   | 2,368.81                                                  | 103.48                   | 16.23                            | 8.46                         | 51.46 | 1.94                                                      | 0.05                     | 0.00                         | 0.00 | 0.39                                                      | 0.00                     | 0.00                         | 0.00 |
| 2                                                      | Financial corporations                                                                          | 2,082.15                                   | 354.83                                                    | 29.72                    | 0.00                             | 3.24                         | 2.10  | 0.81                                                      | 0.05                     | 0.00                         | 0.00 | 0.05                                                      | 0.00                     | 0.00                         | 0.00 |
| 3                                                      | Credit institutions                                                                             | 1,813.02                                   | 349.93                                                    | 28.96                    | 0.00                             | 3.23                         | 1.67  | 0.81                                                      | 0.05                     | 0.00                         | 0.00 | 0.05                                                      | 0.00                     | 0.00                         | 0.00 |
| 4                                                      | Loans and advances                                                                              | 184.81                                     | 21.25                                                     | 0.77                     | 0.00                             | 0.01                         | 0.18  | 0.01                                                      | 0.00                     | 0.00                         | 0.00 | 0.03                                                      | 0.00                     | 0.00                         | 0.00 |
| 5                                                      | Debt securities, including UoP                                                                  | 1,618.86                                   | 328.65                                                    | 28.18                    | 0.00                             | 3.21                         | 1.49  | 0.80                                                      | 0.05                     | 0.00                         | 0.00 | 0.02                                                      | 0.00                     | 0.00                         | 0.00 |
| 6                                                      | Equity instruments                                                                              | 9.35                                       | 0.03                                                      | 0.00                     |                                  | 0.00                         | 0.00  | 0.00                                                      | 0.00                     |                              | 0.00 | 0.00                                                      | 0.00                     |                              | 0.00 |
| 7                                                      | Other financial corporations                                                                    | 269.14                                     | 4.89                                                      | 0.76                     | 0.00                             | 0.01                         | 0.42  | 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 |
| 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 |
| 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 |
| 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 |
| 12                                                     | of which management companies                                                                   | 265.87                                     | 4.89                                                      | 0.76                     | 0.00                             | 0.01                         | 0.42  | 0.00                                                      | 0.00                     | 0.00                         | 0.00 | 0.00                                                      | 0.00                     | 0.00                         | 0.00 |
| 13                                                     | Loans and advances                                                                              | 206.06                                     | 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 |
| 14                                                     | Debt securities, including UoP                                                                  | 58.91                                      | 4.89                                                      | 0.76                     | 0.00                             | 0.01                         | 0.42  | 0.00                                                      | 0.00                     | 0.00                         | 0.00 | 0.00                                                      | 0.00                     | 0.00                         | 0.00 |
| 15                                                     | Equity instruments                                                                              | 0.90                                       | 0.00                                                      | 0.00                     |                                  | 0.00                         | 0.00  | 0.00                                                      | 0.00                     |                              | 0.00 | 0.00                                                      | 0.00                     |                              | 0.00 |
| 16                                                     | of which insurance undertakings                                                                 | 3.27                                       | 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 |
| 17                                                     | Loans and advances                                                                              | 3.27                                       | 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 |
| 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 |
| 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 |
| 20                                                     | Non-financial corporations                                                                      | 448.78                                     | 156.22                                                    | 57.54                    | 0.00                             | 5.22                         | 49.36 | 0.86                                                      | 0.00                     | 0.00                         | 0.00 | 0.00                                                      | 0.00                     | 0.00                         | 0.00 |
| 21                                                     | Loans and advances                                                                              | 371.61                                     | 117.63                                                    | 34.72                    | 0.00                             | 5.16                         | 28.00 | 0.05                                                      | 0.00                     | 0.00                         | 0.00 | 0.00                                                      | 0.00                     | 0.00                         | 0.00 |
| 22                                                     | Debt securities, including UoP                                                                  | 77.16                                      | 38.59                                                     | 22.81                    | 0.00                             | 0.07                         | 21.37 | 0.81                                                      | 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 |
| 24                                                     | Households*                                                                                     | 1,748.28                                   | 1,732.54                                                  | 16.23                    | 16.23                            | 0.00                         | 0.00  | 0.00                                                      | 0.00                     | 0.00                         | 0.00 |                                                           |                          |                              |      |
| 25                                                     | of which loans collateralised by residential immovable property                                 | 1,555.32                                   | 1,550.91                                                  | 13.66                    | 13.66                            | 0.00                         | 0.00  | 0.00                                                      | 0.00                     | 0.00                         | 0.00 |                                                           |                          |                              |      |
| 26                                                     | of which building renovation loans                                                              | 122.82                                     | 122.21                                                    | 0.00                     | 0.00                             | 0.00                         | 0.00  | 0.00                                                      | 0.00                     | 0.00                         | 0.00 |                                                           |                          |                              |      |
| 27                                                     | of which motor vehicle loans                                                                    | 0.34                                       | 0.33                                                      | 0.00                     | 0.00                             | 0.00                         | 0.00  |                                                           |                          |                              |      |                                                           |                          |                              |      |

T1 CapEx (1/10)

\* Total loans to households collateralised by residential immovable property or granted for building renovation purposes or for the purchase of a motor vehicle. The remaining assets in respect of households are shown in row 47 "Other asset categories" (third Commission Notice (C/2024/6691), question 64).

|                                                                                |                                                                                           | a                                          | b                                                         | c                           | d                                     | e                                 | f     | g                                                         | h                           | i                                 | j    | k                                                         | l                           | m                                 | n    |
|--------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|--------------------------------------------|-----------------------------------------------------------|-----------------------------|---------------------------------------|-----------------------------------|-------|-----------------------------------------------------------|-----------------------------|-----------------------------------|------|-----------------------------------------------------------|-----------------------------|-----------------------------------|------|
| EUR million                                                                    |                                                                                           | Disclosure reference date 31 December 2024 |                                                           |                             |                                       |                                   |       |                                                           |                             |                                   |      |                                                           |                             |                                   |      |
|                                                                                |                                                                                           | Total [gross] carry-<br>ing amount         | Climate change mitigation (CCM)                           |                             |                                       |                                   |       | Climate change adaptation (CCA)                           |                             |                                   |      | Water and marine resources (WTR)                          |                             |                                   |      |
|                                                                                |                                                                                           |                                            | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                             |                                       |                                   |       | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                             |                                   |      | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                             |                                   |      |
|                                                                                |                                                                                           |                                            | Of which environmentally sustainable (taxonomy-aligned)   |                             |                                       |                                   |       | Of which environmentally sustainable (taxonomy-aligned)   |                             |                                   |      | Of which environmentally sustainable (taxonomy-aligned)   |                             |                                   |      |
|                                                                                |                                                                                           |                                            |                                                           | Of which use of<br>proceeds | Of which transi-<br>tional activities | Of which ena-<br>bling activities |       |                                                           | Of which use of<br>proceeds | Of which ena-<br>bling activities |      |                                                           | Of which use of<br>proceeds | Of which ena-<br>bling activities |      |
| 28                                                                             | Local government financing**                                                              | 243.84                                     | 125.22                                                    | 0.00                        | 0.00                                  | 0.00                              | 0.00  | 0.27                                                      | 0.00                        | 0.00                              | 0.00 | 0.34                                                      | 0.00                        | 0.00                              | 0.00 |
| 29                                                                             | Housing finance                                                                           | 3.54                                       | 3.54                                                      | 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                                                          | 240.30                                     | 121.68                                                    | 0.00                        | 0.00                                  | 0.00                              | 0.00  | 0.27                                                      | 0.00                        | 0.00                              | 0.00 | 0.34                                                      | 0.00                        | 0.00                              | 0.00 |
| 31                                                                             | Collateral obtained by taking possession: residential and 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                                                      | 0.00                        | 0.00                              | 0.00 |
| 32                                                                             | Assets excluded from the numerator for GAR calculation (covered in the denominator)       | 9,624.00                                   | 0.00                                                      | 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                                                                             | Financial and non-financial corporations                                                  | 7,986.43                                   |                                                           |                             |                                       |                                   |       |                                                           |                             |                                   |      |                                                           |                             |                                   |      |
| 34                                                                             | SMEs and NFCs (other than SMEs) not subject to the NFRD disclosure obligations            | 6,162.86                                   |                                                           |                             |                                       |                                   |       |                                                           |                             |                                   |      |                                                           |                             |                                   |      |
| 35                                                                             | Loans and advances                                                                        | 6,108.59                                   |                                                           |                             |                                       |                                   |       |                                                           |                             |                                   |      |                                                           |                             |                                   |      |
| 36                                                                             | of which loans collateralised by commercial immovable property                            | 0.00                                       |                                                           |                             |                                       |                                   |       |                                                           |                             |                                   |      |                                                           |                             |                                   |      |
| 37                                                                             | of which building renovation loans                                                        | 49.03                                      |                                                           |                             |                                       |                                   |       |                                                           |                             |                                   |      |                                                           |                             |                                   |      |
| 38                                                                             | Debt securities                                                                           | 49.83                                      |                                                           |                             |                                       |                                   |       |                                                           |                             |                                   |      |                                                           |                             |                                   |      |
| 39                                                                             | Equity instruments                                                                        | 4.44                                       |                                                           |                             |                                       |                                   |       |                                                           |                             |                                   |      |                                                           |                             |                                   |      |
| 40                                                                             | Non-EU country counterparties not subject to NFRD disclosure obligations                  | 1,823.58                                   |                                                           |                             |                                       |                                   |       |                                                           |                             |                                   |      |                                                           |                             |                                   |      |
| 41                                                                             | Loans and advances                                                                        | 1,452.61                                   |                                                           |                             |                                       |                                   |       |                                                           |                             |                                   |      |                                                           |                             |                                   |      |
| 42                                                                             | Debt securities                                                                           | 352.88                                     |                                                           |                             |                                       |                                   |       |                                                           |                             |                                   |      |                                                           |                             |                                   |      |
| 43                                                                             | Equity instruments                                                                        | 18.08                                      |                                                           |                             |                                       |                                   |       |                                                           |                             |                                   |      |                                                           |                             |                                   |      |
| 44                                                                             | Derivatives                                                                               | 449.62                                     |                                                           |                             |                                       |                                   |       |                                                           |                             |                                   |      |                                                           |                             |                                   |      |
| 45                                                                             | On-demand interbank loans                                                                 | 45.75                                      |                                                           |                             |                                       |                                   |       |                                                           |                             |                                   |      |                                                           |                             |                                   |      |
| 46                                                                             | Cash and cash-related assets                                                              | 22.38                                      |                                                           |                             |                                       |                                   |       |                                                           |                             |                                   |      |                                                           |                             |                                   |      |
| 47                                                                             | Other asset categories (e.g. goodwill, commodities etc.)                                  | 1,119.82                                   |                                                           |                             |                                       |                                   |       |                                                           |                             |                                   |      |                                                           |                             |                                   |      |
| 48                                                                             | Total GAR assets                                                                          | 14,147.05                                  | 2,368.81                                                  | 103.48                      | 16.23                                 | 8.46                              | 51.46 | 1.94                                                      | 0.05                        | 0.00                              | 0.00 | 0.39                                                      | 0.00                        | 0.00                              | 0.00 |
| 49                                                                             | Other assets not covered for GAR calculation                                              | 1,414.72                                   |                                                           |                             |                                       |                                   |       |                                                           |                             |                                   |      |                                                           |                             |                                   |      |
| 50                                                                             | Sovereigns                                                                                | 972.71                                     |                                                           |                             |                                       |                                   |       |                                                           |                             |                                   |      |                                                           |                             |                                   |      |
| 51                                                                             | Central bank exposures                                                                    | 428.03                                     |                                                           |                             |                                       |                                   |       |                                                           |                             |                                   |      |                                                           |                             |                                   |      |
| 52                                                                             | Trading book                                                                              | 13.98                                      |                                                           |                             |                                       |                                   |       |                                                           |                             |                                   |      |                                                           |                             |                                   |      |
| 53                                                                             | Total assets                                                                              | 15,561.77                                  | 2,368.81                                                  | 103.48                      | 16.23                                 | 8.46                              | 51.46 | 1.94                                                      | 0.05                        | 0.00                              | 0.00 | 0.39                                                      | 0.00                        | 0.00                              | 0.00 |
| Off-balance-sheet exposures – companies subject to NFRD disclosure obligations |                                                                                           |                                            |                                                           |                             |                                       |                                   |       |                                                           |                             |                                   |      |                                                           |                             |                                   |      |
| 54                                                                             | Financial guarantees                                                                      | 291.84                                     | 3.70                                                      | 0.52                        | 0.00                                  | 0.00                              | 0.23  | 0.93                                                      | 0.00                        | 0.00                              | 0.00 | 0.00                                                      | 0.00                        | 0.00                              | 0.00 |
| 55                                                                             | Assets under management                                                                   | 100.95                                     | 28.57                                                     | 12.80                       | 0.00                                  | 0.49                              | 5.80  | 1.63                                                      | 0.02                        | 0.00                              | 0.00 | 0.35                                                      | 0.00                        | 0.00                              | 0.00 |
| 56                                                                             | Of which debt securities                                                                  | 43.90                                      | 15.57                                                     | 6.67                        | 0.00                                  | 0.15                              | 2.46  | 0.41                                                      | 0.01                        | 0.00                              | 0.00 | 0.33                                                      | 0.00                        | 0.00                              | 0.00 |
| 57                                                                             | Of which equity instruments                                                               | 57.05                                      | 13.00                                                     | 6.12                        | 0.00                                  | 0.33                              | 3.34  | 1.22                                                      | 0.01                        | 0.00                              | 0.00 | 0.02                                                      | 0.00                        | 0.00                              | 0.00 |

T1 CapEx (2/10)

\*\* Total amount of financing of public housing and other activities and assets for which the use of proceeds in respect of local government is known. Assets for which the use of proceeds is unknown are shown in row 50 (third Commission Notice (C/2024/6691), question 64).

|             |                                                                                                 | o                                                         | p    | q                        | r                            | s                                                         | t    | u                        | v                            | w                                                         | x    | z                        | aa                           |
|-------------|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|
| EUR million |                                                                                                 | Disclosure reference date 31 December 2024                |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
|             |                                                                                                 | Circular economy (CE)                                     |      |                          |                              | Pollution prevention and control (PPC)                    |      |                          |                              | Biodiversity and ecosystems (BIO)                         |      |                          |                              |
|             |                                                                                                 | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              |
|             |                                                                                                 | Of which environmentally sustainable (taxonomy-aligned)   |      |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |      |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |      |                          |                              |
|             |                                                                                                 |                                                           |      | Of which use of proceeds | Of which enabling activities |                                                           |      | Of which use of proceeds | Of which enabling activities |                                                           |      | Of which use of proceeds | Of which enabling activities |
|             | GAR – Assets covered in both numerator and denominator                                          |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 1           | Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation | 7.26                                                      | 0.00 | 0.00                     | 0.00                         | 0.65                                                      | 0.00 | 0.00                     | 0.00                         | 0.05                                                      | 0.00 | 0.00                     | 0.00                         |
| 2           | Financial corporations                                                                          | 0.15                                                      | 0.00 | 0.00                     | 0.00                         | 0.15                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 3           | Credit institutions                                                                             | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 4           | 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                         |
| 5           | 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                         |
| 6           | Equity instruments                                                                              | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         |
| 7           | Other financial corporations                                                                    | 0.15                                                      | 0.00 | 0.00                     | 0.00                         | 0.15                                                      | 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                         |
| 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                         |
| 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                         |
| 11          | Equity instruments                                                                              | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         |
| 12          | of which management companies                                                                   | 0.15                                                      | 0.00 | 0.00                     | 0.00                         | 0.15                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 13          | Loans and advances                                                                              | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 14          | Debt securities, including UoP                                                                  | 0.15                                                      | 0.00 | 0.00                     | 0.00                         | 0.15                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 15          | Equity instruments                                                                              | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         |
| 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                         |
| 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                         |
| 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                         |
| 19          | Equity instruments                                                                              | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         |
| 20          | Non-financial corporations                                                                      | 6.72                                                      | 0.00 | 0.00                     | 0.00                         | 0.50                                                      | 0.00 | 0.00                     | 0.00                         | 0.05                                                      | 0.00 | 0.00                     | 0.00                         |
| 21          | Loans and advances                                                                              | 6.70                                                      | 0.00 | 0.00                     | 0.00                         | 0.45                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 22          | Debt securities, including UoP                                                                  | 0.02                                                      | 0.00 | 0.00                     | 0.00                         | 0.05                                                      | 0.00 | 0.00                     | 0.00                         | 0.05                                                      | 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                         |
| 24          | Households*                                                                                     | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 25          | of which loans collateralised by residential immovable property                                 | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 26          | of which building renovation loans                                                              | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 27          | of which motor vehicle loans                                                                    |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |

T1 CapEx (3/10)



|                                                                                       |                                                                                           | o                                                         | p    | q                        | r                            | s                                                         | t    | u                        | v                            | w                                                         | x    | z                        | aa                           |
|---------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|
| EUR million                                                                           |                                                                                           | Disclosure reference date 31 December 2024                |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
|                                                                                       |                                                                                           | Circular economy (CE)                                     |      |                          |                              | Pollution prevention and control (PPC)                    |      |                          |                              | Biodiversity and ecosystems (BIO)                         |      |                          |                              |
|                                                                                       |                                                                                           | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              |
|                                                                                       |                                                                                           | Of which environmentally sustainable (taxonomy-aligned)   |      |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |      |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |      |                          |                              |
|                                                                                       |                                                                                           |                                                           |      | Of which use of proceeds | Of which enabling activities |                                                           |      | Of which use of proceeds | Of which enabling activities |                                                           |      | Of which use of proceeds | Of which enabling activities |
| 28                                                                                    | Local government financing**                                                              | 0.39                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 29                                                                                    | Housing finance                                                                           | 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                                                          | 0.39                                                      | 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 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                     | 0.00                         |
| 32                                                                                    | Assets excluded from the numerator for GAR calculation (covered in the denominator)       | 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                                                                                    | Financial and non-financial corporations                                                  |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 34                                                                                    | SMEs and NFCs (other than SMEs) not subject to the NFRD disclosure obligations            |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 35                                                                                    | Loans and advances                                                                        |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 36                                                                                    | of which loans collateralised by commercial immovable property                            |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 37                                                                                    | of which building renovation loans                                                        |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 38                                                                                    | Debt securities                                                                           |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 39                                                                                    | Equity instruments                                                                        |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 40                                                                                    | Non-EU country counterparties not subject to NFRD disclosure obligations                  |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 41                                                                                    | Loans and advances                                                                        |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 42                                                                                    | Debt securities                                                                           |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 43                                                                                    | Equity instruments                                                                        |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 44                                                                                    | Derivatives                                                                               |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 45                                                                                    | On-demand interbank loans                                                                 |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 46                                                                                    | Cash and cash-related assets                                                              |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 47                                                                                    | Other asset categories (e.g. goodwill, commodities etc.)                                  |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 48                                                                                    | <b>Total GAR assets</b>                                                                   | 7.26                                                      | 0.00 | 0.00                     | 0.00                         | 0.65                                                      | 0.00 | 0.00                     | 0.00                         | 0.05                                                      | 0.00 | 0.00                     | 0.00                         |
| 49                                                                                    | Other assets not covered for GAR calculation                                              |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 50                                                                                    | Sovereigns                                                                                |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 51                                                                                    | Central bank exposures                                                                    |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 52                                                                                    | Trading book                                                                              |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 53                                                                                    | <b>Total assets</b>                                                                       | 7.26                                                      | 0.00 | 0.00                     | 0.00                         | 0.65                                                      | 0.00 | 0.00                     | 0.00                         | 0.05                                                      | 0.00 | 0.00                     | 0.00                         |
| <b>Off-balance-sheet exposures – companies subject to NFRD disclosure obligations</b> |                                                                                           |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |      |                          |                              |
| 54                                                                                    | Financial guarantees                                                                      | 0.96                                                      | 0.00 | 0.00                     | 0.00                         | 0.02                                                      | 0.00 | 0.00                     | 0.00                         | 0.93                                                      | 0.00 | 0.00                     | 0.00                         |
| 55                                                                                    | Assets under management                                                                   | 1.24                                                      | 0.00 | 0.00                     | 0.00                         | 1.25                                                      | 0.00 | 0.00                     | 0.00                         | 0.03                                                      | 0.00 | 0.00                     | 0.00                         |
| 56                                                                                    | Of which debt securities                                                                  | 0.42                                                      | 0.00 | 0.00                     | 0.00                         | 0.94                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         |
| 57                                                                                    | Of which equity instruments                                                               | 0.82                                                      | 0.00 | 0.00                     | 0.00                         | 0.31                                                      | 0.00 | 0.00                     | 0.00                         | 0.03                                                      | 0.00 | 0.00                     | 0.00                         |

T1 CapEx (4/10)

|                                                        |                                                                                                 | ab                                                        | ac                       | ad                               | ae                           | af    | ag                                         | ah                                                        | ai                       | aj                               | ak                           | al   |
|--------------------------------------------------------|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------|--------------------------|----------------------------------|------------------------------|-------|--------------------------------------------|-----------------------------------------------------------|--------------------------|----------------------------------|------------------------------|------|
| EUR million                                            |                                                                                                 | Disclosure reference date 31 December 2024                |                          |                                  |                              |       | Disclosure reference date 31 December 2023 |                                                           |                          |                                  |                              |      |
|                                                        |                                                                                                 | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                  |                          |                                  |                              |       | Total [gross] carrying amount              | Climate change mitigation (CCM)                           |                          |                                  |                              |      |
|                                                        |                                                                                                 | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                          |                                  |                              |       |                                            | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                          |                                  |                              |      |
|                                                        |                                                                                                 | Of which environmentally sustainable (taxonomy-aligned)   |                          |                                  |                              |       |                                            | Of which environmentally sustainable (taxonomy-aligned)   |                          |                                  |                              |      |
|                                                        |                                                                                                 |                                                           | Of which use of proceeds | Of which transitional activities | Of which enabling activities |       |                                            |                                                           | Of which use of proceeds | Of which transitional activities | Of which enabling activities |      |
| GAR – Assets covered in both numerator and denominator |                                                                                                 |                                                           |                          |                                  |                              |       |                                            |                                                           |                          |                                  |                              |      |
| 1                                                      | Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation | 2,379.10                                                  | 103.54                   | 16.23                            | 8.46                         | 51.46 | 4,696.25                                   | 2,476.14                                                  | 35.41                    | 1.30                             | 0.63                         | 8.38 |
| 2                                                      | Financial corporations                                                                          | 355.98                                                    | 29.77                    | 0.00                             | 3.24                         | 2.10  | 2,253.53                                   | 388.73                                                    | 5.23                     | 0.00                             | 0.00                         | 2.99 |
| 3                                                      | Credit institutions                                                                             | 350.79                                                    | 29.01                    | 0.00                             | 3.23                         | 1.67  | 1,916.72                                   | 376.94                                                    | 2.20                     | 0.00                             | 0.00                         | 0.00 |
| 4                                                      | Loans and advances                                                                              | 21.29                                                     | 0.77                     | 0.00                             | 0.01                         | 0.18  | 310.65                                     | 36.32                                                     | 0.00                     | 0.00                             | 0.00                         | 0.00 |
| 5                                                      | Debt securities, including UoP                                                                  | 329.47                                                    | 28.23                    | 0.00                             | 3.21                         | 1.49  | 1,586.00                                   | 340.62                                                    | 2.20                     | 0.00                             | 0.00                         | 0.00 |
| 6                                                      | Equity instruments                                                                              | 0.03                                                      | 0.00                     |                                  | 0.00                         | 0.00  | 20.08                                      | 0.00                                                      | 0.00                     |                                  | 0.00                         | 0.00 |
| 7                                                      | Other financial corporations                                                                    | 5.20                                                      | 0.76                     | 0.00                             | 0.01                         | 0.42  | 336.81                                     | 11.79                                                     | 3.03                     | 0.00                             | 0.00                         | 2.99 |
| 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 |
| 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 |
| 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 |
| 11                                                     | Equity instruments                                                                              | 0.00                                                      | 0.00                     |                                  | 0.00                         | 0.00  | 0.00                                       | 0.00                                                      | 0.00                     |                                  | 0.00                         | 0.00 |
| 12                                                     | of which management companies                                                                   | 5.20                                                      | 0.76                     | 0.00                             | 0.01                         | 0.42  | 333.37                                     | 11.79                                                     | 3.03                     | 0.00                             | 0.00                         | 2.99 |
| 13                                                     | Loans and advances                                                                              | 0.01                                                      | 0.00                     | 0.00                             | 0.00                         | 0.00  | 261.47                                     | 0.01                                                      | 0.00                     | 0.00                             | 0.00                         | 0.00 |
| 14                                                     | Debt securities, including UoP                                                                  | 5.19                                                      | 0.76                     | 0.00                             | 0.01                         | 0.42  | 69.76                                      | 11.79                                                     | 3.03                     | 0.00                             | 0.00                         | 2.99 |
| 15                                                     | Equity instruments                                                                              | 0.00                                                      | 0.00                     |                                  | 0.00                         | 0.00  | 2.14                                       | 0.00                                                      | 0.00                     |                                  | 0.00                         | 0.00 |
| 16                                                     | of which insurance undertakings                                                                 | 0.00                                                      | 0.00                     | 0.00                             | 0.00                         | 0.00  | 3.44                                       | 0.00                                                      | 0.00                     | 0.00                             | 0.00                         | 0.00 |
| 17                                                     | Loans and advances                                                                              | 0.00                                                      | 0.00                     | 0.00                             | 0.00                         | 0.00  | 3.44                                       | 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 |
| 19                                                     | Equity instruments                                                                              | 0.00                                                      | 0.00                     |                                  | 0.00                         | 0.00  | 0.00                                       | 0.00                                                      | 0.00                     |                                  | 0.00                         | 0.00 |
| 20                                                     | Non-financial corporations                                                                      | 164.35                                                    | 57.54                    | 0.00                             | 5.22                         | 49.36 | 323.85                                     | 124.38                                                    | 28.88                    | 0.00                             | 0.63                         | 5.37 |
| 21                                                     | Loans and advances                                                                              | 124.82                                                    | 34.72                    | 0.00                             | 5.16                         | 28.00 | 255.04                                     | 80.66                                                     | 5.03                     | 0.00                             | 0.00                         | 4.46 |
| 22                                                     | Debt securities, including UoP                                                                  | 39.53                                                     | 22.81                    | 0.00                             | 0.07                         | 21.37 | 68.82                                      | 43.72                                                     | 23.84                    | 0.00                             | 0.63                         | 0.91 |
| 23                                                     | Equity instruments                                                                              | 0.00                                                      | 0.00                     |                                  | 0.00                         | 0.00  | 0.00                                       | 0.00                                                      | 0.00                     |                                  | 0.00                         | 0.00 |
| 24                                                     | Households*                                                                                     | 1,732.54                                                  | 16.23                    | 16.23                            | 0.00                         | 0.00  | 1,847.35                                   | 1,832.70                                                  | 1.30                     | 1.30                             | 0.00                         | 0.02 |
| 25                                                     | of which loans collateralised by residential immovable property                                 | 1,550.91                                                  | 13.66                    | 13.66                            | 0.00                         | 0.00  | 1,627.22                                   | 1,625.39                                                  | 1.16                     | 1.16                             | 0.00                         | 0.02 |
| 26                                                     | of which building renovation loans                                                              | 122.21                                                    | 0.00                     | 0.00                             | 0.00                         | 0.00  | 133.41                                     | 132.77                                                    | 0.02                     | 0.02                             | 0.00                         | 0.02 |
| 27                                                     | of which motor vehicle loans                                                                    | 0.33                                                      | 0.00                     | 0.00                             | 0.00                         | 0.00  | 0.12                                       | 0.12                                                      | 0.00                     | 0.00                             | 0.00                         | 0.00 |

T1 CapEx (5/10)

|                                                                                |                                                                                           | ab                                                        | ac     | ad    | ae                       | af                               | ag                                         | ah                                                        | ai                                                      | aj   | ak   | al   |
|--------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|-----------------------------------------------------------|--------|-------|--------------------------|----------------------------------|--------------------------------------------|-----------------------------------------------------------|---------------------------------------------------------|------|------|------|
| EUR million                                                                    |                                                                                           | Disclosure reference date 31 December 2024                |        |       |                          |                                  | Disclosure reference date 31 December 2023 |                                                           |                                                         |      |      |      |
|                                                                                |                                                                                           | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                  |        |       |                          |                                  | Total [gross] carrying amount              | Climate change mitigation (CCM)                           |                                                         |      |      |      |
|                                                                                |                                                                                           | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |       |                          |                                  |                                            | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                                                         |      |      |      |
|                                                                                |                                                                                           | Of which environmentally sustainable (taxonomy-aligned)   |        |       | Of which use of proceeds | Of which transitional activities |                                            | Of which enabling activities                              | Of which environmentally sustainable (taxonomy-aligned) |      |      |      |
|                                                                                |                                                                                           |                                                           |        |       |                          |                                  |                                            |                                                           |                                                         |      |      |      |
| 28                                                                             | Local government financing**                                                              | 126.23                                                    | 0.00   | 0.00  | 0.00                     | 0.00                             | 271.51                                     | 130.33                                                    | 0.00                                                    | 0.00 | 0.00 | 0.00 |
| 29                                                                             | Housing finance                                                                           | 3.54                                                      | 0.00   | 0.00  | 0.00                     | 0.00                             | 8.11                                       | 0.36                                                      | 0.00                                                    | 0.00 | 0.00 | 0.00 |
| 30                                                                             | Other local government financing                                                          | 122.69                                                    | 0.00   | 0.00  | 0.00                     | 0.00                             | 263.40                                     | 129.97                                                    | 0.00                                                    | 0.00 | 0.00 | 0.00 |
| 31                                                                             | Collateral obtained by taking possession: residential and 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                                                                             | Assets excluded from the numerator for GAR calculation (covered in the denominator)       | 0.00                                                      | 0.00   | 0.00  | 0.00                     | 0.00                             | 9,382.83                                   | 0.00                                                      | 0.00                                                    | 0.00 | 0.00 | 0.00 |
| 33                                                                             | Financial and non-financial corporations                                                  |                                                           |        |       |                          |                                  |                                            |                                                           |                                                         |      |      |      |
| 34                                                                             | SMEs and NFCs (other than SMEs) not subject to the NFRD disclosure obligations            |                                                           |        |       |                          |                                  |                                            |                                                           |                                                         |      |      |      |
| 35                                                                             | Loans and advances                                                                        |                                                           |        |       |                          |                                  |                                            |                                                           |                                                         |      |      |      |
| 36                                                                             | of which loans collateralised by commercial immovable property                            |                                                           |        |       |                          |                                  |                                            |                                                           |                                                         |      |      |      |
| 37                                                                             | of which building renovation loans                                                        |                                                           |        |       |                          |                                  |                                            |                                                           |                                                         |      |      |      |
| 38                                                                             | Debt securities                                                                           |                                                           |        |       |                          |                                  |                                            |                                                           |                                                         |      |      |      |
| 39                                                                             | Equity instruments                                                                        |                                                           |        |       |                          |                                  |                                            |                                                           |                                                         |      |      |      |
| 40                                                                             | Non-EU country counterparties not subject to NFRD disclosure obligations                  |                                                           |        |       |                          |                                  |                                            |                                                           |                                                         |      |      |      |
| 41                                                                             | Loans and advances                                                                        |                                                           |        |       |                          |                                  |                                            |                                                           |                                                         |      |      |      |
| 42                                                                             | Debt securities                                                                           |                                                           |        |       |                          |                                  |                                            |                                                           |                                                         |      |      |      |
| 43                                                                             | Equity instruments                                                                        |                                                           |        |       |                          |                                  |                                            |                                                           |                                                         |      |      |      |
| 44                                                                             | Derivatives                                                                               |                                                           |        |       |                          |                                  |                                            |                                                           |                                                         |      |      |      |
| 45                                                                             | On-demand interbank loans                                                                 |                                                           |        |       |                          |                                  |                                            |                                                           |                                                         |      |      |      |
| 46                                                                             | Cash and cash-related assets                                                              |                                                           |        |       |                          |                                  |                                            |                                                           |                                                         |      |      |      |
| 47                                                                             | Other asset categories (e.g. goodwill, commodities etc.)                                  |                                                           |        |       |                          |                                  |                                            |                                                           |                                                         |      |      |      |
| 48                                                                             | Total GAR assets                                                                          | 2,379.05                                                  | 103.54 | 16.23 | 8.46                     | 51.46                            | 14,079.08                                  | 2,476.14                                                  | 35.41                                                   | 1.30 | 0.63 | 8.38 |
| 49                                                                             | Other assets not covered for GAR calculation                                              |                                                           |        |       |                          |                                  |                                            |                                                           |                                                         |      |      |      |
| 50                                                                             | Sovereigns                                                                                |                                                           |        |       |                          |                                  |                                            |                                                           |                                                         |      |      |      |
| 51                                                                             | Central bank exposures                                                                    |                                                           |        |       |                          |                                  |                                            |                                                           |                                                         |      |      |      |
| 52                                                                             | Trading book                                                                              |                                                           |        |       |                          |                                  |                                            |                                                           |                                                         |      |      |      |
| 53                                                                             | Total assets                                                                              | 2,379.10                                                  | 103.54 | 16.23 | 8.46                     | 51.46                            | 15,736.61                                  | 2,476.14                                                  | 35.41                                                   | 1.30 | 0.63 | 8.38 |
| Off-balance-sheet exposures – companies subject to NFRD disclosure obligations |                                                                                           |                                                           |        |       |                          |                                  |                                            |                                                           |                                                         |      |      |      |
| 54                                                                             | Financial guarantees                                                                      | 6.55                                                      | 0.52   | 0.00  | 0.00                     | 0.23                             | 366.54                                     | 5.06                                                      | 0.69                                                    | 0.00 | 0.00 | 0.29 |
| 55                                                                             | Assets under management                                                                   | 33.07                                                     | 12.82  | 0.00  | 0.49                     | 5.80                             | 175.94                                     | 25.35                                                     | 6.93                                                    | 0.00 | 0.64 | 2.29 |
| 56                                                                             | Of which debt securities                                                                  | 17.68                                                     | 6.68   | 0.00  | 0.15                     | 2.46                             | 79.22                                      | 6.60                                                      | 2.08                                                    | 0.00 | 0.11 | 0.32 |
| 57                                                                             | Of which equity instruments                                                               | 15.39                                                     | 6.13   | 0.00  | 0.33                     | 3.34                             | 96.72                                      | 18.76                                                     | 4.84                                                    | 0.00 | 0.53 | 1.97 |

T1 CapEx (6/10)

|                                                           |                                                                                                 | am                                                        | an   | ao                                                        | ap   | aq                                                        | ar   | as                                                        | at   | au                                                        | av   | aw                                                        | ax   |
|-----------------------------------------------------------|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------|------|-----------------------------------------------------------|------|-----------------------------------------------------------|------|-----------------------------------------------------------|------|-----------------------------------------------------------|------|-----------------------------------------------------------|------|
| EUR million                                               |                                                                                                 | Disclosure reference date 31 December 2023                |      |                                                           |      |                                                           |      |                                                           |      |                                                           |      |                                                           |      |
|                                                           |                                                                                                 | Climate change adaptation (CCA)                           |      |                                                           |      | Water and marine resources (WTR)                          |      |                                                           |      | Circular economy (CE)                                     |      |                                                           |      |
|                                                           |                                                                                                 | Of which environmentally sustainable (taxonomy-aligned)   |      | Of which use of proceeds                                  |      | Of which environmentally sustainable (taxonomy-aligned)   |      | Of which use of proceeds                                  |      | Of which environmentally sustainable (taxonomy-aligned)   |      | Of which use of proceeds                                  |      |
|                                                           |                                                                                                 |                                                           |      |                                                           |      |                                                           |      |                                                           |      |                                                           |      |                                                           |      |
| Of which in taxonomy-relevant sectors (taxonomy-eligible) |                                                                                                 | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |
| Of which environmentally sustainable (taxonomy-aligned)   |                                                                                                 | Of which environmentally sustainable (taxonomy-aligned)   |      | Of which environmentally sustainable (taxonomy-aligned)   |      | Of which environmentally sustainable (taxonomy-aligned)   |      | Of which environmentally sustainable (taxonomy-aligned)   |      | Of which environmentally sustainable (taxonomy-aligned)   |      | Of which environmentally sustainable (taxonomy-aligned)   |      |
| Of which use of proceeds                                  |                                                                                                 | Of which use of proceeds                                  |      | Of which use of proceeds                                  |      | Of which use of proceeds                                  |      | Of which use of proceeds                                  |      | Of which use of proceeds                                  |      | Of which use of proceeds                                  |      |
| Of which enabling activities                              |                                                                                                 | Of which enabling activities                              |      | Of which enabling activities                              |      | Of which enabling activities                              |      | Of which enabling activities                              |      | Of which enabling activities                              |      | Of which enabling activities                              |      |
| GAR – Assets covered in both numerator and denominator    |                                                                                                 |                                                           |      |                                                           |      |                                                           |      |                                                           |      |                                                           |      |                                                           |      |
| 1                                                         | Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation | 0.29                                                      | 0.00 | 0.00                                                      | 0.00 | 0.34                                                      | 0.00 | 0.00                                                      | 0.00 | 0.39                                                      | 0.00 | 0.00                                                      | 0.00 |
| 2                                                         | Financial corporations                                                                          | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 |
| 3                                                         | Credit institutions                                                                             | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 |
| 4                                                         | 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 |
| 5                                                         | 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 |
| 6                                                         | Equity instruments                                                                              | 0.00                                                      | 0.00 |                                                           | 0.00 | 0.00                                                      | 0.00 |                                                           | 0.00 | 0.00                                                      | 0.00 |                                                           | 0.00 |
| 7                                                         | Other financial corporations                                                                    | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 |
| 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 |
| 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 |
| 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 |
| 11                                                        | Equity instruments                                                                              | 0.00                                                      | 0.00 |                                                           | 0.00 | 0.00                                                      | 0.00 |                                                           | 0.00 | 0.00                                                      | 0.00 |                                                           | 0.00 |
| 12                                                        | of which management companies                                                                   | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 |
| 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 |
| 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 |
| 15                                                        | Equity instruments                                                                              | 0.00                                                      | 0.00 |                                                           | 0.00 | 0.00                                                      | 0.00 |                                                           | 0.00 | 0.00                                                      | 0.00 |                                                           | 0.00 |
| 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 |
| 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 |
| 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 |
| 19                                                        | Equity instruments                                                                              | 0.00                                                      | 0.00 |                                                           | 0.00 | 0.00                                                      | 0.00 |                                                           | 0.00 | 0.00                                                      | 0.00 |                                                           | 0.00 |
| 20                                                        | Non-financial corporations                                                                      | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 |
| 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 |
| 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 |
| 23                                                        | Equity instruments                                                                              | 0.00                                                      | 0.00 |                                                           | 0.00 | 0.00                                                      | 0.00 |                                                           | 0.00 | 0.00                                                      | 0.00 |                                                           | 0.00 |
| 24                                                        | Households*                                                                                     | 0.02                                                      | 0.00 | 0.00                                                      | 0.00 |                                                           |      |                                                           |      | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 |
| 25                                                        | of which loans collateralised by residential immovable property                                 | 0.02                                                      | 0.00 | 0.00                                                      | 0.00 |                                                           |      |                                                           |      | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 |
| 26                                                        | of which building renovation loans                                                              | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 |                                                           |      |                                                           |      | 0.00                                                      | 0.00 | 0.00                                                      | 0.00 |
| 27                                                        | of which motor vehicle loans                                                                    |                                                           |      |                                                           |      |                                                           |      |                                                           |      |                                                           |      |                                                           |      |

T1 CapEx (7/10)

|                                                                                       |                                                                                           | am          | an                       | ao                           | ap                                                        | aq          | ar                       | as                           | at                                                        | au          | av                       | aw                           | ax          |
|---------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|-------------|--------------------------|------------------------------|-----------------------------------------------------------|-------------|--------------------------|------------------------------|-----------------------------------------------------------|-------------|--------------------------|------------------------------|-------------|
| EUR million                                                                           | Disclosure reference date 31 December 2023                                                |             |                          |                              |                                                           |             |                          |                              |                                                           |             |                          |                              |             |
|                                                                                       | Climate change adaptation (CCA)                                                           |             |                          |                              | Water and marine resources (WTR)                          |             |                          |                              | Circular economy (CE)                                     |             |                          |                              |             |
|                                                                                       | Of which in taxonomy-relevant sectors (taxonomy-eligible)                                 |             |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |             |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |             |                          |                              |             |
|                                                                                       | Of which environmentally sustainable (taxonomy-aligned)                                   |             |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |             |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |             |                          |                              |             |
|                                                                                       |                                                                                           |             | Of which use of proceeds | Of which enabling activities |                                                           |             | Of which use of proceeds | Of which enabling activities |                                                           |             | Of which use of proceeds | Of which enabling activities |             |
| 28                                                                                    | Local government financing**                                                              | 0.27        | 0.00                     | 0.00                         | 0.00                                                      | 0.34        | 0.00                     | 0.00                         | 0.00                                                      | 0.39        | 0.00                     | 0.00                         | 0.00        |
| 29                                                                                    | Housing finance                                                                           | 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                                                          | 0.27        | 0.00                     | 0.00                         | 0.00                                                      | 0.34        | 0.00                     | 0.00                         | 0.00                                                      | 0.39        | 0.00                     | 0.00                         | 0.00        |
| 31                                                                                    | Collateral obtained by taking possession: residential and 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                         | 0.00        |
| 32                                                                                    | Assets excluded from the numerator for GAR calculation (covered in the denominator)       | 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                                                                                    | Financial and non-financial corporations                                                  |             |                          |                              |                                                           |             |                          |                              |                                                           |             |                          |                              |             |
| 34                                                                                    | SMEs and NFCs (other than SMEs) not subject to the NFRD disclosure obligations            |             |                          |                              |                                                           |             |                          |                              |                                                           |             |                          |                              |             |
| 35                                                                                    | Loans and advances                                                                        |             |                          |                              |                                                           |             |                          |                              |                                                           |             |                          |                              |             |
| 36                                                                                    | of which loans collateralised by commercial immovable property                            |             |                          |                              |                                                           |             |                          |                              |                                                           |             |                          |                              |             |
| 37                                                                                    | of which building renovation loans                                                        |             |                          |                              |                                                           |             |                          |                              |                                                           |             |                          |                              |             |
| 38                                                                                    | Debt securities                                                                           |             |                          |                              |                                                           |             |                          |                              |                                                           |             |                          |                              |             |
| 39                                                                                    | Equity instruments                                                                        |             |                          |                              |                                                           |             |                          |                              |                                                           |             |                          |                              |             |
| 40                                                                                    | Non-EU country counterparties not subject to NFRD disclosure obligations                  |             |                          |                              |                                                           |             |                          |                              |                                                           |             |                          |                              |             |
| 41                                                                                    | Loans and advances                                                                        |             |                          |                              |                                                           |             |                          |                              |                                                           |             |                          |                              |             |
| 42                                                                                    | Debt securities                                                                           |             |                          |                              |                                                           |             |                          |                              |                                                           |             |                          |                              |             |
| 43                                                                                    | Equity instruments                                                                        |             |                          |                              |                                                           |             |                          |                              |                                                           |             |                          |                              |             |
| 44                                                                                    | Derivatives                                                                               |             |                          |                              |                                                           |             |                          |                              |                                                           |             |                          |                              |             |
| 45                                                                                    | On-demand interbank loans                                                                 |             |                          |                              |                                                           |             |                          |                              |                                                           |             |                          |                              |             |
| 46                                                                                    | Cash and cash-related assets                                                              |             |                          |                              |                                                           |             |                          |                              |                                                           |             |                          |                              |             |
| 47                                                                                    | Other asset categories (e.g. goodwill, commodities etc.)                                  |             |                          |                              |                                                           |             |                          |                              |                                                           |             |                          |                              |             |
| 48                                                                                    | <b>Total GAR assets</b>                                                                   | <b>0.29</b> | <b>0.00</b>              | <b>0.00</b>                  | <b>0.00</b>                                               | <b>0.34</b> | <b>0.00</b>              | <b>0.00</b>                  | <b>0.00</b>                                               | <b>0.39</b> | <b>0.00</b>              | <b>0.00</b>                  | <b>0.00</b> |
| 49                                                                                    | Other assets not covered for GAR calculation                                              |             |                          |                              |                                                           |             |                          |                              |                                                           |             |                          |                              |             |
| 50                                                                                    | Sovereigns                                                                                |             |                          |                              |                                                           |             |                          |                              |                                                           |             |                          |                              |             |
| 51                                                                                    | Central bank exposures                                                                    |             |                          |                              |                                                           |             |                          |                              |                                                           |             |                          |                              |             |
| 52                                                                                    | Trading book                                                                              |             |                          |                              |                                                           |             |                          |                              |                                                           |             |                          |                              |             |
| 53                                                                                    | <b>Total assets</b>                                                                       | <b>0.00</b> | <b>0.00</b>              | <b>0.00</b>                  | <b>0.00</b>                                               | <b>0.00</b> | <b>0.00</b>              | <b>0.00</b>                  | <b>0.00</b>                                               | <b>0.00</b> | <b>0.00</b>              | <b>0.00</b>                  | <b>0.00</b> |
| <b>Off-balance-sheet exposures – companies subject to NFRD disclosure obligations</b> |                                                                                           |             |                          |                              |                                                           |             |                          |                              |                                                           |             |                          |                              |             |
| 54                                                                                    | Financial guarantees                                                                      | 0.95        | 0.00                     | 0.00                         | 0.00                                                      | 0.00        | 0.00                     | 0.00                         | 0.00                                                      | 0.00        | 0.00                     | 0.00                         | 0.00        |
| 55                                                                                    | Assets under management                                                                   | 25.11       | 0.03                     | 0.00                         | 0.01                                                      | 0.00        | 0.00                     | 0.00                         | 0.00                                                      | 0.00        | 0.00                     | 0.00                         | 0.00        |
| 56                                                                                    | Of which debt securities                                                                  | 6.63        | 0.01                     | 0.00                         | 0.00                                                      | 0.00        | 0.00                     | 0.00                         | 0.00                                                      | 0.00        | 0.00                     | 0.00                         | 0.00        |
| 57                                                                                    | Of which equity instruments                                                               | 18.48       | 0.01                     | 0.00                         | 0.01                                                      | 0.00        | 0.00                     | 0.00                         | 0.00                                                      | 0.00        | 0.00                     | 0.00                         | 0.00        |

T1 CapEx (8/10)

|             |                                                                                                 | ay                                                        | az   | ba                       | bb                           | bc                                                        | bd   | be                       | bf                           | bg                                                        | bh    | bi                       | bj                               | bk                           |
|-------------|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|-----------------------------------------------------------|-------|--------------------------|----------------------------------|------------------------------|
| EUR million |                                                                                                 | Disclosure reference date 31 December 2023                |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
|             |                                                                                                 | Pollution prevention and control (PPC)                    |      |                          |                              | Biodiversity and ecosystems (BIO)                         |      |                          |                              | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                  |       |                          |                                  |                              |
|             |                                                                                                 | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |       |                          |                                  |                              |
|             |                                                                                                 | Of which environmentally sustainable (taxonomy-aligned)   |      |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |      |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |       |                          |                                  |                              |
|             |                                                                                                 |                                                           |      | Of which use of proceeds | Of which enabling activities |                                                           |      | Of which use of proceeds | Of which enabling activities |                                                           |       | Of which use of proceeds | Of which transitional activities | Of which enabling activities |
|             | GAR – Assets covered in both numerator and denominator                                          |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 1           | Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 2477.16                                                   | 35.41 | 1.30                     | 0.63                             | 8.38                         |
| 2           | Financial corporations                                                                          | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 388.73                                                    | 5.23  | 0.00                     | 0.00                             | 2.99                         |
| 3           | Credit institutions                                                                             | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 376.94                                                    | 2.20  | 0.00                     | 0.00                             | 0.00                         |
| 4           | Loans and advances                                                                              | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 36.32                                                     | 0.00  | 0.00                     | 0.00                             | 0.00                         |
| 5           | Debt securities, including UoP                                                                  | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 340.62                                                    | 2.20  | 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                         |
| 7           | Other financial corporations                                                                    | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 11.79                                                     | 3.03  | 0.00                     | 0.00                             | 2.99                         |
| 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                         |
| 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                         |
| 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                         |
| 11          | Equity instruments                                                                              | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00  |                          | 0.00                             | 0.00                         |
| 12          | of which management companies                                                                   | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 11.79                                                     | 3.03  | 0.00                     | 0.00                             | 2.99                         |
| 13          | Loans and advances                                                                              | 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                         |
| 14          | Debt securities, including UoP                                                                  | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 11.79                                                     | 3.03  | 0.00                     | 0.00                             | 2.99                         |
| 15          | Equity instruments                                                                              | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00  |                          | 0.00                             | 0.00                         |
| 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                         |
| 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                         |
| 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                         |
| 19          | Equity instruments                                                                              | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00  |                          | 0.00                             | 0.00                         |
| 20          | Non-financial corporations                                                                      | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 124.38                                                    | 28.88 | 0.00                     | 0.63                             | 5.37                         |
| 21          | Loans and advances                                                                              | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 80.66                                                     | 5.03  | 0.00                     | 0.00                             | 4.46                         |
| 22          | Debt securities, including UoP                                                                  | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 43.72                                                     | 23.84 | 0.00                     | 0.63                             | 0.91                         |
| 23          | Equity instruments                                                                              | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00 |                          | 0.00                         | 0.00                                                      | 0.00  |                          | 0.00                             | 0.00                         |
| 24          | Households*                                                                                     |                                                           |      |                          |                              |                                                           |      |                          |                              | 1832.72                                                   | 1.30  | 1.30                     | 0.00                             | 0.02                         |
| 25          | of which loans collateralised by residential immovable property                                 |                                                           |      |                          |                              |                                                           |      |                          |                              | 1625.41                                                   | 1.16  | 1.16                     | 0.00                             | 0.02                         |
| 26          | of which building renovation loans                                                              |                                                           |      |                          |                              |                                                           |      |                          |                              | 132.77                                                    | 0.02  | 0.02                     | 0.00                             | 0.02                         |
| 27          | of which motor vehicle loans                                                                    |                                                           |      |                          |                              |                                                           |      |                          |                              | 0.12                                                      | 0.00  | 0.00                     | 0.00                             | 0.00                         |

T1 CapEx (9/10)

|                                                                                       |                                                                                           | ay                                                        | az   | ba                       | bb                           | bc                                                        | bd   | be                       | bf                           | bg                                                        | bh    | bi                       | bj                               | bk                           |
|---------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|-----------------------------------------------------------|------|--------------------------|------------------------------|-----------------------------------------------------------|-------|--------------------------|----------------------------------|------------------------------|
| EUR million                                                                           |                                                                                           | Disclosure reference date 31 December 2023                |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
|                                                                                       |                                                                                           | Pollution prevention and control (PPC)                    |      |                          |                              | Biodiversity and ecosystems (BIO)                         |      |                          |                              | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                  |       |                          |                                  |                              |
|                                                                                       |                                                                                           | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |      |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |       |                          |                                  |                              |
|                                                                                       |                                                                                           | Of which environmentally sustainable (taxonomy-aligned)   |      |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |      |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |       |                          |                                  |                              |
|                                                                                       |                                                                                           |                                                           |      | Of which use of proceeds | Of which enabling activities |                                                           |      | Of which use of proceeds | Of which enabling activities |                                                           |       | Of which use of proceeds | Of which transitional activities | Of which enabling activities |
| 28                                                                                    | Local government financing**                                                              | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 131.34                                                    | 0.00  | 0.00                     | 0.00                             | 0.00                         |
| 29                                                                                    | Housing finance                                                                           | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.36                                                      | 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                         | 130.97                                                    | 0.00  | 0.00                     | 0.00                             | 0.00                         |
| 31                                                                                    | Collateral obtained by taking possession: residential and 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                     | 0.00                             | 0.00                         |
| 32                                                                                    | Assets excluded from the numerator for GAR calculation (covered in the denominator)       | 0.00                                                      | 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                                                                                    | Financial and non-financial corporations                                                  |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 34                                                                                    | SMEs and NFCs (other than SMEs) not subject to the NFRD disclosure obligations            |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 35                                                                                    | Loans and advances                                                                        |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 36                                                                                    | of which loans collateralised by commercial immovable property                            |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 37                                                                                    | of which building renovation loans                                                        |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 38                                                                                    | Debt securities                                                                           |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 39                                                                                    | Equity instruments                                                                        |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 40                                                                                    | Non-EU country counterparties not subject to NFRD disclosure obligations                  |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 41                                                                                    | Loans and advances                                                                        |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 42                                                                                    | Debt securities                                                                           |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 43                                                                                    | Equity instruments                                                                        |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 44                                                                                    | Derivatives                                                                               |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 45                                                                                    | On-demand interbank loans                                                                 |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 46                                                                                    | Cash and cash-related assets                                                              |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 47                                                                                    | Other asset categories (e.g. goodwill, commodities etc.)                                  |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 48                                                                                    | <b>Total GAR assets</b>                                                                   | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 2477.16                                                   | 35.41 | 1.30                     | 0.63                             | 8.38                         |
| 49                                                                                    | Other assets not covered for GAR calculation                                              |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 50                                                                                    | Sovereigns                                                                                |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 51                                                                                    | Central bank exposures                                                                    |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 52                                                                                    | Trading book                                                                              |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 53                                                                                    | <b>Total assets</b>                                                                       | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 2477.16                                                   | 35.41 | 1.30                     | 0.63                             | 8.38                         |
| <b>Off-balance-sheet exposures – companies subject to NFRD disclosure obligations</b> |                                                                                           |                                                           |      |                          |                              |                                                           |      |                          |                              |                                                           |       |                          |                                  |                              |
| 54                                                                                    | Financial guarantees                                                                      | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 6.01                                                      | 0.69  | 0.00                     | 0.00                             | 0.29                         |
| 55                                                                                    | Assets under management                                                                   | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 50.46                                                     | 6.95  | 0.00                     | 0.64                             | 2.30                         |
| 56                                                                                    | Of which debt securities                                                                  | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 13.22                                                     | 2.10  | 0.00                     | 0.11                             | 0.33                         |
| 57                                                                                    | Of which equity instruments                                                               | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 0.00                                                      | 0.00 | 0.00                     | 0.00                         | 37.24                                                     | 4.85  | 0.00                     | 0.53                             | 1.98                         |

T1 CapEx (10/10)



## 2. GAR sector information (revenue-based)

| Disaggregation by sector – NACE 4-digits level (code and label) |                                                                                         | a                                          | b                                          | c                                       | d                                          | e                                          | f                                          | g                                       | h                                          | i                                          | j                                          | k                                       | l                                          | m                                          | n                                         |
|-----------------------------------------------------------------|-----------------------------------------------------------------------------------------|--------------------------------------------|--------------------------------------------|-----------------------------------------|--------------------------------------------|--------------------------------------------|--------------------------------------------|-----------------------------------------|--------------------------------------------|--------------------------------------------|--------------------------------------------|-----------------------------------------|--------------------------------------------|--------------------------------------------|-------------------------------------------|
|                                                                 |                                                                                         | Climate change mitigation (CCM)            |                                            | Climate change adaptation (CCA)         |                                            | Water and marine resources (WTR)           |                                            | Circular economy (CE)                   |                                            |                                            |                                            |                                         |                                            |                                            |                                           |
|                                                                 |                                                                                         | Non-financial corporates (subject to NFRD) |                                            | SMEs and other NFCs not subject to NFRD |                                            | Non-financial corporates (subject to NFRD) |                                            | SMEs and other NFCs not subject to NFRD |                                            | Non-financial corporates (subject to NFRD) |                                            | SMEs and other NFCs not subject to NFRD |                                            | Non-financial corporates (subject to NFRD) |                                           |
|                                                                 |                                                                                         | [Gross] carrying amount*                   |                                            | [Gross] carrying amount                 |                                            | [Gross] carrying amount*                   |                                            | [Gross] carrying amount                 |                                            | [Gross] carrying amount*                   |                                            | [Gross] carrying amount                 |                                            | [Gross] carrying amount*                   |                                           |
|                                                                 |                                                                                         | EUR million                                | Of which environmentally sustainable (CCM) | EUR million                             | Of which environmentally sustainable (CCM) | EUR million                                | Of which environmentally sustainable (CCA) | EUR million                             | Of which environmentally sustainable (CCA) | EUR million                                | Of which environmentally sustainable (WTR) | EUR million                             | Of which environmentally sustainable (WTR) | EUR million                                | Of which environmentally sustainable (CE) |
| 1                                                               | 1072 Manufacture of rusks and biscuits; manufacture of preserved pastry goods and cakes | 10.00                                      | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 2                                                               | 2016 Manufacture of plastics in primary forms                                           | 4.51                                       | 0.18                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 3                                                               | 2120 Manufacture of pharmaceutical preparations                                         | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 4                                                               | 2410 Manufacture of basic iron and steel and of ferro-alloys                            | 7.18                                       | 2.69                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 5                                                               | 2572 Manufacture of locks and hinges                                                    | 0.94                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 6                                                               | 2612 Manufacture of loaded electronic boards                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 15.11                                      | 0.00                                      |
| 7                                                               | 2910 Manufacture of motor vehicles                                                      | 19.68                                      | 0.63                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 8                                                               | 3091 Manufacture of motorcycles                                                         | 3.21                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 9                                                               | 3512 Transmission of electricity                                                        | 0.91                                       | 0.00                                       |                                         |                                            | 0.91                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 10                                                              | 3513 Distribution of electricity                                                        | 0.57                                       | 0.57                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 11                                                              | 4211 Construction of roads and motorways                                                | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 12                                                              | 4672 Wholesale of metals and metal ores                                                 | 12.95                                      | 4.85                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 13                                                              | 4910 Passenger rail transport, interurban                                               | 23.12                                      | 15.96                                      |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 14                                                              | 5221 Service activities incidental to land transportation                               | 17.45                                      | 14.69                                      |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 15                                                              | 6120 Wireless telecommunications activities                                             | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.01                                       | 0.00                                      |
| 16                                                              | 6820 Renting and operating of own or leased real estate                                 | 0.25                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 17                                                              | 7010 Activities of head offices                                                         | 36.64                                      | 4.92                                       |                                         |                                            | 1.92                                       | 0.00                                       |                                         |                                            | 0.01                                       | 0.00                                       |                                         |                                            | 2.51                                       | 0.00                                      |
| 18                                                              | 8610 Hospital activities                                                                | 2.77                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |

| Disaggregation by sector – NACE 4-digits level (code and label) |                                                                                         | o                                       | p                                         | q                                          | r                                          | s                                       | t                                          | u                                          | v                                          | w                                       | x                                          | y                                          | z                                                                       | aa                                      | ab                                                                      |
|-----------------------------------------------------------------|-----------------------------------------------------------------------------------------|-----------------------------------------|-------------------------------------------|--------------------------------------------|--------------------------------------------|-----------------------------------------|--------------------------------------------|--------------------------------------------|--------------------------------------------|-----------------------------------------|--------------------------------------------|--------------------------------------------|-------------------------------------------------------------------------|-----------------------------------------|-------------------------------------------------------------------------|
|                                                                 |                                                                                         | Circular economy (CE)                   |                                           | Pollution prevention and control (PPC)     |                                            | Biodiversity and ecosystems (BIO)       |                                            | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)   |                                            |                                         |                                            |                                            |                                                                         |                                         |                                                                         |
|                                                                 |                                                                                         | SMEs and other NFCs not subject to NFRD |                                           | Non-financial corporates (subject to NFRD) |                                            | SMEs and other NFCs not subject to NFRD |                                            | Non-financial corporates (subject to NFRD) |                                            | SMEs and other NFCs not subject to NFRD |                                            | Non-financial corporates (subject to NFRD) |                                                                         | SMEs and other NFCs not subject to NFRD |                                                                         |
|                                                                 |                                                                                         | [Gross] carrying amount                 |                                           | [Gross] carrying amount*                   |                                            | [Gross] carrying amount                 |                                            | [Gross] carrying amount*                   |                                            | [Gross] carrying amount                 |                                            | [Gross] carrying amount*                   |                                                                         | [Gross] carrying amount                 |                                                                         |
|                                                                 |                                                                                         | EUR million                             | Of which environmentally sustainable (CE) | EUR million                                | Of which environmentally sustainable (PPC) | EUR million                             | Of which environmentally sustainable (PPC) | EUR million                                | Of which environmentally sustainable (BIO) | EUR million                             | Of which environmentally sustainable (BIO) | EUR million                                | Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) | EUR million                             | Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) |
| 1                                                               | 1072 Manufacture of rusks and biscuits; manufacture of preserved pastry goods and cakes |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 10.00                                      | 0.00                                                                    |                                         |                                                                         |
| 2                                                               | 2016 Manufacture of plastics in primary forms                                           |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 4.51                                       | 0.18                                                                    |                                         |                                                                         |
| 3                                                               | 2120 Manufacture of pharmaceutical preparations                                         |                                         |                                           | 0.06                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.06                                       | 0.00                                                                    |                                         |                                                                         |
| 4                                                               | 2410 Manufacture of basic iron and steel and of ferro-alloys                            |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 7.18                                       | 2.69                                                                    |                                         |                                                                         |
| 5                                                               | 2572 Manufacture of locks and hinges                                                    |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.94                                       | 0.00                                                                    |                                         |                                                                         |
| 6                                                               | 2612 Manufacture of loaded electronic boards                                            |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 15.11                                      | 0.00                                                                    |                                         |                                                                         |
| 7                                                               | 2910 Manufacture of motor vehicles                                                      |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 19.68                                      | 0.63                                                                    |                                         |                                                                         |
| 8                                                               | 3091 Manufacture of motorcycles                                                         |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 3.21                                       | 0.00                                                                    |                                         |                                                                         |
| 9                                                               | 3512 Transmission of electricity                                                        |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 1.83                                       | 0.00                                                                    |                                         |                                                                         |
| 10                                                              | 3513 Distribution of electricity                                                        |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.57                                       | 0.57                                                                    |                                         |                                                                         |
| 11                                                              | 4211 Construction of roads and motorways                                                |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                                                    |                                         |                                                                         |
| 12                                                              | 4672 Wholesale of metals and metal ores                                                 |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 12.95                                      | 4.85                                                                    |                                         |                                                                         |
| 13                                                              | 4910 Passenger rail transport, interurban                                               |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 23.12                                      | 15.96                                                                   |                                         |                                                                         |
| 14                                                              | 5221 Service activities incidental to land transportation                               |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 17.45                                      | 14.69                                                                   |                                         |                                                                         |
| 15                                                              | 6120 Wireless telecommunications activities                                             |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.01                                       | 0.00                                                                    |                                         |                                                                         |
| 16                                                              | 6820 Renting and operating of own or leased real estate                                 |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.25                                       | 0.00                                                                    |                                         |                                                                         |
| 17                                                              | 7010 Activities of head offices                                                         |                                         |                                           | 0.53                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 41.60                                      | 4.92                                                                    |                                         |                                                                         |
| 18                                                              | 8610 Hospital activities                                                                |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 2.77                                       | 0.00                                                                    |                                         |                                                                         |

\* in taxonomy-relevant sectors (taxonomy-eligible)

## 2. GAR sector information (CapEx-based)

|                                                                 |                                                                                         | a                                          | b                                          | c                                       | d                                          | e                                          | f                                          | g                                       | h                                          | i                                          | j                                          | k                                       | l                                          | m                                          | n                                         |
|-----------------------------------------------------------------|-----------------------------------------------------------------------------------------|--------------------------------------------|--------------------------------------------|-----------------------------------------|--------------------------------------------|--------------------------------------------|--------------------------------------------|-----------------------------------------|--------------------------------------------|--------------------------------------------|--------------------------------------------|-----------------------------------------|--------------------------------------------|--------------------------------------------|-------------------------------------------|
| Disaggregation by sector – NACE 4-digits level (code and label) |                                                                                         | Climate change mitigation (CCM)            |                                            |                                         |                                            | Climate change adaptation (CCA)            |                                            |                                         |                                            | Water and marine resources (WTR)           |                                            |                                         |                                            | Circular economy (CE)                      |                                           |
|                                                                 |                                                                                         | Non-financial corporates (subject to NFRD) |                                            | SMEs and other NFCs not subject to NFRD |                                            | Non-financial corporates (subject to NFRD) |                                            | SMEs and other NFCs not subject to NFRD |                                            | Non-financial corporates (subject to NFRD) |                                            | SMEs and other NFCs not subject to NFRD |                                            | Non-financial corporates (subject to NFRD) |                                           |
|                                                                 |                                                                                         | [Gross] carrying amount*                   |                                            | [Gross] carrying amount                 |                                            | [Gross] carrying amount*                   |                                            | [Gross] carrying amount                 |                                            | [Gross] carrying amount*                   |                                            | [Gross] carrying amount                 |                                            | [Gross] carrying amount*                   |                                           |
|                                                                 |                                                                                         | EUR million                                | Of which environmentally sustainable (CCM) | EUR million                             | Of which environmentally sustainable (CCM) | EUR million                                | Of which environmentally sustainable (CCA) | EUR million                             | Of which environmentally sustainable (CCA) | EUR million                                | Of which environmentally sustainable (WTR) | EUR million                             | Of which environmentally sustainable (WTR) | EUR million                                | Of which environmentally sustainable (CE) |
| 1                                                               | 1072 Manufacture of rusks and biscuits; manufacture of preserved pastry goods and cakes | 10.38                                      | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 2                                                               | 2016 Manufacture of plastics in primary forms                                           | 4.64                                       | 0.75                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 3                                                               | 2120 Manufacture of pharmaceutical preparations                                         | 0.01                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 4                                                               | 2410 Manufacture of basic iron and steel and of ferro-alloys                            | 7.87                                       | 2.35                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 5                                                               | 2440 Manufacture of basic precious and other non-ferrous metals                         | 0.30                                       | 0.30                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 6                                                               | 2572 Manufacture of locks and hinges                                                    | 0.15                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 7                                                               | 2612 Manufacture of loaded electronic boards                                            | 8.42                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 4.12                                       | 0.00                                      |
| 8                                                               | 2910 Manufacture of motor vehicles                                                      | 12.06                                      | 1.88                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 9                                                               | 3091 Manufacture of motorcycles                                                         | 4.70                                       | 0.01                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 10                                                              | 3512 Transmission of electricity                                                        | 0.91                                       | 0.00                                       |                                         |                                            | 0.81                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 11                                                              | 3513 Distribution of electricity                                                        | 2.21                                       | 2.15                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 12                                                              | 4211 Construction of roads and motorways                                                | 0.83                                       | 0.25                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.02                                       | 0.00                                      |
| 13                                                              | 4616 Agents involved in the sale of textiles, clothing, footwear and leather goods      | 2.41                                       | 0.01                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 14                                                              | 4672 Wholesale of metals and metal ores                                                 | 14.20                                      | 4.25                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 15                                                              | 4910 Passenger rail transport, interurban                                               | 27.22                                      | 19.62                                      |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 16                                                              | 5221 Service activities incidental to land transportation                               | 20.72                                      | 18.05                                      |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 17                                                              | 6120 Wireless telecommunications activities                                             | 0.05                                       | 0.00                                       |                                         |                                            | 0.05                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.02                                       | 0.00                                      |
| 18                                                              | 6820 Renting and operating of own or leased real estate                                 | 0.25                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |
| 19                                                              | 7010 Activities of head offices                                                         | 34.18                                      | 7.92                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 2.55                                       | 0.00                                      |
| 20                                                              | 8610 Hospital activities                                                                | 4.70                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                      |

|                                                                 |                                                                                         | o                                       | p                                         | q                                          | r                                          | s                                       | t                                          | u                                          | v                                          | w                                       | x                                          | y                                          | z                                                                       | aa                                      | ab                                                                      |
|-----------------------------------------------------------------|-----------------------------------------------------------------------------------------|-----------------------------------------|-------------------------------------------|--------------------------------------------|--------------------------------------------|-----------------------------------------|--------------------------------------------|--------------------------------------------|--------------------------------------------|-----------------------------------------|--------------------------------------------|--------------------------------------------|-------------------------------------------------------------------------|-----------------------------------------|-------------------------------------------------------------------------|
| Disaggregation by sector – NACE 4-digits level (code and label) |                                                                                         | Circular economy (CE)                   |                                           | Pollution prevention and control (PPC)     |                                            |                                         |                                            | Biodiversity and ecosystems (BIO)          |                                            |                                         |                                            | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)   |                                                                         |                                         |                                                                         |
|                                                                 |                                                                                         | SMEs and other NFCs not subject to NFRD |                                           | Non-financial corporates (subject to NFRD) |                                            | SMEs and other NFCs not subject to NFRD |                                            | Non-financial corporates (subject to NFRD) |                                            | SMEs and other NFCs not subject to NFRD |                                            | Non-financial corporates (subject to NFRD) |                                                                         | SMEs and other NFCs not subject to NFRD |                                                                         |
|                                                                 |                                                                                         | [Gross] carrying amount                 |                                           | [Gross] carrying amount*                   |                                            | [Gross] carrying amount                 |                                            | [Gross] carrying amount*                   |                                            | [Gross] carrying amount                 |                                            | [Gross] carrying amount*                   |                                                                         | [Gross] carrying amount                 |                                                                         |
|                                                                 |                                                                                         | EUR million                             | Of which environmentally sustainable (CE) | EUR million                                | Of which environmentally sustainable (PPC) | EUR million                             | Of which environmentally sustainable (PPC) | EUR million                                | Of which environmentally sustainable (BIO) | EUR million                             | Of which environmentally sustainable (BIO) | EUR million                                | Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) | EUR million                             | Of which environmentally sustainable (CCM + CCA + WTR + CE + PPC + BIO) |
| 1                                                               | 1072 Manufacture of rusks and biscuits; manufacture of preserved pastry goods and cakes |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 10.38                                      | 0.00                                                                    |                                         |                                                                         |
| 2                                                               | 2016 Manufacture of plastics in primary forms                                           |                                         |                                           | 0.04                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 4.69                                       | 0.75                                                                    |                                         |                                                                         |
| 3                                                               | 2120 Manufacture of pharmaceutical preparations                                         |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.02                                       | 0.00                                                                    |                                         |                                                                         |
| 4                                                               | 2410 Manufacture of basic iron and steel and of ferro-alloys                            |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 7.87                                       | 2.35                                                                    |                                         |                                                                         |
| 5                                                               | 2440 Manufacture of basic precious and other non-ferrous metals                         |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.30                                       | 0.30                                                                    |                                         |                                                                         |
| 6                                                               | 2572 Manufacture of locks and hinges                                                    |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.15                                       | 0.00                                                                    |                                         |                                                                         |
| 7                                                               | 2612 Manufacture of loaded electronic boards                                            |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 12.54                                      | 0.00                                                                    |                                         |                                                                         |
| 8                                                               | 2910 Manufacture of motor vehicles                                                      |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 12.06                                      | 1.88                                                                    |                                         |                                                                         |
| 9                                                               | 3091 Manufacture of motorcycles                                                         |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 4.70                                       | 0.01                                                                    |                                         |                                                                         |
| 10                                                              | 3512 Transmission of electricity                                                        |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 1.73                                       | 0.00                                                                    |                                         |                                                                         |
| 11                                                              | 3513 Distribution of electricity                                                        |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 2.21                                       | 2.15                                                                    |                                         |                                                                         |
| 12                                                              | 4211 Construction of roads and motorways                                                |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.05                                       | 0.00                                       |                                         |                                            | 0.91                                       | 0.25                                                                    |                                         |                                                                         |
| 13                                                              | 4616 Agents involved in the sale of textiles, clothing, footwear and leather goods      |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 2.41                                       | 0.01                                                                    |                                         |                                                                         |
| 14                                                              | 4672 Wholesale of metals and metal ores                                                 |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 14.20                                      | 4.25                                                                    |                                         |                                                                         |
| 15                                                              | 4910 Passenger rail transport, interurban                                               |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 27.22                                      | 19.62                                                                   |                                         |                                                                         |
| 16                                                              | 5221 Service activities incidental to land transportation                               |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 20.72                                      | 18.05                                                                   |                                         |                                                                         |
| 17                                                              | 6120 Wireless telecommunications activities                                             |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.11                                       | 0.00                                                                    |                                         |                                                                         |
| 18                                                              | 6820 Renting and operating of own or leased real estate                                 |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 0.25                                       | 0.00                                                                    |                                         |                                                                         |
| 19                                                              | 7010 Activities of head offices                                                         |                                         |                                           | 0.45                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 37.17                                      | 7.92                                                                    |                                         |                                                                         |
| 20                                                              | 8610 Hospital activities                                                                |                                         |                                           | 0.00                                       | 0.00                                       |                                         |                                            | 0.00                                       | 0.00                                       |                                         |                                            | 4.70                                       | 0.00                                                                    |                                         |                                                                         |

\* in taxonomy-relevant sectors (taxonomy-eligible)

### 3. GAR KPI stock (revenue-based)

|                                                              | a                                                                                               | b        | c                        | d                                | e                            | f                                                         | g      | h                        | i                            | j                                                         | k      | l                        | m                            | n                                                         | o      | p                        | q                            |
|--------------------------------------------------------------|-------------------------------------------------------------------------------------------------|----------|--------------------------|----------------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|
| % (compared to the total assets covered in the denominator)* | Disclosure reference date 31 December 2024                                                      |          |                          |                                  |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |
|                                                              | Climate change mitigation (CCM)                                                                 |          |                          |                                  |                              | Climate change adaptation (CCA)                           |        |                          |                              | Water and marine resources (WTR)                          |        |                          |                              | Circular economy (CE)                                     |        |                          |                              |
|                                                              | Of which in taxonomy-relevant sectors (taxonomy-eligible)                                       |          |                          |                                  |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              |
|                                                              | Of which environmentally sustainable (taxonomy-aligned)                                         |          |                          |                                  |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              |
|                                                              |                                                                                                 |          | Of which use of proceeds | Of which transitional activities | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which enabling activities |
|                                                              | GAR – Assets covered in both numerator and denominator                                          |          |                          |                                  |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |
| 1                                                            | Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation | 51.97 %  | 2.02 %                   | 0.36 %                           | 0.19 %                       | 0.78 %                                                    | 0.07 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.01 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.40 % | 0.00 %                   | 0.00 %                       |
| 2                                                            | Financial corporations                                                                          | 16.94 %  | 1.48 %                   | 0.00 %                           | 0.14 %                       | 0.06 %                                                    | 0.01 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.01 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 3                                                            | Credit institutions                                                                             | 19.10 %  | 1.58 %                   | 0.00 %                           | 0.16 %                       | 0.05 %                                                    | 0.01 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 4                                                            | Loans and advances                                                                              | 11.49 %  | 0.32 %                   | 0.00 %                           | 0.01 %                       | 0.04 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.02 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 5                                                            | Debt securities, including UoP                                                                  | 20.08 %  | 1.73 %                   | 0.00 %                           | 0.18 %                       | 0.05 %                                                    | 0.01 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 6                                                            | Equity instruments                                                                              | 0.33 %   | 0.03 %                   |                                  | 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                                                                    | 2.37 %   | 0.79 %                   | 0.00 %                           | 0.00 %                       | 0.11 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.06 %                                                    | 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 %                       |
| 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 %                       |
| 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 %                       |
| 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                                                                   | 2.40 %   | 0.80 %                   | 0.00 %                           | 0.00 %                       | 0.11 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.06 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 13                                                           | Loans and advances                                                                              | 0.00 %   | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 14                                                           | Debt securities, including UoP                                                                  | 10.81 %  | 3.60 %                   | 0.00 %                           | 0.00 %                       | 0.49 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.25 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 15                                                           | Equity instruments                                                                              | 0.00 %   | 0.00 %                   |                                  | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   |                              | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       |
| 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 %                       |
| 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 %                       |
| 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 %                       |
| 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 corporations                                                                      | 31.24 %  | 9.92 %                   | 0.00 %                           | 1.23 %                       | 7.54 %                                                    | 0.63 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 3.93 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 21                                                           | Loans and advances                                                                              | 28.91 %  | 7.42 %                   | 0.00 %                           | 1.44 %                       | 5.18 %                                                    | 0.52 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 4.74 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 22                                                           | Debt securities, including UoP                                                                  | 42.45 %  | 21.94 %                  | 0.00 %                           | 0.19 %                       | 18.89 %                                                   | 1.19 % | 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 %                       |
| 24                                                           | Households                                                                                      | 99.10 %  | 0.93 %                   | 0.93 %                           | 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                                 | 99.72 %  | 0.88 %                   | 0.88 %                           | 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                                                              | 99.50 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    |        |                          |                              | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 27                                                           | of which motor vehicle loans                                                                    | 96.67 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.00 %                                                    |        |                          |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |
| 28                                                           | Local government financing                                                                      | 51.35 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.00 %                                                    | 0.11 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.14 % | 0.00 %                   | 0.00 %                       | 0.16 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 29                                                           | Housing finance                                                                                 | 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 %                       |
| 30                                                           | Other local government financing                                                                | 50.64 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.00 %                                                    | 0.11 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.14 % | 0.00 %                   | 0.00 %                       | 0.16 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 31                                                           | Collateral obtained by taking possession: residential and 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 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 32                                                           | Total GAR assets                                                                                | 16.97 %  | 0.66 %                   | 0.12 %                           | 0.06 %                       | 0.25 %                                                    | 0.02 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.13 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |

T3 Stock Revenue (1/4)

\*per row

|                                                              |                                                                                                 | r                                                         | s      | t                        | u                            | v                                                         | w      | x                        | z                            | aa                                                        | ab                               | ac                           | ad     | ae      | af                                   |
|--------------------------------------------------------------|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|----------------------------------|------------------------------|--------|---------|--------------------------------------|
| % (compared to the total assets covered in the denominator)* |                                                                                                 | Disclosure reference date 31 December 2024                |        |                          |                              |                                                           |        |                          |                              |                                                           |                                  |                              |        |         |                                      |
|                                                              |                                                                                                 | Pollution prevention and control (PPC)                    |        |                          |                              | Biodiversity and ecosystems (BIO)                         |        |                          |                              | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                  |                                  |                              |        |         | Proportion of total assets covered** |
|                                                              |                                                                                                 | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                                  |                              |        |         |                                      |
|                                                              |                                                                                                 | Of which environmentally sustainable (taxonomy-aligned)   |        | Of which use of proceeds | Of which enabling activities | Of which environmentally sustainable (taxonomy-aligned)   |        | Of which use of proceeds | Of which enabling activities | Of which environmentally sustainable (taxonomy-aligned)   |                                  |                              |        |         |                                      |
|                                                              |                                                                                                 |                                                           |        |                          |                              |                                                           |        |                          |                              | Of which use of proceeds                                  | Of which transitional activities | Of which enabling activities |        |         |                                      |
|                                                              | GAR – Assets covered in both numerator and denominator                                          |                                                           |        |                          |                              |                                                           |        |                          |                              |                                                           |                                  |                              |        |         |                                      |
| 1                                                            | Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 52.45 %                                                   | 2.02 %                           | 0.36 %                       | 0.19 % | 0.78 %  | 29.63 %                              |
| 2                                                            | Financial corporations                                                                          | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 16.96 %                                                   | 1.48 %                           | 0.00 %                       | 0.14 % | 0.06 %  | 13.64 %                              |
| 3                                                            | Credit institutions                                                                             | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 19.11 %                                                   | 1.58 %                           | 0.00 %                       | 0.16 % | 0.05 %  | 11.88 %                              |
| 4                                                            | Loans and advances                                                                              | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 11.51 %                                                   | 0.32 %                           | 0.00 %                       | 0.01 % | 0.04 %  | 1.21 %                               |
| 5                                                            | Debt securities, including UoP                                                                  | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 20.09 %                                                   | 1.74 %                           | 0.00 %                       | 0.18 % | 0.05 %  | 10.60 %                              |
| 6                                                            | Equity instruments                                                                              | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.33 %                                                    | 0.03 %                           |                              | 0.00 % | 0.00 %  | 0.06 %                               |
| 7                                                            | Other financial corporations                                                                    | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 2.43 %                                                    | 0.79 %                           | 0.00 %                       | 0.00 % | 0.11 %  | 1.76 %                               |
| 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 %                               |
| 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 %                               |
| 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 %                               |
| 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 %                               |
| 12                                                           | of which management companies                                                                   | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 2.45 %                                                    | 0.80 %                           | 0.00 %                       | 0.00 % | 0.11 %  | 1.74 %                               |
| 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 %  | 1.35 %                               |
| 14                                                           | Debt securities, including UoP                                                                  | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 11.07 %                                                   | 3.60 %                           | 0.00 %                       | 0.00 % | 0.49 %  | 0.39 %                               |
| 15                                                           | Equity instruments                                                                              | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 %                           |                              | 0.00 % | 0.00 %  | 0.01 %                               |
| 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 %  | 0.02 %                               |
| 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 %  | 0.02 %                               |
| 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 %                               |
| 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 %                               |
| 20                                                           | Non-financial corporations                                                                      | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 35.80 %                                                   | 9.92 %                           | 0.00 %                       | 1.23 % | 7.54 %  | 2.94 %                               |
| 21                                                           | Loans and advances                                                                              | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 34.17 %                                                   | 7.42 %                           | 0.00 %                       | 1.44 % | 5.18 %  | 2.43 %                               |
| 22                                                           | Debt securities, including UoP                                                                  | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 43.64 %                                                   | 21.94 %                          | 0.00 %                       | 0.19 % | 18.89 % | 0.51 %                               |
| 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 %                               |
| 24                                                           | Households                                                                                      |                                                           |        |                          |                              |                                                           |        |                          |                              | 99.10 %                                                   | 0.93 %                           | 0.93 %                       | 0.00 % | 0.00 %  | 11.45 %                              |
| 25                                                           | of which loans collateralised by residential immovable property                                 |                                                           |        |                          |                              |                                                           |        |                          |                              | 99.72 %                                                   | 0.88 %                           | 0.88 %                       | 0.00 % | 0.00 %  | 10.19 %                              |
| 26                                                           | of which building renovation loans                                                              |                                                           |        |                          |                              |                                                           |        |                          |                              | 99.50 %                                                   | 0.00 %                           | 0.00 %                       | 0.00 % | 0.00 %  | 0.80 %                               |
| 27                                                           | of which motor vehicle loans                                                                    |                                                           |        |                          |                              |                                                           |        |                          |                              |                                                           |                                  |                              |        |         |                                      |
| 28                                                           | Local government financing                                                                      | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 51.77 %                                                   | 0.00 %                           | 0.00 %                       | 0.00 % | 0.00 %  | 1.60 %                               |
| 29                                                           | Housing finance                                                                                 | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 100.00 %                                                  | 0.00 %                           | 0.00 %                       | 0.00 % | 0.00 %  | 0.02 %                               |
| 30                                                           | Other local government financing                                                                | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 51.06 %                                                   | 0.00 %                           | 0.00 %                       | 0.00 % | 0.00 %  | 1.57 %                               |
| 31                                                           | Collateral obtained by taking possession: residential and 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 %                       | 0.00 % | 0.00 %  | 0.00 %                               |
| 32                                                           | Total GAR assets                                                                                | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 17.13 %                                                   | 0.66 %                           | 0.12 %                       | 0.06 % | 0.25 %  | 90.73 %                              |

T3 Stock Revenue (2/4)

\*\*Assets covered in both numerator and denominator as a proportion of total assets

|                                                              |                                                                                                 | ag                                                        | ah      | ai                       | aj                               | ak                           | al                                                        | am     | an                       | ao                           | ap                                                        | aq     | ar                       | as                           | at                                                        | au     | av                       | aw                           |
|--------------------------------------------------------------|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------|---------|--------------------------|----------------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|
| % (compared to the total assets covered in the denominator)* |                                                                                                 | Disclosure reference date 31 December 2023                |         |                          |                                  |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |
|                                                              |                                                                                                 | Climate change mitigation (CCM)                           |         |                          |                                  |                              | Climate change adaptation (CCA)                           |        |                          |                              | Water and marine resources (WTR)                          |        |                          |                              | Circular economy (CE)                                     |        |                          |                              |
|                                                              |                                                                                                 | Of which in taxonomy-relevant sectors (taxonomy-eligible) |         |                          |                                  |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              |
|                                                              |                                                                                                 | Of which environmentally sustainable (taxonomy-aligned)   |         |                          |                                  |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              |
|                                                              |                                                                                                 |                                                           |         | Of which use of proceeds | Of which transitional activities | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which enabling activities |
|                                                              | GAR – Assets covered in both numerator and denominator                                          |                                                           |         |                          |                                  |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |
| 1                                                            | Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation | 52.30 %                                                   | 0.43 %  | 0.03 %                   | 0.00 %                           | 0.14 %                       | 0.01 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.01 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.01 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 2                                                            | Financial corporations                                                                          | 17.06 %                                                   | 0.11 %  |                          | 0.00 %                           | 0.04 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 3                                                            | Credit institutions                                                                             | 19.42 %                                                   | 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 %                       |
| 4                                                            | Loans and advances                                                                              | 11.85 %                                                   | 0.00 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       | 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                                                                  | 21.15 %                                                   | 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 %                       |
| 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                                                                    | 3.64 %                                                    | 0.62 %  | 0.00 %                   | 0.00 %                           | 0.27 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 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 %                       |
| 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                                                                  | 0.00 %                                                    | 0.00 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 11                                                           | Equity instruments                                                                              | 0.00 %                                                    | 0.00 %  |                          | 0.00 %                           | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       |
| 12                                                           | of which management companies                                                                   | 3.68 %                                                    | 0.63 %  | 0.00 %                   | 0.00 %                           | 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 %                       |
| 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                                                                  | 17.56 %                                                   | 3.00 %  | 0.00 %                   | 0.00 %                           | 1.33 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 15                                                           | Equity instruments                                                                              | 0.00 %                                                    | 0.00 %  |                          | 0.00 %                           | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       |
| 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 %                       |
| 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                                                                  | 0.00 %                                                    | 0.00 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       | 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 %                       |
| 20                                                           | Non-financial corporations                                                                      | 33.55 %                                                   | 5.07 %  | 0.00 %                   | 0.00 %                           | 1.72 %                       | 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                                                                              | 30.64 %                                                   | 0.96 %  | 0.00 %                   | 0.00 %                           | 0.72 %                       | 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                                                                  | 44.35 %                                                   | 20.31 % | 0.00 %                   | 0.00 %                           | 5.43 %                       | 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 %                       |
| 24                                                           | Households                                                                                      | 99.21 %                                                   | 0.07 %  | 0.07 %                   | 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                                 | 99.89 %                                                   | 0.07 %  | 0.07 %                   | 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                                                              | 99.52 %                                                   | 0.01 %  | 0.01 %                   | 0.00 %                           | 0.01 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |                                                           |        |                          |                              | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 27                                                           | of which motor vehicle loans                                                                    |                                                           |         |                          |                                  |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |
| 28                                                           | Local government financing                                                                      | 48.00 %                                                   | 0.00 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.10 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.13 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.14 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 29                                                           | Housing finance                                                                                 | 4.49 %                                                    | 0.00 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 30                                                           | Other local government financing                                                                | 49.34 %                                                   | 0.00 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.10 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.13 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.15 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 31                                                           | Collateral obtained by taking possession: residential and 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 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 32                                                           | Total GAR assets                                                                                | 17.45 %                                                   | 0.14 %  | 0.01 %                   | 0.00 %                           | 0.05 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |

|                                                              |                                                                                                 | ax                                                        | ay     | az                       | ba     | bb                                                        | bc     | bd     | be     | bf                                                        | bg      | bh                           | bi     | bj     | bk      |                                    |
|--------------------------------------------------------------|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------|--------|--------------------------|--------|-----------------------------------------------------------|--------|--------|--------|-----------------------------------------------------------|---------|------------------------------|--------|--------|---------|------------------------------------|
| % (compared to the total assets covered in the denominator)* |                                                                                                 | Disclosure reference date 31 December 2023                |        |                          |        |                                                           |        |        |        |                                                           |         |                              |        |        |         |                                    |
|                                                              |                                                                                                 | Pollution prevention and control (PPC)                    |        |                          |        | Biodiversity and ecosystems (BIO)                         |        |        |        | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                  |         |                              |        |        |         | Proportion of total assets covered |
|                                                              |                                                                                                 | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |        | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |        |        | Of which in taxonomy-relevant sectors (taxonomy-eligible) |         |                              |        |        |         |                                    |
|                                                              |                                                                                                 | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |        | Of which environmentally sustainable (taxonomy-aligned)   |        |        |        | Of which environmentally sustainable (taxonomy-aligned)   |         |                              |        |        |         |                                    |
|                                                              |                                                                                                 |                                                           |        | Of which use of proceeds |        | Of which enabling activities                              |        |        |        | Of which use of proceeds                                  |         | Of which enabling activities |        |        |         |                                    |
| GAR – Assets covered in both numerator and denominator       |                                                                                                 |                                                           |        |                          |        |                                                           |        |        |        |                                                           |         |                              |        |        |         |                                    |
| 1                                                            | Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 % | 0.00 %                                                    | 0.00 % | 0.00 % | 0.00 % | 52.32 %                                                   | 0.43 %  | 0.03 %                       | 0.00 % | 0.14 % | 29.84 % |                                    |
| 2                                                            | Financial corporations                                                                          | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 % | 0.00 %                                                    | 0.00 % | 0.00 % | 0.00 % | 17.06 %                                                   | 0.11 %  | 0.00 %                       | 0.00 % | 0.04 % | 14.32 % |                                    |
| 3                                                            | Credit institutions                                                                             | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 % | 0.00 %                                                    | 0.00 % | 0.00 % | 0.00 % | 19.42 %                                                   | 0.02 %  | 0.00 %                       | 0.00 % | 0.00 % | 12.18 % |                                    |
| 4                                                            | Loans and advances                                                                              | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 % | 0.00 %                                                    | 0.00 % | 0.00 % | 0.00 % | 11.85 %                                                   | 0.00 %  | 0.00 %                       | 0.00 % | 0.00 % | 1.97 %  |                                    |
| 5                                                            | Debt securities, including UoP                                                                  | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 % | 0.00 %                                                    | 0.00 % | 0.00 % | 0.00 % | 21.15 %                                                   | 0.03 %  | 0.00 %                       | 0.00 % | 0.00 % | 10.08 % |                                    |
| 6                                                            | Equity instruments                                                                              | 0.00 %                                                    | 0.00 % |                          | 0.00 % | 0.00 %                                                    | 0.00 % |        | 0.00 % | 0.00 %                                                    | 0.00 %  |                              | 0.00 % | 0.00 % | 0.13 %  |                                    |
| 7                                                            | Other financial corporations                                                                    | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 % | 0.00 %                                                    | 0.00 % | 0.00 % | 0.00 % | 3.64 %                                                    | 0.62 %  | 0.00 %                       | 0.00 % | 0.27 % | 2.14 %  |                                    |
| 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 %  |                                    |
| 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 %  |                                    |
| 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 %  |                                    |
| 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 %  |                                    |
| 12                                                           | of which management companies                                                                   | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 % | 0.00 %                                                    | 0.00 % | 0.00 % | 0.00 % | 3.68 %                                                    | 0.63 %  | 0.00 %                       | 0.00 % | 0.28 % | 2.12 %  |                                    |
| 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 % | 1.66 %  |                                    |
| 14                                                           | Debt securities, including UoP                                                                  | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 % | 0.00 %                                                    | 0.00 % | 0.00 % | 0.00 % | 17.56 %                                                   | 3.00 %  | 0.00 %                       | 0.00 % | 1.33 % | 0.44 %  |                                    |
| 15                                                           | Equity instruments                                                                              | 0.00 %                                                    | 0.00 % |                          | 0.00 % | 0.00 %                                                    | 0.00 % |        | 0.00 % | 0.00 %                                                    | 0.00 %  |                              | 0.00 % | 0.00 % | 0.01 %  |                                    |
| 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 % | 0.02 %  |                                    |
| 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 % | 0.02 %  |                                    |
| 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 %  |                                    |
| 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 %  |                                    |
| 20                                                           | Non-financial corporations                                                                      | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 % | 0.00 %                                                    | 0.00 % | 0.00 % | 0.00 % | 33.55 %                                                   | 5.07 %  | 0.00 %                       | 0.00 % | 1.72 % | 2.06 %  |                                    |
| 21                                                           | Loans and advances                                                                              | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 % | 0.00 %                                                    | 0.00 % | 0.00 % | 0.00 % | 30.64 %                                                   | 0.96 %  | 0.00 %                       | 0.00 % | 0.72 % | 1.62 %  |                                    |
| 22                                                           | Debt securities, including UoP                                                                  | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 % | 0.00 %                                                    | 0.00 % | 0.00 % | 0.00 % | 44.35 %                                                   | 20.31 % | 0.00 %                       | 0.00 % | 5.43 % | 0.44 %  |                                    |
| 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 %  |                                    |
| 24                                                           | Households                                                                                      |                                                           |        |                          |        |                                                           |        |        |        | 99.21 %                                                   | 0.07 %  | 0.00 %                       | 0.00 % | 0.00 % | 11.74 % |                                    |
| 25                                                           | of which loans collateralised by residential immovable property                                 |                                                           |        |                          |        |                                                           |        |        |        | 99.89 %                                                   | 0.07 %  | 0.00 %                       | 0.00 % | 0.00 % | 10.34 % |                                    |
| 26                                                           | of which building renovation loans                                                              |                                                           |        |                          |        |                                                           |        |        |        | 99.52 %                                                   | 0.01 %  | 0.00 %                       | 0.00 % | 0.01 % | 0.85 %  |                                    |
| 27                                                           | of which motor vehicle loans                                                                    |                                                           |        |                          |        |                                                           |        |        |        | 0.00 %                                                    | 0.00 %  | 0.00 %                       | 0.00 % | 0.00 % | 0.00 %  |                                    |
| 28                                                           | Local government financing                                                                      | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 % | 0.00 %                                                    | 0.00 % | 0.00 % | 0.00 % | 48.37 %                                                   | 0.00 %  | 0.00 %                       | 0.00 % | 0.00 % | 1.73 %  |                                    |
| 29                                                           | Housing finance                                                                                 | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 % | 0.00 %                                                    | 0.00 % | 0.00 % | 0.00 % | 4.49 %                                                    | 0.00 %  | 0.00 %                       | 0.00 % | 0.00 % | 0.05 %  |                                    |
| 30                                                           | Other local government financing                                                                | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 % | 0.00 %                                                    | 0.00 % | 0.00 % | 0.00 % | 49.72 %                                                   | 0.00 %  | 0.00 %                       | 0.00 % | 0.00 % | 1.67 %  |                                    |
| 31                                                           | Collateral obtained by taking possession: residential and 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 %                       | 0.00 % | 0.00 % | 0.00 %  |                                    |
| 32                                                           | Total GAR assets                                                                                | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 % | 0.00 %                                                    | 0.00 % | 0.00 % | 0.00 % | 17.45 %                                                   | 0.14 %  | 0.01 %                       | 0.00 % | 0.05 % | 89.47 % |                                    |

T3 Stock Revenue (4/4)

### 3. GAR KPI stock (CapEx-based)

|                                                              |                                                                                                 | a                                                         | b                        | c                                | d                            | e             | f                                                         | g                        | h                            | i             | j                                                         | k                        | l                            | m             | n                                                         | o                        | p                            | q             |
|--------------------------------------------------------------|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------|--------------------------|----------------------------------|------------------------------|---------------|-----------------------------------------------------------|--------------------------|------------------------------|---------------|-----------------------------------------------------------|--------------------------|------------------------------|---------------|-----------------------------------------------------------|--------------------------|------------------------------|---------------|
|                                                              |                                                                                                 | Disclosure reference date 31 December 2024                |                          |                                  |                              |               |                                                           |                          |                              |               |                                                           |                          |                              |               |                                                           |                          |                              |               |
| % (compared to the total assets covered in the denominator)* |                                                                                                 | Climate change mitigation (CCM)                           |                          |                                  |                              |               | Climate change adaptation (CCA)                           |                          |                              |               | Water and marine resources (WTR)                          |                          |                              |               | Circular economy (CE)                                     |                          |                              |               |
|                                                              |                                                                                                 | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                          |                                  |                              |               | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                          |                              |               | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                          |                              |               | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                          |                              |               |
|                                                              |                                                                                                 | Of which environmentally sustainable (taxonomy-aligned)   |                          |                                  |                              |               | Of which environmentally sustainable (taxonomy-aligned)   |                          |                              |               | Of which environmentally sustainable (taxonomy-aligned)   |                          |                              |               | Of which environmentally sustainable (taxonomy-aligned)   |                          |                              |               |
|                                                              |                                                                                                 |                                                           | Of which use of proceeds | Of which transitional activities | Of which enabling activities |               |                                                           | Of which use of proceeds | Of which enabling activities |               |                                                           | Of which use of proceeds | Of which enabling activities |               |                                                           | Of which use of proceeds | Of which enabling activities |               |
|                                                              | GAR – Assets covered in both numerator and denominator                                          |                                                           |                          |                                  |                              |               |                                                           |                          |                              |               |                                                           |                          |                              |               |                                                           |                          |                              |               |
| 1                                                            | Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation | 52.37 %                                                   | 2.29 %                   | 0.36 %                           | 0.19 %                       | 1.14 %        | 0.04 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.01 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.16 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        |
| 2                                                            | Financial corporations                                                                          | 17.04 %                                                   | 1.43 %                   | 0.00 %                           | 0.16 %                       | 0.10 %        | 0.04 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.01 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        |
| 3                                                            | Credit institutions                                                                             | 19.30 %                                                   | 1.60 %                   | 0.00 %                           | 0.18 %                       | 0.09 %        | 0.04 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        |
| 4                                                            | Loans and advances                                                                              | 11.50 %                                                   | 0.42 %                   | 0.00 %                           | 0.01 %                       | 0.10 %        | 0.01 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.02 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        |
| 5                                                            | Debt securities, including UoP                                                                  | 20.30 %                                                   | 1.74 %                   | 0.00 %                           | 0.20 %                       | 0.09 %        | 0.05 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        |
| 6                                                            | Equity instruments                                                                              | 0.33 %                                                    | 0.03 %                   |                                  | 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                                                                    | 1.82 %                                                    | 0.28 %                   | 0.00 %                           | 0.00 %                       | 0.16 %        | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.06 %                                                    | 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 %        |
| 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                                                                  | 0.00 %                                                    | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.00 %        | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        |
| 11                                                           | Equity instruments                                                                              | 0.00 %                                                    | 0.00 %                   |                                  | 0.00 %                       | 0.00 %        | 0.00 %                                                    | 0.00 %                   |                              | 0.00 %        | 0.00 %                                                    | 0.00 %                   |                              | 0.00 %        | 0.00 %                                                    | 0.00 %                   |                              | 0.00 %        |
| 12                                                           | of which management companies                                                                   | 1.84 %                                                    | 0.29 %                   | 0.00 %                           | 0.00 %                       | 0.16 %        | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.06 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        |
| 13                                                           | Loans and advances                                                                              | 0.00 %                                                    | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.00 %        | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        |
| 14                                                           | Debt securities, including UoP                                                                  | 8.30 %                                                    | 1.30 %                   | 0.00 %                           | 0.02 %                       | 0.72 %        | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.25 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        |
| 15                                                           | Equity instruments                                                                              | 0.00 %                                                    | 0.00 %                   |                                  | 0.00 %                       | 0.00 %        | 0.00 %                                                    | 0.00 %                   |                              | 0.00 %        | 0.00 %                                                    | 0.00 %                   |                              | 0.00 %        | 0.00 %                                                    | 0.00 %                   |                              | 0.00 %        |
| 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 %        |
| 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                                                                  | 0.00 %                                                    | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.00 %        | 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 %        |
| 20                                                           | Non-financial corporations                                                                      | 34.81 %                                                   | 12.82 %                  | 0.00 %                           | 1.16 %                       | 11.00 %       | 0.19 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 1.50 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        |
| 21                                                           | Loans and advances                                                                              | 31.65 %                                                   | 9.34 %                   | 0.00 %                           | 1.39 %                       | 7.53 %        | 0.01 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 1.80 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        |
| 22                                                           | Debt securities, including UoP                                                                  | 50.01 %                                                   | 29.57 %                  | 0.00 %                           | 0.09 %                       | 27.69 %       | 1.05 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.03 %                                                    | 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 %        |
| 24                                                           | Households                                                                                      | 99.10 %                                                   | 0.93 %                   | 0.93 %                           | 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                                 | 99.72 %                                                   | 0.88 %                   | 0.88 %                           | 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                                                              | 99.50 %                                                   | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.00 %        | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        |                                                           |                          |                              |               | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        |
| 27                                                           | of which motor vehicle loans                                                                    | 96.67 %                                                   | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.00 %        |                                                           |                          |                              |               |                                                           |                          |                              |               |                                                           |                          |                              |               |
| 28                                                           | Local government financing                                                                      | 51.35 %                                                   | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.00 %        | 0.11 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.14 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.16 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        |
| 29                                                           | Housing finance                                                                                 | 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 %        |
| 30                                                           | Other local government financing                                                                | 50.64 %                                                   | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.00 %        | 0.11 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.14 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        | 0.16 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        |
| 31                                                           | Collateral obtained by taking possession: residential and 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 %                   | 0.00 %                       | 0.00 %        | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 %        |
| 32                                                           | <b>Total GAR assets</b>                                                                         | <b>16.74 %</b>                                            | <b>0.73 %</b>            | <b>0.11 %</b>                    | <b>0.06 %</b>                | <b>0.36 %</b> | <b>0.01 %</b>                                             | <b>0.00 %</b>            | <b>0.00 %</b>                | <b>0.00 %</b> | <b>0.00 %</b>                                             | <b>0.00 %</b>            | <b>0.00 %</b>                | <b>0.00 %</b> | <b>0.05 %</b>                                             | <b>0.00 %</b>            | <b>0.00 %</b>                | <b>0.00 %</b> |

T3 Stock CapEx (1/4)

\*per row

|                                                              |                                                                                                 | r                                                         | s      | t                        | u                            | v                                                         | w      | x                        | z                            | aa                                                        | ab      | ac                       | ad                               | ae                           | af      |                                      |
|--------------------------------------------------------------|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|---------|--------------------------|----------------------------------|------------------------------|---------|--------------------------------------|
| % (compared to the total assets covered in the denominator)* |                                                                                                 | Disclosure reference date 31 December 2024                |        |                          |                              |                                                           |        |                          |                              |                                                           |         |                          |                                  |                              |         |                                      |
|                                                              |                                                                                                 | Pollution prevention and control (PPC)                    |        |                          |                              | Biodiversity and ecosystems (BIO)                         |        |                          |                              | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                  |         |                          |                                  |                              |         | Proportion of total assets covered** |
|                                                              |                                                                                                 | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |         |                          |                                  |                              |         |                                      |
|                                                              |                                                                                                 | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |         |                          |                                  |                              |         |                                      |
|                                                              |                                                                                                 |                                                           |        | Of which use of proceeds | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which enabling activities |                                                           |         | Of which use of proceeds | Of which transitional activities | Of which enabling activities |         |                                      |
|                                                              | GAR – Assets covered in both numerator and denominator                                          |                                                           |        |                          |                              |                                                           |        |                          |                              |                                                           |         |                          |                                  |                              |         |                                      |
| 1                                                            | Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 52.58 %                                                   | 2.29 %  | 0.36 %                   | 0.19 %                           | 1.14 %                       | 29.07 % |                                      |
| 2                                                            | Financial corporations                                                                          | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 17.09 %                                                   | 1.43 %  | 0.00 %                   | 0.16 %                           | 0.10 %                       | 13.38 % |                                      |
| 3                                                            | Credit institutions                                                                             | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 19.35 %                                                   | 1.60 %  | 0.00 %                   | 0.18 %                           | 0.09 %                       | 11.65 % |                                      |
| 4                                                            | Loans and advances                                                                              | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 11.52 %                                                   | 0.42 %  | 0.00 %                   | 0.01 %                           | 0.10 %                       | 1.19 %  |                                      |
| 5                                                            | Debt securities, including UoP                                                                  | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 20.35 %                                                   | 1.74 %  | 0.00 %                   | 0.20 %                           | 0.09 %                       | 10.40 % |                                      |
| 6                                                            | Equity instruments                                                                              | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.33 %                                                    | 0.03 %  |                          | 0.00 %                           | 0.00 %                       | 0.06 %  |                                      |
| 7                                                            | Other financial corporations                                                                    | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 1.87 %                                                    | 0.28 %  | 0.00 %                   | 0.00 %                           | 0.16 %                       | 1.73 %  |                                      |
| 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 %  |                                      |
| 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 %  |                                      |
| 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 %  |                                      |
| 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 %  |                                      |
| 12                                                           | of which management companies                                                                   | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 1.90 %                                                    | 0.29 %  | 0.00 %                   | 0.00 %                           | 0.16 %                       | 1.71 %  |                                      |
| 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 %                       | 1.32 %  |                                      |
| 14                                                           | Debt securities, including UoP                                                                  | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 8.55 %                                                    | 1.30 %  | 0.00 %                   | 0.02 %                           | 0.72 %                       | 0.38 %  |                                      |
| 15                                                           | Equity instruments                                                                              | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 %  |                          | 0.00 %                           | 0.00 %                       | 0.01 %  |                                      |
| 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 %                       | 0.02 %  |                                      |
| 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 %                       | 0.02 %  |                                      |
| 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 %  |                                      |
| 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 %  |                                      |
| 20                                                           | Non-financial corporations                                                                      | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 36.50 %                                                   | 12.82 % | 0.00 %                   | 1.16 %                           | 11.00 %                      | 2.88 %  |                                      |
| 21                                                           | Loans and advances                                                                              | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 33.47 %                                                   | 9.34 %  | 0.00 %                   | 1.39 %                           | 7.53 %                       | 2.39 %  |                                      |
| 22                                                           | Debt securities, including UoP                                                                  | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 51.09 %                                                   | 29.57 % | 0.00 %                   | 0.09 %                           | 27.69 %                      | 0.50 %  |                                      |
| 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 %  |                                      |
| 24                                                           | Households                                                                                      |                                                           |        |                          |                              |                                                           |        |                          |                              | 99.10 %                                                   | 0.93 %  | 0.93 %                   | 0.00 %                           | 0.00 %                       | 11.23 % |                                      |
| 25                                                           | of which loans collateralised by residential immovable property                                 |                                                           |        |                          |                              |                                                           |        |                          |                              | 99.72 %                                                   | 0.88 %  | 0.88 %                   | 0.00 %                           | 0.00 %                       | 9.99 %  |                                      |
| 26                                                           | of which building renovation loans                                                              |                                                           |        |                          |                              |                                                           |        |                          |                              | 99.50 %                                                   | 0.00 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.79 %  |                                      |
| 27                                                           | of which motor vehicle loans                                                                    |                                                           |        |                          |                              |                                                           |        |                          |                              |                                                           |         |                          |                                  |                              |         |                                      |
| 28                                                           | Local government financing                                                                      | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 51.77 %                                                   | 0.00 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       | 1.57 %  |                                      |
| 29                                                           | Housing finance                                                                                 | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 100.00 %                                                  | 0.00 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.02 %  |                                      |
| 30                                                           | Other local government financing                                                                | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 51.06 %                                                   | 0.00 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       | 1.54 %  |                                      |
| 31                                                           | Collateral obtained by taking possession: residential and 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 %                   | 0.00 %                           | 0.00 %                       | 0.00 %  |                                      |
| 32                                                           | Total GAR assets                                                                                | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 16.82 %                                                   | 0.73 %  | 0.11 %                   | 0.06 %                           | 0.36 %                       | 89.01 % |                                      |

T3 Stock CapEx (2/4)

\*\*Assets covered in both numerator and denominator as a proportion of total assets



|                                                              |                                                                                                 | ag                                                        | ah                       | ai                               | aj                           | ak     | al                                                        | am                           | an     | ao                       | ap                                                        | aq     | ar                       | as                           | at                                                        | au                       | av                           | aw     |
|--------------------------------------------------------------|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------|--------------------------|----------------------------------|------------------------------|--------|-----------------------------------------------------------|------------------------------|--------|--------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|--------------------------|------------------------------|--------|
| % (compared to the total assets covered in the denominator)* |                                                                                                 | Disclosure reference date 31 December 2023                |                          |                                  |                              |        |                                                           |                              |        |                          |                                                           |        |                          |                              |                                                           |                          |                              |        |
|                                                              |                                                                                                 | Climate change mitigation (CCM)                           |                          |                                  |                              |        | Climate change adaptation (CCA)                           |                              |        |                          | Water and marine resources (WTR)                          |        |                          |                              | Circular economy (CE)                                     |                          |                              |        |
|                                                              |                                                                                                 | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                          |                                  |                              |        | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                              |        |                          | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                          |                              |        |
|                                                              |                                                                                                 | Of which environmentally sustainable (taxonomy-aligned)   |                          |                                  |                              |        | Of which environmentally sustainable (taxonomy-aligned)   |                              |        |                          | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |                          |                              |        |
|                                                              |                                                                                                 |                                                           | Of which use of proceeds | Of which transitional activities | Of which enabling activities |        | Of which use of proceeds                                  | Of which enabling activities |        | Of which use of proceeds | Of which enabling activities                              |        | Of which use of proceeds | Of which enabling activities |                                                           | Of which use of proceeds | Of which enabling activities |        |
|                                                              | GAR – Assets covered in both numerator and denominator                                          |                                                           |                          |                                  |                              |        |                                                           |                              |        |                          |                                                           |        |                          |                              |                                                           |                          |                              |        |
| 1                                                            | Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation | 52.73 %                                                   | 0.75 %                   | 0.03 %                           | 0.01 %                       | 0.18 % | 0.01 %                                                    | 0.00 %                       | 0.00 % | 0.00 %                   | 0.01 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.01 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 % |
| 2                                                            | Financial corporations                                                                          | 17.25 %                                                   | 0.23 %                   | 0.00 %                           | 0.00 %                       | 0.13 % | 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                                                            | Credit institutions                                                                             | 19.67 %                                                   | 0.11 %                   | 0.00 %                           | 0.00 %                       | 0.00 % | 0.00 %                                                    | 0.00 %                       | 0.00 % | 0.00 %                   | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 % |
| 4                                                            | Loans and advances                                                                              | 11.69 %                                                   | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.00 % | 0.00 %                                                    | 0.00 %                       | 0.00 % | 0.00 %                   | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 % |
| 5                                                            | Debt securities, including UoP                                                                  | 21.48 %                                                   | 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 % |
| 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                                                                    | 3.50 %                                                    | 0.90 %                   | 0.00 %                           | 0.00 %                       | 0.89 % | 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 % |
| 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                                                                  | 0.00 %                                                    | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.00 % | 0.00 %                                                    | 0.00 %                       | 0.00 % | 0.00 %                   | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 % |
| 11                                                           | Equity instruments                                                                              | 0.00 %                                                    | 0.00 %                   |                                  | 0.00 %                       | 0.00 % | 0.00 %                                                    | 0.00 %                       |        | 0.00 %                   | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 %                   |                              | 0.00 % |
| 12                                                           | of which management companies                                                                   | 3.54 %                                                    | 0.91 %                   | 0.00 %                           | 0.00 %                       | 0.90 % | 0.00 %                                                    | 0.00 %                       | 0.00 % | 0.00 %                   | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 % |
| 13                                                           | Loans and advances                                                                              | 0.00 %                                                    | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.00 % | 0.00 %                                                    | 0.00 %                       | 0.00 % | 0.00 %                   | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 % |
| 14                                                           | Debt securities, including UoP                                                                  | 16.89 %                                                   | 4.34 %                   | 0.00 %                           | 0.00 %                       | 4.28 % | 0.00 %                                                    | 0.00 %                       | 0.00 % | 0.00 %                   | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 % |
| 15                                                           | Equity instruments                                                                              | 0.00 %                                                    | 0.00 %                   |                                  | 0.00 %                       | 0.00 % | 0.00 %                                                    | 0.00 %                       |        | 0.00 %                   | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 %                   |                              | 0.00 % |
| 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 % |
| 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                                                                  | 0.00 %                                                    | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.00 % | 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 % |
| 20                                                           | Non-financial corporations                                                                      | 38.41 %                                                   | 8.92 %                   | 0.00 %                           | 0.19 %                       | 1.66 % | 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                                                                              | 31.63 %                                                   | 1.97 %                   | 0.00 %                           | 0.00 %                       | 1.75 % | 0.00 %                                                    | 0.00 %                       | 0.00 % | 0.00 %                   | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 % |
| 22                                                           | Debt securities, including UoP                                                                  | 63.53 %                                                   | 34.65 %                  | 0.00 %                           | 0.91 %                       | 1.32 % | 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 % |
| 24                                                           | Households                                                                                      | 99.21 %                                                   | 0.07 %                   | 0.07 %                           | 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                                 | 99.89 %                                                   | 0.07 %                   | 0.07 %                           | 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                                                              | 99.52 %                                                   | 0.01 %                   | 0.01 %                           | 0.00 %                       | 0.01 % | 0.00 %                                                    | 0.00 %                       | 0.00 % | 0.00 %                   |                                                           |        |                          |                              | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 % |
| 27                                                           | of which motor vehicle loans                                                                    |                                                           |                          |                                  |                              |        |                                                           |                              |        |                          |                                                           |        |                          |                              |                                                           |                          |                              |        |
| 28                                                           | Local government financing                                                                      | 48.00 %                                                   | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.00 % | 0.10 %                                                    | 0.00 %                       | 0.00 % | 0.00 %                   | 0.13 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.14 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 % |
| 29                                                           | Housing finance                                                                                 | 4.49 %                                                    | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.00 % | 0.00 %                                                    | 0.00 %                       | 0.00 % | 0.00 %                   | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 % |
| 30                                                           | Other local government financing                                                                | 49.34 %                                                   | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.00 % | 0.10 %                                                    | 0.00 %                       | 0.00 % | 0.00 %                   | 0.13 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.15 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 % |
| 31                                                           | Collateral obtained by taking possession: residential and 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 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 % |
| 32                                                           | Total GAR assets                                                                                | 17.59 %                                                   | 0.25 %                   | 0.01 %                           | 0.00 %                       | 0.06 % | 0.00 %                                                    | 0.00 %                       | 0.00 % | 0.00 %                   | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 % |

T3 Stock CapEx (3/4)

|                                                              |                                                                                                 | ax                                                        | ay     | az                       | ba                           | bb                                                        | bc     | bd                       | be                           | bf                                                        | bg                               | bh                           | bi     | bj     | bk                                 |
|--------------------------------------------------------------|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|----------------------------------|------------------------------|--------|--------|------------------------------------|
| % (compared to the total assets covered in the denominator)* |                                                                                                 | Disclosure reference date 31 December 2023                |        |                          |                              |                                                           |        |                          |                              |                                                           |                                  |                              |        |        |                                    |
|                                                              |                                                                                                 | Pollution prevention and control (PPC)                    |        |                          |                              | Biodiversity and ecosystems (BIO)                         |        |                          |                              | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                  |                                  |                              |        |        | Proportion of total assets covered |
|                                                              |                                                                                                 | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                                  |                              |        |        |                                    |
|                                                              |                                                                                                 | Of which environmentally sustainable (taxonomy-aligned)   |        | Of which use of proceeds | Of which enabling activities | Of which environmentally sustainable (taxonomy-aligned)   |        | Of which use of proceeds | Of which enabling activities | Of which environmentally sustainable (taxonomy-aligned)   |                                  |                              |        |        |                                    |
|                                                              |                                                                                                 |                                                           |        |                          |                              |                                                           |        |                          |                              | Of which use of proceeds                                  | Of which transitional activities | Of which enabling activities |        |        |                                    |
|                                                              | GAR – Assets covered in both numerator and denominator                                          |                                                           |        |                          |                              |                                                           |        |                          |                              |                                                           |                                  |                              |        |        |                                    |
| 1                                                            | Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 52.75 %                                                   | 0.75 %                           | 0.03 %                       | 0.01 % | 0.18 % | 29.84 %                            |
| 2                                                            | Financial corporations                                                                          | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 17.25 %                                                   | 0.23 %                           | 0.00 %                       | 0.00 % | 0.13 % | 14.32 %                            |
| 3                                                            | Credit institutions                                                                             | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 19.67 %                                                   | 0.11 %                           | 0.00 %                       | 0.00 % | 0.00 % | 12.18 %                            |
| 4                                                            | Loans and advances                                                                              | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 11.69 %                                                   | 0.00 %                           | 0.00 %                       | 0.00 % | 0.00 % | 1.97 %                             |
| 5                                                            | Debt securities, including UoP                                                                  | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 21.48 %                                                   | 0.14 %                           | 0.00 %                       | 0.00 % | 0.00 % | 10.08 %                            |
| 6                                                            | Equity instruments                                                                              | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 %                           |                              | 0.00 % | 0.00 % | 0.13 %                             |
| 7                                                            | Other financial corporations                                                                    | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 3.50 %                                                    | 0.90 %                           | 0.00 %                       | 0.00 % | 0.89 % | 2.14 %                             |
| 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 %                             |
| 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 %                             |
| 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 %                             |
| 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 %                             |
| 12                                                           | of which management companies                                                                   | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 3.54 %                                                    | 0.91 %                           | 0.00 %                       | 0.00 % | 0.90 % | 2.12 %                             |
| 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 % | 1.66 %                             |
| 14                                                           | Debt securities, including UoP                                                                  | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 16.89 %                                                   | 4.34 %                           | 0.00 %                       | 0.00 % | 4.28 % | 0.44 %                             |
| 15                                                           | Equity instruments                                                                              | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 %                           |                              | 0.00 % | 0.00 % | 0.01 %                             |
| 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 % | 0.02 %                             |
| 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 % | 0.02 %                             |
| 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 %                             |
| 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 %                             |
| 20                                                           | Non-financial corporations                                                                      | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 38.41 %                                                   | 8.92 %                           | 0.00 %                       | 0.19 % | 1.66 % | 2.06 %                             |
| 21                                                           | Loans and advances                                                                              | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 31.63 %                                                   | 1.97 %                           | 0.00 %                       | 0.00 % | 1.75 % | 1.62 %                             |
| 22                                                           | Debt securities, including UoP                                                                  | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 63.53 %                                                   | 34.65 %                          | 0.00 %                       | 0.91 % | 1.32 % | 0.44 %                             |
| 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 %                             |
| 24                                                           | Households                                                                                      |                                                           |        |                          |                              |                                                           |        |                          |                              | 99.21 %                                                   | 0.07 %                           | 0.07 %                       | 0.00 % | 0.00 % | 11.74 %                            |
| 25                                                           | of which loans collateralised by residential immovable property                                 |                                                           |        |                          |                              |                                                           |        |                          |                              | 99.89 %                                                   | 0.07 %                           | 0.07 %                       | 0.00 % | 0.00 % | 10.34 %                            |
| 26                                                           | of which building renovation loans                                                              |                                                           |        |                          |                              |                                                           |        |                          |                              | 99.52 %                                                   | 0.01 %                           | 0.01 %                       | 0.00 % | 0.01 % | 0.85 %                             |
| 27                                                           | of which motor vehicle loans                                                                    |                                                           |        |                          |                              |                                                           |        |                          |                              | 0.00 %                                                    | 0.00 %                           | 0.00 %                       | 0.00 % | 0.00 % | 0.00 %                             |
| 28                                                           | Local government financing                                                                      | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 48.37 %                                                   | 0.00 %                           | 0.00 %                       | 0.00 % | 0.00 % | 1.73 %                             |
| 29                                                           | Housing finance                                                                                 | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 4.49 %                                                    | 0.00 %                           | 0.00 %                       | 0.00 % | 0.00 % | 0.05 %                             |
| 30                                                           | Other local government financing                                                                | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 49.72 %                                                   | 0.00 %                           | 0.00 %                       | 0.00 % | 0.00 % | 1.67 %                             |
| 31                                                           | Collateral obtained by taking possession: residential and 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 %                       | 0.00 % | 0.00 % | 0.00 %                             |
| 32                                                           | Total GAR assets                                                                                | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 17.59 %                                                   | 0.25 %                           | 0.01 %                       | 0.00 % | 0.06 % | 89.47 %                            |

T3 Stock CapEx (4/4)

#### 4. GAR KPI flow (revenue-based)\*

|                                                          |                                                                                                 | a                                                         | b       | c                        | d                                | e                            | f                                                         | g      | h                        | i                            | j                                                         | k      | l                        | m                            | n                                                         | o      | p                        | q                            |
|----------------------------------------------------------|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------|---------|--------------------------|----------------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|
|                                                          |                                                                                                 | Disclosure reference date 31 December 2024                |         |                          |                                  |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |
|                                                          |                                                                                                 | Climate change mitigation (CCM)                           |         |                          |                                  |                              | Climate change adaptation (CCA)                           |        |                          |                              | Water and marine resources (WTR)                          |        |                          |                              | Circular economy (CE)                                     |        |                          |                              |
|                                                          |                                                                                                 | Of which in taxonomy-relevant sectors (taxonomy-eligible) |         |                          |                                  |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              |
|                                                          |                                                                                                 | Of which environmentally sustainable (taxonomy-aligned)   |         |                          |                                  |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              |
|                                                          |                                                                                                 |                                                           |         | Of which use of proceeds | Of which transitional activities | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which enabling activities |
| % (compared to flow of total taxonomy-eligible assets)** |                                                                                                 |                                                           |         |                          |                                  |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |
|                                                          | GAR – Assets covered in both numerator and denominator                                          |                                                           |         |                          |                                  |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |
| 1                                                        | Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation | 64.85 %                                                   | 10.56 % | 1.66 %                   | 2.14 %                           | 5.94 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.01 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.61 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 2                                                        | Financial corporations                                                                          | 7.69 %                                                    | 0.24 %  | 0.00 %                   | 0.00 %                           | 0.05 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.05 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 3                                                        | Credit institutions                                                                             | 16.10 %                                                   | 0.50 %  | 0.00 %                   | 0.00 %                           | 0.10 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.10 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 4                                                        | Loans and advances                                                                              | 16.10 %                                                   | 0.50 %  | 0.00 %                   | 0.00 %                           | 0.10 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.10 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 5                                                        | 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 %                       |
| 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                                                                    | 0.00 %                                                    | 0.00 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       | 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 %                       |
| 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                                                                  | 0.00 %                                                    | 0.00 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 11                                                       | Equity instruments                                                                              | 0.00 %                                                    | 0.00 %  |                          | 0.00 %                           | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       |
| 12                                                       | of which management companies                                                                   | 0.00 %                                                    | 0.00 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 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                                                                              | 0.00 %                                                    | 0.00 %  |                          | 0.00 %                           | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       |
| 16                                                       | of which insurance 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 %                       |
| 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                                                                  | 0.00 %                                                    | 0.00 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       | 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 %                       |
| 20                                                       | Non-financial corporations                                                                      | 62.25 %                                                   | 34.07 % | 0.00 %                   | 8.26 %                           | 22.76 %                      | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 2.33 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 21                                                       | Loans and advances                                                                              | 62.25 %                                                   | 34.07 % | 0.00 %                   | 8.26 %                           | 22.76 %                      | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 2.33 %                                                    | 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 %                   | 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 %                       |
| 24                                                       | Households                                                                                      | 97.17 %                                                   | 3.62 %  | 3.62 %                   | 0.00 %                           | 0.04 %                       | 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                                 | 97.22 %                                                   | 2.95 %  | 2.95 %                   | 0.00 %                           | 0.05 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |                                                           |        |                          |                              | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 26                                                       | of which building renovation loans                                                              | 98.91 %                                                   | 0.86 %  | 0.86 %                   | 0.00 %                           | 0.52 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |                                                           |        |                          |                              | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 27                                                       | of which motor vehicle loans                                                                    | 100.00 %                                                  | 0.00 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       |                                                           |        |                          |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |
| 28                                                       | Local government financing                                                                      | 35.38 %                                                   | 0.00 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       | 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 finance                                                                                 | 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 %                       |
| 30                                                       | Other local government financing                                                                | 17.04 %                                                   | 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 %                       |
| 31                                                       | Collateral obtained by taking possession: residential and 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 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 32                                                       | Total GAR assets                                                                                | 6.92 %                                                    | 1.13 %  | 0.18 %                   | 0.23 %                           | 0.63 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |

\*Receivables newly entered into during the year prior to the disclosure reference date, without deducting the amounts of loan repayments or disposals of debt/equity instruments that took place during the year prior to the disclosure reference date. This is determined by reference to the date of addition. A flow of zero was recognised for derivatives, on-demand interbank loans and cash and cash-related assets, as the market value on conclusion is zero or the instruments have no maturity (third Commission Notice (C/2024/6691), question 65).

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|                                                          |                                                                                                 | r                                                         | s      | t                        | u                            | v                                                         | w      | x                        | z                            | aa                                                        | ab      | ac     | ad                       | ae                               | af                                        |                              |
|----------------------------------------------------------|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|---------|--------|--------------------------|----------------------------------|-------------------------------------------|------------------------------|
| % (compared to flow of total taxonomy-eligible assets)** |                                                                                                 | Disclosure reference date 31 December 2024                |        |                          |                              |                                                           |        |                          |                              |                                                           |         |        |                          |                                  |                                           |                              |
|                                                          |                                                                                                 | Pollution prevention and control (PPC)                    |        |                          |                              | Biodiversity and ecosystems (BIO)                         |        |                          |                              | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                  |         |        |                          |                                  | Proportion of total new assets covered*** |                              |
|                                                          |                                                                                                 | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |         |        |                          |                                  |                                           |                              |
|                                                          |                                                                                                 | Of which environmentally sustainable (taxonomy-aligned)   |        | Of which use of proceeds | Of which enabling activities | Of which environmentally sustainable (taxonomy-aligned)   |        | Of which use of proceeds | Of which enabling activities | Of which environmentally sustainable (taxonomy-aligned)   |         |        | Of which use of proceeds | Of which transitional activities |                                           | Of which enabling activities |
|                                                          |                                                                                                 |                                                           |        |                          |                              |                                                           |        |                          |                              |                                                           |         |        |                          |                                  |                                           |                              |
|                                                          | GAR – Assets covered in both numerator and denominator                                          |                                                           |        |                          |                              |                                                           |        |                          |                              |                                                           |         |        |                          |                                  |                                           |                              |
| 1                                                        | Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 65.46 %                                                   | 10.56 % | 1.66 % | 2.14 %                   | 5.94 %                           | 10.09 %                                   |                              |
| 2                                                        | Financial corporations                                                                          | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 7.74 %                                                    | 0.24 %  | 0.00 % | 0.00 %                   | 0.05 %                           | 2.11 %                                    |                              |
| 3                                                        | Credit institutions                                                                             | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 16.20 %                                                   | 0.50 %  | 0.00 % | 0.00 %                   | 0.10 %                           | 1.01 %                                    |                              |
| 4                                                        | Loans and advances                                                                              | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 16.20 %                                                   | 0.50 %  | 0.00 % | 0.00 %                   | 0.10 %                           | 1.01 %                                    |                              |
| 5                                                        | 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 %                                    |                              |
| 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 %                                    |                              |
| 7                                                        | Other financial corporations                                                                    | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 %  | 0.00 % | 0.00 %                   | 0.00 %                           | 1.10 %                                    |                              |
| 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 %                                    |                              |
| 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 %                                    |                              |
| 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 %                                    |                              |
| 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 %                                    |                              |
| 12                                                       | of which management companies                                                                   | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 %  | 0.00 % | 0.00 %                   | 0.00 %                           | 1.10 %                                    |                              |
| 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 %                           | 1.10 %                                    |                              |
| 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 %                                    |                              |
| 15                                                       | Equity instruments                                                                              | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 %  |        | 0.00 %                   | 0.00 %                           | 0.00 %                                    |                              |
| 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 %                                    |                              |
| 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 %                                    |                              |
| 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 %                                    |                              |
| 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 %                                    |                              |
| 20                                                       | Non-financial corporations                                                                      | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 64.59 %                                                   | 34.07 % | 0.00 % | 8.26 %                   | 22.76 %                          | 2.62 %                                    |                              |
| 21                                                       | Loans and advances                                                                              | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 64.59 %                                                   | 34.07 % | 0.00 % | 8.26 %                   | 22.76 %                          | 2.62 %                                    |                              |
| 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 %                                    |                              |
| 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 %                                    |                              |
| 24                                                       | Households                                                                                      |                                                           |        |                          |                              |                                                           |        |                          |                              | 97.17 %                                                   | 3.62 %  | 3.62 % | 0.00 %                   | 0.04 %                           | 4.62 %                                    |                              |
| 25                                                       | of which loans collateralised by residential immovable property                                 |                                                           |        |                          |                              |                                                           |        |                          |                              | 97.22 %                                                   | 2.95 %  | 2.95 % | 0.00 %                   | 0.05 %                           | 4.01 %                                    |                              |
| 26                                                       | of which building renovation loans                                                              |                                                           |        |                          |                              |                                                           |        |                          |                              | 98.91 %                                                   | 0.86 %  | 0.86 % | 0.00 %                   | 0.52 %                           | 0.40 %                                    |                              |
| 27                                                       | of which motor vehicle loans                                                                    |                                                           |        |                          |                              |                                                           |        |                          |                              | 100.00 %                                                  | 0.00 %  | 0.00 % | 0.00 %                   | 0.00 %                           | 0.00 %                                    |                              |
| 28                                                       | Local government financing                                                                      | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 35.38 %                                                   | 0.00 %  | 0.00 % | 0.00 %                   | 0.00 %                           | 0.74 %                                    |                              |
| 29                                                       | Housing finance                                                                                 | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 100.00 %                                                  | 0.00 %  | 0.00 % | 0.00 %                   | 0.00 %                           | 0.16 %                                    |                              |
| 30                                                       | Other local government financing                                                                | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 17.04 %                                                   | 0.00 %  | 0.00 % | 0.00 %                   | 0.00 %                           | 0.58 %                                    |                              |
| 31                                                       | Collateral obtained by taking possession: residential and 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 % | 0.00 %                   | 0.00 %                           | 0.00 %                                    |                              |
| 32                                                       | Total GAR assets                                                                                | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 6.92 %                                                    | 1.13 %  | 0.18 % | 0.23 %                   | 0.63 %                           | 94.56 %                                   |                              |

\*\*\*New assets covered in both numerator and denominator as a proportion of the flow of total assets

#### 4. GAR KPI flow (CapEx-based)\*

|                                                          |                                                                                                 | a                                                         | b       | c                        | d                                | e                            | f                                                         | g      | h                        | i                            | j                                                         | k      | l                        | m                            | n                                                         | o      | p                        | q                            |
|----------------------------------------------------------|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------|---------|--------------------------|----------------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|
| % (compared to flow of total taxonomy-eligible assets)** |                                                                                                 | Disclosure reference date 31 December 2024                |         |                          |                                  |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |
|                                                          |                                                                                                 | Climate change mitigation (CCM)                           |         |                          |                                  |                              | Climate change adaptation (CCA)                           |        |                          |                              | Water and marine resources (WTR)                          |        |                          |                              | Circular economy (CE)                                     |        |                          |                              |
|                                                          |                                                                                                 | Of which in taxonomy-relevant sectors (taxonomy-eligible) |         |                          |                                  |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              |
|                                                          |                                                                                                 | Of which environmentally sustainable (taxonomy-aligned)   |         |                          |                                  |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              |
|                                                          |                                                                                                 |                                                           |         | Of which use of proceeds | Of which transitional activities | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which enabling activities |
|                                                          | GAR – Assets covered in both numerator and denominator                                          |                                                           |         |                          |                                  |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |
| 1                                                        | Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation | 66.85 %                                                   | 11.38 % | 1.66 %                   | 2.06 %                           | 7.42 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.01 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.72 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 2                                                        | Financial corporations                                                                          | 7.93 %                                                    | 0.38 %  | 0.00 %                   | 0.00 %                           | 0.14 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.05 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 3                                                        | Credit institutions                                                                             | 16.60 %                                                   | 0.80 %  | 0.00 %                   | 0.00 %                           | 0.30 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.10 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 4                                                        | Loans and advances                                                                              | 16.60 %                                                   | 0.80 %  | 0.00 %                   | 0.00 %                           | 0.30 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.10 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 5                                                        | 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 %                       |
| 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                                                                    | 0.00 %                                                    | 0.00 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       | 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 %                       |
| 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                                                                  | 0.00 %                                                    | 0.00 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 11                                                       | Equity instruments                                                                              | 0.00 %                                                    | 0.00 %  |                          | 0.00 %                           | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       |
| 12                                                       | of which management companies                                                                   | 0.00 %                                                    | 0.00 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 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                                                                              | 0.00 %                                                    | 0.00 %  |                          | 0.00 %                           | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       |
| 16                                                       | of which insurance 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 %                       |
| 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                                                                  | 0.00 %                                                    | 0.00 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       | 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 %                       |
| 20                                                       | Non-financial corporations                                                                      | 69.76 %                                                   | 37.13 % | 0.00 %                   | 7.95 %                           | 28.39 %                      | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 2.79 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 21                                                       | Loans and advances                                                                              | 69.76 %                                                   | 37.13 % | 0.00 %                   | 7.95 %                           | 28.39 %                      | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 2.79 %                       | 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 %                   | 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 %                       |
| 24                                                       | Households                                                                                      | 97.17 %                                                   | 3.62 %  | 3.62 %                   | 0.00 %                           | 0.04 %                       | 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                                 | 97.22 %                                                   | 2.95 %  | 2.95 %                   | 0.00 %                           | 0.05 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |                                                           |        |                          | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 26                                                       | of which building renovation loans                                                              | 98.91 %                                                   | 0.86 %  | 0.86 %                   | 0.00 %                           | 0.52 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |                                                           |        |                          | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 27                                                       | of which motor vehicle loans                                                                    | 100.00 %                                                  | 0.00 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       |                                                           |        |                          |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |
| 28                                                       | Local government financing                                                                      | 35.38 %                                                   | 0.00 %  | 0.00 %                   | 0.00 %                           | 0.00 %                       | 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 finance                                                                                 | 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 %                       |
| 30                                                       | Other local government financing                                                                | 17.04 %                                                   | 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 %                       |
| 31                                                       | Collateral obtained by taking possession: residential and 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 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |
| 32                                                       | Total GAR assets                                                                                | 7.13 %                                                    | 1.21 %  | 0.18 %                   | 0.22 %                           | 0.79 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |

\*Receivables newly entered into during the year prior to the disclosure reference date, without deducting the amounts of loan repayments or disposals of debt/equity instruments that took place during the year prior to the disclosure reference date. This is determined by reference to the date of addition. A flow of zero was recognised for derivatives, on-demand interbank loans and cash and cash-related assets, as the market value on conclusion is zero or the instruments have no maturity (third Commission Notice (C/2024/6691), question 65).

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|                                                          |                                                                                                 | r                                                         | s      | t                        | u                            | v                                                         | w      | x                        | z                            | aa                                                        | ab                               | ac                           | ad     | ae      | af                                        |
|----------------------------------------------------------|-------------------------------------------------------------------------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|----------------------------------|------------------------------|--------|---------|-------------------------------------------|
| % (compared to flow of total taxonomy-eligible assets)** |                                                                                                 | Disclosure reference date 31 December 2024                |        |                          |                              |                                                           |        |                          |                              |                                                           |                                  |                              |        |         |                                           |
|                                                          |                                                                                                 | Pollution prevention and control (PPC)                    |        |                          |                              | Biodiversity and ecosystems (BIO)                         |        |                          |                              | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                  |                                  |                              |        |         | Proportion of total new assets covered*** |
|                                                          |                                                                                                 | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                                  |                              |        |         |                                           |
|                                                          |                                                                                                 | Of which environmentally sustainable (taxonomy-aligned)   |        | Of which use of proceeds | Of which enabling activities | Of which environmentally sustainable (taxonomy-aligned)   |        | Of which use of proceeds | Of which enabling activities | Of which environmentally sustainable (taxonomy-aligned)   |                                  |                              |        |         |                                           |
|                                                          |                                                                                                 |                                                           |        |                          |                              |                                                           |        |                          |                              | Of which use of proceeds                                  | Of which transitional activities | Of which enabling activities |        |         |                                           |
|                                                          | GAR – Assets covered in both numerator and denominator                                          |                                                           |        |                          |                              |                                                           |        |                          |                              |                                                           |                                  |                              |        |         |                                           |
| 1                                                        | Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 67.58 %                                                   | 11.38 %                          | 1.66 %                       | 2.06 % | 7.42 %  | 10.09 %                                   |
| 2                                                        | Financial corporations                                                                          | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 7.98 %                                                    | 0.38 %                           | 0.00 %                       | 0.00 % | 0.14 %  | 2.11 %                                    |
| 3                                                        | Credit institutions                                                                             | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 16.70 %                                                   | 0.80 %                           | 0.00 %                       | 0.00 % | 0.30 %  | 1.01 %                                    |
| 4                                                        | Loans and advances                                                                              | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 16.70 %                                                   | 0.80 %                           | 0.00 %                       | 0.00 % | 0.30 %  | 1.01 %                                    |
| 5                                                        | 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 %                                    |
| 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 %                                    |
| 7                                                        | Other financial corporations                                                                    | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 %                           | 0.00 %                       | 0.00 % | 0.00 %  | 1.10 %                                    |
| 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 %                                    |
| 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 %                                    |
| 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 %                                    |
| 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 %                                    |
| 12                                                       | of which management companies                                                                   | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 %                           | 0.00 %                       | 0.00 % | 0.00 %  | 1.10 %                                    |
| 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 %  | 1.10 %                                    |
| 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 %                                    |
| 15                                                       | Equity instruments                                                                              | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 % |                          | 0.00 %                       | 0.00 %                                                    | 0.00 %                           |                              | 0.00 % | 0.00 %  | 0.00 %                                    |
| 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 %                                    |
| 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 %                                    |
| 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 %                                    |
| 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 %                                    |
| 20                                                       | Non-financial corporations                                                                      | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 72.55 %                                                   | 37.13 %                          | 0.00 %                       | 7.95 % | 28.39 % | 2.62 %                                    |
| 21                                                       | Loans and advances                                                                              | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 72.55 %                                                   | 37.13 %                          | 0.00 %                       | 7.95 % | 28.39 % | 2.62 %                                    |
| 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 %                                    |
| 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 %                                    |
| 24                                                       | Households                                                                                      |                                                           |        |                          |                              |                                                           |        |                          |                              | 97.17 %                                                   | 3.62 %                           | 3.62 %                       | 0.00 % | 0.04 %  | 4.62 %                                    |
| 25                                                       | of which loans collateralised by residential immovable property                                 |                                                           |        |                          |                              |                                                           |        |                          |                              | 97.22 %                                                   | 2.95 %                           | 2.95 %                       | 0.00 % | 0.05 %  | 4.01 %                                    |
| 26                                                       | of which building renovation loans                                                              |                                                           |        |                          |                              |                                                           |        |                          |                              | 98.91 %                                                   | 0.86 %                           | 0.86 %                       | 0.00 % | 0.52 %  | 0.40 %                                    |
| 27                                                       | of which motor vehicle loans                                                                    |                                                           |        |                          |                              |                                                           |        |                          |                              | 100.00 %                                                  | 0.00 %                           | 0.00 %                       | 0.00 % | 0.00 %  | 0.00 %                                    |
| 28                                                       | Local government financing                                                                      | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 35.38 %                                                   | 0.00 %                           | 0.00 %                       | 0.00 % | 0.00 %  | 0.74 %                                    |
| 29                                                       | Housing finance                                                                                 | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 100.00 %                                                  | 0.00 %                           | 0.00 %                       | 0.00 % | 0.00 %  | 0.16 %                                    |
| 30                                                       | Other local government financing                                                                | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 17.04 %                                                   | 0.00 %                           | 0.00 %                       | 0.00 % | 0.00 %  | 0.58 %                                    |
| 31                                                       | Collateral obtained by taking possession: residential and 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 %                       | 0.00 % | 0.00 %  | 0.00 %                                    |
| 32                                                       | Total GAR assets                                                                                | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 7.13 %                                                    | 1.21 %                           | 0.18 %                       | 0.22 % | 0.79 %  | 94.56 %                                   |

\*\*\*New assets covered in both numerator and denominator as a proportion of the flow of total assets

5. KPI off-balance-sheet exposures (portfolio, revenue-based)

|                                                          |                                    | a                                                         | b                        | c                                | d                            | e      | f                                                         | g                        | h                            | i      | j                                                         | k                        | l                            | m      | n                                                         | o                        | p                            | q      |
|----------------------------------------------------------|------------------------------------|-----------------------------------------------------------|--------------------------|----------------------------------|------------------------------|--------|-----------------------------------------------------------|--------------------------|------------------------------|--------|-----------------------------------------------------------|--------------------------|------------------------------|--------|-----------------------------------------------------------|--------------------------|------------------------------|--------|
| % (compared to total eligible off-balance-sheet assets)* |                                    | Disclosure reference date 31 December 2024                |                          |                                  |                              |        |                                                           |                          |                              |        |                                                           |                          |                              |        |                                                           |                          |                              |        |
|                                                          |                                    | Climate change mitigation (CCM)                           |                          |                                  |                              |        | Climate change adaptation (CCA)                           |                          |                              |        | Water and marine resources (WTR)                          |                          |                              |        | Circular economy (CE)                                     |                          |                              |        |
|                                                          |                                    | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                          |                                  |                              |        | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                          |                              |        | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                          |                              |        | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                          |                              |        |
|                                                          |                                    | Of which environmentally sustainable (taxonomy-aligned)   |                          |                                  |                              |        | Of which environmentally sustainable (taxonomy-aligned)   |                          |                              |        | Of which environmentally sustainable (taxonomy-aligned)   |                          |                              |        | Of which environmentally sustainable (taxonomy-aligned)   |                          |                              |        |
|                                                          |                                    |                                                           | Of which use of proceeds | Of which transitional activities | Of which enabling activities |        |                                                           | Of which use of proceeds | Of which enabling activities |        |                                                           | Of which use of proceeds | Of which enabling activities |        |                                                           | Of which use of proceeds | Of which enabling activities |        |
| 1                                                        | Financial guarantees (FinGuar KPI) | 2.79 %                                                    | 0.27 %                   | 0.00 %                           | 0.00 %                       | 0.23 % | 0.32 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 % | 0.01 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 % | 0.79 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 % |
| 2                                                        | Assets under management (AuM KPI)  | 19.82 %                                                   | 6.90 %                   | 0.00 %                           | 0.16 %                       | 3.76 % | 0.41 %                                                    | 0.03 %                   | 0.00 %                       | 0.01 % | 0.26 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 % | 2.13 %                                                    | 0.00 %                   | 0.00 %                       | 0.00 % |

|                                                          |                                    | r                                                         | s                        | t                                                       | u      | v                                                         | w                        | x                                                       | z      | aa                                                        | ab                       | ac                               | ad                           | ae     |
|----------------------------------------------------------|------------------------------------|-----------------------------------------------------------|--------------------------|---------------------------------------------------------|--------|-----------------------------------------------------------|--------------------------|---------------------------------------------------------|--------|-----------------------------------------------------------|--------------------------|----------------------------------|------------------------------|--------|
| % (compared to total eligible off-balance-sheet assets)* |                                    | Disclosure reference date 31 December 2024                |                          |                                                         |        |                                                           |                          |                                                         |        |                                                           |                          |                                  |                              |        |
|                                                          |                                    | Pollution prevention and control (PPC)                    |                          |                                                         |        | Biodiversity and ecosystems (BIO)                         |                          |                                                         |        | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                  |                          |                                  |                              |        |
|                                                          |                                    | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                          |                                                         |        | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                          |                                                         |        | Of which in taxonomy-relevant sectors (taxonomy-eligible) |                          |                                  |                              |        |
|                                                          |                                    | Of which environmentally sustainable (taxonomy-aligned)   |                          | Of which environmentally sustainable (taxonomy-aligned) |        | Of which environmentally sustainable (taxonomy-aligned)   |                          | Of which environmentally sustainable (taxonomy-aligned) |        |                                                           |                          |                                  |                              |        |
|                                                          |                                    |                                                           |                          |                                                         |        |                                                           |                          |                                                         |        |                                                           |                          |                                  |                              |        |
|                                                          |                                    |                                                           | Of which use of proceeds | Of which enabling activities                            |        |                                                           | Of which use of proceeds | Of which enabling activities                            |        |                                                           | Of which use of proceeds | Of which transitional activities | Of which enabling activities |        |
| 1                                                        | Financial guarantees (FinGuar KPI) | 0.00 %                                                    | 0.00 %                   | 0.00 %                                                  | 0.00 % | 0.32 %                                                    | 0.00 %                   | 0.00 %                                                  | 0.00 % | 4.23 %                                                    | 0.27 %                   | 0.00 %                           | 0.00 %                       | 0.23 % |
| 2                                                        | Assets under management (AuM KPI)  | 1.49 %                                                    | 0.00 %                   | 0.00 %                                                  | 0.00 % | 0.01 %                                                    | 0.00 %                   | 0.00 %                                                  | 0.00 % | 24.12 %                                                   | 6.93 %                   | 0.00 %                           | 0.16 %                       | 3.77 % |

\*per row

5. KPI off-balance-sheet exposures (portfolio, CapEx-based)

|                                                          |                                    | a                                                         | b       | c                        | d                                | e                            | f                                                         | g      | h                        | i                            | j                                                         | k      | l                        | m                            | n                                                         | o      | p                        | q                            |
|----------------------------------------------------------|------------------------------------|-----------------------------------------------------------|---------|--------------------------|----------------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|
| % (compared to total eligible off-balance-sheet assets)* |                                    | Disclosure reference date 31 December 2024                |         |                          |                                  |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |
|                                                          |                                    | Climate change mitigation (CCM)                           |         |                          |                                  |                              | Climate change adaptation (CCA)                           |        |                          |                              | Water and marine resources (WTR)                          |        |                          |                              | Circular economy (CE)                                     |        |                          |                              |
|                                                          |                                    | Of which in taxonomy-relevant sectors (taxonomy-eligible) |         |                          |                                  |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              |
|                                                          |                                    | Of which environmentally sustainable (taxonomy-aligned)   |         |                          |                                  |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              |
|                                                          |                                    |                                                           |         | Of which use of proceeds | Of which transitional activities | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which enabling activities |
| 1                                                        | Financial guarantees (FinGuar KPI) | 1.27 %                                                    | 0.18 %  | 0.00 %                   | 0.00 %                           | 0.08 %                       | 0.32 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   | 0.33 %                       | 0.00 %                                                    | 0.00 % | 0.00 %                   |                              |
| 2                                                        | Assets under management (AuM KPI)  | 28.30 %                                                   | 12.68 % | 0.00 %                   | 0.48 %                           | 5.74 %                       | 1.62 %                                                    | 0.02 % | 0.00 %                   | 0.00 %                       | 0.35 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 1.23 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |

|                                                          |                                    | r                                                         | s      | t                        | u                            | v                                                         | w      | x                        | z                            | aa                                                        | ab      | ac                       | ad                               | ae                           |
|----------------------------------------------------------|------------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|---------|--------------------------|----------------------------------|------------------------------|
| % (compared to total eligible off-balance-sheet assets)* |                                    | Disclosure reference date 31 December 2024                |        |                          |                              |                                                           |        |                          |                              |                                                           |         |                          |                                  |                              |
|                                                          |                                    | Pollution prevention and control (PPC)                    |        |                          |                              | Biodiversity and ecosystems (BIO)                         |        |                          |                              | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                  |         |                          |                                  |                              |
|                                                          |                                    | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |         |                          |                                  |                              |
|                                                          |                                    | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |         |                          |                                  |                              |
|                                                          |                                    |                                                           |        | Of which use of proceeds | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which enabling activities |                                                           |         | Of which use of proceeds | Of which transitional activities | Of which enabling activities |
| 1                                                        | Financial guarantees (FinGuar KPI) | 0.01 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.32 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 2.24 %                                                    | 0.18 %  | 0.00 %                   | 0.00 %                           | 0.08 %                       |
| 2                                                        | Assets under management (AuM KPI)  | 1.24 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.03 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 32.76 %                                                   | 12.70 % | 0.00 %                   | 0.48 %                           | 5.74 %                       |

\*per row

## 5. KPI off-balance-sheet exposures (flow, revenue-based)

|                                                          |                                    | a                                                         | b      | c                        | d                                | e                            | f                                                         | g      | h                        | i                            | j                                                         | k      | l                        | m                            | n                                                         | o      | p                        | q                            |
|----------------------------------------------------------|------------------------------------|-----------------------------------------------------------|--------|--------------------------|----------------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|
| % (compared to total eligible off-balance-sheet assets)* |                                    | Disclosure reference date 31 December 2024                |        |                          |                                  |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |
|                                                          |                                    | Climate change mitigation (CCM)                           |        |                          |                                  |                              | Climate change adaptation (CCA)                           |        |                          |                              | Water and marine resources (WTR)                          |        |                          |                              | Circular economy (CE)                                     |        |                          |                              |
|                                                          |                                    | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                                  |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              |
|                                                          |                                    | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                                  |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              |
|                                                          |                                    |                                                           |        | Of which use of proceeds | Of which transitional activities | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which enabling activities |
| 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 % | 0.00 %                   | 0.00 %                       |
| 2                                                        | Assets under management (AuM KPI)  | 21.65 %                                                   | 6.97 % | 0.00 %                   | 0.07 %                           | 4.24 %                       | 0.38 %                                                    | 0.02 % | 0.00 %                   | 0.01 %                       | 0.10 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 2.10 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |

|                                                          |                                    | r                                                         | s      | t                        | u                            | v                                                         | w      | x                        | z                            | aa                                                        | ab     | ac                       | ad                               | ae                           |
|----------------------------------------------------------|------------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|----------------------------------|------------------------------|
| % (compared to total eligible off-balance-sheet assets)* |                                    | Disclosure reference date 31 December 2024                |        |                          |                              |                                                           |        |                          |                              |                                                           |        |                          |                                  |                              |
|                                                          |                                    | Pollution prevention and control (PPC)                    |        |                          |                              | Biodiversity and ecosystems (BIO)                         |        |                          |                              | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                  |        |                          |                                  |                              |
|                                                          |                                    | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                                  |                              |
|                                                          |                                    | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                                  |                              |
|                                                          |                                    |                                                           |        | Of which use of proceeds | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which transitional activities | Of which enabling activities |
| 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 %                       |
| 2                                                        | Assets under management (AuM KPI)  | 1.07 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.01 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 25.32 %                                                   | 6.99 % | 0.00 %                   | 0.07 %                           | 4.25 %                       |

\*per row

## 5. KPI off-balance-sheet exposures (flow, CapEx-based)

|                                                          |                                    | a                                                         | b       | c                        | d                                | e                            | f                                                         | g      | h                        | i                            | j                                                         | k      | l                        | m                            | n                                                         | o      | p                        | q                            |
|----------------------------------------------------------|------------------------------------|-----------------------------------------------------------|---------|--------------------------|----------------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|
| % (compared to total eligible off-balance-sheet assets)* |                                    | Disclosure reference date 31 December 2024                |         |                          |                                  |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |                                                           |        |                          |                              |
|                                                          |                                    | Climate change mitigation (CCM)                           |         |                          |                                  |                              | Climate change adaptation (CCA)                           |        |                          |                              | Water and marine resources (WTR)                          |        |                          |                              | Circular economy (CE)                                     |        |                          |                              |
|                                                          |                                    | Of which in taxonomy-relevant sectors (taxonomy-eligible) |         |                          |                                  |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              |
|                                                          |                                    | Of which environmentally sustainable (taxonomy-aligned)   |         |                          |                                  |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              |
|                                                          |                                    |                                                           |         | Of which use of proceeds | Of which transitional activities | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which enabling activities |
| 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 % | 0.00 %                   | 0.00 %                       |
| 2                                                        | Assets under management (AuM KPI)  | 29.78 %                                                   | 13.04 % | 0.00 %                   | 0.38 %                           | 6.01 %                       | 1.32 %                                                    | 0.02 % | 0.00 %                   | 0.00 %                       | 0.13 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 1.00 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       |

|                                                          |                                    | r                                                         | s      | t                        | u                            | v                                                         | w      | x                        | z                            | aa                                                        | ab      | ac                       | ad                               | ae                           |
|----------------------------------------------------------|------------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|--------|--------------------------|------------------------------|-----------------------------------------------------------|---------|--------------------------|----------------------------------|------------------------------|
| % (compared to total eligible off-balance-sheet assets)* |                                    | Disclosure reference date 31 December 2024                |        |                          |                              |                                                           |        |                          |                              |                                                           |         |                          |                                  |                              |
|                                                          |                                    | Pollution prevention and control (PPC)                    |        |                          |                              | Biodiversity and ecosystems (BIO)                         |        |                          |                              | TOTAL (CCM + CCA + WTR + CE + PPC + BIO)                  |         |                          |                                  |                              |
|                                                          |                                    | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |        |                          |                              | Of which in taxonomy-relevant sectors (taxonomy-eligible) |         |                          |                                  |                              |
|                                                          |                                    | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |        |                          |                              | Of which environmentally sustainable (taxonomy-aligned)   |         |                          |                                  |                              |
|                                                          |                                    |                                                           |        | Of which use of proceeds | Of which enabling activities |                                                           |        | Of which use of proceeds | Of which enabling activities |                                                           |         | Of which use of proceeds | Of which transitional activities | Of which enabling activities |
| 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 %                       |
| 2                                                        | Assets under management (AuM KPI)  | 0.98 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 0.03 %                                                    | 0.00 % | 0.00 %                   | 0.00 %                       | 33.24 %                                                   | 13.05 % | 0.00 %                   | 0.38 %                           | 6.01 %                       |

\*per row



## TEMPLATES IN ACCORDANCE WITH ANNEX XII TO DELEGATED REGULATION (EU) 2021/2178 ON THE TAXONOMY REGULATION (EU) 2020/852

### Template 1 Nuclear and fossil gas related activities

#### Stock

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

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

#### Stock (revenue-based)

| Economic activities                                                                                                                                                                            | CCM + CCA   |        | Climate change mitigation (CCM) |        | Climate change adaptation (CCA) |        |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|--------|---------------------------------|--------|---------------------------------|--------|
|                                                                                                                                                                                                | EUR million | in %   | EUR million                     | in %   | EUR million                     | in %   |
| 1. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00        | 0.00 % | 0.00                            | 0.00 % | 0.00                            | 0.00 % |
| 2. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00        | 0.00 % | 0.00                            | 0.00 % | 0.00                            | 0.00 % |
| 3. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.23        | 0.00 % | 0.23                            | 0.00 % | 0.00                            | 0.00 % |
| 4. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00        | 0.00 % | 0.00                            | 0.00 % | 0.00                            | 0.00 % |
| 5. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00        | 0.00 % | 0.00                            | 0.00 % | 0.00                            | 0.00 % |
| 6. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00        | 0.00 % | 0.00                            | 0.00 % | 0.00                            | 0.00 % |
| 7. 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                                           | 91.31       | 0.66 % | 91.26                           | 0.66 % | 0.05                            | 0.00 % |
| 8. Total applicable KPI                                                                                                                                                                        | 91.54       | 0.66 % | 91.49                           | 0.66 % | 0.05                            | 0.00 % |

**Template 3 Taxonomy-aligned economic activities (numerator)**  
**Stock (revenue-based)**

| Economic activities                                                                                                                                                                          | CCM + CCA    |                 | Climate change mitigation (CCM) |                 | Climate change adaptation (CCA) |                 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|-----------------|---------------------------------|-----------------|---------------------------------|-----------------|
|                                                                                                                                                                                              | EUR million  | in %            | EUR million                     | in %            | EUR million                     | in %            |
| 1. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00         | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 0.00 %          |
| 2. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00         | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 0.00 %          |
| 3. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.23         | 0.25 %          | 0.23                            | 0.25 %          | 0.00                            | 0.00 %          |
| 4. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00         | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 0.00 %          |
| 5. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00         | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 0.07 %          |
| 6. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00         | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 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                                           | 91.31        | 99.74 %         | 91.26                           | 99.74 %         | 0.05                            | 99.93 %         |
| <b>8. Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>                                                                         | <b>91.54</b> | <b>100.00 %</b> | <b>91.49</b>                    | <b>100.00 %</b> | <b>0.05</b>                     | <b>100.00 %</b> |

**Template 4 Taxonomy-eligible but not taxonomy-aligned economic activities**  
**Stock (revenue-based)**

| Economic activities                                                                                                                                                                                                      | CCM + CCA       |                | Climate change mitigation (CCM) |                | Climate change adaptation (CCA) |               |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|----------------|---------------------------------|----------------|---------------------------------|---------------|
|                                                                                                                                                                                                                          | EUR million     | in %           | EUR million                     | in %           | EUR million                     | in %          |
| 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 Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00            | 0.00 %         | 0.00                            | 0.00 %         | 0.00                            | 0.00 %        |
| 2. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00            | 0.00 %         | 0.00                            | 0.00 %         | 0.00                            | 0.00 %        |
| 3. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.01            | 0.00 %         | 0.01                            | 0.00 %         | 0.00                            | 0.00 %        |
| 4. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.17            | 0.00 %         | 0.17                            | 0.00 %         | 0.00                            | 0.00 %        |
| 5. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.13            | 0.00 %         | 0.13                            | 0.00 %         | 0.00                            | 0.00 %        |
| 6. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.02            | 0.00 %         | 0.02                            | 0.00 %         | 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                                           | 2,262.08        | 16.33 %        | 2,258.81                        | 16.31 %        | 3.27                            | 0.02 %        |
| <b>8. Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI</b>                                                                         | <b>2,262.40</b> | <b>16.33 %</b> | <b>2,259.13</b>                 | <b>16.31 %</b> | <b>3.27</b>                     | <b>0.02 %</b> |

**Template 5 Taxonomy non-eligible economic activities**
**Stock (revenue-based)**

| Economic activities                                                                                                                                                                                                                                | EUR million      | in %           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|----------------|
| 1. Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy non-eligible in accordance with section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.62             | 0.00 %         |
| 2. Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy non-eligible in accordance with section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.01             | 0.00 %         |
| 3. Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy non-eligible in accordance with section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.08             | 0.00 %         |
| 4. Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy non-eligible in accordance with section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.01             | 0.00 %         |
| 5. Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy non-eligible in accordance with section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00             | 0.00 %         |
| 6. Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy non-eligible in accordance with section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.62             | 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                                                                                          | 11,496.17        | 83.00 %        |
| <b>8. Total amount and proportion of taxonomy non-eligible economic activities in the denominator of the applicable KPI</b>                                                                                                                        | <b>11,497.51</b> | <b>83.01 %</b> |

**Template 2 Taxonomy-aligned economic activities (denominator)**
**Stock (CapEx-based)**

| Economic activities                                                                                                                                                                            | CCM + CCA     |               | Climate change mitigation (CCM) |               | Climate change adaptation (CCA) |               |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|---------------|---------------------------------|---------------|---------------------------------|---------------|
|                                                                                                                                                                                                | EUR million   | in %          | EUR million                     | in %          | EUR million                     | in %          |
| 1. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00          | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 2. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.02          | 0.00 %        | 0.02                            | 0.00 %        | 0.00                            | 0.00 %        |
| 3. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.20          | 0.00 %        | 0.20                            | 0.00 %        | 0.00                            | 0.00 %        |
| 4. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00          | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 5. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00          | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 6. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.01          | 0.00 %        | 0.01                            | 0.00 %        | 0.00                            | 0.00 %        |
| 7. 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                                           | 103.29        | 0.73 %        | 103.24                          | 0.73 %        | 0.05                            | 0.00 %        |
| <b>8. Total applicable KPI</b>                                                                                                                                                                 | <b>103.53</b> | <b>0.73 %</b> | <b>103.48</b>                   | <b>0.73 %</b> | <b>0.05</b>                     | <b>0.00 %</b> |

**Template 3 Taxonomy-aligned economic activities (numerator)**  
**Stock (CapEx-based)**

| Economic activities                                                                                                                                                                          | CCM + CCA     |                 | Climate change mitigation (CCM) |                 | Climate change adaptation (CCA) |                 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-----------------|---------------------------------|-----------------|---------------------------------|-----------------|
|                                                                                                                                                                                              | EUR million   | in %            | EUR million                     | in %            | EUR million                     | in %            |
| 1. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00          | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 0.00 %          |
| 2. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.02          | 0.02 %          | 0.02                            | 0.02 %          | 0.00                            | 0.00 %          |
| 3. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.20          | 0.20 %          | 0.20                            | 0.20 %          | 0.00                            | 0.00 %          |
| 4. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00          | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 0.00 %          |
| 5. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00          | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 0.00 %          |
| 6. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.01          | 0.01 %          | 0.01                            | 0.01 %          | 0.00                            | 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                                           | 103.29        | 99.77 %         | 103.24                          | 99.77 %         | 0.05                            | 100.00 %        |
| <b>8. Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>                                                                         | <b>103.53</b> | <b>100.00 %</b> | <b>103.48</b>                   | <b>100.00 %</b> | <b>0.05</b>                     | <b>100.00 %</b> |

**Template 4 Taxonomy-eligible but not taxonomy-aligned economic activities**  
**Stock (CapEx-based)**

| Economic activities                                                                                                                                                                                                      | CCM + CCA       |                | Climate change mitigation (CCM) |                | Climate change adaptation (CCA) |               |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|----------------|---------------------------------|----------------|---------------------------------|---------------|
|                                                                                                                                                                                                                          | EUR million     | in %           | EUR million                     | in %           | EUR million                     | in %          |
| 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 Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00            | 0.00 %         | 0.00                            | 0.00 %         | 0.00                            | 0.00 %        |
| 2. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00            | 0.00 %         | 0.00                            | 0.00 %         | 0.00                            | 0.00 %        |
| 3. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00            | 0.00 %         | 0.00                            | 0.00 %         | 0.00                            | 0.00 %        |
| 4. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.03            | 0.00 %         | 0.03                            | 0.00 %         | 0.00                            | 0.00 %        |
| 5. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.15            | 0.00 %         | 0.15                            | 0.00 %         | 0.00                            | 0.00 %        |
| 6. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00            | 0.00 %         | 0.00                            | 0.00 %         | 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                                           | 2,267.03        | 16.02 %        | 2,265.14                        | 16.01 %        | 1.89                            | 0.01 %        |
| <b>8. Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI</b>                                                                         | <b>2,267.22</b> | <b>16.03 %</b> | <b>2,265.33</b>                 | <b>16.01 %</b> | <b>1.89</b>                     | <b>0.01 %</b> |

**Template 5 Taxonomy non-eligible economic activities**  
**Stock (CapEx-based)**

| Economic activities                                                                                                                                                                                                                                | EUR million      | in %           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------|----------------|
| 1. Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy non-eligible in accordance with section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00             | 0.00 %         |
| 2. Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy non-eligible in accordance with section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.02             | 0.00 %         |
| 3. Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy non-eligible in accordance with section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.04             | 0.00 %         |
| 4. Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy non-eligible in accordance with section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.01             | 0.00 %         |
| 5. Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy non-eligible in accordance with section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00             | 0.00 %         |
| 6. Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy non-eligible in accordance with section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 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                                                                                          | 11,776.24        | 83.24 %        |
| <b>8. Total amount and proportion of taxonomy non-eligible economic activities in the denominator of the applicable KPI</b>                                                                                                                        | <b>11,776.30</b> | <b>83.24 %</b> |

**Template 1 Nuclear and fossil gas related activities**

**Flow**

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

**Template 2 Taxonomy-aligned economic activities (denominator)**  
**Flow (revenue-based)**

| Economic activities                                                                                                                                                                            | CCM + CCA    |               | Climate change mitigation (CCM) |               | Climate change adaptation (CCA) |               |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|---------------|---------------------------------|---------------|---------------------------------|---------------|
|                                                                                                                                                                                                | EUR million  | in %          | EUR million                     | in %          | EUR million                     | in %          |
| 1. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 2. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 3. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 4. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 5. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 6. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 7. 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                                           | 43.32        | 1.54 %        | 43.32                           | 1.54 %        | 0.00                            | 0.00 %        |
| <b>8. Total applicable KPI</b>                                                                                                                                                                 | <b>43.32</b> | <b>1.54 %</b> | <b>43.32</b>                    | <b>1.54 %</b> | <b>0.00</b>                     | <b>0.00 %</b> |

**Template 3 Taxonomy-aligned economic activities (numerator)**  
**Flow (revenue-based)**

| Economic activities                                                                                                                                                                          | CCM + CCA    |                 | Climate change mitigation (CCM) |                 | Climate change adaptation (CCA) |               |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|-----------------|---------------------------------|-----------------|---------------------------------|---------------|
|                                                                                                                                                                                              | EUR million  | in %            | EUR million                     | in %            | EUR million                     | in %          |
| 1. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00         | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 0.00 %        |
| 2. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00         | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 0.00 %        |
| 3. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00         | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 0.00 %        |
| 4. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00         | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 0.00 %        |
| 5. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00         | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 0.00 %        |
| 6. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00         | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 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                                           | 43.32        | 100.00 %        | 43.32                           | 100.00 %        | 0.00                            | 0.00 %        |
| <b>8. Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>                                                                         | <b>43.32</b> | <b>100.00 %</b> | <b>43.32</b>                    | <b>100.00 %</b> | <b>0.00</b>                     | <b>0.00 %</b> |

**Template 4 Taxonomy-eligible but not taxonomy-aligned economic activities**  
**Flow (revenue-based)**

| Economic activities                                                                                                                                                                                                      | CCM + CCA     |               | Climate change mitigation (CCM) |               | Climate change adaptation (CCA) |               |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|---------------|---------------------------------|---------------|---------------------------------|---------------|
|                                                                                                                                                                                                                          | EUR million   | in %          | EUR million                     | in %          | EUR million                     | in %          |
| 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 Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00          | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 2. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00          | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 3. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00          | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 4. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00          | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 5. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00          | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 6. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00          | 0.00 %        | 0.00                            | 0.00 %        | 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                                           | 160.63        | 5.69 %        | 160.63                          | 5.69 %        | 0.00                            | 0.00 %        |
| <b>8. Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI</b>                                                                         | <b>160.63</b> | <b>5.69 %</b> | <b>160.63</b>                   | <b>5.69 %</b> | <b>0.00</b>                     | <b>0.00 %</b> |

**Template 5 Taxonomy non-eligible economic activities**  
**Flow (revenue-based)**

| Economic activities                                                                                                                                                                                                                                | EUR million     | in %           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|----------------|
| 1. Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy non-eligible in accordance with section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00            | 0.00 %         |
| 2. Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy non-eligible in accordance with section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00            | 0.00 %         |
| 3. Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy non-eligible in accordance with section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00            | 0.00 %         |
| 4. Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy non-eligible in accordance with section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00            | 0.00 %         |
| 5. Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy non-eligible in accordance with section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00            | 0.00 %         |
| 6. Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy non-eligible in accordance with section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 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                                                                                          | 2,617.08        | 92.77 %        |
| <b>8. Total amount and proportion of taxonomy non-eligible economic activities in the denominator of the applicable KPI</b>                                                                                                                        | <b>2,617.08</b> | <b>92.77 %</b> |

**Template 2 Taxonomy-aligned economic activities (denominator)**  
**Flow (CapEx-based)**

| Economic activities                                                                                                                                                                            | CCM + CCA    |               | Climate change mitigation (CCM) |               | Climate change adaptation (CCA) |               |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|---------------|---------------------------------|---------------|---------------------------------|---------------|
|                                                                                                                                                                                                | EUR million  | in %          | EUR million                     | in %          | EUR million                     | in %          |
| 1. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 2. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 3. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 4. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 5. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 6. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 7. 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                                           | 42.14        | 1.49 %        | 42.14                           | 1.49 %        | 0.00                            | 0.00 %        |
| <b>8. Total applicable KPI</b>                                                                                                                                                                 | <b>42.14</b> | <b>1.49 %</b> | <b>42.14</b>                    | <b>1.49 %</b> | <b>0.00</b>                     | <b>0.00 %</b> |

**Template 3 Taxonomy-aligned economic activities (numerator)**  
**Flow (CapEx-based)**

| Economic activities                                                                                                                                                                          | CCM + CCA    |                 | Climate change mitigation (CCM) |                 | Climate change adaptation (CCA) |               |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|-----------------|---------------------------------|-----------------|---------------------------------|---------------|
|                                                                                                                                                                                              | EUR million  | in %            | EUR million                     | in %            | EUR million                     | in %          |
| 1. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00         | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 0.00 %        |
| 2. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00         | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 0.00 %        |
| 3. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00         | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 0.00 %        |
| 4. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00         | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 0.00 %        |
| 5. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00         | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 0.00 %        |
| 6. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00         | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 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                                           | 42.14        | 100.00 %        | 42.14                           | 100.00 %        | 0.00                            | 0.00 %        |
| <b>8. Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>                                                                         | <b>42.14</b> | <b>100.00 %</b> | <b>42.14</b>                    | <b>100.00 %</b> | <b>0.00</b>                     | <b>0.00 %</b> |



**Template 4 Taxonomy-eligible but not taxonomy-aligned economic activities**  
**Flow (CapEx-based)**

| Economic activities                                                                                                                                                                                                      | CCM + CCA     |               | Climate change mitigation (CCM) |               | Climate change adaptation (CCA) |               |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|---------------|---------------------------------|---------------|---------------------------------|---------------|
|                                                                                                                                                                                                                          | EUR million   | in %          | EUR million                     | in %          | EUR million                     | in %          |
| 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 Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00          | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 2. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00          | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 3. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00          | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 4. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00          | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 5. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00          | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 6. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00          | 0.00 %        | 0.00                            | 0.00 %        | 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                                           | 164.27        | 5.82 %        | 164.27                          | 5.82 %        | 0.00                            | 0.00 %        |
| <b>8. Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI</b>                                                                         | <b>164.27</b> | <b>5.82 %</b> | <b>164.27</b>                   | <b>5.82 %</b> | <b>0.00</b>                     | <b>0.00 %</b> |

**Template 5 Taxonomy non-eligible economic activities**  
**Flow (CapEx-based)**

| Economic activities                                                                                                                                                                                                                                | EUR million     | in %           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------|----------------|
| 1. Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy non-eligible in accordance with section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00            | 0.00 %         |
| 2. Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy non-eligible in accordance with section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00            | 0.00 %         |
| 3. Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy non-eligible in accordance with section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00            | 0.00 %         |
| 4. Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy non-eligible in accordance with section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00            | 0.00 %         |
| 5. Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy non-eligible in accordance with section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00            | 0.00 %         |
| 6. Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy non-eligible in accordance with section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 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                                                                                          | 2,614.62        | 92.68 %        |
| <b>8. Total amount and proportion of taxonomy non-eligible economic activities in the denominator of the applicable KPI</b>                                                                                                                        | <b>2,614.62</b> | <b>92.68 %</b> |

## Template 1 Nuclear and fossil gas related activities

### Off-balance-sheet exposures

#### Stock

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

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

### Off-balance-sheet exposures

#### Stock (revenue-based)

| Economic activities                                                                                                                                                                            | CCM + CCA   |               | Climate change mitigation (CCM) |               | Climate change adaptation (CCA) |               |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|---------------|---------------------------------|---------------|---------------------------------|---------------|
|                                                                                                                                                                                                | EUR million | in %          | EUR million                     | in %          | EUR million                     | in %          |
| 1. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00        | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 2. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.01        | 0.01 %        | 0.01                            | 0.01 %        | 0.00                            | 0.00 %        |
| 3. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.12        | 0.12 %        | 0.12                            | 0.12 %        | 0.00                            | 0.00 %        |
| 4. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00        | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 5. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00        | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 6. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00        | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 7. 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                                           | 6.86        | 6.79 %        | 6.83                            | 6.76 %        | 0.03                            | 0.03 %        |
| <b>8. Total applicable KPI</b>                                                                                                                                                                 | <b>6.99</b> | <b>6.92 %</b> | <b>6.96</b>                     | <b>6.89 %</b> | <b>0.03</b>                     | <b>0.03 %</b> |

**Template 3 Taxonomy-aligned economic activities (numerator)**  
**Off-balance-sheet exposures**  
**Stock (revenue-based)**

| Economic activities                                                                                                                                                                          | CCM + CCA   |                 | Climate change mitigation (CCM) |                 | Climate change adaptation (CCA) |                 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|-----------------|---------------------------------|-----------------|---------------------------------|-----------------|
|                                                                                                                                                                                              | EUR million | in %            | EUR million                     | in %            | EUR million                     | in %            |
| 1. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00        | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 0.00 %          |
| 2. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.01        | 0.14 %          | 0.01                            | 0.14 %          | 0.00                            | 0.00 %          |
| 3. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.12        | 1.69 %          | 0.12                            | 1.70 %          | 0.00                            | 0.00 %          |
| 4. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00        | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 0.00 %          |
| 5. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00        | 0.03 %          | 0.00                            | 0.03 %          | 0.00                            | 0.00 %          |
| 6. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00        | 0.05 %          | 0.00                            | 0.05 %          | 0.00                            | 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                                           | 6.86        | 98.09 %         | 6.83                            | 98.08 %         | 0.03                            | 100.00 %        |
| <b>8. Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>                                                                         | <b>6.99</b> | <b>100.00 %</b> | <b>6.96</b>                     | <b>100.00 %</b> | <b>0.03</b>                     | <b>100.00 %</b> |

**Template 4 Taxonomy-eligible but not taxonomy-aligned economic activities**  
**Off-balance-sheet exposures**  
**Stock (revenue-based)**

| Economic activities                                                                                                                                                                                                      | CCM + CCA    |                | Climate change mitigation (CCM) |                | Climate change adaptation (CCA) |               |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|----------------|---------------------------------|----------------|---------------------------------|---------------|
|                                                                                                                                                                                                                          | EUR million  | in %           | EUR million                     | in %           | EUR million                     | in %          |
| 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 Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         | 0.00                            | 0.00 %         | 0.00                            | 0.00 %        |
| 2. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         | 0.00                            | 0.00 %         | 0.00                            | 0.00 %        |
| 3. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         | 0.00                            | 0.00 %         | 0.00                            | 0.00 %        |
| 4. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.25         | 0.25 %         | 0.25                            | 0.25 %         | 0.00                            | 0.00 %        |
| 5. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.15         | 0.15 %         | 0.15                            | 0.15 %         | 0.00                            | 0.00 %        |
| 6. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         | 0.00                            | 0.00 %         | 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                                           | 13.03        | 12.91 %        | 12.64                           | 12.52 %        | 0.39                            | 0.39 %        |
| <b>8. Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI</b>                                                                         | <b>13.44</b> | <b>13.32 %</b> | <b>13.05</b>                    | <b>12.93 %</b> | <b>0.39</b>                     | <b>0.39 %</b> |

**Template 5 Taxonomy non-eligible economic activities**
**Off-balance-sheet exposures**
**Stock (revenue-based)**

| Economic activities                                                                                                                                                                                                                                | EUR million  | in %           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|----------------|
| 1. Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy non-eligible in accordance with section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         |
| 2. Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy non-eligible in accordance with section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         |
| 3. Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy non-eligible in accordance with section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.01         | 0.01 %         |
| 4. Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy non-eligible in accordance with section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         |
| 5. Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy non-eligible in accordance with section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         |
| 6. Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy non-eligible in accordance with section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 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                                                                                          | 80.51        | 79.75 %        |
| <b>8. Total amount and proportion of taxonomy non-eligible economic activities in the denominator of the applicable KPI</b>                                                                                                                        | <b>80.52</b> | <b>79.76 %</b> |

**Template 2 Taxonomy-aligned economic activities (denominator)**
**Off-balance-sheet exposures**
**Stock (CapEx-based)**

| Economic activities                                                                                                                                                                            | CCM + CCA    |                | Climate change mitigation (CCM) |                | Climate change adaptation (CCA) |               |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|----------------|---------------------------------|----------------|---------------------------------|---------------|
|                                                                                                                                                                                                | EUR million  | in %           | EUR million                     | in %           | EUR million                     | in %          |
| 1. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         | 0.00                            | 0.00 %         | 0.00                            | 0.00 %        |
| 2. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         | 0.00                            | 0.00 %         | 0.00                            | 0.00 %        |
| 3. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.04         | 0.04 %         | 0.04                            | 0.04 %         | 0.00                            | 0.00 %        |
| 4. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         | 0.00                            | 0.00 %         | 0.00                            | 0.00 %        |
| 5. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.02         | 0.02 %         | 0.02                            | 0.02 %         | 0.00                            | 0.00 %        |
| 6. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         | 0.00                            | 0.00 %         | 0.00                            | 0.00 %        |
| 7. 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                                           | 12.75        | 12.63 %        | 12.73                           | 12.61 %        | 0.02                            | 0.02 %        |
| <b>8. Total applicable KPI</b>                                                                                                                                                                 | <b>12.82</b> | <b>12.70 %</b> | <b>12.80</b>                    | <b>12.68 %</b> | <b>0.02</b>                     | <b>0.02 %</b> |

**Template 3 Taxonomy-aligned economic activities (numerator)**  
**Off-balance-sheet exposures**  
**Stock (CapEx-based)**

| Economic activities                                                                                                                                                                          | CCM + CCA    |                 | Climate change mitigation (CCM) |                 | Climate change adaptation (CCA) |                 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|-----------------|---------------------------------|-----------------|---------------------------------|-----------------|
|                                                                                                                                                                                              | EUR million  | in %            | EUR million                     | in %            | EUR million                     | in %            |
| 1. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00         | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 0.00 %          |
| 2. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00         | 0.04 %          | 0.00                            | 0.04 %          | 0.00                            | 0.00 %          |
| 3. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.04         | 0.31 %          | 0.04                            | 0.31 %          | 0.00                            | 0.00 %          |
| 4. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00         | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 0.00 %          |
| 5. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.02         | 0.19 %          | 0.02                            | 0.19 %          | 0.00                            | 0.00 %          |
| 6. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00         | 0.01 %          | 0.00                            | 0.01 %          | 0.00                            | 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                                           | 12.75        | 99.46 %         | 12.73                           | 99.46 %         | 0.02                            | 100.00 %        |
| <b>8. Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>                                                                         | <b>12.82</b> | <b>100.00 %</b> | <b>12.80</b>                    | <b>100.00 %</b> | <b>0.02</b>                     | <b>100.00 %</b> |

**Template 4 Taxonomy-eligible but not taxonomy-aligned economic activities**  
**Off-balance-sheet exposures**  
**Stock (CapEx-based)**

| Economic activities                                                                                                                                                                                                      | CCM + CCA    |                | Climate change mitigation (CCM) |                | Climate change adaptation (CCA) |               |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|----------------|---------------------------------|----------------|---------------------------------|---------------|
|                                                                                                                                                                                                                          | EUR million  | in %           | EUR million                     | in %           | EUR million                     | in %          |
| 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 Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         | 0.00                            | 0.00 %         | 0.00                            | 0.00 %        |
| 2. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         | 0.00                            | 0.00 %         | 0.00                            | 0.00 %        |
| 3. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         | 0.00                            | 0.00 %         | 0.00                            | 0.00 %        |
| 4. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.06         | 0.06 %         | 0.06                            | 0.06 %         | 0.00                            | 0.00 %        |
| 5. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.02         | 0.02 %         | 0.02                            | 0.02 %         | 0.00                            | 0.00 %        |
| 6. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         | 0.00                            | 0.00 %         | 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                                           | 17.30        | 17.13 %        | 15.69                           | 15.54 %        | 1.61                            | 1.59 %        |
| <b>8. Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI</b>                                                                         | <b>17.38</b> | <b>17.21 %</b> | <b>15.77</b>                    | <b>15.62 %</b> | <b>1.61</b>                     | <b>1.59 %</b> |

## Template 5 Taxonomy non-eligible economic activities

### Off-balance-sheet exposures

#### Stock (CapEx-based)

| Economic activities                                                                                                                                                                                                                                | EUR million  | in %           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|----------------|
| 1. Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy non-eligible in accordance with section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         |
| 2. Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy non-eligible in accordance with section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.03         | 0.03 %         |
| 3. Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy non-eligible in accordance with section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         |
| 4. Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy non-eligible in accordance with section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         |
| 5. Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy non-eligible in accordance with section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         |
| 6. Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy non-eligible in accordance with section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 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                                                                                          | 70.72        | 70.05 %        |
| <b>8. Total amount and proportion of taxonomy non-eligible economic activities in the denominator of the applicable KPI</b>                                                                                                                        | <b>70.75</b> | <b>70.08 %</b> |

## Template 1 Nuclear and fossil gas related activities

### Off-balance-sheet exposures

#### Flow

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

**Template 2 Taxonomy-aligned economic activities (denominator)**  
**Off-balance-sheet exposures**  
**Flow (revenue-based)**

| Economic activities                                                                                                                                                                            | CCM + CCA   |               | Climate change mitigation (CCM) |               | Climate change adaptation (CCA) |               |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|---------------|---------------------------------|---------------|---------------------------------|---------------|
|                                                                                                                                                                                                | EUR million | in %          | EUR million                     | in %          | EUR million                     | in %          |
| 1. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00        | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 2. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00        | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 3. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.02        | 0.03 %        | 0.02                            | 0.03 %        | 0.00                            | 0.00 %        |
| 4. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00        | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 5. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00        | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 6. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00        | 0.00 %        | 0.00                            | 0.00 %        | 0.00                            | 0.00 %        |
| 7. 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                                           | 4.97        | 6.96 %        | 4.95                            | 6.93 %        | 0.02                            | 0.03 %        |
| <b>8. Total applicable KPI</b>                                                                                                                                                                 | <b>4.99</b> | <b>7.00 %</b> | <b>4.97</b>                     | <b>6.97 %</b> | <b>0.02</b>                     | <b>0.03 %</b> |

**Template 3 Taxonomy-aligned economic activities (numerator)**  
**Off-balance-sheet exposures**  
**Flow (revenue-based)**

| Economic activities                                                                                                                                                                          | CCM + CCA   |                 | Climate change mitigation (CCM) |                 | Climate change adaptation (CCA) |                 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|-----------------|---------------------------------|-----------------|---------------------------------|-----------------|
|                                                                                                                                                                                              | EUR million | in %            | EUR million                     | in %            | EUR million                     | in %            |
| 1. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00        | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 0.00 %          |
| 2. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00        | 0.02 %          | 0.00                            | 0.02 %          | 0.00                            | 0.00 %          |
| 3. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.02        | 0.45 %          | 0.02                            | 0.46 %          | 0.00                            | 0.00 %          |
| 4. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00        | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 0.00 %          |
| 5. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00        | 0.01 %          | 0.00                            | 0.01 %          | 0.00                            | 0.00 %          |
| 6. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00        | 0.01 %          | 0.00                            | 0.01 %          | 0.00                            | 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                                           | 4.97        | 99.51 %         | 4.95                            | 99.51 %         | 0.02                            | 100.00 %        |
| <b>8. Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>                                                                         | <b>4.99</b> | <b>100.00 %</b> | <b>4.97</b>                     | <b>100.00 %</b> | <b>0.02</b>                     | <b>100.00 %</b> |

**Template 4 Taxonomy-eligible but not taxonomy-aligned economic activities**
**Off-balance-sheet exposures**
**Flow (revenue-based)**

| Economic activities                                                                                                                                                                                                      | CCM + CCA    |                | Climate change mitigation (CCM) |                | Climate change adaptation (CCA) |               |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|----------------|---------------------------------|----------------|---------------------------------|---------------|
|                                                                                                                                                                                                                          | EUR million  | in %           | EUR million                     | in %           | EUR million                     | in %          |
| 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 Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         | 0.00                            | 0.00 %         | 0.00                            | 0.00 %        |
| 2. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         | 0.00                            | 0.00 %         | 0.00                            | 0.00 %        |
| 3. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         | 0.00                            | 0.00 %         | 0.00                            | 0.00 %        |
| 4. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.17         | 0.24 %         | 0.17                            | 0.24 %         | 0.00                            | 0.00 %        |
| 5. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.08         | 0.11 %         | 0.08                            | 0.11 %         | 0.00                            | 0.00 %        |
| 6. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         | 0.00                            | 0.00 %         | 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                                           | 10.47        | 14.68 %        | 10.22                           | 14.33 %        | 0.25                            | 0.35 %        |
| <b>8. Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI</b>                                                                         | <b>10.72</b> | <b>15.03 %</b> | <b>10.47</b>                    | <b>14.68 %</b> | <b>0.25</b>                     | <b>0.35 %</b> |

**Template 5 Taxonomy non-eligible economic activities**
**Off-balance-sheet exposures**
**Flow (revenue-based)**

| Economic activities                                                                                                                                                                                                                                | EUR million  | in %           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|----------------|
| 1. Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy non-eligible in accordance with section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         |
| 2. Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy non-eligible in accordance with section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         |
| 3. Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy non-eligible in accordance with section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.01         | 0.01 %         |
| 4. Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy non-eligible in accordance with section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         |
| 5. Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy non-eligible in accordance with section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         |
| 6. Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy non-eligible in accordance with section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 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                                                                                          | 55.61        | 77.96 %        |
| <b>8. Total amount and proportion of taxonomy non-eligible economic activities in the denominator of the applicable KPI</b>                                                                                                                        | <b>55.62</b> | <b>77.98 %</b> |



**Template 2 Taxonomy-aligned economic activities (denominator)**  
**Off-balance-sheet exposures**  
**Flow (CapEx-based)**

| Economic activities                                                                                                                                                                            | CCM + CCA   |                | Climate change mitigation (CCM) |                | Climate change adaptation (CCA) |               |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|----------------|---------------------------------|----------------|---------------------------------|---------------|
|                                                                                                                                                                                                | EUR million | in %           | EUR million                     | in %           | EUR million                     | in %          |
| 1. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00        | 0.00 %         | 0.00                            | 0.00 %         | 0.00                            | 0.00 %        |
| 2. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00        | 0.00 %         | 0.00                            | 0.00 %         | 0.00                            | 0.00 %        |
| 3. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.01        | 0.02 %         | 0.01                            | 0.02 %         | 0.00                            | 0.00 %        |
| 4. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00        | 0.00 %         | 0.00                            | 0.00 %         | 0.00                            | 0.00 %        |
| 5. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00        | 0.01 %         | 0.00                            | 0.01 %         | 0.00                            | 0.00 %        |
| 6. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00        | 0.00 %         | 0.00                            | 0.00 %         | 0.00                            | 0.00 %        |
| 7. 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                                           | 9.29        | 13.02 %        | 9.28                            | 13.01 %        | 0.01                            | 0.01 %        |
| <b>8. Total applicable KPI</b>                                                                                                                                                                 | <b>9.31</b> | <b>13.05 %</b> | <b>9.30</b>                     | <b>13.04 %</b> | <b>0.01</b>                     | <b>0.01 %</b> |

**Template 3 Taxonomy-aligned economic activities (numerator)**  
**Off-balance-sheet exposures**  
**Flow (CapEx-based)**

| Economic activities                                                                                                                                                                          | CCM + CCA   |                 | Climate change mitigation (CCM) |                 | Climate change adaptation (CCA) |                 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|-----------------|---------------------------------|-----------------|---------------------------------|-----------------|
|                                                                                                                                                                                              | EUR million | in %            | EUR million                     | in %            | EUR million                     | in %            |
| 1. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00        | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 0.00 %          |
| 2. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00        | 0.03 %          | 0.00                            | 0.03 %          | 0.00                            | 0.00 %          |
| 3. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.01        | 0.16 %          | 0.01                            | 0.16 %          | 0.00                            | 0.00 %          |
| 4. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00        | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 0.00 %          |
| 5. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00        | 0.04 %          | 0.00                            | 0.04 %          | 0.00                            | 0.00 %          |
| 6. Amount and proportion of taxonomy-aligned economic activity referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the numerator of the applicable KPI | 0.00        | 0.00 %          | 0.00                            | 0.00 %          | 0.00                            | 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                                           | 9.29        | 99.77 %         | 9.28                            | 99.77 %         | 0.01                            | 100.00 %        |
| <b>8. Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>                                                                         | <b>9.31</b> | <b>100.00 %</b> | <b>9.30</b>                     | <b>100.00 %</b> | <b>0.01</b>                     | <b>100.00 %</b> |

**Template 4 Taxonomy-eligible but not taxonomy-aligned economic activities**  
**Off-balance-sheet exposures**  
**Flow (CapEx-based)**

| Economic activities                                                                                                                                                                                                      | CCM + CCA    |                | Climate change mitigation (CCM) |                | Climate change adaptation (CCA) |               |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|----------------|---------------------------------|----------------|---------------------------------|---------------|
|                                                                                                                                                                                                                          | EUR million  | in %           | EUR million                     | in %           | EUR million                     | in %          |
| 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 Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         | 0.00                            | 0.00 %         | 0.00                            | 0.00 %        |
| 2. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         | 0.00                            | 0.00 %         | 0.00                            | 0.00 %        |
| 3. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         | 0.00                            | 0.00 %         | 0.00                            | 0.00 %        |
| 4. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.04         | 0.06 %         | 0.04                            | 0.06 %         | 0.00                            | 0.00 %        |
| 5. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.01         | 0.01 %         | 0.01                            | 0.01 %         | 0.00                            | 0.00 %        |
| 6. Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         | 0.00                            | 0.00 %         | 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                                           | 12.82        | 17.97 %        | 11.89                           | 16.67 %        | 0.93                            | 1.30 %        |
| <b>8. Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI</b>                                                                         | <b>12.87</b> | <b>18.04 %</b> | <b>11.94</b>                    | <b>16.74 %</b> | <b>0.93</b>                     | <b>1.30 %</b> |

**Template 5 Taxonomy non-eligible economic activities**  
**Off-balance-sheet exposures**  
**Flow (CapEx-based)**

| Economic activities                                                                                                                                                                                                                                | EUR million  | in %           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------|----------------|
| 1. Amount and proportion of economic activity referred to in row 1 of Template 1 that is taxonomy non-eligible in accordance with section 4.26 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         |
| 2. Amount and proportion of economic activity referred to in row 2 of Template 1 that is taxonomy non-eligible in accordance with section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.01         | 0.02 %         |
| 3. Amount and proportion of economic activity referred to in row 3 of Template 1 that is taxonomy non-eligible in accordance with section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         |
| 4. Amount and proportion of economic activity referred to in row 4 of Template 1 that is taxonomy non-eligible in accordance with section 4.29 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         |
| 5. Amount and proportion of economic activity referred to in row 5 of Template 1 that is taxonomy non-eligible in accordance with section 4.30 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 0.00         | 0.00 %         |
| 6. Amount and proportion of economic activity referred to in row 6 of Template 1 that is taxonomy non-eligible in accordance with section 4.31 of Annexes I and II to Delegated Regulation (EU) 2021/2139 in the denominator of the applicable KPI | 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                                                                                          | 49.13        | 68.88 %        |
| <b>8. Total amount and proportion of taxonomy non-eligible economic activities in the denominator of the applicable KPI</b>                                                                                                                        | <b>49.15</b> | <b>68.91 %</b> |

## ESRS E1: CLIMATE CHANGE

### STRATEGY

#### DISCLOSURE REQUIREMENT E1-1 – TRANSITION PLAN FOR CLIMATE CHANGE MITIGATION

##### OWN BUSINESS OPERATIONS & DOWNSTREAM VALUE CHAIN

###### 17) Planning and disclosure of a transition plan

Hypo Vorarlberg recognises the importance of a transition plan for climate change mitigation and plans to address this issue in 2025. In doing so, it aims to make a contribution to protecting the climate and achieving the 1.5-degree target of the Paris Agreement. The report for the 2025 financial year will provide a transparent presentation of the progress made.

Hypo Vorarlberg is aware that it contributes to increasing greenhouse gas emissions in various ways. The GHG Protocol standard classifies greenhouse gas emissions as Scope 1, 2 and 3 emissions. For financial institutions, the most significant contribution comes from Scope 3 emissions, i.e. core business (financed emissions in accordance with Scope 3.15) and the resulting attributable share of the emissions of the respective business partners.

With the fundamental revision of its sustainability strategy in 2024, Hypo Vorarlberg has committed to comprehensively enhancing the calculation of financed emissions (see PCAF measurement E1 IRO1-20.a, BP-2.10, BP-2.11). It has emphasised this aspiration by signing up to PCAF and calculating the financed emissions using this methodology for the first time. This means it is also acting in accordance with the PCAF guidelines, which propose the calculation and disclosure of financed emissions before a transition plan is defined. This is followed by adopting objectives, developing corresponding strategies and implementing measures with a focus on reducing greenhouse gas emissions.

#### DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-3 – MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

###### 18) Discussion of material climate-related risks

Hypo Vorarlberg has identified both physical risks and transition risks in the area of climate change. These are as follows:

###### Physical risks

| Risk factors                         | Materiality | Explanation                                                                                                                                                                                                 |
|--------------------------------------|-------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Droughts/extreme heat                |             | Potentially significant topic. To be re-evaluated in 2025                                                                                                                                                   |
| Flooding                             | x           | Flooding occurs in the Bank's market areas. Flood protection is an important social and political issue in Vorarlberg (and Austria)                                                                         |
| Loss of biodiversity/land-use change |             | Potentially significant topic. The transmission channels in the reporting period are not yet clear                                                                                                          |
| (Drinking) water shortage            |             | Same approach as for rising temperatures                                                                                                                                                                    |
| Avalanches                           |             | Although the risk of avalanches is not material according to the risk inventory, it can be determined using the same solution as for flooding risk. There are also geographical overlaps with flooding risk |
| Rising temperatures                  | x           | The high temperatures in recent years have had an unexpected impact on the economy (e.g. supply chain disruption); potential strategic risk in the medium term                                              |

###### Transition risks

| Risk factors                                                   | Materiality | Explanation                                                                                                                                                               |
|----------------------------------------------------------------|-------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Changes to the legal framework                                 | x           | Carbon taxes and other regulatory requirements can cause additional costs and influence business models                                                                   |
| Technological development                                      | x           | No investment or insufficient investment in new, riskier technologies; more investment in new, riskier technologies; potential bad investments, sunk costs                |
| Changes in consumer behaviour (including investment behaviour) | x           | Lack of engagement with sustainability risks; erosion of earnings power; higher defaults than the industry as a whole; reputational risks in connection with greenwashing |

###### 19a) Scope of the resilience analysis

Hypo Vorarlberg understands the resilience analysis as a systematic assessment of unexpected changes, crises and risks with the aim of evaluating and improving its resilience.

A complete risk inventory is a prerequisite for mapping risks. This ensures the comprehensive mapping of all material risks. The ICAAP risk inventory, the ILAAP risk inventory and the risk inventory for sustainability risks are carried out annually by Group Risk Controlling when the risk strategy is revised. With regard to quantification, the focus is currently on climate risks in accordance with the FMA guidelines and the EBA report.

Physical risks (flooding risk) are presented based on geographical aspects. In the case of transition risks, the requirements of the risk strategy for energy performance certificates (for real estate and consumer financing) and greenhouse gas intensities are reviewed.

Among others, the following documents form the basis for handling sustainability risks at the Bank:

- FMA guidelines on handling sustainability risks ("FMA guidelines")
- EBA report on the management and supervision of ESG risks ("EBA report")
- ECB good practices for climate-related and environmental risk management ("ECB good practices")

## **19b) Disclosures on how the resilience analysis was conducted, including the use of climate scenarios**

### **AR 7a+c) Disclosure of topic-specific critical assumptions and consideration of the actions listed under E1-3**

Quantitative measurement methods were already established for both physical and transition risks in 2022. These measurements were enhanced and specified in 2023. The analysis has since been extended to cover the whole of Austria. Physical risks such as flooding risk are presented based on geographical aspects (see E1-20b for details of the assumptions pursuant to AR 7a). Both avalanche risk and flooding risk are addressed. The measures introduced in the financing business in connection with "Credit risk: Failure of collateral due to extreme weather conditions or environmental disasters" (see E1-3.28) contribute to risk minimisation. They apply to new business with customers. In the case of transition risks, the requirements of the risk strategy for energy performance certificates (for real estate and consumer financing) and greenhouse gas intensities are reviewed (see E1-20c for details of the assumptions and actions pursuant to AR 7a).

Plausible scenarios with physical climate risks that are expected to occur with a high likelihood should not lead to a breach of the stress test requirements in the short term. Plausible scenarios with transitional climate risks that are expected to occur with a high likelihood should not lead to an erosion of the Bank's equity base in the long term. The question of whether sustainability risks will have to be backed by equity in future must also be observed.

Stress tests are to be developed for risks identified as material. The challenges must be addressed as best as possible. The long-term nature of sustainability risks (especially transition risks in the area of climate risks) is a particular challenge. The long-term specifications for the scenarios can be described qualitatively. If quantitative assessments are not possible or can only be prepared at unreasonably high cost and effort compared to the existing risk, the qualitative assessment of these scenarios once a year (as part of stress testing) is sufficient. The NGFS scenarios used in the CST (climate risk stress test of the European Central Bank) can serve as a starting point for determining the scenarios used. Plausible assumptions should be used where data or modelling gaps still exist. The impacts of the scenarios should be estimated qualitatively or quantitatively. The uncertainty of the estimate for long time periods must be taken into account.

### **AR 7b) Time horizons for material physical and transition risks and emission reduction targets**

The observation period in the risk inventory is currently 3 years for sustainability risks. Developments beyond this 3-year period are extremely uncertain in terms of their likelihood of occurrence and amount. From 2025 onwards, risk management will adapt the approach in the risk inventory to reflect the proposed ESRs periods (up to 1 year, 1-5 years and over 5 years).

## **19c) Results of the resilience analysis including the results of the scenario analyses**

### **RESULTS OF THE RESILIENCE ANALYSIS**

The results of the resilience analysis are published annually on 30 June as part of the internal sustainability risk report. The risk inventory confirmed potential risks from flooding and potential strategic risks from rising temperatures. The following parameters must be taken into account when assessing the risk of flooding as part of stress testing:

- Affected geographical area: Flooding (especially in the Alps) is typically a local or regional occurrence. The distribution of risks from the sustainability risk report must be taken into account
- Affected volume: This may depend on the address of the customer and the collateral
- Increased default rates among affected customers
- Increased loss severity: Factors such as insurance or expected public aid must be taken into account

Summary of material physical risks:

- The exposure to customers domiciled in HQ100 zones throughout Austria amounts to EUR 569 million, of which EUR 409 million is attributable to Vorarlberg (June 2023: EUR 546 million and EUR 413 million respectively). The corresponding real estate collateral amounts to EUR 347 million throughout Austria, of which EUR 231 million is attributable to Vorarlberg (June 2023: EUR 306 million and EUR 218 million respectively)
- The exposure to customers domiciled in avalanche hazard zones amounts to EUR 89 million (June 2023: EUR 82 million). With the exception of a few customers in the rest of Austria with small volumes, the customers concerned are based in Vorarlberg. The value of the corresponding collateral in avalanche hazard zones amounts to EUR 85 million (June 2023: EUR 71 million). In the same way as for the exposure, this is almost entirely attributable to Vorarlberg
- Some of the Bank's customers are located in both an HQ100 zone and an avalanche zone and hence are at risk from both hazards. The exposure in question totals EUR 14 million (unchanged from June 2023). The collateral value for the combined flooding/avalanche risk amounts to EUR 39 million (June 2023: EUR 22 million)

The risk inventory also shows risks from changes in the legal framework (carbon taxes, legal requirements in areas such as disclosure) and, in the medium term, strategic risks due to changes in customer behaviour. The following parameters must be taken into account when assessing the risk from changes in the legal framework as part of stress testing:

- The estimated greenhouse gas intensities from the sustainability risk report
- The distribution of greenhouse gas intensities by industry
- Possible transmission channels to the Bank's balance sheet and income statement
- As well-founded a description as possible of the transmission mechanisms including the premises applied
- The scenarios for independent variables (in this case the carbon price) must still be plausible, but must represent strong deviations from the expectation

While the direct physical climate risks for the banking infrastructure are considered serious but relatively low, it is primarily indirect physical climate risks in the core business that are significant for the company (e.g. the provision of financing to companies that are exposed to physical risks). Climate change transition risks also mainly affect Hypo Vorarlberg's core business (e.g. the provision of financing to companies whose business models are being tested by climate change).

#### Summary of transition risks:

- The prices for emission allowances have been fluctuating between EUR 60 and EUR 70 per metric ton for a year now and are generally falling
- The greenhouse gas intensity for corporate financing based on Eurostat data is 38.7 metric tons of CO<sub>2</sub> per EUR million of revenue (December 2022: 38 metric tons, June 2023: 36 metric tons)
- The Eurostat data is from 2022
- No significant changes are evident in the heat map compared to June 2023 and no cluster risks are visible
- The option of recording energy performance certificates (EPCs) directly in the property data was recently implemented. The data previously had to be entered into the account, resulting in inaccuracies. The transfer of data from the accounts to the properties is in progress. An improvement in data quality is expected as a result
- The proportion of EPCs recorded in relation to the portfolio of commercial real estate loans is 23 % (June 2023: 13 %). The proportion of EPCs recorded for loans to private customers is slowly increasing and amounts to 36 % (June 2023: 32 %)
- The proportion of coded energy performance certificates (EPCs) in new commercial real estate financing business has increased. The coding of the various key figures is inconsistent
- In the case of loans to private customers, energy performance certificates are recorded for approx. 50-60 % of new business

#### RESULTS OF SCENARIO ANALYSIS

The analysis for the scenarios below was performed using the key macroeconomic variables (NIGEM NGFS v1.21 | Austria). No specific portfolio data was used.

##### Current Policies

In the long term, the occurrence of physical risks in a form that would have a sustained negative impact on Hypo Vorarlberg cannot be ruled out. There are no indications of such an impact in the medium term. The assessment is that no significant impacts can arise from physical risks based on the current composition of the portfolio and the current business strategy.

##### Divergent Net Zero (1.5 °C)

Minor effects are to be expected in the observation period for stress testing. Overall, the model anticipates relatively low GDP growth and relatively low interest rate rises. There is no critical trend in terms of either unemployment or inflation. House prices are expected to move sideways for long periods of time. Based on the figures and the scenario description, no additional short-term and medium-term effects are expected that would justify a quantitative simulation of the scenario.

In the long term, it should be noted that the scenario is characterised by relatively low GDP growth. Share price performance (as an indicator of company values) is generally weak. In the medium term, the costs of poorly coordinated policies therefore have a negative impact on economic growth, and hence on prosperity. The impact on the profitability and creditworthiness of companies and demand for credit can be seen in the medium term. Negative impacts on the creditworthiness of companies (depending on the respective industry) cannot be ruled out.

The selection of scenarios for stress testing and the results for the assessment of physical and transition risks are discussed in greater detail under E1 IRO-1.21.

##### AR 8b) Ability to adapt the business model to climate change, including financing, asset redeployment, portfolio shifting and reskilling

Hypo Vorarlberg is pursuing a strategic approach to adapting its business model to the short-term, medium-term and long-term challenges of climate change.

##### SHORT TERM

The Bank uses comprehensive business continuity management (BCM) to manage acute physical climate risks, such as damage caused by extreme weather events, in order to ensure that material business processes can continue even in exceptional circumstances. This includes emergency plans, crisis management and the training of safety officers at the branches. Requirements have also been introduced for financing in high-risk areas, such as flooding or avalanche hazard zones, in order to minimise the direct impact of natural disasters on collateral and customer creditworthiness.

##### MEDIUM TERM

Hypo Vorarlberg integrates ESG key figures into its risk controlling and continuously reviews the adjustment of its exclusion criteria (selection criteria), positive criteria and sensitive areas in order to prevent sustainability risks to the greatest possible extent. This includes assessing physical and transition risks in new business, particularly in relation to greenhouse gas intensity and financing in hazard zones. Current and potential sustainability risks for each industry must be taken into account when setting limits. Real estate financing is controlled on the basis of energy performance certificates. The analysis of greenhouse gas intensities shows no need for adjustment. None of the industries with a high greenhouse gas intensity accounts for a significant share of the portfolio, and these industries are already limited to 10 % in any case. It should be noted that a significant proportion of the business segment is controlled on the basis of energy performance certificates. The current and expected greenhouse gas intensities must be assessed and taken into account when setting industry limits. The product and service portfolio is adapted or expanded to pursue the opportunities presented by climate change, e.g. by developing new sustainable financial products or adding sustainability aspects to existing financial products. The diversification of the portfolio serves to avoid cluster risks. Potential risks from "green industries" are also taken into account.

##### LONG TERM

The Bank is strengthening the resilience of its business model by gradually implementing strategic guidelines on governance, risk and portfolio management. The aim is to achieve resilience in the face of climate risks while continuing to secure funding on competitive terms. Regular reviews by Internal Audit and the continuous enhancement of strategies serve to ensure the long-term adaptability of the business model.

## IMPACT, RISK AND OPPORTUNITY MANAGEMENT

### DISCLOSURE REQUIREMENT E1-2 – POLICIES RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

#### OWN BUSINESS OPERATIONS & DOWNSTREAM VALUE CHAIN

##### 24) Policies for managing material climate impacts, risks and opportunities in accordance with ESRS 2 MDR-P

###### General information on strategies for dealing with climate change mitigation and adaptation

The following is a list of internal policies and strategies related to climate change mitigation and adaptation. They primarily result from the sustainability strategy, which is the central guiding document for all strategies relating to sustainability and ESG. Numerous sustainability aspects can also be found in the business and risk strategy. The specific implementation and operationalisation of the sustainability strategy takes place in the respective specialist departments. Department-specific issues are addressed and effectively implemented with the help of functional strategies.

###### "Sustainability strategy" policy (Group)

###### Key content

Hypo Vorarlberg's sustainability strategy describes the central aspects of how sustainability issues are aligned and incorporated within the Group and within Hypo Vorarlberg's core business. The strategy is reviewed annually and was most recently updated in the second half of 2024. The individual sections provide an overview of the core elements of the strategy and its implementation to date in the specialist departments for individual key ESG topics:

- Definitions of terms
- Regulatory framework
- Business model and strategic orientation
- Core elements of the strategy:
  - Environmental
  - Social
  - Governance

###### General objectives

The sustainability strategy acts as a framework for all relevant ESG topics with the primary objective of reducing the identified negative impacts to the greatest possible extent and promoting positive impacts, minimising risks and exploiting opportunities arising in particular from the transition to a climate-neutral economy based on responsible resource management.

###### References to material impacts, risks or opportunities

The context for the material impacts, risks and opportunities is determined on the basis of the double materiality analysis and the resulting material topics (environmental, social and governance). The results are determined and then incorporated into the sustainability strategy so that it acts as a framework for the implementation of the IROs identified from the material topics.

###### Monitoring process

The sustainability strategy is defined by the full Managing Board as part of the annual strategy and planning process and is closely aligned with the Group's business strategy. It is submitted to the Supervisory Board for acknowledgement following approval by the full Managing Board.

###### Area of application

The sustainability strategy applies to all employees of the Group, irrespective of their position. The standards set out therein apply to colleagues, customers, business partners and other stakeholders. Responsibility for implementing the strategic guidelines lies with Hypo Vorarlberg's specialist departments and subsidiaries. The comprehensive operationalisation of the sustainability strategy will be advanced with the help of sub-strategies for the individual departments.

###### Responsible organisational level

The full Managing Board sets the direction of travel with regard to sustainability issues and defines fundamental values and goals that apply throughout the Group. The full Managing Board is also responsible for determining and ensuring compliance with sustainability targets, the comprehensive integration of ESG topics within the individual departments and the continuous enhancement of the sustainability strategy. The full Managing Board is regularly informed about current progress by the Sustainability Group and forwards this information to the Supervisory Board.

###### References to third-party standards or initiatives

The topic of sustainability is a cross-cutting issue in which various regulatory requirements must be met. The following references to regulatory standards do not constitute an exhaustive list:

- EU taxonomy (Regulation (EU) 2020/852)
- SFDR (Regulation (EU) 2019/2088)
- CSRD (Directive (EU) 2022/2464)
- ECB guide on climate-related and environmental risks
- FMA guidelines on handling sustainability risks

###### Consideration of stakeholder interests

The sustainability strategy is defined by the Managing Board as part of the annual strategy and planning process. Responsibility for implementing the strategic guidelines lies with the specialist departments, which ensure the involvement of the relevant stakeholders and employees of Hypo Vorarlberg. The Sustainability Group supports the strategy and target definition process in relation to sustainability topics and the operational implementation of the sustainability strategy. As a cross-cutting issue, sustainability affects almost all areas, departments and employees throughout the Group.

###### Availability of the policy for stakeholders

The sustainability strategy is an internal company document that is made available to all Hypo Vorarlberg employees on the intranet.

## **"Risk strategy" policy**

### **Key content**

Hypo Vorarlberg's risk strategy describes the risk management framework and risk policy principles of the Hypo Vorarlberg Group. The strategy is reviewed annually and was most recently updated in the first half of 2024. The individual sections provide a detailed overview of the elements of the strategy:

- Validity of the risk strategy
- Definitions
- Risk management in the Group
- Regulatory risk appetite
- ICAAP/ILAAP
- Sustainability risks
- Stress testing
- Other risk types (e.g. credit risk, foreign currency risk in the lending business)

### **General objectives**

In terms of sustainability risks, the risk strategy acts as a framework for relevant ESG issues with the primary objective of identifying potential risks, recognising and avoiding cluster risks and building up a data pool and expertise. The risks recognised as material are handled in the risk strategy for the respective risk type.

### **References to material impacts, risks or opportunities**

The context of the material risks is determined when the risk inventory is carried out. The results are analysed and (if material) subsequently incorporated into the risk strategy. The company also plans to include the results of the materiality analysis in the risk inventory in future. The sustainability risk report monitors the requirements for material sustainability risks identified according to the risk inventory.

### **Monitoring process**

The risk strategy is defined by the Managing Board as part of the annual strategy and planning process. As part of the annual strategy and planning process, care is taken to ensure that the business and risk strategies are coherent. In the event of inconsistencies with the business strategy, the risk strategy takes precedence due to the risk policy principles applicable within the Group. The risk strategy is acknowledged by the Risk Committee of the Supervisory Board and by the Supervisory Board.

### **Area of application**

The risk strategy applies to all employees of the Hypo Vorarlberg Group, irrespective of their position. The standards set out therein apply to the Group (all companies included in the regulatory scope of consolidation of the credit institution group), the individual bank (the Bank including the St. Gallen branch) and/or specific management units (e.g. Bank FK, Hypo Vorarlberg Leasing), depending on the respective topic.

### **Responsible organisational level**

The Managing Board is responsible for overall risk management within the Group. In this function, it approves the risk controlling principles, governance and risk measurement procedures. Governance is based on the three-line model. The Managing Board also defines the risk appetite and limits for all relevant risk types. Among other things, the Risk Committee discusses the Group's risk strategy and its implementation, the risk types and the current risk situation (including sustainability risks), compliance with limits and, in particular, whether they have been exceeded, as well as risky developments. The Head of Group Risk Controlling attends the meetings of the Risk Committee at least once a year. The ICAAP, the ILAAP, the sustainability risks and the Group's risk situation are discussed by the Asset Liability Management (ALM) Committee. The specialist departments must take risk management in the Group into account in accordance with the organisational structure.

### **References to third-party standards or initiatives**

The topic of sustainability risk is a cross-cutting issue in which various regulatory requirements must be met. The following references to regulatory standards do not constitute an exhaustive list:

- FMA guidelines on handling sustainability risks
- EBA report on the management and supervision of ESG risks
- ECB good practices for climate-related and environmental risk management

### **Consideration of stakeholder interests**

The risk strategy is defined by the Managing Board as part of the annual strategy and planning process. The involvement of the relevant stakeholders of Hypo Vorarlberg is ensured and documented.

### **Availability of the policy for stakeholders**

The risk strategy is an internal company document that is made available to all Hypo Vorarlberg employees on the intranet.

## **"Sustainable procurement and circular economy in business operations" policy**

### **Key content**

Hypo Vorarlberg's "Sustainable procurement and circular economy in business operations" policy describes the process and the criteria applied for the procurement of products and services for Hypo Vorarlberg and must be applied by all employees who perform procurement processes. The policy is reviewed regularly and was most recently updated at the end of 2024. The individual sections are organised according to product groups and services and include the defined requirements to ensure sustainable procurement in each case:

- Scope of application and regulatory requirements
- Application of the policy for product groups/services:
  - IT equipment
  - Waste management
  - Vehicle fleet
  - Construction
  - Purchase of energy for business operations
  - Office equipment
  - Advertising materials
  - Customer events and gifts



### General objectives

As a financial services company (banking, leasing and real estate business), Hypo Vorarlberg's supply and value chain differs fundamentally from that of a manufacturing company. Nevertheless, it has set itself the goal of defining and implementing sustainable procurement processes in order to make a significant contribution to resource conservation, environmental friendliness and economic efficiency in the regions in which it operates. The resulting impacts should be taken into account in the holistic view of the procurement processes and product areas.

### References to material impacts, risks or opportunities

The specific references to the material impacts are currently as follows:

#### Impacts

#### Increase in GHG emissions: Negative impact on the climate due to GHG emissions from operations and the vehicle fleet

Operations:

- Purchase of electricity only from 100 % renewable sources
- New heating and cooling systems without fossil fuels
- Replacement of lighting with LED technology (Bank)
- Control optimisation of the heating and cooling systems with setpoint selection of 21 °C or 24 °C (Bank)
- Logo lighting mostly switched off at night (Bank)
- Business trips and trips to training courses only if online participation is not possible. If air travel is booked, at least one leg of the journey should be travelled by train

Vehicle fleet:

- Pool vehicles:
  - Purchase of electric vehicles (ICEVs only in exceptional cases); long-term use of existing vehicles

The policy helps to minimise the negative impact on the climate caused by CO<sub>2</sub> emissions from business operations and the vehicle fleet.

#### Monitoring process

The Logistics department management team monitors compliance by performing regular and ad hoc checks and documentation in internal systems.

#### Area of application

Some parts of the policy are specifically designed for all Group locations in Austria. For locations outside Austria, the requirements apply according to the same principles or must be applied analogously. If an exception to these documented requirements is necessary, an application with accompanying rationale must be submitted to the document owner of the policy, who is responsible for approving the exception.

#### Responsible organisational level

The Logistics department, which reports directly to the Managing Board, is responsible for creating and continuously updating the policy as well as for its implementation.

#### References to third-party standards or initiatives

The following references to regulatory standards do not constitute an exhaustive list:

- Austrian Action Plan for Sustainable Public Procurement 2021 (naBe)
- ÖGNI (Austrian Society for Sustainable Real Estate Management) standard
- Austrian Federal Act on Health and Safety at Work

#### Consideration of stakeholder interests

All relevant stakeholders and knowledge bearers at Hypo Vorarlberg were involved in the creation of this policy, in particular the specialist departments for Logistics (Facility Services, Material and Fleet Management, Construction, Customer Marketing, Sponsorship & Events, IT and Sustainability). Any amendment to this policy requires the renewed involvement of the aforementioned stakeholders.

#### Availability of the policy for stakeholders

The "Sustainable procurement and circular economy in business operations" policy is an internal company document that is made available to all Hypo Vorarlberg employees on the intranet.

### "Ethics and sustainability criteria (financing business)" policy

#### Key content

Hypo Vorarlberg's "Ethics and sustainability criteria for financing" policy describes the central procedure for taking ESG criteria into account in the financing business and must be applied by all Group employees. The policy is reviewed regularly and was most recently updated in the second half of 2024. The individual sections cover the methodology and the most important steps for reviewing and evaluating potential financing in respect of sustainability aspects and establishing material references to the topic-specific standard EI Climate change. Hypo Vorarlberg can actively and directly control the granting of loans by defining criteria (e.g. exclusion criteria for certain activities/industries). In this way, it can contribute to the prevention of negative impacts on climate protection and existing risks, while at the same time having a positive impact on the achievement of the environmental objectives and pursuing the resulting (market) opportunities. The content of the policy can be summarised as follows:

- Scope of application and legal provisions for financing
- Procedure for implementation in financing business:
  - Application of positive criteria
  - Application of exclusion criteria
  - Consideration of sensitive areas:
    - Characteristics that are harmful to the environment or the climate
    - Controversial or morally objectionable characteristics
- Implementation, review and control

#### General objectives

In 2017, Hypo Vorarlberg decided to take into account the impact of transactions in its financing business on the environment, the climate and people. Since then, desirable and undesirable transactions in this respect have been identified using a variety of different criteria.



## References to material impacts, risks or opportunities

The topic-specific management of material impacts (positive and negative), risks and opportunities is performed by applying positive criteria and exclusion criteria or by taking sensitive areas into account. In the case of material risks, risk aspects are also taken into account. Where possible, market opportunities are expressed in the form of sustainability aspects in the existing or future product range. The specific references to the material impacts, risks and/or opportunities are currently as follows:

### Impacts

#### Reduction in GHG emissions: Positive impact on climate change through the financing of sustainable properties

Application of positive criteria:

- Projects that correspond to the following environmental objectives of the EU taxonomy:
  - Climate change mitigation
  - Climate change adaptation

Implementation in the product range:

- Klima-Kredit:
  - Renovation work to lower energy requirements
  - Installation of sustainable building automation systems
  - Installation of energy-saving and sustainable heating, ventilation, air conditioning and hot water systems
  - Installation of renewable energy technologies such as solar systems and heat pumps
- Klima-Schnell-Kredit:
  - Purchase of energy-saving/energy-efficient appliances

#### Increase in GHG emissions: Negative impact on the climate due to GHG emissions resulting from financing in connection with land-use changes

Consideration of sensitive areas:

- Characteristics that are harmful to the environment or the climate:
  - Transactions involving fossil fuels (oil and gas extraction through fracking, oil extraction from tar sands)
  - Flagrant disregard of environmental laws
  - Disregard of generally recognised environmental standards or rules of conduct by large-scale projects (e.g. pipelines, mines, power plants, timber extraction from primary forests)
- Controversial or morally objectionable characteristics:
  - Flagrant disregard of statutory provisions

### Risks

#### Reputational risk: Transactions in connection with fossil fuels

Application of exclusion criteria:

- Exclusion of coal mining (no direct project financing for coal mining projects)

Consideration of sensitive areas:

- Characteristics that are harmful to the environment or the climate:
  - Transactions involving fossil fuels (oil and gas extraction through fracking, oil extraction from tar sands)
  - Flagrant disregard of environmental laws
  - Disregard of generally recognised environmental standards or rules of conduct by large-scale projects (e.g. pipelines, mines, power plants, timber extraction from primary forests)
- Controversial or morally objectionable characteristics:
  - Flagrant disregard of statutory provisions

#### Credit risk: Failure of collateral due to extreme weather conditions or environmental disasters

Requirements in the risk strategy:

- The risks associated with financing in hazard zones (flooding (HQ100), avalanches) according to the applicable hazard zone plans (in Austria: Avalanche and Torrent Control Service (WLV), Federal Water Engineering Administration (BWV)) must be taken into account.
- The bank only accepts and finances construction projects for which all official permits have been or are expected to be secured. This does not include pure property purchases.
- Potential hazards (e.g. due to a location in a hazard zone) and the mitigation of these hazards (typically conditions imposed by the building authorities) are determined as part of the valuation of the collateral (building survey) and taken into account in determining the market value (see E1 SBM-3.19c).

### Reputational opportunity

#### Transactions in connection with measures to increase energy efficiency and reduce energy consumption

Application of positive criteria:

- Projects that correspond to the following environmental objectives of the EU taxonomy:
  - Climate change mitigation
  - Climate change adaptation

Implementation in the product range:

- Klima-Kredit:
  - Renovation work to lower energy requirements
  - Installation of sustainable building automation systems
  - Installation of energy-saving and sustainable heating, ventilation, air conditioning and hot water systems
  - Installation of renewable energy technologies such as solar systems and heat pumps
- Klima-Schnell-Kredit:
  - Purchase of energy-saving/energy-efficient appliances

### Market opportunity

#### Transactions (= new financing) in connection with renewable energies

Application of positive criteria:

- Projects that correspond to the following environmental objectives of the EU taxonomy:
  - Climate change mitigation
  - Climate change adaptation

Implementation in the product range:

- Klima-Kredit:
  - Renovation work to lower energy requirements
  - Installation of sustainable building automation systems
  - Installation of energy-saving and sustainable heating, ventilation, air conditioning and hot water systems
  - Installation of renewable energy technologies such as solar systems and heat pumps
- Klima-Schnell-Kredit:
  - Purchase of energy-saving/energy-efficient appliances

#### Monitoring process

Compliance is monitored by Hypo Vorarlberg employees using the dual control principle before the transaction is concluded. Internal Audit also takes the "Ethics and sustainability criteria for financing" into account in its ongoing audits. This forms part of the internal due diligence process.

#### Area of application

The policy applies to all employees of the Group who are involved in financing in their business segment, irrespective of their position. The standards set out therein apply to new and existing customers in the financing business.

#### Responsible organisational level

The respective specialist department (Credit Management, Sales) is responsible for creating the policy and updating it as required, as well as for its implementation. Coordination is performed by the Sustainability Group in collaboration with Group Risk Controlling, both of which report directly to the Managing Board.

#### References to third-party standards or initiatives

The "Ethics and sustainability criteria for financing" policy is based on the requirements of international agreements and ethical standards in the areas of human and labour rights. The relevant agreements and standards are:

- United Nations Human Rights Charter
- Principles of the ILO Declaration on Fundamental Principles and Rights at Work

#### Consideration of stakeholder interests

All of the relevant specialist departments at Hypo Vorarlberg are involved in the regular revision of this policy, in particular Sales, Credit Management, Legal, Group Risk Controlling, Sustainability and the Managing Board. Any amendment to this policy requires the renewed involvement of the aforementioned specialist departments.

#### Availability of the policy for stakeholders

The "Ethics and sustainability criteria for financing" policy is an internal company document that is made available to all Hypo Vorarlberg employees on the intranet.

### "ESG investment approach (Asset Management)" policy

#### Key content

Hypo Vorarlberg's "ESG investment approach" describes the central procedure for evaluating investments in Asset Management and must be applied by all employees in this business segment. The policy is reviewed regularly and was most recently updated in November 2024. The individual sections describe the holistic process and the Hypo ESG rating as its key component, as well as the most important steps for reviewing and evaluating new and existing investments (equities, bonds and target funds) in respect of a range of defined sustainability aspects and establishing material references to the topic-specific standard EI Climate change:

- Overview of financial products (asset management, funds)
- External ESG data sources (Sustainalytics, a Morningstar Group company)
- Procedure for determining the Hypo ESG rating:
  - Selection criteria applied
  - Compliance with international standards through norm-based screening
  - Comparison using the best-in-class approach
  - CO<sub>2</sub> risk (CO<sub>2</sub> risk and CO<sub>2</sub> management, fossil fuels, renewable energies, CO<sub>2</sub> intensity (Scope 1 and 2), stranded assets)
  - Measurable impact on SDGs<sup>8</sup>
  - Controversial business practices (business operations, supply chain (environmental), employees, corporate governance, society and community, products and services, supply chain (social), customers, business ethics, public)
  - Corporate governance (quality and integrity of the Managing Board and management, composition of the Managing Board, ownership and shareholder rights, wages and salaries, auditing and financial reporting, stakeholder treatment)
  - ESG risk rating
  - Approach to calculating ESG country rating:
    - Country risk
    - Freedom House Index (Free, Partly Free, Not Free)
- Measurement and management of the principal adverse impacts (PAIs) on sustainability factors

The material topics are specifically taken into account within the aforementioned framework when selecting securities in accordance with the ESG investment approach. All of the figures used in Hypo Vorarlberg's ESG rating are based on ESG data from the research partner Sustainalytics<sup>9</sup> or publicly accessible databases such as Freedom House<sup>10</sup>.

<sup>8</sup> United Nations Sustainable Development Goals

<sup>9</sup> The information, data, analyses and opinions contained herein (the "Information"): (1) includes the proprietary information of Sustainalytics and/or its content providers; (2) may not be copied or redistributed except as specifically authorized; (3) do not constitute investment advice nor an endorsement of any product, project, investment strategy or consideration of any particular environmental, social or governance related issues as part of any investment strategy; (4) are provided solely for informational purposes; and (5) are not warranted to be complete, accurate or timely. The Information is not directed to, nor intended for distribution to or use by India-based clients and/or users, and the distribution of Information to India resident individuals and entities is not permitted. Neither Morningstar Inc., Sustainalytics, nor their content providers accept any liability for the use of the information, for actions of third parties in respect to the information, nor are responsible for any trading decisions, damages or other losses related to the information or its use. The use of the data is subject to conditions at <https://www.sustainalytics.com/legal-disclaimers>.

<sup>10</sup> [www.freedomhouse.org](http://www.freedomhouse.org)

## General objectives

The main objective of the "ESG investment approach" is to assess and classify ESG aspects in order to minimise potentially negative environmental, social and governance impacts and support positive ones by investing directly or indirectly in companies. Since November 2021, all Hypo Vorarlberg funds and asset management strategies that are actively offered have been classified as financial products within the meaning of Article 8 of Regulation (EU) 2019/2088 (Sustainable Finance Disclosure Regulation) and take into account environmental and/or social characteristics.

## References to material impacts, risks or opportunities

The topic-specific management of material impacts (positive and negative) and opportunities is performed in the individual components of Hypo Vorarlberg's ESG rating. This consists of selection criteria, norm-based screening, a best-in-class approach (CO<sub>2</sub> risk rating, measurable impact on SDGs, controversial economic practices, corporate governance, ESG risk rating) and the country risk for government bonds. The specific references to the material impacts, risks and opportunities are currently as follows:

### Impacts

#### Reduction in GHG emissions: Positive impact on climate change through the financing of sustainable properties

Application of best-in-class approach:

- Measurable impact on SDGs (only a measurable impact on the United Nations Sustainable Development Goals contributes to an improved rating):
  - SDG 7: Affordable and clean energy
  - SDG 11: Sustainable cities and communities
  - SDG 13: Climate action

#### Increase in GHG emissions: Negative impact on the climate due to GHG emissions resulting from financing in connection with land-use changes

Compliance with international standards through norm-based screening:

- Norm-based screening enables compliance with international norms and standards relating to the environment. It uses the categories "compliant", "watchlist" and "non-compliant". "Compliant" companies and securities on the "watchlist" are given equal weighting in the Hypo ESG rating. "Non-compliant" companies are not selected:
  - United Nations Global Compact: Principle 7, 8, 9<sup>11</sup>
  - OECD Guidelines for Multinational Enterprises: Chapter VI – Environment<sup>12</sup>

Application of selection criteria (revenue thresholds):

- Nuclear energy 5 %
- Fossil fuels:
  - Oil extraction from tar sands 5 %
  - Production of oil and gas 10 %
  - Crude oil and natural gas extraction through fracking 0 %
  - Coal extraction/mining 5 %

### Risks

#### Reputational risk: Transactions in connection with fossil fuels

Compliance with international standards through norm-based screening:

- Norm-based screening enables compliance with international norms and standards relating to the environment. It uses the categories "compliant", "watchlist" and "non-compliant". "Compliant" companies and securities on the "watchlist" are given equal weighting in the Hypo ESG rating. "Non-compliant" companies are not selected:
  - United Nations Global Compact: Principle 7, 8, 9<sup>13</sup>
  - OECD Guidelines for Multinational Enterprises: Chapter VI – Environment<sup>14</sup>

Application of selection criteria (revenue thresholds):

- Nuclear energy 5 %
- Fossil fuels:
  - Oil extraction from tar sands 5 %
  - Production of oil and gas 10 %
  - Crude oil and natural gas extraction through fracking 0 %
  - Coal extraction/mining 5 %

### Reputational opportunity

#### Transactions in connection with measures to increase energy efficiency and reduce energy consumption

Application of best-in-class approach:

- Companies with low risks in connection with the transition to a low-carbon economy have a better rating:
  - Areas considered:
    - CO<sub>2</sub> risk and CO<sub>2</sub> management
    - Renewable energies
- Companies that have a measurable impact on one or more sustainable development goals have a better rating:
  - SDG 7: Affordable and clean energy
  - SDG 13: Climate action

### Market opportunity

#### Transactions (= new financing) in connection with renewable energies

Application of best-in-class approach:

- Companies with low risks in connection with the transition to a low-carbon economy have a better rating:
  - Areas considered:
    - CO<sub>2</sub> risk and CO<sub>2</sub> management
    - Renewable energies
- Companies that have a measurable impact on one or more sustainable development goals have a better rating:
  - SDG 7: Affordable and clean energy
  - SDG 13: Climate action

<sup>11</sup> <https://unglobalcompact.org/what-is-gc/mission/principles>

<sup>12</sup> [https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_81f92357-en.html](https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html)

<sup>13</sup> <https://unglobalcompact.org/what-is-gc/mission/principles>

<sup>14</sup> [https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_81f92357-en.html](https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html)

### Monitoring process

Compliance is monitored using the dual control principle. The ESG rating tool is used to examine and ensure compliance with the defined ESG requirements on an ex-ante basis as part of the securities selection process. Investments are only made if the ESG investment approach is complied with at the time of purchase. Securities portfolios are also regularly reviewed. The results are checked for plausibility at product level on an ex-post basis. Additional review steps are initiated if any anomalies are identified.

### Area of application

The policy applies to all employees of the Group who are involved in portfolio management in their business segment, irrespective of their position. The standards set out therein are aimed at the downstream value chain. At product level, the Hypo ESG investment approach defines the main requirements for portfolio management, including the distinction between "Investments" and "Other investments". It is divided into two areas: "Selection of individual securities" and "Selection of target funds".

### Responsible organisational level

The Asset Management department, which reports directly to the Managing Board, is responsible for creating the policy and updating it as required, as well as for its implementation.

### References to third-party standards or initiatives

The "ESG investment approach" is based on European directives and guidelines from international organisations. The relevant directives and guidelines are:

- Sustainable Finance Disclosure Regulation (EU 2019/2088) (SFDR)
- Regulation (EU) 2021/1253 on sustainability in connection with MiFID II
- United Nations principles for responsible corporate governance (United Nations Global Compact)
- OECD Guidelines for Multinational Enterprises
- United Nations Guiding Principles on Business and Human Rights
- United Nations Sustainable Development Goals (UN SDGs)
- Degree of freedom according to the non-governmental organisation Freedom House

### Consideration of stakeholder interests

All relevant stakeholders and knowledge bearers at Hypo Vorarlberg were involved in the creation of this policy, in particular the specialist departments for Asset Management, Compliance and Sustainability. Any amendment to this policy requires the renewed involvement of the aforementioned stakeholders.

### Availability of the policy for stakeholders

The ESG investment approach is available on Hypo Vorarlberg's website.<sup>15</sup>

## "ESG in own-account investments (Treasury: APM & Investments)" policy

### Key content

The "ESG in own-account investments (Treasury: APM & Investments)" document describes Hypo Vorarlberg's central procedure for taking ethics and sustainability criteria into consideration in its own-account investments. This investment strategy must be taken into account by all Hypo Vorarlberg employees working in this business segment. It is regularly reviewed and updated, most recently in the first half of 2024. By taking sustainability aspects into account when making investment decisions, the company aims to support the transition to a climate-neutral economy and indirectly influence companies to focus on environmental and social responsibility to a greater extent. This is based on compliance standards, minimum requirements, positive and exclusion criteria and the definition of sensitive areas. Investments are checked for compliance with these criteria, with a particular focus on human rights, environmental and social aspects. Country-specific risk assessments are applied for government bonds in order to comprehensively assess political and economic stability.

The following aspects can also be used to establish a reference to the topic-specific standard EI Climate change:

- Scope of application and legal provisions
- Procedure for implementation in the area of own-account investments:
  - Minimum requirements and norm-based screening
  - Application of positive criteria
  - Application of exclusion criteria
  - Consideration of sensitive areas:
    - Characteristics that are harmful to the environment or the climate
    - Controversial or morally objectionable characteristics
- Review and control

Compliance with these criteria is reviewed by reference to data from external ESG research partners. If no data is available or the intended use is not known, the valuation is carried out on the basis of available company information.

### General objectives

The main objective of the document is to promote sustainable investments, ensure compliance with ethical standards and minimise risk by avoiding investments in socially or environmentally problematic areas. Hypo Vorarlberg aims to invest exclusively in forms of investment that comply with international ethical standards and to exclude high-risk areas that do not satisfy these standards.

### References to material impacts, risks or opportunities

The topic-specific management of material impacts (positive and negative), risks and opportunities is performed by applying positive criteria and exclusion criteria or by taking sensitive areas into account. The specific references to the material impacts, risks and/or opportunities are currently as follows:

#### Impacts

##### Reduction in GHG emissions: Positive impact on climate change through the financing of sustainable properties

Positive criteria are reviewed by checking for the presence of the following two characteristics:

- Conformity with the Green Bond Principles, the Social Bond Principles, the Sustainability-Linked Bond Principles or the Sustainability Bond Guidelines
- Classification as an ESG investment and provision of a second party opinion by a recognised sustainability rating agency

##### Increase in GHG emissions: Negative impact on the climate due to GHG emissions resulting from financing in connection with land-use changes

Consideration of sensitive areas:

- Characteristics that are harmful to the environment or the climate:

<sup>15</sup> [https://www.hypovbg.at/fileadmin/Hypovbg/Hypo-Vorarlberg/Nachhaltigkeit/Offenlegungen/ESG-Investmentansatz-Hypo-Vorarlberg\\_02-01-2025.pdf](https://www.hypovbg.at/fileadmin/Hypovbg/Hypo-Vorarlberg/Nachhaltigkeit/Offenlegungen/ESG-Investmentansatz-Hypo-Vorarlberg_02-01-2025.pdf)

- Flagrant disregard of environmental laws
- Disregard of generally recognised environmental standards or rules of conduct by large-scale projects
- Controversial or morally objectionable characteristics:
  - Flagrant disregard of statutory provisions

Compliance with international standards through norm-based screening:

- Norm-based screening enables compliance with international norms and standards relating to the environment. No investments are made in companies that violate international environmental norms and standards. The basis for screening is as follows:
  - United Nations Global Compact: Principle 7, 8, 9<sup>16</sup>
  - OECD Guidelines for Multinational Enterprises: Chapter VI – Environment<sup>17</sup>

#### Reputational risk

##### Transactions in connection with fossil fuels

Application of exclusion criteria (revenue thresholds):

- Fossil fuels:
  - Crude oil and natural gas extraction through fracking 0 %
  - Oil extraction from tar sands 5 %
  - Coal extraction/mining 5 %
- Nuclear energy 5 %

Consideration of sensitive areas:

- Characteristics that are harmful to the environment or the climate:
  - Flagrant disregard of environmental laws
  - Disregard of generally recognised environmental standards or rules of conduct by large-scale projects
- Controversial or morally objectionable characteristics:
  - Flagrant disregard of statutory provisions

Compliance with international standards through norm-based screening:

- Norm-based screening enables compliance with international norms and standards relating to the environment. No investments are made in companies that violate international environmental norms and standards. The basis for screening is as follows:
  - United Nations Global Compact: Principle 7, 8, 9<sup>18</sup>
  - OECD Guidelines for Multinational Enterprises: Chapter VI – Environment<sup>19</sup>

#### Reputational opportunity

##### Transactions in connection with measures to increase energy efficiency and reduce energy consumption

Positive criteria are reviewed by checking for the presence of the following two characteristics:

- Conformity with the Green Bond Principles, the Social Bond Principles, the Sustainability-Linked Bond Principles or the Sustainability Bond Guidelines
- Classification as an ESG investment and provision of a second party opinion by a recognised sustainability rating agency

#### Market opportunity

##### Transactions (= new financing) in connection with renewable energies

Positive criteria are reviewed by checking for the presence of the following two characteristics:

- Conformity with the Green Bond Principles, the Social Bond Principles, the Sustainability-Linked Bond Principles or the Sustainability Bond Guidelines
- Classification as an ESG investment and provision of a second party opinion by a recognised sustainability rating agency

#### Monitoring process

Compliance is monitored by the Treasury APM & Investments Group using the dual control principle and is regularly audited by Internal Audit.

#### Area of application

The document applies to all employees and covers Hypo Vorarlberg's direct investments. Supply chains and shareholdings are not currently subject to mandatory review, as this is generally not possible due to data availability.

#### Responsible organisational level

The Treasury: APM & Investments specialist department, which reports directly to the Managing Board, is responsible for creating the document and updating it as required, as well as for its implementation.

#### References to third-party standards or initiatives

The "ESG in own-account investments (Treasury: APM & Investments)" document is based on international agreements and standards in the areas of human rights, labour standards, the environment and corruption prevention, including:

- Principles of the United Nations Global Compact
- OECD Guidelines for Multinational Enterprises
- United Nations Guiding Principles on Business and Human Rights

#### Consideration of stakeholder interests

The interests of all relevant stakeholders were taken into account in the creation of this document and knowledge bearers at Hypo Vorarlberg were involved, in particular the specialist departments for Own-account Investments, Data Protection and Compliance as well as the Sustainability Group. Any amendment to this policy requires a renewed assessment by the aforementioned stakeholders.

#### Availability of the policy for stakeholders

The "ESG in own-account investments (Treasury: APM & Investments)" policy is an internal document that is made available to all Hypo Vorarlberg employees on the intranet.

#### 25a-d) Consideration of certain areas in the policies

Hypo Vorarlberg's strategies already take account of the issues of a) climate change mitigation, b) climate change adaptation, c) energy efficiency and d) renewable energy deployment. These areas are an integral part of the sustainability strategy and are addressed by specific policies (see E1-2.24).

<sup>16</sup> <https://unglobalcompact.org/what-is-gc/mission/principles>

<sup>17</sup> [https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_81f92357-en.html](https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html)

<sup>18</sup> <https://unglobalcompact.org/what-is-gc/mission/principles>

<sup>19</sup> [https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_81f92357-en.html](https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html)

## DISCLOSURE REQUIREMENT E1-3 – ACTIONS AND RESOURCES IN RELATION TO CLIMATE CHANGE POLICIES

### OWN BUSINESS OPERATIONS & DOWNSTREAM VALUE CHAIN

#### 28) Actions and resources related to climate change mitigation and adaptation in accordance with ESRS 2 MDR-A

##### GENERAL INFORMATION ON ACTIONS RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

The following is a list of actions related to the climate strategies. Actions for climate change mitigation and adaptation can be derived on the basis of the topic-specific requirements addressed in the sustainability strategy. The respective specialist departments are responsible for defining and implementing the individual actions. Most of these are also set out in separate policies or work instructions.

##### Financing business

###### Key measures

###### Taken

The individual measures cover the most important criteria as outlined below (positive criteria, exclusion criteria and sensitive areas) for reviewing and evaluating potential financing in respect of sustainability aspects and establishing material references to the topic-specific standard E1 Climate change:

- In the case of financing with new customers, the positive criteria of the first and second environmental objectives of the EU taxonomy are applied:
  - Climate change mitigation
  - Climate change adaptation
- The positive criteria are also applied to financing of new business and extensions for existing customers
- Defined exclusion criteria for financing (e.g. environmental degradation) have been implemented:
  - Exclusion of coal mining (no direct project financing for coal mining projects)
- In addition to exclusion criteria, sensitive areas for potential financing that are subject to more extensive scrutiny are defined:
  - Characteristics that are harmful to the environment or the climate:
    - Transactions involving fossil fuels (oil and gas extraction through fracking, oil extraction from tar sands)
    - Flagrant disregard of environmental laws
    - Disregard of generally recognised environmental standards or rules of conduct by large-scale projects
  - Controversial or morally objectionable characteristics:
    - Flagrant disregard of environmental laws

###### Planned

###### New application and implementation of GHG accounting for financed emissions

As a financial institution, Hypo Vorarlberg is aware that it can have a significant influence on financed emissions (Scope 3.15). For this reason, financed emissions were measured in accordance with the GHG Protocol for the first time in 2024. Hypo Vorarlberg's loan portfolio was compared on the basis of current data using the PCAF framework and its classification steps for the first time. Further steps are already planned on the basis of these results. The expansion and enhancement of the process includes increasing the degree of coverage of the portfolio based on the PCAF asset classes and improving the "data quality score" (PCAF defines data quality scores using a five-point rating system). The implementation of the process in the business strategy and its incorporation into Hypo Vorarlberg's processes is planned on the basis of a practice-oriented test run, as the calculation and preparation of GHG accounting (Scope 1-3) is a recurring annual task. The disclosure of the current GHG balance for all scopes is mandatory every year, while it also serves as a key indicator for developing a decarbonisation strategy and deriving, expanding and implementing measures and targets.

###### Derivation of measures and targets for the decarbonisation strategy

The application and implementation of the PCAF methodology was the first step in creating a decarbonisation strategy. The results will be used to derive operationally available decarbonisation levers and to develop relevant performance indicators. To this end, granular simulations involving science-based scenarios and selected parameters are used in order to define a robust reduction path for emissions over time. At the heart of the strategy is the creation of a transition plan that will specify both qualitative and quantitative measures and targets.

###### Expected results

###### Expected results for financed emissions (GHG accounting)

By calculating the financed emissions using the PCAF framework for the first time, Hypo Vorarlberg was able to gain an initial insight into the composition of the emission budget in financing via its loan portfolio. Hypo Vorarlberg has already planned measures based on this year's results, including the annual performance of the calculation, the expansion of the calculation model and integration into existing processes. The development of a decarbonisation strategy based on the model is expected to be possible in the next reporting period.

###### Contribution to the realisation of the objectives and targets of the policy

The measures already taken are consistent with the objective of the "Ethics and sustainability criteria for financing" policy, which essentially aims to take into account the impact of financing on the environment, the climate and people. The material impacts, risks and opportunities identified in the double materiality assessment are taken into account as follows:

###### Impacts

###### Reduction in GHG emissions: Positive impact on climate change through the financing of sustainable properties

Application of positive criteria:

- Projects that correspond to the following environmental objectives of the EU taxonomy:
  - Climate change mitigation
  - Climate change adaptation

Implementation in the product range:

- Klima-Kredit:
  - Renovation work to lower energy requirements
  - Installation of sustainable building automation systems
  - Installation of energy-saving and sustainable heating, ventilation, air conditioning and hot water systems
  - Installation of renewable energy technologies such as solar systems and heat pumps
- Klima-Schnell-Kredit:
  - Purchase of energy-saving/energy-efficient appliances

###### Increase in GHG emissions: Negative impact on the climate due to GHG emissions resulting from financing in connection with land-use changes

Consideration of sensitive areas:

- Characteristics that are harmful to the environment or the climate:
  - Transactions involving fossil fuels (oil and gas extraction through fracking, oil extraction from tar sands)

- Flagrant disregard of environmental laws
- Disregard of generally recognised environmental standards or rules of conduct by large-scale projects (e.g. pipelines, mines, power plants, timber extraction from primary forests)
- Controversial or morally objectionable characteristics:
  - Flagrant disregard of statutory provisions

## Risks

### Reputational risk: Transactions in connection with fossil fuels

Application of exclusion criteria:

- Construction and operation of nuclear power plants (no direct project financing for nuclear power projects)
- Exclusion of coal mining (no direct project financing for coal mining projects)

Consideration of sensitive areas:

- Characteristics that are harmful to the environment or the climate:
  - Transactions involving fossil fuels (oil and gas extraction through fracking, oil extraction from tar sands)
  - Flagrant disregard of environmental laws
  - Disregard of generally recognised environmental standards or rules of conduct by large-scale projects (e.g. pipelines, mines, power plants, timber extraction from primary forests)
- Controversial or morally objectionable characteristics:
  - Flagrant disregard of statutory provisions

### Credit risk: Failure of collateral due to extreme weather conditions or environmental disasters

Requirements in the risk strategy:

- The risks associated with financing in hazard zones (flooding (HQ100), avalanches) according to the applicable hazard zone plans (in Austria: Avalanche and Torrent Control Service (WLV), Federal Water Engineering Administration (BWV)) must be taken into account.
- The bank only accepts and finances construction projects for which all official permits have been or are expected to be secured. This does not include pure property purchases.
- Potential hazards (e.g. due to a location in a hazard zone) and the mitigation of these hazards (typically conditions imposed by the building authorities) are determined as part of the valuation of the collateral (building survey) and taken into account in determining the market value.
- For more information see E1 SBM-3.19c

## Reputational opportunity

### Transactions in connection with measures to increase energy efficiency and reduce energy consumption

Application of positive criteria:

- Projects that correspond to the following environmental objectives of the EU taxonomy:
  - Climate change mitigation
  - Climate change adaptation

Implementation in the product range:

- Klima-Kredit:
  - Renovation work to lower energy requirements
  - Installation of sustainable building automation systems
  - Installation of energy-saving and sustainable heating, ventilation, air conditioning and hot water systems
  - Installation of renewable energy technologies such as solar systems and heat pumps
- Klima-Schnell-Kredit:
  - Purchase of energy-saving/energy-efficient appliances

## Market opportunity

### Transactions (= new financing) in connection with renewable energies

Application of positive criteria:

- Projects that correspond to the following environmental objectives of the EU taxonomy:
  - Climate change mitigation
  - Climate change adaptation

Implementation in the product range:

- Klima-Kredit:
  - Renovation work to lower energy requirements
  - Installation of sustainable building automation systems
  - Installation of energy-saving and sustainable heating, ventilation, air conditioning and hot water systems
  - Installation of renewable energy technologies such as solar systems and heat pumps
- Klima-Schnell-Kredit:
  - Purchase of energy-saving/energy-efficient appliances

## Scope and area of application

The measures taken are designed to be consistent with the policy and apply throughout the Group. The planned measures will also cover the entire value chain.

## Time horizon

The measures taken have a long-term time horizon (more than five years). The planned measures have a short-term perspective (up to 1 year). All measures are regularly reviewed as part of a continuous process (plan-do-check-act) and adjusted as necessary.

## Key remedial measures

The measures taken have a preventive effect. No further remedial measures are linked to the provision of financing.

## Progress

The measures taken have already been implemented and are reviewed annually to determine whether they need to be adjusted. There was no need for any qualitative adjustments compared to the previous year. No quantitative measurements were carried out.



## Asset Management

### Key measures

#### Taken

The following measures taken include the procedure for determining Hypo Vorarlberg's ESG rating in the area of investment strategies and in the selection of target funds. The measures also cover the measurement and controlling of potential negative impacts on the sustainability factors for investments and include material references to the topic-specific standard E1 Climate change:

- Application of defined selection criteria for direct and indirect investments in companies that exceed revenue thresholds in certain business areas (0-5 %):
  - Transactions involving fossil fuels (oil and gas extraction through fracking, oil extraction from tar sands)
  - Exclusion of investments by companies that cause significant emissions of air pollutants (such as the coal industry)
  - Loss of biodiversity due to certain industries (use of genetic engineering in agriculture, tobacco industry)
- Implementation of norm-based screening:
  - When making investment decisions, no investments are made in companies that violate international norms and standards in the areas of human and labour rights, the environment and corruption. Companies are also categorised as "compliant", "watchlist" or "non-compliant". Companies categorised as "non-compliant" are not selected for investment.
- The application of the best-in-class approach takes the following areas into account:
  - GHG risk and GHG management: Comparison of companies to identify those with the lowest risk in connection with the transition to a low-carbon economy
  - Companies that have a measurable impact on one or more of the United Nations SDGs (e.g. zero hunger, good health and well-being, quality education, life on land and below water, sustainable cities and communities, responsible consumption and production) have a better rating
  - Companies without controversial incidents with a potentially negative impact on stakeholders, the environment or operations have a lower risk and hence a better rating
  - Companies with good corporate governance (e.g. composition of the Managing Board, wages and salaries, stakeholder treatment) have a better rating
  - Companies that are only exposed to low ESG risks or a small number of ESG risks have a better rating (risk exposure and risk management), including taking the LCTR (= implied temperature alignment) into account
- In the case of government bonds, only bonds with a medium risk (at least C-) on a rating scale of A-E are authorised in order to limit potential negative impacts. The country risk rating is supplied by an external service provider and is included in the overall assessment of the Hypo ESG rating
- Measurement and management of the principal adverse impacts (PAIs) on sustainability factors through the publication of PAI statements
- Annual ESG screening of the Hypo Vorarlberg funds by an external service provider to ensure transparency and comparability

#### Expected results

The criteria and measures already implemented are used to comprehensively review investment opportunities in order to ensure compliance with international norms and standards and a heightened focus on forms of investment that take sustainability aspects into account.

#### Contribution to the realisation of the objectives and targets of the policy

The measures already taken are consistent with the objective of the "ESG investment approach" policy, which essentially involves promoting sustainable investments and minimising the potential impact of problematic forms of investment on the environment, the climate and people. The material impacts, risks and opportunities identified in the double materiality assessment are addressed as follows:

#### Impacts

##### Reduction in GHG emissions: Positive impact on climate change through the financing of sustainable properties

Application of best-in-class approach:

- Measurable impact on SDGs (only a measurable impact on the United Nations Sustainable Development Goals contributes to an improved rating):
  - SDG 7: Affordable and clean energy
  - SDG 11: Sustainable cities and communities
  - SDG 13: Climate action

##### Increase in GHG emissions: Negative impact on the climate due to GHG emissions resulting from financing in connection with land-use changes

Compliance with international standards through norm-based screening:

- Norm-based screening enables compliance with international norms and standards relating to the environment. It uses the categories "compliant", "watchlist" and "non-compliant". "Compliant" companies and securities on the "watchlist" are given equal weighting in the Hypo ESG rating. "Non-compliant" companies are not selected:
  - United Nations Global Compact: Principle 7, 8, 9<sup>20</sup>
  - OECD Guidelines for Multinational Enterprises: Chapter VI – Environment<sup>21</sup>

Application of selection criteria (revenue thresholds):

- Nuclear energy 5 %
- Fossil fuels:
  - Oil extraction from tar sands 5 %
  - Production of oil and gas 10 %
  - Crude oil and natural gas extraction through fracking 0 %
  - Coal extraction/mining 5 %

#### Risks

##### Reputational risk: Transactions in connection with fossil fuels

Compliance with international standards through norm-based screening:

- Norm-based screening enables compliance with international norms and standards relating to the environment. It uses the categories "compliant", "watchlist" and "non-compliant". "Compliant" companies and securities on the "watchlist" are given equal weighting in the Hypo ESG rating. "Non-compliant" companies are not selected:
  - United Nations Global Compact: Principle 7, 8, 9<sup>22</sup>

<sup>20</sup> <https://unglobalcompact.org/what-is-gc/mission/principles>

<sup>21</sup> [https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_81f92357-en.html](https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html)

<sup>22</sup> <https://unglobalcompact.org/what-is-gc/mission/principles>



- OECD Guidelines for Multinational Enterprises: Chapter VI – Environment<sup>23</sup>

Application of selection criteria (revenue thresholds):

- Nuclear energy 5 %
- Fossil fuels:
  - Oil extraction from tar sands 5 %
  - Production of oil and gas 10 %
  - Crude oil and natural gas extraction through fracking 0 %
  - Coal extraction/mining 5 %

#### Reputational opportunity

##### Transactions in connection with measures to increase energy efficiency and reduce energy consumption

Application of best-in-class approach:

- Companies with low risks in connection with the transition to a low-carbon economy have a better rating.
  - Areas considered:
    - CO<sub>2</sub> risk and CO<sub>2</sub> management
    - Renewable energies
- Companies that have a measurable impact on one or more sustainable development goals have a better rating:
  - SDG 7: Affordable and clean energy
  - SDG 13: Climate action

#### Market opportunity

##### Transactions (= new financing) in connection with renewable energies

Application of best-in-class approach:

- Companies with low risks in connection with the transition to a low-carbon economy have a better rating:
  - Areas considered:
    - CO<sub>2</sub> risk and CO<sub>2</sub> management
    - Renewable energies
- Companies that have a measurable impact on one or more sustainable development goals have a better rating:
  - SDG 7: Affordable and clean energy
  - SDG 13: Climate action

#### Scope and area of application

The measures taken are designed to be consistent with the policy and apply to the Bank and, in some cases, the St. Gallen branch.

#### Time horizon

The measures taken have a long-term time horizon (more than five years). All measures are regularly reviewed as part of a continuous process (plan-do-check-act) and adjusted as necessary.

#### Key remedial measures

The measures taken have a direct effect. The criteria to be taken into account contribute directly to remedial action.

#### Progress

The measures taken have already been implemented and are reviewed annually to determine whether they need to be adjusted. There was no need for any qualitative adjustments compared to the previous year. Quantitative measurements are carried out on a monthly and quarterly basis via the rating process.

<sup>23</sup> [https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_81f92357-en.html](https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html)

## Own-account investments

### Key measures

#### Taken

- The individual measures cover the most important criteria as outlined below for reviewing and evaluating potential investments in respect of sustainability aspects and establishing material references to the topic-specific standard EI Climate change:
- Implementation of norm-based screening: When making investment decisions (new purchases), no investments are made in companies that violate international environmental standards and norms. The screening is based on the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights.
- Positive criteria are reviewed by checking for the presence of the following two characteristics:
  - Conformity with the Green Bond Principles, the Social Bond Principles, the Sustainability-Linked Bond Principles or the Sustainability Bond Guidelines
  - Classification as an ESG investment and provision of a second party opinion by a recognised sustainability rating agency
- Application of defined exclusion criteria for investments in companies that exceed revenue thresholds in certain business areas (0-5 %):
  - Transactions involving fossil fuels (crude oil and natural gas extraction through fracking, oil extraction from tar sands, coal extraction/mining)
- In addition to exclusion criteria, sensitive areas for potential investments that are subject to more extensive scrutiny are defined in order to identify characteristics that are controversial, morally objectionable, or harmful to the climate or the environment (e.g. timber extraction from primary forests)
- Compliance with these criteria is reviewed by reference to data from external ESG research partners. If no data is available or the intended use is not known, the valuation is carried out on the basis of available company information.

#### Planned

##### New application and implementation of GHG accounting for financed emissions

As a financial institution, Hypo Vorarlberg is aware that it can have a significant influence on financed emissions (Scope 3.15). For this reason, financed emissions were measured in accordance with the GHG Protocol for the first time in 2024. Hypo Vorarlberg's loan portfolio was compared on the basis of current data using the PCAF framework and its classification steps for the first time. Further steps are already planned on the basis of these results. The expansion and enhancement of the process includes increasing the degree of coverage of the portfolio based on the PCAF asset classes and improving the "data quality score" (PCAF defines data quality scores using a five-point rating system). The implementation of the process in the business strategy and its incorporation into Hypo Vorarlberg's processes is planned on the basis of a practice-oriented test run, as the calculation and preparation of GHG accounting (Scope 1-3) is a recurring annual task. The disclosure of the current GHG balance for all scopes is mandatory every year, while it also serves as a key indicator for developing a decarbonisation strategy and deriving, expanding and implementing measures and targets.

##### Derivation of measures and targets for the decarbonisation strategy

The application and implementation of the PCAF methodology was the first step in creating a decarbonisation strategy. The results will be used to derive operationally available decarbonisation levers and to develop relevant performance indicators. To this end, granular simulations involving science-based scenarios and selected parameters are used in order to define a robust reduction path for emissions over time. At the heart of the strategy is the creation of a transition plan that will specify both qualitative and quantitative measures and targets.

### Expected results

#### Expected results for financed emissions (GHG accounting)

By calculating the financed emissions using the PCAF framework for the first time, Hypo Vorarlberg was able to gain an initial insight into the composition of the emission budget in financing via its loan portfolio. Hypo Vorarlberg has already planned measures based on this year's results, including the annual performance of the calculation, the expansion of the calculation model and integration into existing processes. The development of a decarbonisation strategy based on the model is expected to be possible in the next reporting period.

#### Contribution to the realisation of the objectives and targets of the policy

The measures already taken are consistent with the objective of the "ESG in own-account investments (Treasury: APM & Investments)" policy, which essentially involves promoting sustainable investments and minimising the potential impact of problematic forms of investment on the environment, the climate and people. The material impacts, risks and opportunities identified in the double materiality assessment are addressed as follows:

#### Impacts

##### Reduction in GHG emissions: Positive impact on climate change through the financing of sustainable properties

Positive criteria are reviewed by checking for the presence of the following two characteristics:

- Conformity with the Green Bond Principles, the Social Bond Principles, the Sustainability-Linked Bond Principles or the Sustainability Bond Guidelines
- Classification as an ESG investment and provision of a second party opinion by a recognised sustainability rating agency

##### Increase in GHG emissions: Negative impact on the climate due to GHG emissions resulting from financing in connection with land-use changes

Consideration of sensitive areas:

- Characteristics that are harmful to the environment or the climate:
  - Flagrant disregard of environmental laws
  - Disregard of generally recognised environmental standards or rules of conduct by large-scale projects
- Controversial or morally objectionable characteristics:
  - Flagrant disregard of statutory provisions

Compliance with international standards through norm-based screening:

- Norm-based screening enables compliance with international norms and standards relating to the environment. No investments are made in companies that violate international environmental norms and standards. The basis for screening is as follows:
  - United Nations Global Compact: Principle 7, 8, 9<sup>24</sup>
  - OECD Guidelines for Multinational Enterprises: Chapter VI – Environment<sup>25</sup>

#### Reputational risk

##### Transactions in connection with fossil fuels

Application of exclusion criteria (revenue thresholds):

- Fossil fuels:

<sup>24</sup> <https://unglobalcompact.org/what-is-gc/mission/principles>

<sup>25</sup> [https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_81f92357-en.html](https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html)

- Crude oil and natural gas extraction through fracking 0 %
- Oil extraction from tar sands 5 %
- Coal extraction/mining 5 %
- Nuclear energy 5 %

Consideration of sensitive areas:

- Characteristics that are harmful to the environment or the climate:
  - Flagrant disregard of environmental laws
  - Disregard of generally recognised environmental standards or rules of conduct by large-scale projects
- Controversial or morally objectionable characteristics:
  - Flagrant disregard of statutory provisions

Compliance with international standards through norm-based screening:

- Norm-based screening enables compliance with international norms and standards relating to the environment. No investments are made in companies that violate international environmental norms and standards. The basis for screening is as follows:
  - United Nations Global Compact: Principle 7, 8, 9<sup>26</sup>
  - OECD Guidelines for Multinational Enterprises: Chapter VI – Environment<sup>27</sup>

#### Reputational opportunity

##### Transactions in connection with measures to increase energy efficiency and reduce energy consumption

Positive criteria are reviewed by checking for the presence of the following two characteristics:

- Conformity with the Green Bond Principles, the Social Bond Principles, the Sustainability-Linked Bond Principles or the Sustainability Bond Guidelines
- Classification as an ESG investment and provision of a second party opinion by a recognised sustainability rating agency

#### Market opportunity

##### Transactions (= new financing) in connection with renewable energies

Positive criteria are reviewed by checking for the presence of the following two characteristics:

- Conformity with the Green Bond Principles, the Social Bond Principles, the Sustainability-Linked Bond Principles or the Sustainability Bond Guidelines
- Classification as an ESG investment and provision of a second party opinion by a recognised sustainability rating agency

#### Scope and area of application

The measures taken are designed to be consistent with the policy and apply throughout the Group. The planned measures will also cover the entire value chain.

#### Time horizon

The measures taken have a long-term time horizon (more than five years). The planned measures have a short-term perspective (up to 1 year). All measures are regularly reviewed as part of a continuous process (plan-do-check-act) and adjusted as necessary.

#### Key remedial measures

The measures taken have a direct effect. The criteria to be taken into account contribute directly to remedial action.

#### Progress

The measures taken have already been implemented and are reviewed annually to determine whether they need to be adjusted. There was no need for any qualitative adjustments compared to the previous year. No quantitative measurements were carried out.

### Own business operations – reduction in GHG emissions

#### Key measures

##### Taken

- Covering 100 % of total electricity requirements with electricity from renewable sources
- For new buildings, Hypo Vorarlberg aims to achieve the Silver quality standard in accordance with the criteria of "Klimaaktiv.at", an initiative of the Austrian Federal Ministry for Climate Action, Environment, Energy, Mobility, Innovation and Technology, and/or the ÖGNI Gold quality standard
- When purchasing new company cars that are to be used in addition to existing vehicles or as replacements for vehicles that are taken out of service, the focus will continue to be on electric vehicles as long as their planned use does not give rise to any grounds for exclusion (all-wheel drive capability, off-road capability, transportation function, suitability for long-haul driving)
- Carbon credits for climate change mitigation projects
- Business trips and training courses should be organised with as few emissions as possible, e.g. by using train travel or through the increased use of video conferencing. This is set out in a Managing Board directive (Bank)
- Replacement of lighting with LED technology (Bank)
- Control optimisation of the heating and cooling systems with setpoint selection of 21 °C or 24 °C (Bank)
- Logo lighting mostly switched off at night (Bank)

##### Planned

- Suitable roof surfaces should be equipped with solar and/or photovoltaic systems to the greatest possible extent unless there are justifiable reasons that prevent this (e.g. listed building status, impact on landscape and local character, timing of renovation work)
- Use of car-sharing vehicles for business trips
- Replacement of heating energy systems with renewable energy sources (e.g. district heating, biomass or heat pump systems)
- Energy-efficient renovation of buildings by 2030. Renovation work is to be performed as best-practice renovation

#### Expected results

Switching to renewable energies typically reduces total energy consumption and GHG emissions in own business operations

#### Contribution to the realisation of the objectives and targets of the policy

The measures taken are consistent with the objective of the "Sustainable procurement and circular economy in business operations" policy, which essentially concerns climate change adaptation through sustainable procurement and handling and limiting greenhouse gas emissions in business operations. The material impacts, risks and opportunities are addressed in a targeted manner through the measures already taken and planned:

<sup>26</sup> <https://unglobalcompact.org/what-is-gc/mission/principles>

<sup>27</sup> [https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_81f92357-en.html](https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html)

## Impacts

### Increase in GHG emissions: Negative impact on the climate due to GHG emissions from operations and the vehicle fleet

Implementation is in line with the key measures listed above.

#### Scope and area of application

The measures taken are designed to be consistent with the policy and apply to all Group locations in Austria. For locations outside Austria, the requirements apply according to the same principles or must be applied analogously.

#### Time horizon

The measures taken have a long-term time horizon (more than five years). The planned measures have a short-term perspective (up to 1 year). All measures are regularly reviewed as part of a continuous process (plan-do-check-act) and adjusted as necessary.

#### Key remedial measures

The measures taken have a direct effect. The criteria to be taken into account contribute directly to remedial action.

#### Progress

- The proportion of electricity from renewable sources has increased from 10 % in 2016 to 99 % in 2023
- Thanks to ongoing energy efficiency measures, such as the replacement of expiring lighting with LED lighting, control system optimisation in the area of heating/cooling and the reorganisation of infrastructure and equipment, total energy consumption in buildings has been reduced by 24 % (around 1.3 MWh) since 2016

### ESRS 2 69) Disclosure requirements for action plans with significant OpEx and/or CapEx requirements

#### ESRS 2 69a) Disclosure of current and future resources allocated to the action plan

The allocation of current and future operating expenditures and capital expenditures was not carried out in the current reporting period.

#### ESRS 2 69b-c) Disclosure of the amount of current and future resources and discussion of how they relate to the most relevant amounts presented in the financial statements

As this data was not collected in the reporting period, no information is available.

### 29) Disclosures in addition to ESRS 2 MDR-A

#### 29a) List of key actions taken and planned, including the decarbonisation levers applied

##### OWN BUSINESS OPERATIONS

In the 2024 reporting year, several internal measures were taken to reduce greenhouse gas emissions, including the gradual conversion of the vehicle fleet to electric vehicles. Exceptions are only permitted with Managing Board approval and where the vehicles fall below a defined emission threshold. Other initiatives include the introduction of the KlimaTicket public transport pass for employees and support for climate change mitigation projects.

##### DOWNSTREAM VALUE CHAIN

In conjunction with the aforementioned MDR-A, the following actions and decarbonisation levers were identified and applied in the downstream value chain:

- Financing business, own-account investments and ESG-related investments
  - Consideration of exclusion criteria (selection criteria), positive criteria and/or sensitive areas in the financing business (since 2017)
  - Promotion of environmental and/or social aspects through the application of the "ESG investment approach" in portfolio management; compliance with minimum quotas for third-party products pursuant to Art. 8 or Art. 9 SFDR
  - Sustainable investment strategy: Investment in bonds with a clear sustainability focus (e.g. green bonds)
- Product range incorporating ESG aspects:
  - Hypo-Klima-Kredit, Hypo-Klima-Schnell-Kredit
  - Basic account (Basiskonto)/young person's account (Junges Konto)
  - Examination of the expansion/addition of sustainability aspects to existing products (based on the requirements of the EU taxonomy)
- Green bonds:
  - In 2017, Hypo Vorarlberg became the first Austrian bank to issue a green bond with a total volume of EUR 300 million. The proceeds were used to (re)finance energy-efficient residential buildings and commercial properties in Vorarlberg.
  - Spring 2020: CHF 125 million green bond
  - March 2020: Green private placement in CZK
  - 2022: Green retail bond with a volume of EUR 20 million
  - February 2023: Another two retail bonds and a green bond with a volume of EUR 500 million
- Improvement in ESG data quality:
  - Continuous collection of customer ESG data via the OeKB ESG DataHub
  - Climcycle: Tool for taxonomy assessment of financing since 2023
- Transparency and reporting
  - Disclosure in accordance with EU taxonomy/GAR
  - Measurement and disclosure of operational emissions (Scope 1, 2 and 3.13) and Group-wide financed emissions (Scope 3.15)
    - PCAF membership since summer 2024
  - Implementation of decarbonisation project and transition plan in the 2025 financial year

#### 29b) Outcome of climate change mitigation actions, including emission reductions achieved and expected

Hypo Vorarlberg has entirely switched its electricity supply to renewable energies in recent years and now obtains 99 % of its electricity from sustainable sources. As part of the reorganisation of its vehicle fleet, the company decided to focus on fully electric drives when purchasing new vehicles. Where vehicles with combustion engines are still purchased in exceptional circumstances, a maximum emission threshold of 126 g of CO<sub>2</sub>/km (WLTP) has applied since 1 January 2025. In addition, the use of public transport is supported through the introduction of the KlimaTicket public transport pass and by encouraging the use of public transport for business trips in order to reduce the company's own emissions. As a further contribution to climate change mitigation, Hypo Vorarlberg supports climate change mitigation projects in the amount of the

previous year's emissions. The company is increasingly focusing on sustainable and environmentally friendly solutions for renovation and maintenance work, and it continuously promotes energy efficiency at all of its buildings and locations.

| Decarbonisation levers             | Key measures                                                                             | Status                                                                                                                                                                                                                                                             | Time horizons                    | Expected results                                                                                                | Results achieved                                                                                                                                                                               |
|------------------------------------|------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------|-----------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Renewable energy                   | Covering 100 % of total electricity requirements with electricity from renewable sources | Implemented. In the case of one rented location, it is not possible to influence a change in tariff for the electricity consumption for lifts, stairwells and lighting for the entire property. This corresponds to 0.2 % (2024) of total electricity consumption. | Implementation from 2018 to 2023 | -                                                                                                               | The first locations were switched to new tariffs in 2018. Reduction in CO emissions of 379 metric tons from 2017 to 2024. 99.8 % of electricity consumption from renewable sources since 2024. |
|                                    | Equipping suitable roof surfaces with solar/photovoltaic systems                         | Initial analysis completed and projects planned for a further six locations.                                                                                                                                                                                       | By 2028                          | Projects with PV systems totalling around 317 kWp are currently planned.                                        | PV systems have been installed at four locations since 2016.                                                                                                                                   |
|                                    | Replacement of existing oil boiler                                                       | There is no influence over heating energy in implementation or in one rented property (accounting for less than 0.5 % of total energy consumption in buildings).                                                                                                   | By 2026                          | Average reduction in GHG emissions of around 14 metric tons of CO <sub>2</sub> per year.                        | The project is currently being implemented.                                                                                                                                                    |
|                                    | 90 % share of total energy requirements for heating and electricity by 2030              | Implemented with regard to electricity (see above). The replacement of heating systems at four locations is currently planned or in preparation. These are district heating connections or heat pump systems.                                                      | By 2028                          | Increase in share to 81 % (65 % in 2023) and reduction in GHG emissions of 194 metric tons of CO <sub>2</sub> . | Since 2016, the share has increased by 59 % (as of 2024) by switching to electricity from renewable sources.                                                                                   |
| Climate change mitigation projects | Support for climate change mitigation projects                                           | Currently being implemented                                                                                                                                                                                                                                        | Ongoing                          | Offsetting of internal CO <sub>2</sub> emissions in the amount of the previous year's emissions.                | Support for projects in line with CO <sub>2</sub> emissions.                                                                                                                                   |

| Decarbonisation levers        | Key measures                                                                                                                                                                                       | Status                                                                                                                                                                                                                       | Time horizons | Expected results                                                                        | Results achieved                                                                                                                |
|-------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------|-----------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| Operational energy efficiency | Energy-efficient renovation of buildings by 2030 (best practice approach); replacement of expiring lighting with LED lighting; control system optimisation in the area of heating/cooling          | In addition to energy-efficient renovation, the current focus is on replacing fossil fuels with renewable energy sources. Lighting has been replaced and control systems have been optimised on an ongoing basis since 2016. | Since 2016    | Reduction in total energy consumption and hence reduction in CO <sub>2</sub> emissions. | Since 2016, energy efficiency measures have reduced the total energy consumption for buildings by 25 % (1,330 MWh, as of 2024). |
| Vehicle fleet                 | Focus on electric vehicles when it comes to new purchases (exceptions only with Managing Board approval, max. 126 g CO <sub>2</sub> /km from 2025); use of car-sharing vehicles for business trips | Currently being implemented                                                                                                                                                                                                  | From 2025     | Reduction in GHG emissions through electrified vehicle fleet                            | Number of electric vehicles increased to 14. Annual savings of approx. 46 metric tons of CO <sub>2</sub> .                      |

**AR 21) Discussion of the extent to which the undertaking's ability to implement the actions depends on the availability and allocation of resources**

Planned actions are taken into account in the annual budget planning process and allocated to the corresponding funds when approved. Outside of the annual budget planning process, funds may be made available for the implementation of new and existing actions subject to prior authorisation by the full Managing Board. The budgeting process and the budget structure at Group and project level are designed to ensure the feasibility of measures.

**29c) Allocation of required CapEx and OpEx amounts for planned or implemented actions to:  
29ci) the relevant line items or notes in the financial statements**

Allocation is not possible due to the lack of corresponding monetary amounts (CapEx and OpEx).

**29cii) the key performance indicators required under Commission Delegated Regulation (EU) 2021/2178**

Not applicable to financial institutions.

**29ciii) if applicable, the CapEx plan required under Commission Delegated Regulation (EU) 2021/2178**

Not applicable to financial institutions.

**METRICS AND TARGETS**

**DISCLOSURE REQUIREMENT EI-4 – TARGETS RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION**

**OWN BUSINESS OPERATIONS & DOWNSTREAM VALUE CHAIN**

**32) Disclosure of GHG reduction targets and additional climate-related targets (e.g. renewable energies, energy efficiency, climate change adaptation, risk minimisation) in accordance with ESRs 2 MDR-T**

**ESRS 2 80a-j) Description of the relationship between targets and strategy objectives**

**Own business operations – reduction in GHG emissions**

**Target**

Increase in the proportion of renewable energies in the Group's total final energy requirements for heating, cooling and electricity to 90 % by 2030.

**Relationship between target and policy/strategy objective**

The target is consistent with the strategy and policies of the Hypo Vorarlberg Group (sustainability strategy, sustainable procurement policy).

**Defined target level**

90 % of total energy requirements for buildings (heating, cooling and electricity) to come from renewable sources.

**Scope of the target**

Electricity requirements will be switched to 100 % electricity from renewable sources where this can be influenced.

Where possible, heating systems using fossil fuels (heating oil, natural gas) will be replaced by connections to local district heating networks or by heat pump systems.

This target can be realised at locations where the company itself can determine the type of heating used. In the case of co-ownership shares in multi-party buildings, a corresponding change can be proposed; in this case, decisions are made in accordance with the provisions of the Austrian Condominium Act. This target cannot be pursued at rented locations.

**Baseline value and base year**

Base year: 2023

Baseline value: 65 % of the total energy requirement for buildings from renewable sources

**Period to which the target applies, including any milestones and interim targets**

By 2030.

To achieve this target, a step-by-step plan for the buildings covering the period to 2027 was drawn up for banking operations in Vorarlberg. This plan is to be further developed at Group level. It mainly envisages a switch from fossil fuel-based heating systems to district heating networks (biomass) and various heat pump systems.

**Methodologies and significant assumptions**

In the course of collecting data on energy consumption for the energy mix and GHG emissions, data for the individual locations is recorded according to energy consumed and energy source. Source information comes from the bills issued by energy suppliers, either directly or indirectly.

**Relationship with environmental aspects and scientific evidence**

Reducing fossil; fuel combustion and switching to renewable energy sources leads to a significant reduction in GHG emissions. Scenarios taking account of the planned measures were calculated using the GHG Protocol standard.

**Stakeholder involvement**

The target was defined at various management levels, in particular with the involvement of various specialist departments within the Group (e.g. Facilities Engineering). The target applies throughout the Group. Responsibility for implementation lies with the subsidiary Hypo Immobilien & Leasing and is monitored by Hypo Vorarlberg.

**Changes in targets, metrics or measurement methodologies**

No changes to the targets, metrics or measurement methodologies are expected.

**Progress**

Monitoring is carried out by implementing the step-by-step plan. Progress is measured annually.

**Current performance compared with the disclosed target**

The proportion of renewable energies for buildings was 67 % in 2024.

**ESRS 2.81) If the undertaking has not set any measurable outcome-oriented targets**

**ESRS 2.81a) Disclosure of whether the undertaking intends to set such targets and the timeframe for doing so, or the reasons why the undertaking does not set such targets**

**DOWNSTREAM VALUE CHAIN**

Work on defining a decarbonisation strategy for financed emissions (Scope 3.15) will begin in 2025. This strategy will include specific measurable targets as well as relevant key figures and time periods in order to systematically monitor and evaluate progress in this area. These activities are already planned in the measures for the next reporting period (see E1-3.28).

**ESRS 2 81bi-ii) Disclosure of whether the undertaking tracks the effectiveness of its strategies and actions in relation to impacts, risks and opportunities, including the procedures, the targets set and the time periods****DOWNSTREAM VALUE CHAIN**

The effectiveness of the strategies and actions in relation to impacts, risks and opportunities is ensured by the monitoring process defined in the policies (see E1-2, E1-3). The strategies and actions are reviewed regularly (at least annually) and adjusted as necessary. The monitoring process takes account of various internal stakeholders (specialist departments, the Managing Board and, as part of its regular auditing activities, Internal Audit).

**33) Disclosure of whether and how GHG emission reduction targets and/or other targets to manage material climate-related impacts, risks and opportunities are set**

The main IROs for the company's own business operations were taken into account when determining the targets:

"Increase in GHG emissions: Negative impact on the climate due to GHG emissions from operations and the vehicle fleet."

Based on the "Sustainable procurement and circular economy in business operations" policy mentioned above, the company has taken measures aimed at reducing the GHG emissions of its own business operations. The target is based on the reduction targets prescribed by the state of Vorarlberg.

**34) Disclosure of GHG emission reduction targets in detail (the requirements in E1-4.34a-c and e-f apply in addition to ESRS 2 MDR-T)**

**34a AR 23) GHG reduction targets shall be disclosed as absolute values (either in metric tons of CO<sub>2</sub> or as a percentage of the emissions of a base year) and, where relevant, as intensity values**

**34b AR 24) Disclosure of GHG reduction targets for Scope 1, 2 and 3 – separately or combined – including disaggregation of the GHGs covered and the shares attributable to them**

The table, which fulfils requirements 4.34a and b, consists of several dimensions (base year and targets, GHG types, Scope 3 categories, decarbonisation levers, company-specific denominator for the intensity value)

| Group                                                                  | Milestones and target years |        |        |        |
|------------------------------------------------------------------------|-----------------------------|--------|--------|--------|
|                                                                        | 2024                        | 2023   | 2028   | 2030   |
| GHG emissions (market-based) [t CO <sub>2</sub> ] excluding Scope 3.15 | 15                          | 6,636  | -188   | -254   |
| GHG Scope 1 [t CO <sub>2</sub> ]                                       | -39                         | 393    | -154   | -179   |
| GHG Scope 2 location-based [t CO <sub>2</sub> ]                        | 7                           | 511    | 32     | 66     |
| GHG Scope 2 market-based [t CO <sub>2</sub> ]                          | -2                          | 53     | 1      | -22    |
| GHG Scope 3 [t CO <sub>2</sub> ] excluding Scope 3.15                  | 56                          | 6,190  | -35    | -53    |
| Energy efficiency and reduction in consumption                         | 0                           | 0      | 0      | 0      |
| Material efficiency and reduction in consumption                       | 0                           | 0      | 0      | 0      |
| Fuel switching                                                         | 0                           | 0      | 0      | 0      |
| Electrification                                                        | 0                           | 0      | 0      | 0      |
| Use of renewable energies                                              | 67.0 %                      | 65.0 % | 81.0 % | 90.0 % |
| Gradual discontinuation, replacement or modification of the product    | 0                           | 0      | 0      | 0      |
| Gradual discontinuation, replacement or amendment of the procedure     | 0                           | 0      | 0      | 0      |
| Other                                                                  | 0                           | 0      | 0      | 0      |



**AR 25a) Discussion of how the undertaking has ensured that the baseline value is representative**

Hypo Vorarlberg has calculated GHG emissions including Scope 1, 2 and 3 on a Group-wide basis since 2016. In recent years, this has been supported and checked for plausibility by the “turn to zero” community. Data quality has been continuously improved in the meantime. All of the disclosures can be verified, explained and confirmed. Taking into account the system boundaries used, industry comparisons conducted in the past came to similar results.

**AR 25b) If the base year or baseline value is changed, discussion of how the change affects target achievement and the presentation of progress**

The base year for the report is 2023. There are no changes in terms of target achievement and progress for the 2024 reporting year.

**34b) Discussion of how the consistency of the GHG emission reduction targets with the GHG inventory boundaries was ensured**

When measuring its GHG emissions, Hypo Vorarlberg comprehensively takes account of Scope 1, 2 and 3 emissions from its own business operations and Scope 3 emissions from the downstream value chain (see E1-6.44-52). The GHG emission reduction targets relate exclusively to internal business operations and, within this, to the areas of heating, cooling and electricity.

**34e) Disclosure of whether the GHG emission reduction targets are science-based and compatible with limiting global warming to 1.5 °C**

Hypo Vorarlberg’s goals are based on the targets set by the state of Vorarlberg with its MissionZeroV strategy<sup>28</sup>. The state of Vorarlberg is committed to achieving the Paris Agreement climate goals. No further scientific analyses were carried out in the course of defining the targets.

**34f) Disclosure of decarbonisation levers and their quantitative contribution to the GHG emission reduction targets (e.g. efficiency, consumption reduction, renewable energies, fuel switching)**

The following decarbonisation levers were identified in the company’s own business operations:

- Electricity requirements will be switched to 100 % electricity from renewable sources where this can be influenced
- Where possible, heating systems using fossil fuels (heating oil, natural gas) will be replaced by connections to local district heating networks or by heat pump systems

This target can be realised at locations where the company itself can determine the type of heating used. In the case of co-ownership shares in multi-party buildings, a corresponding change can be proposed; in this case, decisions are made in accordance with the provisions of the Austrian Condominium Act. This target cannot be pursued at rented locations.

Through the measures and targets set, Hypo Vorarlberg is expected to achieve a reduction of around 255 metric tons of CO<sub>2</sub> from 2030 onward. Only qualitative targets for vehicle fleet management have been defined to date, which is why the reduction potential cannot be quantified at present. Progress will be disclosed in the 2025 reporting year.

**AR 30) Additional information to be disclosed in accordance with paragraph 34f****AR 30a) Disclosure of climate change mitigation measures, decarbonisation levers and their estimated contributions to GHG emission reduction**

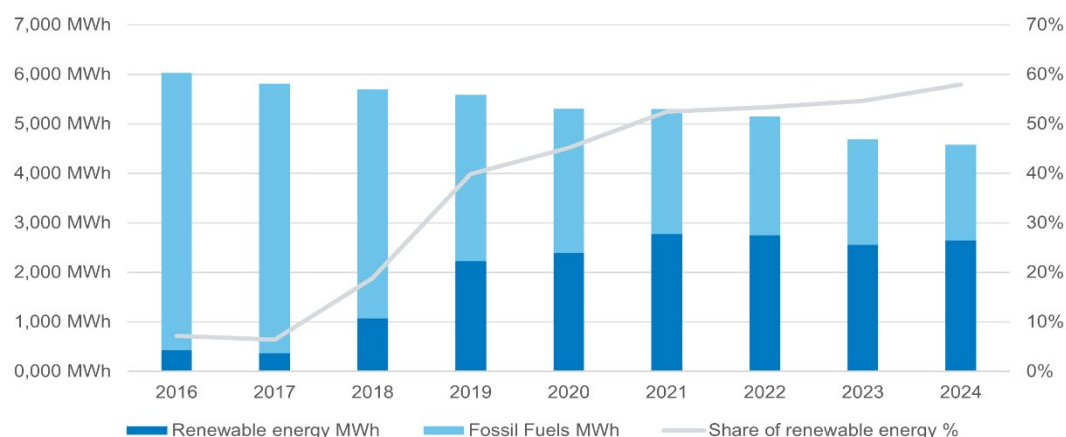
- Lever 1: Electricity requirements will be switched to 100 % electricity from renewable sources where this can be influenced (Scope 2 and 3)
- Lever 2: Where possible, heating systems using fossil fuels (heating oil, natural gas) will be replaced by connections to local district heating networks or by heat pump systems (Scope 1, 2 and 3)

**AR 30b) Adoption of new technologies to achieve GHG emission reduction targets**

There are currently no plans to adopt new technologies to achieve the GHG emission reduction targets.

**AR 30c) Consideration of a diverse range of climate scenarios, including a 1.5 °C scenario, to detect relevant developments and determine decarbonisation levers**

Hypo Vorarlberg’s goals are based on the targets set by the state of Vorarlberg with its MissionZeroV strategy<sup>29</sup>. The state of Vorarlberg is committed to achieving the Paris Agreement climate goals. No further scientific analyses were carried out in the course of defining “decarbonisation levers”.

**DISCLOSURE REQUIREMENT E1-5 – ENERGY CONSUMPTION AND MIX****OWN BUSINESS OPERATIONS****AR 34, 35) Energy consumption and mix related to own business operations**

<sup>28</sup> <https://www.energieautonomie-vorarlberg.at/>

<sup>29</sup> <https://www.energieautonomie-vorarlberg.at/>



The following table fulfils the requirements of E1-5.37 and 5.39:

|                                                                                                                                                                     | Group  |        | Austria |        | Switzerland |        | Italy  |        |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|--------|---------|--------|-------------|--------|--------|--------|
|                                                                                                                                                                     | 2024   | 2023   | 2024    | 2023   | 2024        | 2023   | 2024   | 2023   |
| Total consumption of fossil energy (MWh)                                                                                                                            | 1,916  | 2,115  | 1,604   | 1,760  | 79          | 109    | 233    | 246    |
| Share of fossil fuels in total energy consumption                                                                                                                   | 41.9 % | 45.1 % | 39.1 %  | 41.9 % | 57.2 %      | 76.8 % | 68.7 % | 70.1 % |
| Consumption from nuclear power sources                                                                                                                              | 0      | 0      | 0       | 0      | 0           | 0      | 0      | 0      |
| Share of nuclear power sources in total energy consumption                                                                                                          | 0.0 %  | 0.0 %  | 0.0 %   | 0.0 %  | 0.0 %       | 0.0 %  | 0.0 %  | 0.0 %  |
| Fuel consumption for renewable sources, including biomass (also industrial and municipal waste of biological origin, biogas, hydrogen from renewable sources) (MWh) | 0      | 0      | 0       | 0      | 0           | 0      | 0      | 0      |
| Consumption from electricity, heat, steam and cooling purchased or received and from renewable sources (MWh)                                                        | 2,611  | 2,510  | 2,446   | 2,372  | 59          | 33     | 106    | 105    |
| Consumption of internally generated renewable energy other than fuels (MWh)                                                                                         | 49     | 65     | 49      | 65     | 0           | 0      | 0      | 0      |
| Total renewable energy consumption (MWh) (sum of rows 5 to 7)                                                                                                       | 2,660  | 2,575  | 2,495   | 2,437  | 59          | 33     | 106    | 105    |
| Share of renewable sources in total energy consumption                                                                                                              | 58.1 % | 54.9 % | 60.9 %  | 58.1 % | 42.8 %      | 23.2 % | 31.3 % | 29.9 % |
| Total energy consumption (MWh) (sum of rows 1 to 9)                                                                                                                 | 4,576  | 4,690  | 4,099   | 4,197  | 138         | 142    | 339    | 351    |

#### DISCLOSURE REQUIREMENT E1-6 – GROSS SCOPES 1, 2, 3 AND TOTAL GHG EMISSIONS

##### OWN BUSINESS OPERATIONS & DOWNSTREAM VALUE CHAIN

44-52, AR 39, AR 42, AR 48, AR 52) Gross Scopes 1, 2 and 3 and total GHG emissions in metric tons of CO<sub>2</sub> equivalents

The following table fulfils the requirements of 6.44-52

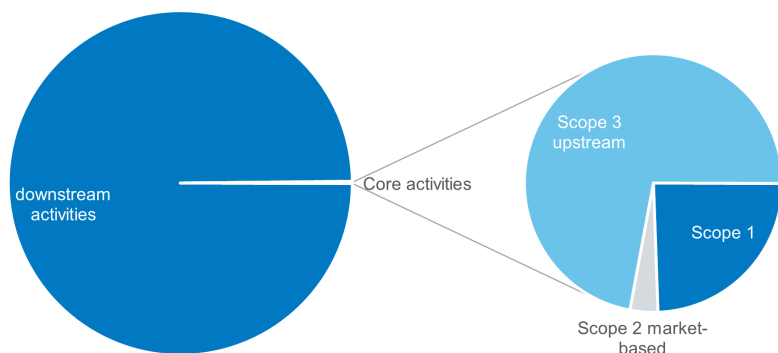
| Group                                                                   | Previous years |      |         | Milestones and target years |      |                           |
|-------------------------------------------------------------------------|----------------|------|---------|-----------------------------|------|---------------------------|
|                                                                         | 2024           | 2023 | % N/N-1 | 2028                        | 2030 | Annual % target/base year |
| <b>Scope 1 GHG emissions</b>                                            |                |      |         |                             |      |                           |
| Gross Scope 1 GHG emissions (t CO <sub>2</sub> )                        | 354            | 393  | -10.0 % | 239                         | 214  | -6.5 %                    |
| Share of Scope 1 GHG emissions from regulated emissions trading schemes | 0              | 0    | 0.0 %   | 0                           | 0    | 0.0 %                     |
| <b>Scope 2 GHG emissions</b>                                            |                |      |         |                             |      |                           |
| Location-based gross GHG emissions (t CO <sub>2</sub> )                 | 518            | 511  | 1.5 %   | 543                         | 577  | 1.8 %                     |
| Market-based gross GHG emissions (Scope 2) (t CO <sub>2</sub> )         | 51             | 53   | -4.5 %  | 54                          | 31   | -6.0 %                    |
| <b>Austria</b>                                                          |                |      |         |                             |      |                           |
| <b>Scope 1 GHG emissions</b>                                            |                |      |         |                             |      |                           |
| Gross Scope 1 GHG emissions (t CO <sub>2</sub> )                        | 278            | 308  | -10.1 % | 154                         | 132  | -8.2 %                    |
| Share of Scope 1 GHG emissions from regulated emissions trading schemes | 0              | 0    | 0.0 %   | 0                           | 0    | 0.0 %                     |
| <b>Scope 2 GHG emissions</b>                                            |                |      |         |                             |      |                           |
| Location-based gross GHG emissions (t CO <sub>2</sub> )                 | 486            | 479  | 1.6 %   | 511                         | 543  | 1.9 %                     |
| Market-based gross GHG emissions (Scope 2) (t CO <sub>2</sub> )         | 51             | 52   | -3.1 %  | 54                          | 31   | -5.8 %                    |
| <b>Switzerland</b>                                                      |                |      |         |                             |      |                           |
| <b>Scope 1 GHG emissions</b>                                            |                |      |         |                             |      |                           |
| Gross Scope 1 GHG emissions (t CO <sub>2</sub> )                        | 16             | 22   | -25.5 % | 22                          | 22   | 0.0 %                     |
| Share of Scope 1 GHG emissions from regulated emissions trading schemes | 0              | 0    | 0.0 %   | 0                           | 0    | 0.0 %                     |
| <b>Scope 2 GHG emissions</b>                                            |                |      |         |                             |      |                           |
| Location-based gross GHG emissions (t CO <sub>2</sub> )                 | 2              | 1    | 58.6 %  | 1                           | 1    | 0.0 %                     |
| Market-based gross GHG emissions (Scope 2) (t CO <sub>2</sub> )         | 0              | 0    | 0.0 %   | 0                           | 0    | 0.0 %                     |

| Italy                                                                   |    |    |          |    |    |         |
|-------------------------------------------------------------------------|----|----|----------|----|----|---------|
| Scope 1 GHG emissions                                                   |    |    |          |    |    |         |
| Gross Scope 1 GHG emissions (t CO <sub>2</sub> )                        | 60 | 63 | -4.4 %   | 63 | 60 | -0.7 %  |
| Share of Scope 1 GHG emissions from regulated emissions trading schemes | 0  | 0  | 0.0 %    | 0  | 0  | 0.0 %   |
| Scope 2 GHG emissions                                                   |    |    |          |    |    |         |
| Location-based gross GHG emissions (t CO <sub>2</sub> )                 | 30 | 31 | -1.9 %   | 31 | 33 | 0.9 %   |
| Market-based gross GHG emissions (Scope 2) (t CO <sub>2</sub> )         | 0  | 1  | -100.0 % | 0  | 0  | -14.3 % |

| Group                                                                     | Previous years |       |         | Milestones and target years |       |                           |
|---------------------------------------------------------------------------|----------------|-------|---------|-----------------------------|-------|---------------------------|
|                                                                           | 2024           | 2023  | % N/N-1 | 2028                        | 2030  | Annual % target/base year |
| Significant Scope 3 GHG emissions                                         |                |       |         |                             |       |                           |
| 1 Purchased goods and services                                            | 129            | 224   | -42.4 % | 224                         | 224   | 0.0 %                     |
| 2 Capital goods                                                           | 90             | 90    | 0.0 %   | 93                          | 93    | 0.5 %                     |
| 3 Fuel and energy-related activities (not included in Scope 1 or Scope 2) | 151            | 155   | -2.6 %  | 118                         | 100   | -5.1 %                    |
| 4 Upstream transportation and distribution                                | 29             | 28    | 3.6 %   | 28                          | 28    | 0.0 %                     |
| 5 Waste generated in operations                                           | 22             | 21    | 4.8 %   | 21                          | 21    | 0.0 %                     |
| 6 Business travel                                                         | 139            | 94    | 47.9 %  | 94                          | 94    | 0.0 %                     |
| 7 Employee commuting                                                      | 482            | 461   | 4.6 %   | 460                         | 460   | 0.0 %                     |
| 8 Upstream leased assets                                                  | 4              | 5     | -20.0 % | 5                           | 5     | 0.0 %                     |
| 9 Downstream transportation                                               | 0              | 0     | 0.0 %   | 0                           | 0     | 0.0 %                     |
| 10 Processing of sold products                                            | 0              | 0     | 0.0 %   | 0                           | 0     | 0.0 %                     |
| 11 Use of sold products                                                   | 0              | 0     | 0.0 %   | 0                           | 0     | 0.0 %                     |
| 12 End-of-life treatment of sold products                                 | 0              | 0     | 0.0 %   | 0                           | 0     | 0.0 %                     |
| 13 Downstream leased assets                                               | 5,200          | 5,112 | 1.7 %   | 5,112                       | 5,112 | 0.0 %                     |
| Rented property, plant and equipment                                      | 5,245          | 5,157 | 1.7 %   | 5,157                       | 5,157 | 0.0 %                     |
| Managed forests                                                           | -45            | -45   | 0.0 %   | -45                         | -45   | 0.0 %                     |
| 14 Franchises                                                             | 0              | 0     | 0.0 %   | 0                           | 0     | 0.0 %                     |
| Gross Scope 3 GHG emissions (t CO <sub>2</sub> ) excluding Scope 3.15     | 6,246          | 6,190 | 0.9 %   | 6,155                       | 6,136 | -0.1 %                    |
| 15 Investments                                                            | 1,384,930      | 0     | 100.0 % | 0                           | 0     | 0.0 %                     |
| Gross Scope 3 GHG emissions (t CO <sub>2</sub> ) including Scope 3.15     | 1,391,176      |       |         |                             |       |                           |
| Total GHG emissions                                                       |                |       |         |                             |       |                           |
| Total GHG emissions (location-based) (t CO <sub>2</sub> )                 | 1,392,048      | 7,094 |         | 6,937                       | 6,928 | -0.3 %                    |
| Total GHG emissions (market-based) (t CO <sub>2</sub> )                   | 1,391,581      | 6,636 |         | 6,448                       | 6,382 | -0.5 %                    |

\*Investments: Financed emissions (Scope 3.15) are disclosed separately under E1-6.AR 41 and the content of the results is described.

#### E1-6. AR 52) GHG emissions disaggregated by value chain



#### AR 41) GHG emissions disaggregated by PCAF asset class

##### FINANCED EMISSIONS

Scope 3.15 emissions are also referred to as financed emissions. PCAF has developed a methodology which Hypo Vorarlberg uses to calculate its financed emissions. Hypo Vorarlberg has been a member of PCAF since summer 2024.

Financed emissions were calculated for the first time as at 31 December 2024. For this reason, it is not possible to publish a comparative or prior-year figure. The results of the calculation are shown in tables 1 and 2 below. The vast majority of Scope 3 emissions were calculated using PCAF emission factors and hence only include Scope 3 upstream emissions. For the small remainder, directly reported emissions were available and were used for the calculation. PCAF describes methodologies for recording emissions in the real economy that are financed by lending and investment activities for seven different asset classes. Further information on the calculation methodology and the PCAF emission factors used can be found under ESRS 2 BP-2.10. The first-time application of the PCAF methodology meant it was possible to calculate the financed emissions for the following asset classes:

- Listed equity and corporate bonds
- Business loans and unlisted equity
- Commercial real estate
- Mortgages
- Motor vehicle loans
- Sovereign debt

Emissions in the PCAF asset class "Project finance" were not calculated as at the reporting date. This asset class is of subordinate importance in terms of its volume and it was not possible to prioritise the data quality and data scope issues associated with integration in the initial calculation.

The calculations were based on Hypo Vorarlberg's loan portfolio and own-account investment portfolio, the leasing portfolios of Hypo Immobilien & Leasing GmbH (Dornbirn) and Hypo Vorarlberg Leasing AG (Bolzano) and companies included in the consolidated financial statements using the equity method (comit Versicherungsmakler GmbH, MASTERINVEST Kapitalanlage GmbH). This corresponds to a total volume of EUR 14.6 billion, which was applied in calculating the financed emissions. The table below describes the relative and absolute coverage of the volumes covered by PCAF asset class.

| PCAF asset class                   | Of which covered         |                  |                            |
|------------------------------------|--------------------------|------------------|----------------------------|
|                                    | Volume<br>in EUR million | Relative<br>in % | Absolute<br>in EUR million |
| Listed equity and corporate bonds  | 469.47                   | 100 %            | 469.47                     |
| Business loans and unlisted equity | 6,722.67                 | 100 %            | 6,722.65                   |
| Commercial real estate             | 3,916.25                 | 98 %             | 3,830.74                   |
| Mortgages                          | 1,698.44                 | 100 %            | 1,694.94                   |
| Motor vehicle loans                | 36.04                    | 100 %            | 36.04                      |
| Sovereign debt                     | 736.09                   | 99 %             | 726.09                     |
| Out of scope                       | 1,023.63                 | 0 %              | 0.00                       |
| <b>Total</b>                       | <b>14,602.58</b>         | <b>92 %</b>      | <b>13,479.93</b>           |

Table 1: Total volume disaggregated by PCAF asset class

A calculation closely based on the PCAF methodology was possible for 92 % of the volume. This corresponds to EUR 13.5 billion. The differences compared to the total volume included in the calculation were due to incomplete data sets, which meant it was not possible to calculate the financed emissions for individual financing in some cases, and the fact that PCAF calculation methods are currently not available for some items. For methodological reasons, it was not possible to perform a calculation for these products, e.g. derivatives or consumer loans to private individuals (see ESRS 2 BP-2.10). Where they form part of the portfolios included in the calculation, these items are shown in the above table under "Out of scope".

Hypo Vorarlberg is keen to permanently improve data quality in order to ensure the continued consistency of the calculation and to continuously improve coverage. These efforts include the addition of the PCAF asset class "project finance", which is planned for the next reporting period (see also ESRS 2 BP-2.10d).

Table 2 below shows the financed emissions according to the PCAF asset classes. The monetary volumes are shown in EUR million, the emissions in thousands of metric tons of CO<sub>2</sub> and the emissions intensity in metric tons of CO<sub>2</sub> per EUR million. The data quality score ranges from 1 to 5, with 1 indicating high data quality and 5 indicating low data quality. The data quality score is aggregated on a volume-weighted basis in accordance with the PCAF methodology.

| PCAF asset class                   | Volume in EUR million | Financed emissions in thousands of metric tons of CO <sub>2</sub> |               |                 | Emissions intensity t CO <sub>2</sub> /EUR million | Data quality score |             |
|------------------------------------|-----------------------|-------------------------------------------------------------------|---------------|-----------------|----------------------------------------------------|--------------------|-------------|
|                                    |                       | Scope 1+2                                                         | Scope 3       | Scope 1+2+3     |                                                    | Scope 1+2          | Scope 3     |
| Listed equity and corporate bonds  | 469.47                | 3.49                                                              | 25.39         | 28.87           | 61.50                                              | 1.69               | 1.74        |
| Business loans and unlisted equity | 6,722.65              | 292.89                                                            | 648.05        | 940.94          | 139.97                                             | 4.09               | 4.10        |
| Commercial real estate             | 3,830.74              | 74.76                                                             | -             | 74.76           | 19.52                                              | 4.59               | -           |
| Mortgages                          | 1,694.94              | 19.44                                                             | -             | 19.44           | 11.47                                              | 4.08               | -           |
| Motor vehicle loans                | 36.04                 | 12.34                                                             | -             | 12.34           | 342.38                                             | 3.76               | -           |
| Sovereign debt                     | 726.09                |                                                                   |               |                 |                                                    |                    |             |
| Excluding LULUCF <sup>30</sup>     |                       | 185.12                                                            | 123.45        | 308.57          | 424.98                                             | 1.78               | 4.00        |
| Including LULUCF                   |                       | 179.48                                                            | 123.45        | 302.93          | 417.21                                             | 1.78               | 4.00        |
| <b>Total<sup>31</sup></b>          | <b>13,479.93</b>      | <b>588.04</b>                                                     | <b>796.89</b> | <b>1,384.93</b> | <b>102.74</b>                                      | <b>4.02</b>        | <b>3.95</b> |

Table 2: Total volume disaggregated by PCAF asset class

Looking at the overall portfolio, 1,384,930 metric tons of CO<sub>2</sub> are financed, comprising 588,040 metric tons of CO<sub>2</sub> in Scope 1 and 2 emissions from the financed counterparties and 796,890 metric tons of CO<sub>2</sub> in Scope 3 emissions from the counterparties. The weighted data quality score is 4.02 for Scopes 1 and 2, and 3.95 for Scope 3.

As illustrated in table 2, there are some considerable differences between the asset classes when it comes to emissions intensity and the available data. These indicate potential for improvement in data availability and collection, as well as offering starting points for decarbonisation levers and potential focus areas in transition planning. The accounting of financed emissions represents a starting point for Hypo Vorarlberg as it seeks to define a realistic, fact-based transition plan.

Emissions from leases are reported as financed emissions. These transactions are calculated without pro rata attribution, but instead with the full allocation of the emissions of the financed properties (in accordance with the GHG Protocol standard).

## CORPORATE FINANCING

The business loans and unlisted equity asset class accounts for the largest share of the financing analysed. This comprises business loans where the utilisation of funds is unknown (e.g. working capital loans) and unlisted equity investments. With a volume of EUR 6,723 million, 49.87 % of the financing volume analysed is allocated to this asset class. The data quality score of 4.09 for Scope 1 and 2 and 4.10 for Scope 3 reflects the low availability of reported and verified emissions data. In the case of loans to small and medium-sized enterprises (SMEs) in particular, the financed emissions must increasingly be approximated using emission factors. Emissions from the financing of movable assets (excluding vehicles) at the leasing companies are reported as financed emissions in the PCAF asset class "Business loans". The calculation is based on the Scope 3.13 lessee-specific method and uses PCAF emission factors. As described in ESRs 2 BP-2.10d, efforts are being made to expand the available emissions data in future reporting periods.

In contrast to the asset class of business loans and unlisted equity, the pool of available emissions data in the asset class of listed equity and corporate bonds is significantly larger. The weighted data quality score of 1.69 (or 1.74 for Scope 3) clearly illustrates the high availability and usability of emissions data for the financed counterparties. This is partly due to the fact that listed companies have already published emissions data in the past, making it possible to incorporate this into the calculation of financed emissions through research or with the help of commercially available databases. At EUR 469.47 million, listed equity and corporate bonds are the sixth-largest asset class.

## REAL ESTATE FINANCING

Real estate financing is reported in the asset classes "Commercial real estate" and "Mortgages". Emissions from the financing of real estate at the leasing companies are reported as financed emissions in the PCAF asset class "Commercial real estate". The calculation methodology corresponds to that of Scope 3.13. (no use of attribution factors, i.e. the total relevant emissions of the financed properties are accounted for).

The calculation includes emissions resulting from the operation and use of the properties (Scope 1 and Scope 2). Life cycle emissions (Scope 3) are not included in the calculation of financed emissions for properties in accordance with the PCAF methodology.

The "Commercial real estate" asset class includes financing for the construction and/or purchase of commercial properties. It was possible to calculate the financed emissions for a volume of EUR 3,831 million. This corresponds to around 98 % of the total financing of commercial real estate included in the calculation. Due to the low availability of actual energy consumption data, the data quality score is 4.59. Approximating the financed emissions using average values for large-scale real estate projects leads to relatively low emissions intensities in certain sub-portfolios. Hypo Vorarlberg is keen to reduce this uncertainty in the following years by using real data. These efforts are described in greater detail in ESRs 2 BP-2.10.

The "Mortgages" asset class includes financing for the construction and/or purchase of residential real estate. In accordance with the PCAF methodology, this asset class includes financing used for residential purposes and not for commercial purposes. It was possible to calculate the financed emissions for a volume of EUR 1,695 million. This corresponds to almost 100 % of the financing included in the calculation. The data quality score is 4.08.

<sup>30</sup> LULUCF stands for the land use, land-use change and forestry sector.

<sup>31</sup> Emissions in connection with sovereign debt were included in the total excluding LULUCF.

## MOTOR VEHICLE LOANS

Emissions from the financing of vehicles at the leasing companies are reported as financed emissions in the PCAF asset class "Motor vehicle loans". The calculation methodology corresponds to that of Scope 3.13. (no use of attribution factors, i.e. the total relevant emissions of the financed properties are accounted for). Within this asset class, 12,340 metric tons of CO<sub>2</sub> are financed. At 343 metric tons of CO<sub>2</sub> per EUR million, the emissions intensity is the second highest in the portfolio. In a similar way to real estate financing, only the emissions from the operation of the vehicles are calculated in accordance with the PCAF methodology, whereas no Scope 3 emissions are calculated. Depending on the type of drive, these are either Scope 1 emissions (combustion engines) or Scope 2 emissions (electric motors). The data quality score is 3.76.

## SOVEREIGN DEBT

The "Sovereign debt" asset class includes investments in government bonds and bonds issued by supranational institutions (e.g. development banks). The weighted data quality score is 1.78 for Scope 1 and 2 and 4.00 for Scope 3. For government bonds in particular, it was possible to perform the calculation with the highest data quality level, as the national emissions inventories published by governments were used to calculate the financed Scope 1 emissions. Emissions for government bonds were calculated according to the PCAF methodology including and excluding land use, land-use change and forestry. The presentation in table 2 is therefore also based on two separate figures. The financed emissions amount to 302,930 metric tons of CO<sub>2</sub> including the land use, land-use change and forestry sectors, or 308,570 metric tons of CO<sub>2</sub> if those sectors are excluded. Emissions excluding land use, land-use change and forestry are used in the aggregation at overall level.

### 47) Disclosure of significant changes to the reporting undertaking and its value chain and their effect on the comparability of reported GHG emissions

See ESRS 2 BP-2.13.

### AR 39b) Discussion of the approach to the information required by paragraph 44 for reporting GHG emissions

See ESRS 2 BP-2.10-13.

### AR 42c) Disclosure of GHG-relevant events between the reporting dates

See ESRS 2 BP-2.13c.

### AR 45d) Location-based and market-based methods to calculate Scope 2 GHG emissions and information on the share and types of contractual instruments

Based on the available information (purchase via power purchase agreement), no share of contractual instruments related to Scope 2 emissions can be assumed. For 95.5 % of the electricity purchased, there are contractual agreements and proof that 100 % of the electricity supplied comes from renewable energy sources. This share amounts to 0.05 metric tons of CO<sub>2</sub> or 0.11 % of Scope 2 GHG emissions according to the market-based calculation. For 3.9 % of the electricity purchased (e.g. for common areas in multi-party buildings), this information is based on data from the property management companies and the electricity suppliers in the region. This share amounts to 0.01 metric tons of CO<sub>2</sub> or 0.01 % of Scope 2 GHG emissions according to the market-based calculation. In the case of one rented location where it is not possible to influence the choice of tariff, the available information indicates that only 72 % of the electricity comes from renewable sources. This share of total electricity consumption amounts to 0.6 %, while the share of Scope 2 market-based GHG emissions is 1.96 % or 1 metric ton of CO<sub>2</sub>. 98 % or 49 metric tons of CO<sub>2</sub> from Scope 2 GHG emissions are attributable to purchased heat. The heat supply agreements have been concluded with the property management companies of the respective properties; no proof of origin is currently available. These emissions are therefore only calculated as location-based. Based on publicly available information, 5 % of this is attributable to district heating from renewable energy sources. The location-based Scope 2 GHG emissions are divided into five segments: electricity (Austria), electricity (Switzerland), electricity (Italy), district heating average (Austria) and district heating (renewable). The latter two segments are only relevant for banking locations in Austria.

### AR 43c) Disclosure of biogenic CO<sub>2</sub> emissions from the combustion or biodegradation of biomass separately from the Scope 1 GHG emissions, but including emissions of other types of GHG (CH<sub>4</sub>, N<sub>2</sub>O)

No biodegradation of biomass takes place.

### AR 45e) Disclosure of biogenic CO<sub>2</sub> emissions from the combustion or biodegradation of biomass separately from the Scope 2 GHG emissions, but including emissions of other types of GHG (CH<sub>4</sub>, N<sub>2</sub>O)

No biodegradation or combustion of biomass takes place.

### AR 46g) Disclosure of gross Scope 3 GHG emissions

See E1-6.

### AR 46h) Disclosure of reporting boundaries, calculation methods and calculation tools for each Scope 3 GHG category

See ESRS 2 BP-2.10.

### AR 46i) List of Scope 3 categories included in and excluded from the inventory, including reasons

The following categories were included in the calculation: Scope 3.13, 3.15.

The most significant Scope 3 categories for financial institutions were calculated in the current reporting period and are shown numerically in the table above. A zero value is shown for categories not included/calculated.

### AR 46j) Disclosure of biogenic CO<sub>2</sub> emissions in the value chain from the combustion or biodegradation of biomass separately from Scope 2 GHG emissions. Other types of GHG (in particular CH<sub>4</sub> and N<sub>2</sub>O) must nevertheless be taken into account in Scope 2

No biodegradation or combustion of biomass takes place.

### 53-54) Greenhouse gas emissions intensity, location-based and market-based (total GHG emissions per net revenue)

This key figure has risen sharply compared with the previous year due to the first-time calculation and inclusion of Scope 3.15 emissions. The GHG emissions per monetary volume for each asset class are shown under E1-6.AR 41.

| Group                                                                                  | 2024   | 2023   |
|----------------------------------------------------------------------------------------|--------|--------|
| Total GHG emissions (location-based) per net revenue (t CO <sub>2</sub> /EUR thousand) | 32.79  | 0.18   |
| Total GHG emissions (market-based) per net revenue (t CO <sub>2</sub> /EUR thousand)   | 32.78  | 0.17   |
| Total net revenue in EUR thousand (in the financial statements)                        | 42,450 | 40,099 |

**55) Disclosure of the reconciliation of net revenue (GHG intensity reference value required by paragraph 53) to the relevant line item or notes in the financial statements**

**AR 55) The reconciliation of the net revenue used to calculate GHG intensity to the relevant line item or notes in the financial statements (as required by paragraph 55) may be done by either:**

**AR 55a) a cross-reference to the related line item or disclosure in the financial statements**

See net income for the year in section I, "Consolidated financial statements (IFRS)", statement of comprehensive income (income statement).

## DISCLOSURE REQUIREMENT E1-7 – GHG REMOVALS AND GHG MITIGATION PROJECTS FINANCED THROUGH CARBON CREDITS

### OWN BUSINESS OPERATIONS & DOWNSTREAM VALUE CHAIN

**56a, 57a-b) Disclosure of GHG removals and storage in own projects or in the value chain (t CO<sub>2</sub>)**

No projects for GHG removal or storage were developed within the company's own operations or value chain, nor were any such projects contributed to.

**AR 58e) Marking of GHG removal activities that are converted into carbon credits and sold**

There were no GHG removal activities within the company's own operations or value chain that were converted into carbon credits and sold to other parties on the voluntary market.

**56b) Disclosure of GHG emission reductions or removals from projects outside the value chain financed through carbon credits**

**AR 62) Disaggregation of carbon credits to be reported in accordance with paragraph 56b**

**59a) Detailed information on carbon credits (table from AR 64)**

Where no metric information was provided, it was not possible to record the corresponding figures.

| Carbon credits cancelled <sup>32</sup> in the reporting year                              | 2024         | 2023         |
|-------------------------------------------------------------------------------------------|--------------|--------------|
| <b>Total (t CO<sub>2</sub>)</b>                                                           | <b>1,865</b> | <b>1,287</b> |
| Share from removal projects (%) <sup>33</sup>                                             | 55           | 15           |
| Share from reduction projects (%) <sup>34</sup>                                           | 100          | 100          |
| Recognised quality standard Gold Standard VER (%)                                         | 21           | 80           |
| Recognised quality standard SILVACONSULT® Forest Carbon Standard ISO 14064-2 (%)          | 50           | 0            |
| Recognised quality standard University of Natural Resources and Life Sciences, Vienna (%) | 5            | 5            |
| Recognised quality standard Plan Vivo                                                     | 24           | 15           |
| Share from projects within the EU (%) <sup>35</sup>                                       | 71           | 80           |
| Share of carbon credits that qualify as corresponding adjustments (%) <sup>36</sup>       | -            | -            |

**59b) Information on carbon credits planned to be cancelled in future:**

No carbon credits are currently planned to be cancelled in future.

**60) Disclosure of scope, methodologies, frameworks and neutralisation of residual GHG emissions where a net zero target is disclosed**

Hypo Vorarlberg is not currently pursuing a net zero target.

**61a-c) Discussion of the company's carbon neutrality through the use of carbon credits**

Hypo Vorarlberg does not pursue carbon neutrality through the use of carbon credits.

## DISCLOSURE REQUIREMENT E1-8 – INTERNAL CARBON PRICING

### OWN BUSINESS OPERATIONS

**63a) Disclosure of internal carbon pricing schemes that influence decision-making and climate strategies**

Hypo Vorarlberg has not yet implemented an internal carbon pricing scheme, as its operating activities and business model cause comparatively low direct CO<sub>2</sub> emissions (Scope 1 and 2) and the indirect emissions (Scope 3) result primarily from the financing and investment portfolio.

<sup>32</sup> Cancelled = the purchase of credits for climate change mitigation projects contributes to the reduction

<sup>33</sup> E1-7.AR 62a.

<sup>34</sup> E1-7.AR 62a.

<sup>35</sup> E1-7.AR 62d.

<sup>36</sup> E1-7.AR 62e.

# ESRS E2: POLLUTION

## IMPACT, RISK AND OPPORTUNITY MANAGEMENT

### DISCLOSURE REQUIREMENT E2-1 – POLICIES RELATED TO AIR POLLUTION

#### DOWNSTREAM VALUE CHAIN

##### 14) Policies to manage material impacts, risks and opportunities related to the prevention and reduction of air pollution in accordance with ESRS 2 MDR-P

The following is a list of internal policies and strategies related to air pollution. They primarily result from the sustainability strategy, which is the central guiding document for all strategies relating to sustainability and ESG. The specific implementation and operationalisation of the sustainability strategy takes place in the respective specialist departments. Department-specific issues are addressed and effectively implemented with the help of functional strategies.

| "Ethics and sustainability criteria (financing business)" policy                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <p><b>Key content</b></p> <p>Hypo Vorarlberg's "Ethics and sustainability criteria for financing" policy describes the central procedure for taking ESG criteria into account in the financing business and must be applied by all Group employees. The policy is reviewed regularly and was most recently updated in the second half of 2024. The individual sections cover the methodology and the most important steps for reviewing and evaluating potential financing in respect of sustainability aspects and establishing key references to the topic-specific standard E2 Air Pollution.</p> <p>Hypo Vorarlberg can actively and directly control the allocation of its funds by defining criteria (e.g. exclusion criteria for certain activities/industries). In this way, it can contribute to the prevention of environmental impacts and existing environmental risks, while at the same time having a positive impact on the achievement of the environmental objectives. The content of the policy can be summarised as follows:</p> <ul style="list-style-type: none"><li>▪ Scope of application and legal provisions for financing</li><li>▪ Procedure for implementation in financing business:<ul style="list-style-type: none"><li>▪ Application of positive criteria</li><li>▪ Application of exclusion criteria</li><li>▪ Consideration of sensitive areas:<ul style="list-style-type: none"><li>Characteristics that are harmful to the environment or the climate</li><li>Controversial or morally objectionable characteristics</li></ul></li></ul></li><li>▪ Implementation, review and control</li></ul> |
| <p><b>General objectives</b></p> <p>In 2017, Hypo Vorarlberg decided to take into account the impact of transactions in its financing business on the environment, the climate and people. Since then, desirable and undesirable transactions in this respect have been identified using a variety of different criteria.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <p><b>References to material impacts, risks or opportunities</b></p> <p>The topic-specific management of material impacts (positive and negative), risks and opportunities is performed by applying positive criteria and exclusion criteria or by taking sensitive areas into account. In the case of material risks, risk aspects are also taken into account. Where possible, market opportunities are expressed in the form of sustainability aspects in the existing or future product range. The specific references to the material impacts and risks are currently as follows:</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <p><b>Impacts</b></p> <p><b>Increase in air pollutants: Negative impact on air quality due to financing and investments in pollutant-intensive industries</b></p> <p>Application of exclusion criteria:</p> <ul style="list-style-type: none"><li>▪ Coal mining (no direct project financing for coal mining projects)</li></ul> <p>Consideration of sensitive areas:</p> <ul style="list-style-type: none"><li>▪ Characteristics that are harmful to the environment or the climate:<ul style="list-style-type: none"><li>▪ Transactions involving fossil fuels (oil and gas extraction through fracking, oil extraction from tar sands)</li><li>▪ Flagrant disregard of environmental laws</li><li>▪ Disregard of generally recognised environmental standards or rules of conduct by large-scale projects (e.g. pipelines, mines, power plants, timber extraction from primary forests)</li></ul></li><li>▪ Controversial or morally objectionable characteristics:<ul style="list-style-type: none"><li>▪ Flagrant disregard of statutory provisions</li></ul></li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <p><b>Risks</b></p> <p><b>Credit risk: Business with companies in specific industrial sectors with relatively high emissions of air pollutants</b></p> <p>Application of exclusion criteria:</p> <ul style="list-style-type: none"><li>▪ Coal mining (no direct project financing for coal mining projects)</li></ul> <p>Consideration of sensitive areas:</p> <ul style="list-style-type: none"><li>▪ Characteristics that are harmful to the environment or the climate:<ul style="list-style-type: none"><li>▪ Transactions involving fossil fuels (oil and gas extraction through fracking, oil extraction from tar sands)</li><li>▪ Flagrant disregard of environmental laws</li><li>▪ Disregard of generally recognised environmental standards or rules of conduct by large-scale projects (e.g. pipelines, mines, power plants, timber extraction from primary forests)</li></ul></li><li>▪ Controversial or morally objectionable characteristics:<ul style="list-style-type: none"><li>▪ Flagrant disregard of statutory provisions</li></ul></li></ul> <p>Control takes place on the basis of energy performance certificates (see E1 SBM-3.19c for details)</p> <p>GHG accounting and decarbonisation measures</p>                                                                                                                                                                                                                                                                                                                                                                                                      |

### Monitoring process

Compliance is monitored by Hypo Vorarlberg employees using the dual control principle before the transaction is concluded. Internal Audit also takes the "Ethics and sustainability criteria for financing" into account in its ongoing audits. This forms part of the internal due diligence process.

### Area of application

The policy applies to all employees of the Group who are involved in financing in their business segment, irrespective of their position. The standards set out therein apply to new and existing customers in the financing business.

### Responsible organisational level

The respective specialist department (Credit Management, Sales) is responsible for creating the policy and updating it as required, as well as for its implementation. Coordination is performed by the Sustainability Group in collaboration with Group Risk Controlling, both of which report directly to the Managing Board.

### References to third-party standards or initiatives

The "Ethics and sustainability criteria for financing" policy is based on the requirements of international agreements and ethical standards in the areas of human and labour rights. The relevant agreements and standards are:

- United Nations Human Rights Charter
- Principles of the ILO Declaration on Fundamental Principles and Rights at Work

### Consideration of stakeholder interests

All of the relevant specialist departments at Hypo Vorarlberg are involved in the regular revision of this policy, in particular Sales, Credit Management, Legal, Group Risk Controlling, Sustainability and the Managing Board. Any amendment to this policy requires the renewed involvement of the aforementioned specialist departments.

### Availability of the policy for stakeholders

The "Ethics and sustainability criteria for financing" policy is an internal company document that is made available to all Hypo Vorarlberg employees on the intranet.

## "ESG investment approach (Asset Management)" policy

### Key content

Hypo Vorarlberg's "ESG investment approach" describes the central procedure for selecting securities for Asset Management and must be applied by all employees in this business segment. The policy is reviewed regularly and was most recently updated in November 2024. The individual sections describe the holistic process and the Hypo ESG rating as its key component, as well as the most important steps for reviewing and evaluating new and existing investments (equities, bonds and target funds) in respect of a range of defined sustainability aspects and establishing key references to the topic-specific standard E2 Air Pollution:

- Overview of financial products (asset management, funds)
- External ESG data sources (Sustainalytics, a Morningstar Group company)
- Procedure for determining the Hypo ESG rating:
  - Selection criteria applied
  - Compliance with international standards through norm-based screening
  - Comparison using the best-in-class approach
  - CO<sub>2</sub> risk (CO<sub>2</sub> risk and CO<sub>2</sub> management, fossil fuels, renewable energies, CO<sub>2</sub> intensity (Scope 1 and 2), stranded assets)
  - Measurable impact on SDGs
  - Controversial business practices (business operations, supply chain (environmental), employees, corporate governance, society and community, products and services, supply chain (social), customers, business ethics, public)
  - Corporate governance (quality and integrity of the Managing Board and management, composition of the Managing Board, ownership and shareholder rights, wages and salaries, auditing and financial reporting, stakeholder treatment)
  - ESG risk rating
  - Approach to calculating ESG country rating
    - Country risk
    - Freedom House Index (Free, Partly Free, Not Free)
- Measurement and management of the principal adverse impacts (PAIs) on sustainability factors

The material topics are specifically taken into account within the aforementioned framework when selecting securities in accordance with the ESG investment approach. All of the figures used in Hypo Vorarlberg's ESG rating are based on ESG data from the research partner Sustainalytics<sup>37</sup> or publicly accessible databases such as Freedom House<sup>38</sup>.

### General objectives

The main objective of the "ESG investment approach" is to assess and classify ESG aspects in order to minimise potentially negative environmental, social and governance impacts support positive ones by investing directly or indirectly in companies. Since November 2021, all Hypo Vorarlberg funds and asset management strategies that are actively offered have been classified as financial products within the meaning of Article 8 of Regulation (EU) 2019/2088 (Sustainable Finance Disclosure Regulation) and take into account environmental and/or social characteristics.

<sup>37</sup> The information, data, analyses and opinions contained herein (the "Information"): (1) includes the proprietary information of Sustainalytics and/or its content providers; (2) may not be copied or redistributed except as specifically authorized; (3) do not constitute investment advice nor an endorsement of any product, project, investment strategy or consideration of any particular environmental, social or governance related issues as part of any investment strategy; (4) are provided solely for informational purposes; and (5) are not warranted to be complete, accurate or timely. The Information is not directed to, nor intended for distribution to or use by India-based clients and/or users, and the distribution of Information to India resident individuals and entities is not permitted. Neither Morningstar Inc., Sustainalytics, nor their content providers accept any liability for the use of the information, for actions of third parties in respect to the information, nor are responsible for any trading decisions, damages or other losses related to the information or its use. The use of the data is subject to conditions at <https://www.sustainalytics.com/legal-disclaimers>.

<sup>38</sup> [www.freedomhouse.org](http://www.freedomhouse.org)



## References to material impacts, risks or opportunities

The topic-specific management of material impacts (positive and negative) and opportunities is performed in the individual components of Hypo Vorarlberg's ESG rating. This consists of selection criteria, norm-based screening, a best-in-class approach (CO<sub>2</sub> risk rating, measurable impact on SDGs, controversial economic practices, corporate governance, ESG risk rating) and the country risk for government bonds. The specific references to material impacts are currently as follows:

### Impacts

#### Increase in air pollutants: Negative impact on air quality due to financing and investments in pollutant-intensive industries

Compliance with international standards through norm-based screening:

- Norm-based screening enables compliance with international norms and standards relating to the environment. It uses the categories "compliant", "watchlist" and "non-compliant". "Compliant" companies and securities on the "watchlist" are given equal weighting in the Hypo ESG rating. "Non-compliant" companies are not selected:
  - United Nations Global Compact: Principle 7, 8, 9<sup>39</sup>
  - OECD Guidelines for Multinational Enterprises: Chapter VI – Environment<sup>40</sup>

Application of selection criteria (revenue thresholds):

- Fossil fuels:
  - Crude oil and natural gas extraction through fracking 0 %
  - Oil extraction from tar sands 5 %
  - Production of oil and gas 10 %
  - Coal extraction/mining 5 %

### Monitoring process

Compliance is monitored using the dual control principle. The ESG rating tool is used to examine and ensure compliance with the defined ESG requirements on an ex-ante basis as part of the securities selection process. Investments are only made if the ESG investment approach is complied with at the time of purchase. Securities portfolios are also regularly reviewed. The results are checked for plausibility at product level on an ex-post basis. Additional review steps are initiated if any anomalies are identified.

### Area of application

At product level, the ESG investment approach defines the main requirements for portfolio management, including the distinction between "Investments" and "Other investments". It is divided into two areas: "Selection of individual securities" and "Selection of target funds".

### Responsible organisational level

The Asset Management department, which reports directly to the Managing Board, is responsible for creating the policy and updating it as required, as well as for its implementation.

### References to third-party standards or initiatives

The ESG investment approach is based on European directives and guidelines from international organisations. The relevant directives and guidelines are:

- Sustainable Finance Disclosure Regulation (EU 2019/2088) (SFDR)
- Regulation (EU) 2021/1253 on sustainability in connection with MiFID II
- United Nations principles for responsible corporate governance (United Nations Global Compact)
- OECD Guidelines for Multinational Enterprises
- United Nations Guiding Principles on Business and Human Rights
- United Nations Sustainable Development Goals (UN SDGs)
- Degree of freedom according to the non-governmental organisation Freedom House

### Consideration of stakeholder interests

All relevant stakeholders and knowledge bearers at Hypo Vorarlberg were involved in the creation of this policy, in particular the specialist departments for Asset Management, Compliance and Sustainability. Any amendment to this policy requires the renewed involvement of the aforementioned stakeholders.

### Availability of the policy for stakeholders

The ESG investment approach is available on Hypo Vorarlberg's website.<sup>41</sup>

## "ESG in own-account investments (Treasury: APM & Investments)" policy

### Key content

The "ESG in own-account investments (Treasury: APM & Investments)" document describes Hypo Vorarlberg's central approach to taking ethics and sustainability criteria into consideration in its own-account investments. This investment strategy must be taken into account by all Hypo Vorarlberg employees working in this business segment. It is regularly reviewed and updated, most recently in May 2024. By taking sustainability aspects into account when making investment decisions, the company aims to support the transition to a climate-neutral economy and indirectly influence companies to focus on environmental and social responsibility to a greater extent. This is based on compliance standards, minimum requirements, positive and exclusion criteria and the definition of sensitive areas. Investments are checked for compliance with these criteria, with a particular focus on human rights, environmental and social aspects. Country-specific risk assessments are applied for government bonds in order to comprehensively assess political and economic stability. The following aspects can also be used to establish a reference to the topic-specific standard E2 Air pollution:

- Scope of application and legal provisions for financing
- Procedure for implementation in financing business:
  - Application of positive criteria
  - Application of exclusion criteria
  - Consideration of sensitive areas:
    - Characteristics that are harmful to the environment or the climate
    - Controversial or morally objectionable characteristics
- Implementation, review and control

Compliance with these criteria is reviewed by reference to data from external ESG research partners. If no data is available or the intended use is not known, the valuation is carried out on the basis of available company information.

<sup>39</sup> <https://unglobalcompact.org/what-is-gc/mission/principles>

<sup>40</sup> [https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_81f92357-en.html](https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html)

<sup>41</sup> [https://www.hypovbg.at/fileadmin/Hypovbg/Hypo-Vorarlberg/Nachhaltigkeit/Offenlegungen/ESG-Investmentansatz-Hypo-Vorarlberg\\_02-01-2025.pdf](https://www.hypovbg.at/fileadmin/Hypovbg/Hypo-Vorarlberg/Nachhaltigkeit/Offenlegungen/ESG-Investmentansatz-Hypo-Vorarlberg_02-01-2025.pdf)

## General objectives

The main objective of the document is to promote sustainable investments, ensure compliance with ethical standards and minimise risk by avoiding investments in socially or environmentally problematic areas. Hypo Vorarlberg aims to invest exclusively in forms of investment that comply with international ethical standards and to exclude high-risk areas that do not satisfy these standards.

## References to material impacts, risks or opportunities

The topic-specific management of material impacts (positive and negative), risks and opportunities is performed by applying positive criteria and exclusion criteria or by taking sensitive areas into account. The specific references to the material impacts are currently as follows:

### Impacts

#### Increase in air pollutants: Negative impact on air quality due to financing and investments in pollutant-intensive industries

Definition of exclusion criteria (maximum revenue thresholds):

- Fossil fuels:
  - Crude oil and natural gas extraction through fracking 0 %
  - Oil extraction from tar sands 5 %
  - Coal extraction/mining 5 %

Consideration of sensitive areas:

- Characteristics that are harmful to the environment or the climate:
  - Flagrant disregard of environmental laws
  - Disregard of generally recognised environmental standards or rules of conduct by large-scale projects
- Controversial or morally objectionable characteristics:
  - Flagrant disregard of statutory provisions

Compliance with international standards through norm-based screening:

- Norm-based screening enables compliance with international norms and standards relating to the environment. No investments are made in companies that violate international environmental norms and standards. The basis for screening is as follows:
  - United Nations Global Compact: Principle 7, 8, 9<sup>42</sup>
  - OECD Guidelines for Multinational Enterprises: Chapter VI – Environment<sup>43</sup>

## Monitoring process

Compliance is monitored by the Treasury APM & Investments Group using the dual control principle and is regularly audited by Internal Audit.

## Area of application

The document applies to all employees and covers Hypo Vorarlberg's direct investments. Supply chains and shareholdings are not currently subject to mandatory review, as this is generally not possible due to data availability.

## Responsible organisational level

The Treasury: APM & Investments specialist department, which reports directly to the Managing Board, is responsible for creating the document and updating it as required, as well as for its implementation.

## References to third-party standards or initiatives

The "ESG in own-account investments (Treasury: APM & Investments)" document is based on international agreements and standards in the areas of human rights, labour standards, the environment and corruption prevention, including:

- Principles of the United Nations Global Compact
- OECD Guidelines for Multinational Enterprises
- United Nations Guiding Principles on Business and Human Rights

## Consideration of stakeholder interests

The interests of all relevant stakeholders were taken into account in the creation of this document and knowledge bearers at Hypo Vorarlberg were involved, in particular the specialist departments for Own-account Investments, Data Protection and Compliance as well as the Sustainability Group. Any amendment to this policy requires a renewed assessment by the aforementioned stakeholders.

## Availability of the policy for stakeholders

The "ESG in own-account investments (Treasury: APM & Investments)" policy is an internal document that is made available to all Hypo Vorarlberg employees on the intranet.

### 15a) Description of how the strategy prevents and minimises negative impacts related to air pollution

Based on the results of Hypo Vorarlberg's materiality analysis, the air pollution sub-topic defined in the E2 standard was identified as material. In accordance with Hypo Vorarlberg's business model, this materiality relates only to the Bank's portfolios (asset management, own-account investments and loan portfolio) and as for its implementation and financing. This encompasses Hypo Vorarlberg's core business and the majority of the downstream value chain.

The policies for controlling the negative impacts of "emissions from investments in pollutant-intensive industries" are listed under E2-1.14. Each of these policies contains strategies and criteria for addressing negative impacts in relation to investments and financing in pollutant-intensive industries depending on the respective portfolio. The impacts are also taken into account as part of the measures taken and planned (see E2-2.18).

<sup>42</sup> <https://unglobalcompact.org/what-is-gc/mission/principles>

<sup>43</sup> [https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_81f92357-en.html](https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html)

## DISCLOSURE REQUIREMENT E2-2 – ACTIONS AND RESOURCES RELATED TO AIR POLLUTION

### DOWNSTREAM VALUE CHAIN

#### 18) Disclosure of air pollution-related action plans and measures as required by ESRS 2 MDR-A

The following is a list of air pollution-related actions. Actions related to air pollution can be derived on the basis of the topic-specific requirements addressed in the sustainability strategy. The respective specialist departments are responsible for defining and implementing the individual actions. Most of these are also set out in separate policies or work instructions.

| Financing business                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Key measures</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Taken</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <p>The individual measures cover the most important criteria as outlined below (positive criteria, exclusion criteria and sensitive areas) for reviewing and evaluating potential financing in respect of sustainability aspects and establishing material references to the topic-specific standard E2 Air pollution:</p> <ul style="list-style-type: none"><li>▪ In the case of financing with new customers, the positive criteria of the fifth environmental objective of the EU taxonomy are applied:<ul style="list-style-type: none"><li>▪ Pollution prevention and control</li></ul></li><li>▪ The positive criteria are also applied to financing of new business and extensions for existing customers</li><li>▪ Defined exclusion criteria for financing (e.g. environmental degradation) have been implemented:<ul style="list-style-type: none"><li>▪ Exclusion of coal mining (no direct project financing for coal mining projects)</li></ul></li><li>▪ In addition to exclusion criteria, sensitive areas for potential financing that are subject to more extensive scrutiny are defined:<ul style="list-style-type: none"><li>▪ Characteristics that are harmful to the environment or the climate:<ul style="list-style-type: none"><li>Transactions involving fossil fuels (oil and gas extraction through fracking, oil extraction from tar sands)</li><li>Flagrant disregard of environmental laws</li><li>Disregard of generally recognised environmental standards or rules of conduct by large-scale projects</li></ul></li><li>▪ Controversial or morally objectionable characteristics:<ul style="list-style-type: none"><li>Flagrant disregard of statutory provisions</li></ul></li></ul></li></ul> |
| <b>Planned</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Extended NCNR analysis to derive specific measures</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <p>The evaluation of the individual industry sectors delivered an initial indication of potential risks and opportunities in the lending portfolio. In order to derive specific measures in this area, Hypo Vorarlberg will conduct an extended analysis next year including geographical data at country level (e.g. data relevant for biodiversity).</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Application of the “Principles for Responsible Banking” (PRB) in order to analyse potential risks and opportunities in the portfolio in greater detail. A sector analysis and a dialogue with companies are planned for 2025. Three categories of interaction are to be considered:</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <ul style="list-style-type: none"><li>▪ Supporting companies to pursue joint opportunities (“seek out”)</li><li>▪ Engaging in dialogue with companies to obtain sufficient information (“engage”)</li><li>▪ Engaging in dialogue with companies to obtain the necessary data to minimise risks (“challenge”)</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Expected results</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Expected results concerning environmental risks (NCNR analysis)</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <p>Based on the analysis initiated in 2024, a methodology has been developed that will enable the company to identify potential areas of action for the portfolios in the coming years in order to minimise material negative impacts and risks, support positive impacts and pursue opportunities in the environmental topics (air pollution, biodiversity and circular economy). To this end, the analysis must be applied at least once a year in order to periodically evaluate Hypo Vorarlberg’s loan portfolio for environmental risks and to integrate the pool of data from publicly available databases, which are continuously updated and expanded. Engaging in dialogue with companies in accordance with the Principles for Responsible Banking is also expected to raise awareness of environmental risks, which can help to improve the results.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Contribution to the realisation of the objectives and targets of the policy</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <p>The measures already taken are consistent with the objective of the “Ethics and sustainability criteria for financing” policy, which essentially aims to take into account the impact of financing on the environment, the climate and people. The material impacts and risks identified in the double materiality assessment are already addressed in part:</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Impacts</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Increase in air pollutants: Negative impact on air quality due to financing and investments in pollutant-intensive industries</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <p>Application of exclusion criteria:</p> <ul style="list-style-type: none"><li>▪ Coal mining (no direct project financing for coal mining projects)</li></ul> <p>Consideration of sensitive areas:</p> <ul style="list-style-type: none"><li>▪ Characteristics that are harmful to the environment or the climate:<ul style="list-style-type: none"><li>▪ Transactions involving fossil fuels (oil and gas extraction through fracking, oil extraction from tar sands)</li><li>▪ Flagrant disregard of environmental laws</li><li>▪ Disregard of generally recognised environmental standards or rules of conduct by large-scale projects (e.g. pipelines, mines, power plants, timber extraction from primary forests)</li></ul></li><li>▪ Controversial or morally objectionable characteristics:<ul style="list-style-type: none"><li>▪ Flagrant disregard of statutory provisions</li></ul></li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Risks</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Credit risk: Business with companies in specific industrial sectors with relatively high emissions of air pollutants</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <p>Application of exclusion criteria:</p> <ul style="list-style-type: none"><li>▪ Coal mining (no direct project financing for coal mining projects)</li></ul> <p>Consideration of sensitive areas:</p> <ul style="list-style-type: none"><li>▪ Characteristics that are harmful to the environment or the climate:<ul style="list-style-type: none"><li>▪ Transactions involving fossil fuels (oil and gas extraction through fracking, oil extraction from tar sands)</li><li>▪ Flagrant disregard of environmental laws</li><li>▪ Disregard of generally recognised environmental standards or rules of conduct by large-scale projects (e.g. pipelines, mines, power plants, timber extraction from primary forests)</li></ul></li><li>▪ Controversial or morally objectionable characteristics:<ul style="list-style-type: none"><li>▪ Flagrant disregard of statutory provisions</li></ul></li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

Control takes place on the basis of energy performance certificates (see E1 SBM-3.19c for details)  
GHG accounting and decarbonisation measures

#### Scope and area of application

The measures taken are designed to be consistent with the policy and apply throughout the Group. The planned measures will also cover the entire value chain.

#### Time horizon

The measures taken have a long-term time horizon (more than five years). The planned measures have a short-term perspective (up to 1 year). All measures are regularly reviewed as part of a continuous process (PDCA) and adjusted as necessary.

#### Key remedial measures

The measures taken have a preventive effect. No further remedial measures are linked to the provision of financing.

#### Progress

The measures taken have already been implemented and are reviewed annually to determine whether they need to be adjusted. There was no need for any qualitative adjustments compared to the previous year. No quantitative measurements were carried out.

### Asset Management

#### Key measures

##### Taken

The following measures taken include the procedure for determining Hypo Vorarlberg's ESG rating in the area of investment strategies and in the selection of target funds. The measures also cover the measurement and controlling of potential negative impacts on the sustainability factors for investments:

- Application of defined selection criteria for direct and indirect investments in companies that exceed revenue thresholds in certain business areas:
  - Transactions involving fossil fuels (oil and gas extraction through fracking, oil extraction from tar sands)
  - Exclusion of investments by companies that cause significant emissions of air pollutants (such as the coal industry)
  - Loss of biodiversity due to certain industries (use of genetic engineering in agriculture, tobacco industry)
- Implementation of norm-based screening:
  - When making investment decisions, no investments are made in companies that violate international norms and standards in the areas of human and labour rights, the environment and corruption. Companies are also categorised as "compliant", "watchlist" or "non-compliant". Companies categorised as "non-compliant" are not selected for investments
- The application of the best-in-class approach takes the following areas into account:
  - GHG risk and GHG management: Comparison of companies to identify those with the lowest risk in connection with the transition to a low-carbon economy
  - Companies that have a measurable impact on one or more of the United Nations SDGs (e.g. zero hunger, good health and well-being, quality education, life on land and below water, sustainable cities and communities, responsible consumption and production) have a better rating
  - Companies without controversial incidents with a potentially negative impact on stakeholders, the environment or operations have a lower risk and hence a better rating
  - Companies with good corporate governance (e.g. composition of the Managing Board, wages and salaries, stakeholder treatment) have a better rating
  - Companies that are only exposed to low ESG risks or a small number of ESG risks have a better rating (risk exposure and risk management), including taking the LCTR (= implied temperature alignment) into account.
  - In the case of government bonds, only bonds with a medium risk (at least C-) on a rating scale of A-E are authorised in order to limit potential negative impacts. The country risk rating is supplied by an external service provider and is included in the overall assessment of the Hypo ESG rating
- Measurement and management of the principal adverse impacts (PAIs) on sustainability factors through the publication of the PAI statement
- Annual ESG screening of the Hypo Vorarlberg funds by an external service provider to ensure transparency and comparability

##### Planned

#### Extended NCNR analysis to derive specific measures

The evaluation of the individual industry sectors delivered an initial indication of potential risks and opportunities in the asset management portfolio. In order to derive specific measures in this area, Hypo Vorarlberg will potentially conduct an extended analysis next year including geographical data at country level (e.g. data relevant for biodiversity).

**Application of the guiding principles of the "Principles for Responsible Banking" (PRB)** in order to analyse potential risks and opportunities in the portfolio in more detail. A sector analysis and a dialogue with companies are planned for 2025. Three categories of interaction are to be considered:

- Supporting companies to pursue joint opportunities ("seek out")
- Engaging in dialogue with companies to obtain sufficient information ("engage")
- Engaging in dialogue with companies to obtain the necessary data to minimise risks ("challenge")

#### Expected results

##### Expected results concerning environmental risks (NCNR analysis)

Based on the analysis launched this year, a methodology was developed that will enable the company to identify potential areas of action for the portfolios in the coming years in order to minimise material negative impacts and risks, support positive impacts and pursue opportunities in the environmental topics (air pollution, biodiversity and circular economy). To this end, the analysis must be applied at least once a year in order to periodically evaluate Hypo Vorarlberg's asset management portfolio for environmental risks and to integrate the pool of data from publicly available databases, which are continuously updated and expanded. Engaging in dialogue with companies in accordance with the Principles for Responsible Banking is also expected to raise awareness of environmental risks, which can help to improve the results.

#### Contribution to the realisation of the objectives and targets of the policy

The measures already taken are consistent with the objective of the "ESG investment approach" policy, which essentially involves promoting sustainable investments and minimising the potential impact of problematic forms of investment on the environment, the climate and people. The material impacts, risks and opportunities identified in the double materiality assessment are addressed as follows:

##### Impacts

#### Increase in air pollutants: Negative impact on air quality due to financing and investments in pollutant-intensive industries

Compliance with international standards through norm-based screening:

- Norm-based screening enables compliance with international norms and standards relating to the environment. It uses the categories “compliant”, “watchlist” and “non-compliant”. “Compliant” companies and securities on the “watchlist” are given equal weighting in the Hypo ESG rating. “Non-compliant” companies are not selected:
  - United Nations Global Compact: Principle 7, 8, 9<sup>44</sup>
  - OECD Guidelines for Multinational Enterprises: Chapter VI – Environment<sup>45</sup>

Application of selection criteria (maximum revenue thresholds):

- Fossil fuels:
  - Crude oil and natural gas extraction through fracking 0 %
  - Oil extraction from tar sands 5 %
  - Production of oil and gas 10 %
  - Coal extraction/mining 5 %

#### Scope and area of application

The measures taken are designed to be consistent with the policy and apply to the Bank. There are location-specific deviations at the St. Gallen branch.

#### Time horizon

The measures taken have a long-term time horizon (more than five years). The planned measures have a short-term perspective (up to 1 year). All measures are regularly reviewed as part of a continuous process (PDCA) and adjusted as necessary.

#### Key remedial measures

The measures taken have a direct effect. The criteria to be taken into account contribute directly to remedial action.

#### Progress

The measures taken have already been implemented and are reviewed annually to determine whether they need to be adjusted. There was no need for any qualitative adjustments compared to the previous year. Quantitative measurements are carried out on a quarterly basis via the rating process.

### Own-account investments

#### Key measures

##### Taken

The individual measures cover the most important criteria as outlined below for reviewing and evaluating potential investments in respect of sustainability aspects and establishing material references to the topic-specific standard E2 Air pollution:

- Implementation of norm-based screening: When making investment decisions (new purchases), no investments are made in companies that violate international environmental standards and norms. The screening is based on the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights
- Positive criteria are reviewed by checking for the presence of the following two characteristics:
  - Conformity with the Green Bond Principles, the Social Bond Principles, the Sustainability-Linked Bond Principles or the Sustainability Bond Guidelines
  - Classification as an ESG investment and provision of a second party opinion by a recognised sustainability rating agency
- Application of defined exclusion criteria for investments in companies that exceed revenue thresholds in certain business areas:
  - Transactions involving fossil fuels (crude oil and natural gas extraction through fracking, oil extraction from tar sands, coal extraction/mining)
- In addition to exclusion criteria, sensitive areas for potential investments that are subject to more extensive scrutiny are defined in order to identify characteristics that are controversial, morally objectionable, or harmful to the climate or the environment (e.g. timber extraction from primary forests)

Compliance with these criteria is reviewed by reference to data from external ESG research partners. If no data is available or the intended use is not known, the valuation is carried out on the basis of available company information.

##### Planned

#### Extended NCNR analysis to derive specific measures

The evaluation of the individual industry sectors delivered an initial indication of potential risks and opportunities in the own-account investment portfolio. In order to derive specific measures in this area, Hypo Vorarlberg will potentially conduct an extended analysis next year including geographical data at country level (e.g. data relevant for biodiversity).

**Application of the guiding principles of the “Principles for Responsible Banking” (PRB)** in order to analyse potential risks and opportunities in the portfolio in more detail. A sector analysis and a dialogue with companies are planned for 2025. Three categories of interaction are to be considered:

- Supporting companies to pursue joint opportunities (“seek out”)
- Engaging in dialogue with companies to obtain sufficient information (“engage”)
- Engaging in dialogue with companies to obtain the necessary data to minimise risks (“challenge”)

<sup>44</sup> <https://unglobalcompact.org/what-is-gc/mission/principles>

<sup>45</sup> [https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_81f92357-en.html](https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html)

## Expected results

### Expected results concerning environmental risks (NCNR analysis)

Based on the analysis launched this year, a methodology was developed that will enable the company to identify potential areas of action for the portfolios in the coming years in order to minimise material negative impacts and risks, support positive impacts and pursue opportunities in the environmental topics (air pollution, biodiversity and circular economy). To this end, the analysis must be applied at least once a year in order to periodically evaluate Hypo Vorarlberg's own-account investment portfolio for environmental risks and to integrate the pool of data from publicly available databases, which are constantly updated and expanded. Engaging in dialogue with companies in accordance with the Principles for Responsible Banking is also expected to raise awareness of environmental risks, which can help to improve the results.

### Contribution to the realisation of the objectives and targets of the policy

The measures already taken are consistent with the objective of the "ESG in own-account investments (APM & Investments)" policy, which essentially involves promoting sustainable investments and minimising the potential impact of problematic forms of investment on the environment, the climate and people. The material impacts identified in the double materiality assessment are addressed as follows:

#### Impacts

### Increase in air pollutants: Negative impact on air quality due to financing and investments in pollutant-intensive industries

Definition of exclusion criteria (maximum revenue thresholds):

- Fossil fuels:
  - Crude oil and natural gas extraction through fracking 0 %
  - Oil extraction from tar sands 5 %
  - Coal extraction/mining 5 %

Consideration of sensitive areas:

- Characteristics that are harmful to the environment or the climate:
  - Flagrant disregard of environmental laws
  - Disregard of generally recognised environmental standards or rules of conduct by large-scale projects
- Controversial or morally objectionable characteristics:
  - Flagrant disregard of statutory provisions

Compliance with international standards through norm-based screening:

- Norm-based screening enables compliance with international norms and standards relating to the environment. No investments are made in companies that violate international environmental norms and standards. The basis for screening is as follows:
  - United Nations Global Compact: Principle 7, 8, 9<sup>46</sup>
  - OECD Guidelines for Multinational Enterprises: Chapter VI – Environment<sup>47</sup>

### Scope and area of application

The measures taken are designed to be consistent with the policy and apply throughout the Group. The planned measures will also cover the entire value chain.

### Time horizon

The measures taken have a long-term time horizon (more than five years). The planned measures have a short-term perspective (up to 1 year). All measures are regularly reviewed as part of a continuous process (PDCA) and adjusted as necessary.

### Key remedial measures

The measures taken have a direct effect. The criteria to be taken into account contribute directly to remedial action.

### Progress

The measures taken have already been implemented and are reviewed annually to determine whether they need to be adjusted. There was no need for any qualitative adjustments compared to the previous year. No quantitative measurements were carried out.

## ESRS 2 69) Disclosure requirements for action plans with significant OpEx and/or CapEx requirements

### ESRS 2 69a) Disclosure of current and future resources allocated to the action plan

The allocation of current and future operating expenditures and capital expenditures was not carried out in the current reporting period.

### ESRS 2 69b-c) Disclosure of the amount of current and future resources and discussion of how they relate to the most relevant amounts presented in the financial statements

As this data was not collected in the reporting period, no information is available.

### AR 13) Information on actions that extend to upstream or downstream value chain activities

The measures already taken by Hypo Vorarlberg under E2-2 are aimed specifically at the downstream value chain. Hypo Vorarlberg's business model means that the air pollution-related impacts and risks from financing and investments must be addressed. The planned measure for the NCNR analysis will be supplemented in the coming year by a holistic view of the customer's entire value chain. For the first-time application of the analysis this year, only direct "environmental scores" representing Hypo Vorarlberg's downstream value chain were collected.

<sup>46</sup> <https://unglobalcompact.org/what-is-gc/mission/principles>

<sup>47</sup> [https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_81f92357-en.html](https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html)

## METRICS AND TARGETS

### DISCLOSURE REQUIREMENT E2-3 – TARGETS RELATED TO AIR POLLUTION

#### DOWNSTREAM VALUE CHAIN

**81) If the undertaking has not set any measurable outcome-oriented targets**

**81a) Disclosure of whether the undertaking intends to set such targets and the timeframe for doing so, or the reasons why the undertaking does not set such targets**

As a financial institution, Hypo Vorarlberg can have a positive influence on lowering air pollution through the targeted management of its financing and investment activities. To this end, the Group seeks to take responsibility and actively contribute to reducing the environmental impact and environmental degradation in the area of air pollution.

No measurable time-bound targets were defined for the current reporting period as Group initially focused on comprehensive analyses of the various portfolios (see NCNR analysis, E2 IRO-1.11a, E2 IRO-1.11a, BP-2.10, BP-2.11). Quantitative measurement methods will be evaluated on the basis of the qualitative assessment. This will be followed by the definition of targets. This step-by-step approach is intended to ensure that the planned measures can be implemented in a targeted and effective manner and that impacts, risks and opportunities are addressed directly.

**81bi-ii) Disclosure of whether the undertaking tracks the effectiveness of its strategies and actions in relation to impacts, risks and opportunities, including the procedures, the targets set and the time periods**

The effectiveness of the strategies and actions in relation to impacts, risks and opportunities is ensured by the monitoring process defined in the policies (see E2-1, E2-2). The strategies and actions are reviewed regularly (at least annually) and adjusted as necessary. The monitoring process takes account of various internal stakeholders (specialist departments, the Managing Board and, as part of its regular auditing activities, Internal Audit).

## ESRS E4: BIODIVERSITY AND ECOSYSTEMS

### STRATEGY

#### DISCLOSURE REQUIREMENT SBM 3 – MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

##### OWN BUSINESS OPERATIONS

16a) List of locations operated by Hypo Vorarlberg, including locations under operational control based on the results of E4-17a 1.17a). The undertaking makes the following disclosures with regard to these locations:

| Location type              | Location                       | Address                                               |
|----------------------------|--------------------------------|-------------------------------------------------------|
| Branch                     | Bregenz head office            | Hypo-Passage 1, 6900 Bregenz, Austria                 |
| Branch                     | Bludenz                        | Am Postplatz 2, 6800 Bludenz, Austria                 |
| Branch                     | Dornbirn                       | Rathausplatz 6, 6850 Dornbirn, Austria                |
| Branch                     | Egg                            | Wälderpark 940, 6863 Egg, Austria                     |
| Branch                     | Feldkirch                      | Neustadt 23, 6800 Feldkirch, Austria                  |
| Branch                     | Lech                           | Dorf 138, 6764 Lech, Austria                          |
| Branch                     | Rankweil                       | Ringstrasse 11, 6830 Rankweil, Austria                |
| Branch                     | Feldkirch Hospital             | Carinagasse 47-49, 6800 Feldkirch, Austria            |
| Branch                     | Riezern                        | Walserstrasse 31, 6991 Riezern, Austria               |
| Branch                     | Dornbirn Exhibition Centre     | Messestrasse 2, 6850 Dornbirn, Austria                |
| Branch                     | Vienna                         | Brandstätte 6, 1010 Vienna, Austria                   |
| Branch                     | Götzis                         | Hauptstrasse 4, 6840 Götzis, Austria                  |
| Branch                     | Schrüns                        | Jakob Stember Weg 2, 6780 Schrüns, Austria            |
| Branch                     | Lustenau                       | Kaiser-Franz-Josef-Strasse 4a, 6890 Lustenau, Austria |
| Branch                     | Höchst                         | Hauptstrasse 25, 6973 Höchst, Austria                 |
| Branch                     | Hohenems                       | Bahnhofstrasse 19, 6845 Hohenems, Austria             |
| Branch                     | Graz                           | Joanneumring 7, 8010 Graz, Austria                    |
| Branch                     | Wels                           | Kaiser-Josef-Platz 49, 4600 Wels, Austria             |
| Branch                     | Salzburg                       | Strubergasse 30, 5020 Salzburg, Austria               |
| Branch                     | St. Gallen                     | Bankgasse 1, 9004 St. Gallen, Switzerland             |
| Office building            | Hypo Office Bregenz            | Bahnhofstrasse 14, 6900 Bregenz, Austria              |
| Office building            | BAH                            | Bahnhofstrasse 17+19, 6900 Bregenz, Austria           |
| Document storage facility  | Mäser                          | Landwehrstrasse 2, 6900 Bregenz, Austria              |
| Furniture storage facility | Schindler                      | Wuhrkopfweg 1, 6921 Kennelbach, Austria               |
| Training facility          | Dornbirn                       | Poststrasse 11, 6850 Dornbirn, Austria                |
| Office building            | Hypo Immobilien & Leasing GmbH | Poststrasse 11, 6850 Dornbirn, Austria                |
| Office building            | Hypo Vorarlberg Leasing AG     | Galileo-Galilei-Strasse 10 H, 39100 Bolzano, Italy    |
| Office building            | Hypo Vorarlberg Leasing AG     | Viale Fratelli Rosselli 14, 22100 Como, Italy         |

The materiality analysis found that the topic of “biodiversity and ecosystems” is not material in relation to Hypo Vorarlberg’s own business activities. This assessment was confirmed by the analyses conducted (see E4 SBM 3.16a.ii-iii, b, c).

##### 16ai) Disclosure of activities negatively affecting biodiversity

Material negative impacts on biodiversity can result from a financial institution’s own business operations and its core business. In particular, the financing of projects that are harmful to the environment can have a negative impact on aspects of biodiversity. A comprehensive NCNR analysis was conducted to evaluate the specific impacts and dependencies of business activities in relation to biodiversity (see ESRS 2 BP-2.10, 2.11). A comparison with ENCORE’s data pool enabled an initial assessment of the exposure of the portfolios to risks from the impacts and dependencies in relation to biodiversity. Ways of potentially expanding the analysis will be examined in the next reporting year (see E4-3.27).

##### 16a.ii-iii, b, c) List of locations disaggregated by the identified impacts and dependencies and the environmental status of the areas in which they are located

The assessment was performed on the basis of the address data for the locations and office buildings using the publicly available WWF Risk Filter, 6.2. Key Biodiversity Areas<sup>48</sup>. The results were as follows: Risk (0 = n/a, 1 = very low risk; 6 = very high risk)

| Location type | Location            | Risk |
|---------------|---------------------|------|
| Branch        | Bregenz head office | 4    |
| Branch        | Bludenz             | 2    |
| Branch        | Dornbirn            | 4    |
| Branch        | Egg                 | 4    |
| Branch        | Feldkirch           | 2    |

<sup>48</sup> <https://riskfilter.org/biodiversity/explore/map>



| Location type              | Location                       | Risk |
|----------------------------|--------------------------------|------|
| Branch                     | Lech                           | 2    |
| Branch                     | Rankweil                       | 4    |
| Branch                     | Feldkirch Hospital             | 2    |
| Branch                     | Riezlern                       | 3    |
| Branch                     | Dornbirn Exhibition Centre     | 4    |
| Branch                     | Vienna                         | 4    |
| Branch                     | Götzis                         | 4    |
| Branch                     | Schrüns                        | 2    |
| Branch                     | Lustenau                       | 4    |
| Branch                     | Höchst                         | 4    |
| Branch                     | Hohenems                       | 4    |
| Branch                     | Graz                           | 3    |
| Branch                     | Wels                           | 3    |
| Branch                     | Salzburg                       | 4    |
| Branch                     | St. Gallen                     | 4    |
| Office building            | Hypo Office Bregenz            | 4    |
| Office building            | BAH                            | 4    |
| Document storage facility  | Mäser                          | 4    |
| Furniture storage facility | Schindler                      | 4    |
| Training facility          | Dornbirn                       | 4    |
| Office building            | Hypo Immobilien & Leasing GmbH | 4    |
| Office building            | Hypo Vorarlberg Leasing AG     | 2    |
| Office building            | Hypo Vorarlberg Leasing AG     | 4    |

The results of the analysis show that

- 13 % of the locations have a very low risk
- 9 % of the locations have a low risk
- 78 % of the locations and office buildings have a medium risk
- None of the locations are in high/very high risk areas.

As the branches and office buildings operated by Hypo Vorarlberg are located solely in urban areas that are already developed, they have no negative impact on biodiversity and ecosystems.

#### NATURA 2000

The assessment was conducted using the publicly accessible "Natura 2000 Viewer" of the European Environment Agency (managed by the European Commission)<sup>49</sup> based on the address data of the locations and office buildings. The analysis carried out confirmed that none of the locations or office buildings are in Natura 2000 areas.

#### DISCLOSURE REQUIREMENT E4-1 – TRANSITION PLAN AND CONSIDERATION OF BIODIVERSITY AND ECOSYSTEMS IN STRATEGY AND BUSINESS MODEL

##### DOWNSTREAM VALUE CHAIN

##### 13a-f) Description of the resilience of the strategy and business model in relation to biodiversity and ecosystems

Hypo Vorarlberg understands the resilience analysis as a systematic assessment of unexpected changes, crises and risks with the aim of evaluating and improving its resilience.

A complete risk inventory is a prerequisite for mapping risks. This ensures the comprehensive mapping of all material risks. The ICAAP risk inventory, the ILAAP risk inventory and the risk inventory for sustainability risks are carried out annually by Group Risk Controlling when the risk strategy is revised. With regard to quantification, the focus is currently on climate risks in accordance with the FMA guidelines and the EBA report. Risks related to biodiversity and ecosystems were analysed in 2023 as part of the risk inventory. As the transmission channels were still unclear, the risk was categorised as low at this time. The Bank's portfolios – including loan and financing portfolios and own-account investments – were also subjected to an initial specific analysis (NCNR analysis) to determine the extent to which impacts and dependencies exist in relation to biodiversity and ecosystems. Based on the FMA guidelines on handling sustainability risks, further data collection will be required to take place in 2025. The comprehensive analyses of the portfolios with regard to the NCNR analysis will also be taken into account (see E4 IRO-1.17a, BP-2.10, BP-2.11). The aim is to perform the resilience analysis to the required extent for the coming reporting year 2025.

<sup>49</sup> <https://natura2000.eea.europa.eu/>

## IMPACT, RISK AND OPPORTUNITY MANAGEMENT

### DISCLOSURE REQUIREMENT E4-2 – POLICIES RELATED TO BIODIVERSITY AND ECOSYSTEMS

#### 22) Policies to manage material impacts, risks, dependencies and opportunities related to biodiversity and ecosystems in accordance with ESRS 2 MDR-P

The following is a list of internal policies and strategies related to biodiversity and ecosystems. They primarily result from the sustainability strategy, which is the central guiding document for all strategies relating to sustainability and ESG. The specific implementation and operationalisation of the sustainability strategy took place in the respective specialist departments. Department-specific issues are addressed and effectively implemented with the help of functional strategies.

#### **"Ethics and sustainability criteria (financing business)" policy**

##### **Key content**

Hypo Vorarlberg's "Ethics and sustainability criteria for financing" policy describes the central procedure for taking ESG criteria into account in the financing business and must be applied by all Group employees. The policy is reviewed regularly and was most recently updated in the second half of 2024. The individual sections cover the methodology and the most important steps for reviewing and evaluating potential financing in respect of sustainability aspects and establishing key references to the topic-specific standard E4 Biodiversity and ecosystems. The Bank can actively and directly control the allocation of its funds by defining criteria (e.g. exclusion criteria for certain activities/industries). In this way, it can contribute to the prevention of negative impacts on biodiversity and ecosystems, while at the same time having a positive impact on the achievement of the environmental objectives. The resulting (reputational) opportunities can also be pursued.

The content of the policy can be summarised as follows:

- Scope of application and legal provisions for financing
- Procedure for implementation in financing business:
  - Application of positive criteria
  - Application of exclusion criteria
  - Consideration of sensitive areas:
    - Characteristics that are harmful to the environment or the climate
    - Controversial or morally objectionable characteristics
- Implementation, review and control

##### **General objectives**

In 2017, Hypo Vorarlberg decided to take into account the impact of transactions in its financing business on the environment, the climate and people. Since then, desirable and undesirable transactions in this respect have been identified using a variety of different criteria.

##### **References to material impacts, risks or opportunities**

The topic-specific management of material impacts (positive and negative), risks and opportunities is performed by applying positive criteria and exclusion criteria or by taking sensitive areas into account. In the case of material risks, risk aspects are also taken into account. Where possible, market opportunities are expressed in the form of sustainability aspects in the existing or future product range. The specific references to the material impacts and opportunities are currently as follows:

##### **Impact**

#### **Reduction in biodiversity: Negative impact on biodiversity/extent and condition of ecosystems due to financing and investments in certain industries (e.g. real estate and construction industry due to soil and surface sealing)**

Application of exclusion criteria:

- Construction and operation of nuclear power plants (no direct project financing for nuclear power projects)
- Coal mining (no direct project financing for coal mining projects)

Consideration of sensitive areas:

- Characteristics that are harmful to the environment or the climate:
  - Transactions involving fossil fuels (oil and gas extraction through fracking, oil extraction from tar sands)
  - Flagrant disregard of environmental laws
  - Disregard of generally recognised environmental standards or rules of conduct by large-scale projects (e.g. pipelines, mines, power plants, timber extraction from primary forests)
- Controversial or morally objectionable characteristics:
  - Flagrant disregard of statutory provisions

##### **Reputational opportunity**

#### **Transactions that make a positive contribution to biodiversity (within the value chain) and environmental projects (endangered animal and plant species, conservation of ecosystems)**

Application of positive criteria to projects that fulfil the following environmental objective of the EU taxonomy:

- Protection and restoration of biodiversity and ecosystems

##### **Monitoring process**

Compliance is monitored by Hypo Vorarlberg employees using the dual control principle before the transaction is concluded. Internal Audit also takes the "Ethics and sustainability criteria for financing" into account in its ongoing audits. This forms part of the internal due diligence process.

##### **Area of application**

The policy applies to all employees of the Group who are involved in financing in their business segment, irrespective of their position. The standards set out therein apply to new and existing customers in the financing business.

##### **Responsible organisational level**

The respective specialist department (Credit Management, Sales) is responsible for creating the policy and updating it as required, as well as for its implementation. Coordination is performed by the Sustainability Group in collaboration with Group Risk Controlling, both of which report directly to the Managing Board.

## References to third-party standards or initiatives

The “Ethics and sustainability criteria for financing” policy is based on the requirements of international agreements and ethical standards in the areas of human and labour rights. The relevant agreements and standards are:

- United Nations Human Rights Charter
- Principles of the ILO Declaration on Fundamental Principles and Rights at Work

## Consideration of stakeholder interests

All of the relevant specialist departments at Hypo Vorarlberg are involved in the regular revision of this policy, in particular Sales, Credit Management, Legal, Group Risk Controlling, Sustainability and the Managing Board. Any amendment to this policy requires the renewed involvement of the aforementioned specialist departments.

## Availability of the policy for stakeholders

The “Ethics and sustainability criteria for financing” policy is an internal company document that is made available to all Hypo Vorarlberg employees on the intranet.

## “ESG investment approach (Asset Management)” policy

### Key content

Hypo Vorarlberg’s “ESG investment approach” describes the central procedure for Asset Management and must be applied by all employees in this business segment. The policy is reviewed regularly and was most recently updated in November 2024. The individual sections describe the holistic process and the Hypo ESG rating as its key component, as well as the most important steps for reviewing and evaluating new and existing investments (equities, bonds and target funds) in respect of a range of defined sustainability aspects and establishing key references to the topic-specific standard E4 Biodiversity and ecosystems:

- Overview of financial products (asset management, funds)
- External ESG data sources (Sustainalytics, a Morningstar Group company)
- Procedure for determining the Hypo ESG rating:
  - Selection criteria applied
  - Compliance with international standards through norm-based screening
  - Comparison using the best-in-class approach
  - CO<sub>2</sub> risk (CO<sub>2</sub> risk and CO<sub>2</sub> management, fossil fuels, renewable energies, CO<sub>2</sub> intensity (Scope 1 and 2), stranded assets)
  - Measurable impact on SDGs
  - Controversial business practices (business operations, supply chain (environmental), employees, corporate governance, society and community, products and services, supply chain (social), customers, business ethics, public)
  - Corporate governance (quality and integrity of the Managing Board and management, composition of the Managing Board, ownership and shareholder rights, wages and salaries, auditing and financial reporting, stakeholder treatment)
  - ESG risk rating
  - Approach to calculating ESG country rating:
    - Country risk
    - Freedom House Index (Free, Partly Free, Not Free)
- Measurement and management of the principal adverse impacts (PAIs) on sustainability factors

The material topics are specifically taken into account within the aforementioned framework when selecting securities in accordance with the “ESG investment approach”. All of the figures used in Hypo Vorarlberg’s ESG rating are based on ESG data from the research partner Sustainalytics<sup>50</sup> or publicly accessible databases such as Freedom House<sup>51</sup>.

### General objectives

The main objective of the “ESG investment approach” is to assess and classify ESG aspects in order to minimise potentially negative environmental, social and governance impacts support positive ones by investing directly or indirectly in companies. Since November 2021, all Hypo Vorarlberg funds and asset management strategies that are actively offered have been classified as financial products within the meaning of Article 8 of Regulation (EU) 2019/2088 (Sustainable Finance Disclosure Regulation) and take into account environmental and/or social characteristics.

### References to material impacts, risks or opportunities

The topic-specific management of material impacts (positive and negative) and opportunities is performed in the individual components of Hypo Vorarlberg’s ESG rating. This consists of selection criteria, norm-based screening, a best-in-class approach (CO<sub>2</sub> risk rating, measurable impact on SDGs, controversial economic practices, corporate governance, ESG risk rating) and the country risk for government bonds. The specific references to material impacts and opportunities are currently as follows:

### Impact

#### Reduction in biodiversity: Negative impact on biodiversity/extent and condition of ecosystems due to financing and investments in certain industries (e.g. real estate and construction industry due to soil and surface sealing)

Compliance with international standards through norm-based screening:

- Norm-based screening enables compliance with international norms and standards relating to the environment. It uses the categories “compliant”, “watchlist” and “non-compliant”. “Compliant” companies and securities on the “watchlist” are given equal weighting in the Hypo ESG rating. “Non-compliant” companies are not selected:
  - United Nations Global Compact: Principle 7, 8, 9<sup>52</sup>
  - OECD Guidelines for Multinational Enterprises: Chapter VI – Environment<sup>53</sup>

<sup>50</sup> The information, data, analyses and opinions contained herein (the “Information”): (1) includes the proprietary information of Sustainalytics and/or its content providers; (2) may not be copied or redistributed except as specifically authorized; (3) do not constitute investment advice nor an endorsement of any product, project, investment strategy or consideration of any particular environmental, social or governance related issues as part of any investment strategy; (4) are provided solely for informational purposes; and (5) are not warranted to be complete, accurate or timely. The Information is not directed to, nor intended for distribution to or use by India-based clients and/or users, and the distribution of Information to India resident individuals and entities is not permitted. Neither Morningstar Inc., Sustainalytics, nor their content providers accept any liability for the use of the information, for actions of third parties in respect to the information, nor are responsible for any trading decisions, damages or other losses related to the information or its use. The use of the data is subject to conditions at <https://www.sustainalytics.com/legal-disclaimers>.

<sup>51</sup> [www.freedomhouse.org](http://www.freedomhouse.org)

<sup>52</sup> <https://unglobalcompact.org/what-is-gc/mission/principles>

<sup>53</sup> [https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_81f92357-en.html](https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html)

## Reputational opportunity

**Transactions that make a positive contribution to biodiversity (within the value chain) and environmental projects (endangered animal and plant species, conservation of ecosystems)**

Application of best-in-class approach:

- Measurable impact on SDGs (only a measurable impact on the United Nations Sustainable Development Goals contributes to an improved rating):
  - SDG 14: Life below water
  - SDG 15: Life on land
  - SDG 11: Sustainable cities and communities
  - SDG 13: Climate action

### Monitoring process

Compliance is monitored using the dual control principle. The ESG rating tool is used to examine and ensure compliance with the defined ESG requirements on an ex-ante basis as part of the securities selection process. Investments are only made if the ESG investment approach is complied with at the time of purchase. Securities portfolios are also regularly reviewed. The results are checked for plausibility at product level on an ex-post basis. Additional review steps are initiated if any anomalies are identified.

### Area of application

At product level, the ESG investment approach defines the main requirements for portfolio management, including the distinction between "Investments" and "Other investments". It is divided into two areas: "Selection of individual securities" and "Selection of target funds".

### Responsible organisational level

The Asset Management department, which reports directly to the Managing Board, is responsible for creating the policy and updating it as required, as well as for its implementation.

### References to third-party standards or initiatives

The "ESG investment approach" is based on European directives and guidelines from international organisations. The relevant directives and guidelines are:

- Sustainable Finance Disclosure Regulation (EU 2019/2088) (SFDR)
- Regulation (EU) 2021/1253 on sustainability in connection with MiFID II
- United Nations principles for responsible corporate governance (United Nations Global Compact)
- OECD Guidelines for Multinational Enterprises
- United Nations Guiding Principles on Business and Human Rights
- United Nations Sustainable Development Goals (UN SDGs)
- Degree of freedom according to the non-governmental organisation Freedom House

### Consideration of stakeholder interests

All relevant stakeholders and knowledge bearers at Hypo Vorarlberg were involved in the creation of this policy, in particular the specialist departments for Asset Management, Compliance and Sustainability. Any amendment to this policy requires the renewed involvement of the aforementioned stakeholders.

### Availability of the policy for stakeholders

The ESG investment approach is available on Hypo Vorarlberg's website.<sup>54</sup>

## "ESG in own-account investments (Treasury: APM & Investments)" policy

### Key content

The "ESG in own-account investments (Treasury: APM & Investments)" document describes Hypo Vorarlberg's central procedure for taking ethics and sustainability criteria into consideration in its own-account investments. This investment strategy must be taken into account by all Hypo Vorarlberg employees working in this business segment. It is regularly reviewed and updated, most recently in May 2024. By taking sustainability aspects into account when making investment decisions, the company aims to support the transition to a climate-neutral economy and indirectly influence companies to focus on environmental and social responsibility to a greater extent. This is based on compliance standards, minimum requirements, positive and exclusion criteria and the definition of sensitive areas. Investments are checked for compliance with these criteria, with a particular focus on human rights, environmental and social aspects. Country-specific risk assessments are applied for government bonds in order to comprehensively assess political and economic stability. The following aspects can also be used to establish a reference to the topic-specific standard E4 Biodiversity and ecosystems:

- Scope of application and legal provisions for financing
- Procedure for implementation in financing business:
  - Application of positive criteria
  - Application of exclusion criteria
  - Consideration of sensitive areas:
    - Characteristics that are harmful to the environment or the climate
    - Controversial or morally objectionable characteristics
- Implementation, review and control

Compliance with these criteria is reviewed by reference to data from external ESG research partners. If no data is available or the intended use is not known, the valuation is carried out on the basis of available company information.

### General objectives

The main objective of the document is to promote sustainable investments, ensure compliance with ethical standards and minimise risk by avoiding investments in socially or environmentally problematic areas. Hypo Vorarlberg aims to invest exclusively in forms of investment that comply with international ethical standards and to exclude high-risk areas that do not satisfy these standards.

<sup>54</sup> [https://www.hypovbg.at/fileadmin/Hypovbg/Hypo-Vorarlberg/Nachhaltigkeit/Offenlegungen/ESG-Investmentansatz-Hypo-Vorarlberg\\_02-01-2025.pdf](https://www.hypovbg.at/fileadmin/Hypovbg/Hypo-Vorarlberg/Nachhaltigkeit/Offenlegungen/ESG-Investmentansatz-Hypo-Vorarlberg_02-01-2025.pdf)

## References to material impacts, risks or opportunities

The topic-specific management of material impacts (positive and negative), risks and opportunities is performed by applying positive criteria and exclusion criteria or by taking sensitive areas into account. The specific references to the material impacts and opportunities are currently as follows:

### Impact

#### Reduction in biodiversity: Negative impact on biodiversity/extent and condition of ecosystems due to financing and investments in certain industries (e.g. real estate and construction industry due to soil and surface sealing)

Consideration of sensitive areas:

- Characteristics that are harmful to the environment or the climate:
  - Flagrant disregard of environmental laws
  - Disregard of generally recognised environmental standards or rules of conduct by large-scale projects
- Controversial or morally objectionable characteristics:
  - Flagrant disregard of statutory provisions

Compliance with international standards through norm-based screening:

- Norm-based screening enables compliance with international norms and standards relating to the environment. No investments are made in companies that violate international environmental norms and standards. The basis for screening is as follows:
  - United Nations Global Compact: Principle 7, 8, 9<sup>55</sup>
  - OECD Guidelines for Multinational Enterprises: Chapter VI – Environment<sup>56</sup>

### Reputational opportunity

#### Transactions that make a positive contribution to biodiversity (within the value chain) and environmental projects (endangered animal and plant species, conservation of ecosystems)

Positive criteria are reviewed by checking for the presence of the following two characteristics:

- Conformity with the Green Bond Principles, the Social Bond Principles, the Sustainability-Linked Bond Principles or the Sustainability Bond Guidelines
- Classification as an ESG investment and provision of a second party opinion by a recognised sustainability rating agency

### Monitoring process

Compliance is monitored by the Treasury APM & Investments Group using the dual control principle and is regularly audited by Internal Audit.

### Area of application

The document applies to all employees and covers Hypo Vorarlberg's direct investments. Supply chains and shareholdings are not currently subject to mandatory review, as this is generally not possible due to data availability.

### Responsible organisational level

The Treasury: APM & Investments specialist department, which reports directly to the Managing Board, is responsible for creating the document and updating it as required, as well as for its implementation.

### References to third-party standards or initiatives

The "ESG in own-account investments (Treasury: APM & Investments)" document is based on international agreements and standards in the areas of human rights, labour standards, the environment and corruption prevention, including:

- Principles of the United Nations Global Compact
- OECD Guidelines for Multinational Enterprises
- United Nations Guiding Principles on Business and Human Rights

### Consideration of stakeholder interests

The interests of all relevant stakeholders were taken into account in the creation of this document and knowledge bearers at Hypo Vorarlberg were involved, in particular the specialist departments for Own-account Investments, Data Protection and Compliance as well as the Sustainability Group. Any amendment to this policy requires a renewed assessment by the aforementioned stakeholders.

### Availability of the policy for stakeholders

The "ESG in own-account investments (Treasury: APM & Investments)" document is an internal document that is made available to all Hypo Vorarlberg employees via a database.

## 23a) Discussion of biodiversity and ecosystems-related policies in connection with the aspects specified in ESRS E4-AR 4

The topics of biodiversity and ecosystems are taken into account in various strategies at Hypo Vorarlberg (see above). All of the influencing factors specified in ESRS E4-AR4 were assessed as part of the materiality analysis and, where they corresponded to Hypo Vorarlberg's business model, were analysed. Factors that are not applicable to credit institutions or that cannot be identified and controlled were not followed up. Comprehensive analyses of the dependency on and impact of biodiversity and ecosystems were carried out at portfolio level in particular (see NCNR, E4 IRO-1.17a, BP-2.10, BP-2.11). The topics of i) climate change in E1, ii) land-use change from the perspective of investment and financing in E4 and v) air pollution in E2 were included in the strategies and policies.

Hypo Vorarlberg integrates biodiversity and ecosystems into the strategic orientation of its core business through topic-specific positive criteria, exclusion criteria and selection criteria and by taking account of "sensitive areas". For example, financing that seeks to achieve the environmental objectives of the EU taxonomy (e.g. the protection and restoration of biodiversity) is particularly desirable. By contrast, financing with characteristics that are harmful to the environment or the climate (e.g. timber extraction from primary forests, deep-sea fishing that endangers fish stocks) requires particular scrutiny. The aim is to minimise negative impacts and risks and pursue positive opportunities.

<sup>55</sup> <https://unglobalcompact.org/what-is-gc/mission/principles>

<sup>56</sup> [https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_81f92357-en.html](https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html)

**23b) Discussion of material biodiversity and ecosystems-related impacts**

The identified impact "Reduction in biodiversity through a negative impact on biodiversity and/or the extent and condition of ecosystems due to financing and investments in certain industries (real estate and construction)" was taken into account in the department-specific policies. In this way, Hypo Vorarlberg seeks to contribute directly to preventing the reduction in biodiversity. Characteristics of financing that are potentially harmful to the environment or the climate are also addressed. International standards are taken into account in the asset management portfolio and norm-based screening is applied. In the own-account investment portfolio, positive criteria are applied in order to prevent potential negative impacts in all areas, including biodiversity and the condition of ecosystems (see "References to material impacts, opportunities or risks" in the policies under E4 above).

**23c) Discussion of material interdependencies between physical and transition risks and opportunities related to biodiversity and ecosystems**

Hypo Vorarlberg has identified reputational opportunities from transactions that make a positive contribution to biodiversity (within the value chain) and environmental projects (endangered animal and plant species, conservation of ecosystems). This opportunity is already being pursued through the policies implemented. In the area of credit management, positive criteria are applied in line with the environmental objectives of the EU taxonomy in order to promote the conservation, protection and restoration of biodiversity. Asset Management has implemented the best-in-class approach in order to track measurable impacts on the SDGs. The own-account investment portfolio is based on positive criteria that require the presence of two characteristics. Compliance with principles for green and social bonds and classification by an external sustainability agency as a "second party opinion" (see "References to material impacts, opportunities or risks" in the policies under E4 above).

**23d) Support for the traceability of products, components and raw materials with material impacts on biodiversity and ecosystems along the value chain**

As Hypo Vorarlberg is a credit institution and does not manufacture any physical products, the disclosure requirement for this data point does not apply.

**23e) Consideration of production, sourcing or consumption from ecosystems that are managed to maintain or enhance conditions for biodiversity**

As Hypo Vorarlberg is a credit institution and does not manufacture any physical products, the disclosure requirement for this data point does not apply.

**23f) Inclusion of social consequences of biodiversity and ecosystems-related impacts**

No social consequences or biodiversity and ecosystems-related impacts were identified. Nevertheless, Hypo Vorarlberg's investment and financing policies (see E4-3) are based on international agreements and standards in the areas of human rights, labour standards, the environment and corruption prevention.

**24) Specific disclosure of whether the undertaking has adopted****24a) Biodiversity and ecosystem protection policies covering operational sites in or near a protected area or a biodiversity sensitive area**

In the current reporting period, Hypo Vorarlberg examined all of its locations to determine whether they are located near a protected area or a biodiversity sensitive area. The analysis found that none of the locations meet these criteria, meaning there is no need to adopt or introduce a separate policy (see E4 SBM 3.16a.ii-iii, b, c).

**24b) Sustainable land use and agriculture practices or policies**

Topic-specific practices (exclusion criteria, positive criteria and sensitive areas) have a general effect, meaning they also apply to land use and agriculture: Financing with characteristics that are harmful to the environment or the climate (e.g. timber extraction from primary forests) requires particular scrutiny. No special strategies are currently planned.

**24c) Sustainable oceans/seas practices or policies**

Topic-specific practices (exclusion criteria, positive criteria and sensitive areas) have a general effect, meaning they also apply to oceans/seas: Financing with characteristics that are harmful to the environment or the climate (e.g. deep-sea fishing that endangers fish stocks) requires particular scrutiny. No special strategies are currently planned.

**24d) Policies to address deforestation**

Topic-specific practices (exclusion criteria, positive criteria and sensitive areas) have a generalised effect, meaning they also apply to combating deforestation: Financing with characteristics that are harmful to the environment or the climate (e.g. timber extraction from primary forests) requires particular scrutiny. No special strategies are currently planned.

## DISCLOSURE REQUIREMENT E4-3 – ACTIONS AND RESOURCES RELATED TO BIODIVERSITY AND ECOSYSTEMS

### 27) Actions and resources in relation to biodiversity and ecosystems in accordance with ESRS 2 MDR-A

The following is a list of actions related to biodiversity and ecosystems. Actions for biodiversity and ecosystems can be derived on the basis of the topic-specific requirements addressed in the sustainability strategy. The respective specialist departments are responsible for defining and implementing the individual actions. Most of these are also set out in separate policies or work instructions.

| Financing business                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Key measures</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Taken</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <p>The individual measures cover the most important criteria as outlined below (positive criteria and sensitive areas) for reviewing and evaluating potential financing in respect of sustainability aspects and establishing material references to the topic-specific standard E4 Biodiversity and ecosystems:</p> <ul style="list-style-type: none"><li>▪ In the case of financing with new customers, the positive criteria of the sixth environmental objective of the EU taxonomy are applied:<ul style="list-style-type: none"><li>▪ Protection and restoration of biodiversity and ecosystems</li></ul></li><li>▪ The positive criteria are also applied to financing of new business and extensions for existing customers</li><li>▪ In addition, sensitive areas for potential financing that are subject to more extensive scrutiny are defined:<ul style="list-style-type: none"><li>▪ Characteristics that are harmful to the environment or the climate:<ul style="list-style-type: none"><li>Transactions involving fossil fuels (oil and gas extraction through fracking, oil extraction from tar sands)</li><li>Flagrant disregard of environmental laws</li><li>Disregard of generally recognised minimum environmental standards or rules of conduct by large-scale projects (e.g. timber extraction from primary forests, deep-sea fishing that endangers fish stocks)</li></ul></li><li>▪ Controversial or morally objectionable characteristics:<ul style="list-style-type: none"><li>Flagrant disregard of statutory provisions</li></ul></li></ul></li></ul> |
| <b>Planned</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <p><b>Extended NCNR analysis to derive specific measures</b></p> <p>The evaluation of the individual industry sectors delivered an initial indication of potential risks and opportunities in the lending portfolio. In order to derive specific measures in this area, Hypo Vorarlberg will conduct an extended analysis next year including geographical data at country level (e.g. data relevant for biodiversity).</p> <p><b>Application of the guiding principles of the “Principles for Responsible Banking” (PRB)</b> in order to analyse potential risks and opportunities in the portfolio in more detail. A sector analysis and a dialogue with companies are planned for 2025. Three categories of interaction are to be considered:</p> <ul style="list-style-type: none"><li>▪ Supporting companies to pursue joint opportunities (“seek out”)</li><li>▪ Engaging in dialogue with companies to obtain sufficient information (“engage”)</li><li>▪ Engaging in dialogue with companies to obtain the necessary data to minimise risks (“challenge”)</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Expected results</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <p><b>Expected results concerning environmental risks (NCNR analysis)</b></p> <p>Based on the analysis initiated in 2024, a methodology has been developed that will enable the company to identify potential areas of action for the portfolios in the coming years in order to minimise material negative impacts and risks, support positive impacts and pursue opportunities in the environmental topics (air pollution, biodiversity and circular economy). To this end, the analysis must be applied at least once a year in order to periodically evaluate Hypo Vorarlberg’s loan portfolio for environmental risks and to integrate the pool of data from publicly available databases, which are continuously updated and expanded. Engaging in dialogue with companies in accordance with the Principles for Responsible Banking is also expected to raise awareness of environmental risks, which can help to improve the results.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Contribution to the realisation of the objectives and targets of the policy</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <p>The measures already taken are consistent with the objective of the “Ethics and sustainability criteria for financing” policy, which essentially aims to take into account the impact of financing on the environment, the climate and people. The material impacts, risks and opportunities identified in the double materiality assessment are already addressed in part:</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Impact</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| <p><b>Reduction in biodiversity: Negative impact on biodiversity/extent and condition of ecosystems due to financing and investments in certain industries (e.g. real estate and construction industry due to soil and surface sealing)</b></p> <p>Application of exclusion criteria:</p> <ul style="list-style-type: none"><li>▪ Construction and operation of nuclear power plants (no direct project financing for nuclear power projects)</li><li>▪ Exclusion of coal mining (no direct project financing for coal mining projects)</li></ul> <p>Consideration of sensitive areas:</p> <ul style="list-style-type: none"><li>▪ Characteristics that are harmful to the environment or the climate:<ul style="list-style-type: none"><li>▪ Transactions involving fossil fuels (oil and gas extraction through fracking, oil extraction from tar sands)</li><li>▪ Flagrant disregard of environmental laws</li><li>▪ Disregard of generally recognised environmental standards or rules of conduct by large-scale projects (e.g. pipelines, mines, power plants, timber extraction from primary forests)</li></ul></li><li>▪ Controversial or morally objectionable characteristics:<ul style="list-style-type: none"><li>▪ Flagrant disregard of statutory provisions</li></ul></li></ul>                                                                                                                                                                                                                                                                                        |
| <b>Reputational opportunity</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <p><b>Transactions that make a positive contribution to biodiversity (within the value chain) and environmental projects (endangered animal and plant species, conservation of ecosystems)</b></p> <p>Application of positive criteria to projects that fulfil the following environmental objective of the EU taxonomy:</p> <ul style="list-style-type: none"><li>▪ Protection and restoration of biodiversity and ecosystems</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |



### Scope and area of application

The measures taken are designed to be consistent with the policy and apply throughout the Group. The planned measures will also cover the entire value chain.

### Time horizon

The measures taken have a long-term time horizon (more than five years). The planned measures have a short-term perspective (up to 1 year). All measures are regularly reviewed as part of a continuous process (PDCA) and adjusted as necessary.

### Key remedial measures

The measures taken have a preventive effect. No further remedial measures are linked to the provision of financing.

### Progress

The measures taken have already been implemented and are reviewed annually to determine whether they need to be adjusted. There was no need for any qualitative adjustments compared to the previous year. No quantitative measurements were carried out.

## Asset Management

### Key measures

#### Taken

The following measures taken include the procedure for determining Hypo Vorarlberg's ESG rating in the area of investment strategies and in the selection of target funds. The measures also cover the measurement and controlling of potential negative impacts on the sustainability factors for investments:

- Application of defined selection criteria for direct and indirect investments in companies that exceed revenue thresholds in certain business areas:
  - Transactions involving fossil fuels (oil and gas extraction through fracking, oil extraction from tar sands)
  - Exclusion of investments by companies that cause significant emissions of air pollutants (such as the coal industry)
  - Loss of biodiversity due to certain industries (use of genetic engineering in agriculture, tobacco industry)
- Implementation of norm-based screening: When making investment decisions, no investments are made in companies that violate international norms and standards in the areas of human and labour rights, the environment and corruption. Companies are also categorised as "compliant", "watchlist" or "non-compliant". Companies categorised as "non-compliant" are not selected for investments
- The application of the best-in-class approach takes the following areas into account:
  - GHG risk and GHG management: Comparison of companies to identify those with the lowest risk in connection with the transition to a low-carbon economy
  - Companies that have a measurable impact on one or more of the United Nations SDGs (e.g. zero hunger, good health and well-being, quality education, life on land and below water, sustainable cities and communities, responsible consumption and production) have a better rating
  - Companies without controversial incidents with a potentially negative impact on stakeholders, the environment or operations have a lower risk and hence a better rating
  - Companies with good corporate governance (e.g. composition of the Managing Board, wages and salaries, stakeholder treatment) have a better rating
  - Companies that are only exposed to low ESG risks or a small number of ESG risks have a better rating (risk exposure and risk management), including taking the LCTR (= implied temperature alignment) into account
- In the case of government bonds, only bonds with a medium risk (at least C-) on a rating scale of A-E are authorised in order to limit potential negative impacts. The country risk rating is supplied by an external service provider and is included in the overall assessment of the Hypo ESG rating
- Measurement and management of the principal adverse impacts (PAIs) on sustainability factors through the publication of the PAI statement
- Annual ESG screening of the Hypo Vorarlberg funds by an external service provider to ensure transparency and comparability

#### Planned

### Extended NCNR analysis to derive specific measures

The evaluation of the individual industry sectors delivered an initial indication of potential risks and opportunities in the asset management portfolio. In order to derive specific measures in this area, Hypo Vorarlberg will potentially conduct an extended analysis next year including geographical data at country level (e.g. data relevant for biodiversity).

**Application of the guiding principles of the "Principles for Responsible Banking" (PRB)** in order to analyse potential risks and opportunities in the portfolio in more detail. A sector analysis and a dialogue with companies are planned for 2025. Three categories of interaction are to be considered:

- Supporting companies to pursue joint opportunities ("seek out")
- Engaging in dialogue with companies to obtain sufficient information ("engage")
- Engaging in dialogue with companies to obtain the necessary data to minimise risks ("challenge")

### Expected results

#### Expected results concerning environmental risks (NCNR analysis)

Based on the analysis launched this year, a methodology was developed that will enable the company to identify potential areas of action for the portfolios in the coming years in order to minimise material negative impacts and risks, support positive impacts and pursue opportunities in the environmental topics (air pollution, biodiversity and circular economy). To this end, the analysis must be applied at least once a year in order to periodically evaluate Hypo Vorarlberg's asset management portfolio for environmental risks and to integrate the pool of data from publicly available databases, which are continuously updated and expanded. Engaging in dialogue with companies in accordance with the Principles for Responsible Banking is also expected to raise awareness of environmental risks, which can help to improve the results.

### Contribution to the realisation of the objectives and targets of the policy

The measures already taken are consistent with the objective of the "ESG investment approach" policy, which essentially involves promoting sustainable investments and minimising the potential impact of problematic forms of investment on the environment, the climate and people. The material impacts, risks and opportunities identified in the double materiality assessment are addressed as follows:



## Impact

**Reduction in biodiversity: Negative impact on biodiversity/extent and condition of ecosystems due to financing and investments in certain industries (e.g. real estate and construction industry due to soil and surface sealing)**

Compliance with international standards through norm-based screening:

- Norm-based screening enables compliance with international norms and standards relating to the environment. It uses the categories "compliant", "watchlist" and "non-compliant". "Compliant" companies and securities on the "watchlist" are given equal weighting in the Hypo ESG rating. "Non-compliant" companies are not selected:
  - United Nations Global Compact: Principle 7, 8, 9<sup>57</sup>
  - OECD Guidelines for Multinational Enterprises: Chapter VI – Environment<sup>58</sup>

## Reputational opportunity

**Transactions that make a positive contribution to biodiversity (within the value chain) and environmental projects (endangered animal and plant species, conservation of ecosystems)**

Application of best-in-class approach:

- Measurable impact on SDGs (only a measurable impact on the United Nations Sustainable Development Goals contributes to an improved rating):
  - SDG 14: Life below water
  - SDG 15: Life on land
  - SDG 11: Sustainable cities and communities
  - SDG 13: Climate action

## Scope and area of application

The measures taken are designed to be consistent with the policy and apply to the Bank. There are location-specific deviations at the St. Gallen branch.

## Time horizon

The measures taken have a long-term time horizon (more than five years). The planned measures have a short-term perspective (up to 1 year). All measures are regularly reviewed as part of a continuous process (PDCA) and adjusted as necessary.

## Key remedial measures

The measures taken have a direct effect. The criteria to be taken into account contribute directly to remedial action.

## Progress

The measures taken have already been implemented and are reviewed annually to determine whether they need to be adjusted. There was no need for any qualitative adjustments compared to the previous year. Quantitative measurements are carried out on a quarterly basis via the rating process.

## Own-account investments

### Key measures

#### Taken

The individual measures cover the most important criteria as outlined below for reviewing and evaluating potential investments in respect of sustainability aspects and establishing material references to the topic-specific standard E4 Biodiversity and ecosystems:

- Implementation of norm-based screening: When making investment decisions (new purchases), no investments are made in companies that violate international environmental standards and norms. The screening is based on the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights.
- Positive criteria are reviewed by checking for the presence of the following two characteristics:
  - Conformity with the Green Bond Principles, the Social Bond Principles, the Sustainability-Linked Bond Principles or the Sustainability Bond Guidelines
  - Classification as an ESG investment and provision of a second party opinion by a recognised sustainability rating agency
- In addition to exclusion criteria, sensitive areas for potential investments that are subject to more extensive scrutiny are defined in order to identify characteristics that are controversial, morally objectionable, or harmful to the climate or the environment (e.g. timber extraction from primary forests, deep-sea fishing that endangers fish stocks)

Compliance with these criteria is reviewed by reference to data from external ESG research partners. If no data is available or the intended use is not known, the valuation is carried out on the basis of available company information.

#### Planned

### Extended NCNR analysis to derive specific measures

The evaluation of the individual industry sectors delivered an initial indication of potential risks and opportunities in the own-account investment portfolio. In order to derive specific measures in this area, Hypo Vorarlberg will potentially conduct an extended analysis next year including geographical data at country level (e.g. data relevant for biodiversity).

**Application of the guiding principles of the "Principles for Responsible Banking" (PRB)** in order to analyse potential risks and opportunities in the portfolio in more detail. A sector analysis and a dialogue with companies are planned for 2025. Three categories of interaction are to be considered:

- Supporting companies to pursue joint opportunities ("seek out")
- Engaging in dialogue with companies to obtain sufficient information ("engage")
- Engaging in dialogue with companies to obtain the necessary data to minimise risks ("challenge")

<sup>57</sup> <https://unglobalcompact.org/what-is-gc/mission/principles>

<sup>58</sup> [https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_81f92357-en.html](https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html)

## Expected results

### Expected results concerning environmental risks (NCNR analysis)

Based on the analysis launched this year, a methodology was developed that will enable the company to identify potential areas of action for the portfolios in the coming years in order to minimise material negative impacts and risks, support positive impacts and pursue opportunities in the environmental topics (air pollution, biodiversity and circular economy). To this end, the analysis must be applied at least once a year in order to periodically evaluate Hypo Vorarlberg's own-account investment portfolio for environmental risks and to integrate the pool of data from publicly available databases, which are constantly updated and expanded. Engaging in dialogue with companies in accordance with the Principles for Responsible Banking is also expected to raise awareness of environmental risks, which can help to improve the results.

### Contribution to the realisation of the objectives and targets of the policy

The measures already taken are consistent with the objective of the "ESG in own-account investments (Treasury: APM & Investments)" policy, which essentially involves promoting sustainable investments and minimising the potential impact of problematic forms of investment on the environment, the climate and people. The material impacts, risks and opportunities identified in the double materiality assessment are addressed as follows:

#### Impact

### Reduction in biodiversity: Negative impact on biodiversity/extent and condition of ecosystems due to financing and investments in certain industries (e.g. real estate and construction industry due to soil and surface sealing)

Consideration of sensitive areas:

- Characteristics that are harmful to the environment or the climate:
  - Flagrant disregard of environmental laws
  - Disregard of generally recognised environmental standards or rules of conduct by large-scale projects
- Controversial or morally objectionable characteristics:
  - Flagrant disregard of statutory provisions

Compliance with international standards through norm-based screening:

- Norm-based screening enables compliance with international norms and standards relating to the environment. No investments are made in companies that violate international environmental norms and standards. The basis for screening is as follows:
  - United Nations Global Compact: Principle 7, 8, 9<sup>59</sup>
  - OECD Guidelines for Multinational Enterprises: Chapter VI – Environment<sup>60</sup>

#### Reputational opportunity

### Transactions that make a positive contribution to biodiversity (within the value chain) and environmental projects (endangered animal and plant species, conservation of ecosystems)

Positive criteria are reviewed by checking for the presence of the following two characteristics:

- Conformity with the Green Bond Principles, the Social Bond Principles, the Sustainability-Linked Bond Principles or the Sustainability Bond Guidelines
- Classification as an ESG investment and provision of a second party opinion by a recognised sustainability rating agency

### Scope and area of application

The measures taken are designed to be consistent with the policy and apply throughout the Group. The planned measures will also cover the entire value chain.

#### Time horizon

The measures taken have a long-term time horizon (more than five years). The planned measures have a short-term perspective (up to 1 year). All measures are regularly reviewed as part of a continuous process (PDCA) and adjusted as necessary.

### Key remedial measures

The measures taken have a direct effect. The criteria to be taken into account contribute directly to remedial action.

### Progress

The measures taken have already been implemented and are reviewed annually to determine whether they need to be adjusted. There was no need for any qualitative adjustments compared to the previous year. No quantitative measurements were carried out.

## ESRS 2 69) Disclosure requirements for action plans with significant OpEx and/or CapEx requirements

### ESRS 2 69a) Disclosure of current and future resources allocated to the action plan

The allocation of current and future operating expenditures and capital expenditures was not carried out in the current reporting period.

### ESRS 2 69b-c) Disclosure of the amount of current and future resources and discussion of how they relate to the most relevant amounts presented in the financial statements

As this data was not collected in the reporting period, no information is available.

### 28b-c) Disclosure of whether the undertaking used biodiversity offsets in its action plans and provision of relevant information

Hypo Vorarlberg does not currently provide for any biodiversity offsets in its action plans.

<sup>59</sup> <https://unglobalcompact.org/what-is-gc/mission/principles>

<sup>60</sup> [https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_81f92357-en.html](https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html)

## METRICS AND TARGETS

### DISCLOSURE REQUIREMENT E4-4 – TARGETS RELATED TO BIODIVERSITY AND ECOSYSTEMS

#### 32a-f) Disclosures on whether ecological thresholds and allocations of impacts to the undertaking were applied when setting targets

Hypo Vorarlberg has not defined any measurable time-bound targets for biodiversity and ecosystems in accordance with MDR-T in the current reporting period. Consequently, no thresholds were applied (see ESRS 2.81 a, bi and ii). A target related to biodiversity and ecosystems is allocated exclusively to the downstream value chain in order to enable the potential controlling of the portfolios in relation to investments and financing.

#### ESRS 2.81) If the undertaking has not set any measurable outcome-oriented targets

##### ESRS 2.81a) Disclosure of whether the undertaking intends to set such targets and the timeframe for doing so, or the reasons why the undertaking does not set such targets

There is no question that financial institutions and companies can have an impact (positive or negative) on biodiversity and ecosystems through their activities. Hypo Vorarlberg therefore addresses the topic of biodiversity and ecosystems on several levels:

#### STRATEGY

This topic is enshrined in the Group-wide sustainability strategy in order to emphasise its importance for Hypo Vorarlberg. As part of the "Hypo Effect" topics, the focus is on both qualitative and quantitative analyses (for details of the qualitative analysis see E4-3, E4 IRO 1.17a, BP-2.10, BP-2.11).

#### PORTFOLIO ANALYSIS

No measurable time-bound targets were defined for the current reporting period, but a comprehensive analysis of the various portfolios was conducted. The analysis covered not only the entire lending and financing portfolio, but also the areas of own-account investments, asset management and the leasing business of the respective subsidiaries. The results not only serve to supplement the assumptions in the materiality analysis, but also directly form the basis for practices that will be evaluated for a potential (strategic) objective in future.

#### GROUP RISK CONTROLLING

Nature-related risks (biodiversity) are also taken into account in the Group's risk assessment. Based on the analyses carried out in 2024, steps and measures that also enable an analysis from the perspective of Group Risk Controlling have already been evaluated.

#### ESRS 2.81bi-ii) Disclosure of whether the undertaking tracks the effectiveness of its policies and actions in relation to impacts, risks and opportunities, including the procedures, the targets set and the time periods

The effectiveness of the strategies and actions in relation to impacts, risks and opportunities is ensured by the monitoring process defined in the policies (see E4-2, E4-3). The strategies and actions are reviewed regularly (at least annually) and adjusted as necessary. The monitoring process takes account of various internal stakeholders (specialist departments, the Managing Board and, as part of its regular auditing activities, Internal Audit).

### DISCLOSURE REQUIREMENT E4-5 – IMPACT METRICS RELATED TO BIODIVERSITY AND ECOSYSTEMS CHANGE

#### 35) Number and area (in hectares) of biodiversity sensitive areas adversely affected by the undertaking in or near protected areas or key biodiversity areas

Operational sites and office buildings have no negative impact on the aforementioned topics (for details of the approach and analysis see E4 SBM-3.16a.ii-iii, b, c).

## ESRS E5: RESOURCE USE AND CIRCULAR ECONOMY

### IMPACT, RISK AND OPPORTUNITY MANAGEMENT

#### DISCLOSURE REQUIREMENT E5-1 – POLICIES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

##### DOWNSTREAM VALUE CHAIN

##### 14) Policies to manage material impacts, risks and opportunities related to resource use and the circular economy in accordance with ESRS 2 MDR-P

The following is a list of internal policies and strategies related to resource use and the circular economy. They primarily result from the sustainability strategy, which is the central guiding document for all strategies relating to sustainability and ESG. The specific implementation and operationalisation of the sustainability strategy takes place in the respective specialist departments. Department-specific issues are addressed and effectively implemented with the help of functional strategies.

##### “Ethics and sustainability criteria (financing business)” policy

###### Key content

Hypo Vorarlberg’s “Ethics and sustainability criteria for financing” policy describes the central procedure for taking ESG criteria into account in the financing business and must be applied by all Group employees. The policy is reviewed regularly and was most recently updated in the second half of 2024. The individual sections cover the methodology and the most important steps for reviewing and evaluating potential financing in respect of sustainability aspects and establishing material references to the topic-specific standard E5 Resource use and circular economy. The Bank can actively and directly control the allocation of its funds by defining criteria (e.g. exclusion criteria for certain activities/industries). In this way, it can contribute to the prevention of negative impacts on the use of resources and the circular economy, while at the same time having a positive impact on the achievement of the environmental objectives. The resulting (reputational) opportunities can also be pursued. The content of the policy can be summarised as follows:

- Scope of application and legal provisions for financing
- Procedure for implementation in financing business:
  - Application of positive criteria
  - Application of exclusion criteria
  - Consideration of sensitive areas:
    - Characteristics that are harmful to the environment or the climate
    - Controversial or morally objectionable characteristics
- Implementation, review and control

###### General objectives

In 2017, Hypo Vorarlberg decided to take into account the impact of transactions in its financing business on the environment, the climate and people. Since then, desirable and undesirable transactions in this respect have been identified using a variety of different criteria.

###### References to material impacts, risks or opportunities

The topic-specific management of material impacts (positive and negative), risks and opportunities is performed by applying positive criteria and exclusion criteria or by taking sensitive areas into account. In the case of material risks, risk aspects are also taken into account. Where possible, market opportunities are expressed in the form of sustainability aspects in the existing or future product range. The specific references to the material impacts and opportunities are currently as follows:

###### Impacts

##### **Increase in resource consumption: Negative impact on the environment due to financing of resource-intensive companies without measures to reduce consumption**

Consideration of sensitive areas:

- Characteristics that are harmful to the environment or the climate:
  - Transactions involving fossil fuels (oil and gas extraction through fracking, oil extraction from tar sands)
  - Flagrant disregard of environmental laws
  - Disregard of generally recognised environmental standards or rules of conduct by large-scale projects (e.g. pipelines, mines, power plants, timber extraction from primary forests)
- Controversial or morally objectionable characteristics:
  - Flagrant disregard of statutory provisions

##### **Reduction in resource consumption: Positive impact on the environment due to financing that contributes to a sustainable circular economy**

Application of positive criteria:

- Projects that correspond to the following environmental objectives of the EU taxonomy:
  - Transition to a circular economy

###### Reputational opportunity

##### **Transactions with a positive contribution to minimising resource consumption**

Application of positive criteria:

- Projects that correspond to the following environmental objectives of the EU taxonomy:
  - Sustainable use and protection of water and marine resources
  - Transition to a circular economy

Implementation in the product range:

- Klima-Kredit:
  - Renovation work to lower energy requirements
  - Installation of sustainable building automation systems
  - Installation of energy-saving and sustainable heating, ventilation, air conditioning and hot water systems
  - Installation of renewable energy technologies such as solar systems and heat pumps
- Klima-Schnell-Kredit:
  - Purchase of energy-saving/energy-efficient appliances

### Monitoring process

Compliance is monitored by Hypo Vorarlberg employees using the dual control principle before the transaction is concluded. Internal Audit also takes the "Ethics and sustainability criteria for financing" into account in its ongoing audits. This forms part of the internal due diligence process.

### Area of application

The policy applies to all employees of the Group who are involved in financing in their business segment, irrespective of their position. The standards set out therein apply to new and existing customers in the financing business.

### Responsible organisational level

The respective specialist department (Credit Management, Sales) is responsible for creating the policy and updating it as required, as well as for its implementation. Coordination is performed by the Sustainability Group in collaboration with Group Risk Controlling, both of which report directly to the Managing Board.

### References to third-party standards or initiatives

The "Ethics and sustainability criteria for financing" policy is based on the requirements of international agreements and ethical standards in the areas of human and labour rights. The relevant agreements and standards are:

- United Nations Human Rights Charter
- Principles of the ILO Declaration on Fundamental Principles and Rights at Work

### Consideration of stakeholder interests

All of the relevant specialist departments at Hypo Vorarlberg are involved in the regular revision of this policy, in particular Sales, Credit Management, Legal, Group Risk Controlling, Sustainability and the Managing Board. Any amendment to this policy requires the renewed involvement of the aforementioned specialist departments.

### Availability of the policy for stakeholders

The "Ethics and sustainability criteria for financing" policy is an internal company document that is made available to all Hypo Vorarlberg employees on the intranet.

## "ESG investment approach (Asset Management)" policy

### Key content

Hypo Vorarlberg's "ESG investment approach" describes the central procedure for Asset Management and must be applied by all employees in this business segment. The policy is reviewed regularly and was most recently updated in November 2024. The individual sections describe the holistic process and the Hypo ESG rating as its key component, as well as the most important steps for reviewing and evaluating new and existing investments (equities, bonds and target funds) in respect of a range of defined sustainability aspects and establishing material references to the topic-specific standard E5 Resource use and circular economy:

- Overview of financial products (asset management, funds)
- External ESG data sources (Sustainalytics, a Morningstar Group company)
- Procedure for determining the Hypo ESG rating:
  - Selection criteria applied
  - Compliance with international standards through norm-based screening
  - Comparison using the best-in-class approach
  - CO<sub>2</sub> risk (CO<sub>2</sub> risk and CO<sub>2</sub> management, fossil fuels, renewable energies, CO<sub>2</sub> intensity (Scope 1 and 2), stranded assets)
  - Measurable impact on SDGs
  - Controversial business practices (business operations, supply chain (environmental), employees, corporate governance, society and community, products and services, supply chain (social), customers, business ethics, public)
  - Corporate governance (quality and integrity of the Managing Board and management, composition of the Managing Board, ownership and shareholder rights, wages and salaries, auditing and financial reporting, stakeholder treatment)
  - ESG risk rating
  - Approach to calculating ESG country rating:
    - Country risk
    - Freedom House Index (Free, Partly Free, Not Free)
- Measurement and management of the principal adverse impacts (PAIs) on sustainability factors

The material topics are specifically taken into account within the aforementioned framework when selecting securities in accordance with the ESG investment approach. All of the figures used in Hypo Vorarlberg's ESG rating are based on ESG data from the research partner Sustainalytics<sup>61</sup> or publicly accessible databases such as Freedom House<sup>62</sup>.

### General objectives

The main objective of the "ESG investment approach" is to assess and classify ESG aspects in order to minimise potentially negative environmental, social and governance impacts support positive ones by investing directly or indirectly in companies. Since November 2021, all Hypo Vorarlberg funds and asset management strategies that are actively offered have been classified as financial products within the meaning of Article 8 of Regulation (EU) 2019/2088 (Sustainable Finance Disclosure Regulation) and take into account environmental and/or social characteristics.

### References to material impacts, risks or opportunities

The topic-specific management of material impacts (positive and negative) and opportunities is performed in the individual components of Hypo Vorarlberg's ESG rating. This consists of selection criteria, norm-based screening, a best-in-class approach (CO<sub>2</sub> risk rating, measurable impact on SDGs, controversial economic practices, corporate governance, ESG risk rating) and the country risk for government bonds. The specific references to material impacts and opportunities are currently as follows:

<sup>61</sup> The information, data, analyses and opinions contained herein (the "Information"): (1) includes the proprietary information of Sustainalytics and/or its content providers; (2) may not be copied or redistributed except as specifically authorized; (3) do not constitute investment advice nor an endorsement of any product, project, investment strategy or consideration of any particular environmental, social or governance related issues as part of any investment strategy; (4) are provided solely for informational purposes; and (5) are not warranted to be complete, accurate or timely. The Information is not directed to, nor intended for distribution to or use by India-based clients and/or users, and the distribution of Information to India resident individuals and entities is not permitted. Neither Morningstar Inc., Sustainalytics, nor their content providers accept any liability for the use of the information, for actions of third parties in respect to the information, nor are responsible for any trading decisions, damages or other losses related to the information or its use. The use of the data is subject to conditions at <https://www.sustainalytics.com/legal-disclaimers>.

<sup>62</sup> [www.freedomhouse.org](http://www.freedomhouse.org)

## Impacts

### **Increase in resource consumption: Negative impact on the environment due to financing of resource-intensive companies without measures to reduce consumption**

Compliance with international standards through norm-based screening:

- Norm-based screening enables compliance with international norms and standards relating to the environment. It uses the categories “compliant”, “watchlist” and “non-compliant”. “Compliant” companies and securities on the “watchlist” are given equal weighting in the Hypo ESG rating. “Non-compliant” companies are not selected:
  - United Nations Global Compact: Principle 7, 8, 9<sup>63</sup>
  - OECD Guidelines for Multinational Enterprises: Chapter VI – Environment<sup>64</sup>

### **Reduction in resource consumption: Positive impact on the environment due to financing that contributes to a sustainable circular economy**

Application of best-in-class approach:

- Measurable impact on SDGs (only a measurable impact on the United Nations Sustainable Development Goals contributes to an improved rating):
  - SDG 12: Responsible consumption and production

## Reputational opportunity

### **Transactions with a positive contribution to minimising resource consumption**

Application of best-in-class approach:

- Measurable impact on SDGs (only a measurable impact on the United Nations Sustainable Development Goals contributes to an improved rating):
  - SDG 12: Responsible consumption and production

## Monitoring process

Compliance is monitored using the dual control principle. The ESG rating tool is used to examine and ensure compliance with the defined ESG requirements on an ex-ante basis as part of the securities selection process. Investments are only made if the ESG investment approach is complied with at the time of purchase. Securities portfolios are also regularly reviewed. The results are checked for plausibility at product level on an ex-post basis. Additional review steps are initiated if any anomalies are identified.

## Area of application

At product level, the Hypo ESG investment approach defines the main requirements for portfolio management, including the distinction between “Investments” and “Other investments”. It is divided into two areas: “Selection of individual securities” and “Selection of target funds”.

## Responsible organisational level

The Asset Management department, which reports directly to the Managing Board, is responsible for creating the policy and updating it as required, as well as for its implementation.

## References to third-party standards or initiatives

The “ESG investment approach” is based on European directives and guidelines from international organisations. The relevant directives and guidelines are:

- Sustainable Finance Disclosure Regulation (EU 2019/2088) (SFDR)
- Regulation (EU) 2021/1253 on sustainability in connection with MiFID II
- United Nations principles for responsible corporate governance (United Nations Global Compact)
- OECD Guidelines for Multinational Enterprises
- United Nations Guiding Principles on Business and Human Rights
- United Nations Sustainable Development Goals (UN SDGs)
- Degree of freedom according to the non-governmental organisation Freedom House

## Consideration of stakeholder interests

All relevant stakeholders and knowledge bearers at Hypo Vorarlberg were involved in the creation of this policy, in particular the specialist departments for Asset Management, Compliance and Sustainability. Any amendment to this policy requires the renewed involvement of the aforementioned stakeholders.

## Availability of the policy for stakeholders

The ESG investment approach is available on Hypo Vorarlberg’s website.<sup>65</sup>

## “ESG in own-account investments (Treasury: APM & Investments)” policy

### Key content

The “ESG in own-account investments (Treasury: APM & Investments)” document describes Hypo Vorarlberg’s central procedure for taking ethics and sustainability criteria into consideration in its own-account investments. This investment strategy must be taken into account by all Hypo Vorarlberg employees working in this business segment. It is regularly reviewed and updated, most recently in May 2024. By taking sustainability aspects into account when making investment decisions, the company aims to support the transition to a climate-neutral economy and indirectly influence companies to focus on environmental and social responsibility to a greater extent. This is based on compliance standards, minimum requirements, positive and exclusion criteria and the definition of sensitive areas. Investments are checked for compliance with these criteria, with a particular focus on human rights, environmental and social aspects. Country-specific risk assessments are applied for government bonds in order to comprehensively assess political and economic stability. The following aspects can also be used to establish a reference to the topic-specific standard E5 Resource use and circular economy:

- Scope of application and legal provisions for financing
- Procedure for implementation in financing business:
  - Application of positive criteria
  - Application of exclusion criteria
  - Consideration of sensitive areas:
    - Characteristics that are harmful to the environment or the climate
    - Controversial or morally objectionable characteristics
- Implementation, review and control

Compliance with these criteria is reviewed by reference to data from external ESG research partners. If no data is available or the intended use is not known, the valuation is carried out on the basis of available company information.

<sup>63</sup> <https://unglobalcompact.org/what-is-gc/mission/principles>

<sup>64</sup> [https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_81f92357-en.html](https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html)

<sup>65</sup> [https://www.hypovbg.at/fileadmin/Hypovbg/Hypo-Vorarlberg/Nachhaltigkeit/Offenlegungen/ESG-Investmentansatz-Hypo-Vorarlberg\\_02-01-2025.pdf](https://www.hypovbg.at/fileadmin/Hypovbg/Hypo-Vorarlberg/Nachhaltigkeit/Offenlegungen/ESG-Investmentansatz-Hypo-Vorarlberg_02-01-2025.pdf)

## General objectives

The main objective of the document is to promote sustainable investments, ensure compliance with ethical standards and minimise risk by avoiding investments in socially or environmentally problematic areas. Hypo Vorarlberg aims to invest exclusively in forms of investment that comply with international ethical standards and to exclude high-risk areas that do not satisfy these standards.

## References to material impacts, risks or opportunities

The topic-specific management of material impacts (positive and negative), risks and opportunities is performed by applying positive criteria and exclusion criteria or by taking sensitive areas into account. The specific references to the material impacts and opportunities are currently as follows:

### Impacts

#### **Increase in resource consumption: Negative impact on the environment due to financing of resource-intensive companies without measures to reduce consumption**

Consideration of sensitive areas:

- Characteristics that are harmful to the environment or the climate:
  - Flagrant disregard of environmental laws
  - Disregard of generally recognised environmental standards or rules of conduct by large-scale projects
- Controversial or morally objectionable characteristics:
  - Flagrant disregard of statutory provisions

Compliance with international standards through norm-based screening:

- Norm-based screening enables compliance with international norms and standards relating to the environment. No investments are made in companies that violate international environmental norms and standards. The basis for screening is as follows:
  - United Nations Global Compact: Principle 7, 8, 9<sup>66</sup>
  - OECD Guidelines for Multinational Enterprises: Chapter VI – Environment<sup>67</sup>

#### **Reduction in resource consumption: Positive impact on the environment due to financing that contributes to a sustainable circular economy**

Positive criteria are reviewed by checking for the presence of the following two characteristics:

- Conformity with the Green Bond Principles, the Social Bond Principles, the Sustainability-Linked Bond Principles or the Sustainability Bond Guidelines
- Classification as an ESG investment and provision of a second party opinion by a recognised sustainability rating agency

### Reputational opportunity

#### **Transactions with a positive contribution to minimising resource consumption**

Positive criteria are reviewed by checking for the presence of the following two characteristics:

- Conformity with the Green Bond Principles, the Social Bond Principles, the Sustainability-Linked Bond Principles or the Sustainability Bond Guidelines
- Classification as an ESG investment and provision of a second party opinion by a recognised sustainability rating agency

## Monitoring process

Compliance is monitored by the Treasury APM & Investments Group using the dual control principle and is regularly audited by Internal Audit.

## Area of application

The document applies to all employees and covers Hypo Vorarlberg's direct investments. Supply chains and shareholdings are not currently subject to mandatory review, as this is generally not possible due to data availability.

## Responsible organisational level

The Treasury: APM & Investments specialist department, which reports directly to the Managing Board, is responsible for creating the document and updating it as required, as well as for its implementation.

## References to third-party standards or initiatives

The "ESG in own-account investments (Treasury: APM & Investments)" document is based on international agreements and standards in the areas of human rights, labour standards, the environment and corruption prevention, including:

- Principles of the United Nations Global Compact
- OECD Guidelines for Multinational Enterprises
- United Nations Guiding Principles on Business and Human Rights

## Consideration of stakeholder interests

The interests of all relevant stakeholders were taken into account in the creation of this document and knowledge bearers at Hypo Vorarlberg were involved, in particular the specialist departments for Own-account Investments, Data Protection and Compliance as well as the Sustainability Group. Any amendment to this policy requires a renewed assessment by the aforementioned stakeholders.

## Availability of the policy for stakeholders

The "ESG in own-account investments (Treasury: APM & Investments)" policy is an internal document that is made available to all Hypo Vorarlberg employees on the intranet.

<sup>66</sup> <https://unglobalcompact.org/what-is-gc/mission/principles>

<sup>67</sup> [https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_81f92357-en.html](https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html)



## DISCLOSURE REQUIREMENT E5-2 – ACTIONS AND RESOURCES RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

### DOWNSTREAM VALUE CHAIN

#### 19) Resource use and circular economy-related actions and resources in accordance with ESRS 2 MDR-A

The following is a list of actions related to resource use and the circular economy. Actions for the circular economy and resource use can be derived on the basis of the topic-specific requirements addressed in the sustainability strategy. The respective specialist departments are responsible for defining and implementing the individual actions. Most of these are also set out in separate policies or work instructions.

#### Measures for the financing business

##### Key measures

###### Taken

The individual measures cover the most important criteria as outlined below (positive criteria and sensitive areas) for reviewing and evaluating potential financing in respect of sustainability aspects and establishing material references to the topic-specific standard E5 Resource use and circular economy:

- In the case of financing with new customers, the positive criteria of the fourth environmental objective of the EU taxonomy are applied:
  - Transition to a circular economy
- The positive criteria are also applied to financing of new business and extensions for existing customers
- Sensitive areas for potential financing that are subject to more extensive scrutiny have also been defined:
  - Characteristics that are harmful to the environment or the climate:
    - Flagrant disregard of environmental laws
    - Disregard of generally recognised environmental standards or rules of conduct by large-scale projects
  - Controversial or morally objectionable characteristics:
    - Flagrant disregard of statutory provisions

###### Planned

##### Extended NCNR analysis to derive specific measures

The evaluation of the individual industry sectors delivered an initial indication of potential risks and opportunities in the lending portfolio. In order to derive specific measures in this area, Hypo Vorarlberg will conduct an extended analysis next year including geographical data at country level (e.g. data relevant for biodiversity).

**Application of the “Principles for Responsible Banking” (PRB)** in order to analyse potential risks and opportunities in the portfolio in greater detail. A sector analysis and a dialogue with companies are planned for 2025. Three categories of interaction are to be considered:

- Supporting companies to pursue joint opportunities (“seek out”)
- Engaging in dialogue with companies to obtain sufficient information (“engage”)
- Engaging in dialogue with companies to obtain the necessary data to minimise risks (“challenge”)

##### Expected results

##### Expected results concerning environmental risks (NCNR analysis)

Based on the analysis initiated in 2024, a methodology has been developed that will enable the company to identify potential areas of action for the portfolios in the coming years in order to minimise material negative impacts and risks, support positive impacts and pursue opportunities in the environmental topics (air pollution, biodiversity and circular economy). To this end, the analysis must be applied at least once a year in order to periodically evaluate Hypo Vorarlberg’s loan portfolio for environmental risks and to integrate the pool of data from publicly available databases, which are continuously updated and expanded. Engaging in dialogue with companies in accordance with the Principles for Responsible Banking is also expected to raise awareness of environmental risks, which can help to improve the results.

##### Contribution to the realisation of the objectives and targets of the policy

The measures already taken are consistent with the objective of the “Ethics and sustainability criteria for financing” policy, which essentially aims to take into account the impact of financing on the environment, the climate and people. The material impacts, risks and opportunities identified in the double materiality assessment are already addressed in part:

##### Impacts

##### Increase in resource consumption: Negative impact on the environment due to financing of resource-intensive companies without measures to reduce consumption

Consideration of sensitive areas:

- Characteristics that are harmful to the environment or the climate:
  - Transactions involving fossil fuels (oil and gas extraction through fracking, oil extraction from tar sands)
  - Flagrant disregard of environmental laws
  - Disregard of generally recognised environmental standards or rules of conduct by large-scale projects (e.g. pipelines, mines, power plants, timber extraction from primary forests)
- Controversial or morally objectionable characteristics:
  - Flagrant disregard of statutory provisions

##### Reduction in resource consumption: Positive impact on the environment due to financing that contributes to a sustainable circular economy

Application of positive criteria:

- Projects that correspond to the following environmental objectives of the EU taxonomy:
  - Transition to a circular economy

##### Reputational opportunity

##### Transactions with a positive contribution to minimising resource consumption

Application of positive criteria:

- Projects that correspond to the following environmental objectives of the EU taxonomy:
  - Sustainable use and protection of water and marine resources
  - Transition to a circular economy

Implementation in the product range:

- Klima-Kredit:
  - Renovation work to lower energy requirements



- Installation of sustainable building automation systems
- Installation of energy-saving and sustainable heating, ventilation, air conditioning and hot water systems
- Installation of renewable energy technologies such as solar systems and heat pumps
- Klima-Schnell-Kredit:
  - Purchase of energy-saving/energy-efficient appliances

#### Scope and area of application

The measures taken are designed to be consistent with the policy and apply throughout the Group. The planned measures will also cover the entire value chain.

#### Time horizon

The measures taken have a long-term time horizon (more than five years). The planned measures have a short-term perspective (up to 1 year). All measures are regularly reviewed as part of a continuous process (PDCA) and adjusted as necessary.

#### Key remedial measures

The measures taken have a preventive effect. No further remedial measures are linked to the provision of financing.

#### Progress

The measures taken have already been implemented and are reviewed annually to determine whether they need to be adjusted. There was no need for any qualitative adjustments compared to the previous year. No quantitative measurements were carried out.

### Asset Management

#### Measures

##### Taken

The following measures taken include the procedure for determining Hypo Vorarlberg's ESG rating in the area of investment strategies and in the selection of target funds. The measures also cover the measurement and controlling of potential negative impacts on the sustainability factors for investments:

- Application of defined selection criteria for direct and indirect investments in companies that exceed revenue thresholds in certain business areas:
  - Transactions involving fossil fuels (oil and gas extraction through fracking, oil extraction from tar sands)
  - Exclusion of investments by companies that cause significant emissions of air pollutants (such as the coal industry)
  - Loss of biodiversity due to certain industries (use of genetic engineering in agriculture, tobacco industry)
- Implementation of norm-based screening: When making investment decisions, no investments are made in companies that violate international norms and standards in the areas of human and labour rights, the environment and corruption. Companies are also categorised as "compliant", "watchlist" or "non-compliant". Companies categorised as "non-compliant" are not selected for investment.
- The application of the best-in-class approach takes the following areas into account:
  - GHG risk and GHG management: Comparison of companies to identify those with the lowest risk in connection with the transition to a low-carbon economy
  - Companies that have a measurable impact on one or more of the United Nations SDGs (e.g. zero hunger, good health and well-being, quality education, life on land and below water, sustainable cities and communities, responsible consumption and production) have a better rating
  - Companies without controversial incidents with a potentially negative impact on stakeholders, the environment or operations have a lower risk and hence a better rating
  - Companies with good corporate governance (e.g. composition of the Managing Board, wages and salaries, stakeholder treatment) have a better rating
  - Companies that are only exposed to low ESG risks or a small number of ESG risks have a better rating (risk exposure and risk management), including taking the LCTR (= implied temperature alignment) into account
- In the case of government bonds, only bonds with a medium risk (at least C-) on a rating scale of A-E are authorised in order to limit potential negative impacts. The country risk rating is supplied by an external service provider and is included in the overall assessment of the Hypo ESG rating.
- Measurement and management of the principal adverse impacts (PAIs) on sustainability factors through the publication of the PAI statement
- Annual ESG screening of the Hypo Vorarlberg funds by an external service provider to ensure transparency and comparability

##### Planned

#### Extended NCNR analysis to derive specific measures

The evaluation of the individual industry sectors delivered an initial indication of potential risks and opportunities in the asset management portfolio. In order to derive specific measures in this area, Hypo Vorarlberg will potentially conduct an extended analysis next year including geographical data at country level (e.g. data relevant for biodiversity).

**Application of the "Principles for Responsible Banking" (PRB)** in order to analyse potential risks and opportunities in the portfolio in greater detail. A sector analysis and a dialogue with companies are planned for 2025. Three categories of interaction are to be considered:

- Supporting companies to pursue joint opportunities ("seek out")
- Engaging in dialogue with companies to obtain sufficient information ("engage")
- Engaging in dialogue with companies to obtain the necessary data to minimise risks ("challenge")

## Expected results

### Expected results concerning environmental risks (NCNR analysis)

Based on the analysis launched this year, a methodology was developed that will enable the company to identify potential areas of action for the portfolios in the coming years in order to minimise material negative impacts and risks, support positive impacts and pursue opportunities in the environmental topics (air pollution, biodiversity and circular economy). To this end, the analysis must be applied at least once a year in order to periodically evaluate Hypo Vorarlberg's asset management portfolio for environmental risks and to integrate the pool of data from publicly available databases, which are continuously updated and expanded. Engaging in dialogue with companies in accordance with the Principles for Responsible Banking is also expected to raise awareness of environmental risks, which can help to improve the results.

### Contribution to the realisation of the objectives and targets of the policy

The measures already taken are consistent with the objective of the "ESG investment approach" policy, which essentially involves promoting sustainable investments and minimising the potential impact of problematic forms of investment on the environment, the climate and people. The material impacts, risks and opportunities identified in the double materiality assessment are addressed as follows:

#### Impact

#### Increase in resource consumption: Negative impact on the environment due to financing of resource-intensive companies without measures to reduce consumption

Compliance with international standards through norm-based screening:

- Norm-based screening enables compliance with international norms and standards relating to the environment. It uses the categories "compliant", "watchlist" and "non-compliant". "Compliant" companies and securities on the "watchlist" are given equal weighting in the Hypo ESG rating. "Non-compliant" companies are not selected:
  - United Nations Global Compact: Principle 7, 8, 9<sup>68</sup>
  - OECD Guidelines for Multinational Enterprises: Chapter VI – Environment<sup>69</sup>

#### Reduction in resource consumption: Positive impact on the environment due to financing that contributes to a sustainable circular economy

Application of best-in-class approach:

- Measurable impact on SDGs (only a measurable impact on the United Nations Sustainable Development Goals contributes to an improved rating):
  - SDG 12: Responsible consumption and production

#### Reputational opportunity

#### Transactions with a positive contribution to minimising resource consumption

Application of best-in-class approach:

- Measurable impact on SDGs (only a measurable impact on the United Nations Sustainable Development Goals contributes to an improved rating):
  - SDG 12: Responsible consumption and production

#### Scope and area of application

The measures taken are designed to be consistent with the policy and apply to the Bank. There are location-specific deviations at the St. Gallen branch.

#### Time horizon

The measures taken have a long-term time horizon (more than five years). The planned measures have a short-term perspective (up to 1 year). All measures are regularly reviewed as part of a continuous process (PDCA) and adjusted as necessary.

#### Key remedial measures

The measures taken have a direct effect. The criteria to be taken into account contribute directly to remedial action.

#### Progress

The measures taken have already been implemented and are reviewed annually to determine whether they need to be adjusted. There was no need for any qualitative adjustments compared to the previous year. Quantitative measurements are carried out on a quarterly basis via the rating process.

## Own-account investments

### Key measures

#### Taken

The individual measures cover the most important criteria as outlined below for reviewing and evaluating potential investments in respect of sustainability aspects and establishing material references to the topic-specific standard E5 Resource use and circular economy:

- Implementation of norm-based screening: When making investment decisions (new purchases), no investments are made in companies that violate international environmental standards and norms. The screening is based on the United Nations Global Compact, the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights.
- Positive criteria are reviewed by checking for the presence of the following two characteristics:
  - Conformity with the Green Bond Principles, the Social Bond Principles, the Sustainability-Linked Bond Principles or the Sustainability Bond Guidelines
  - Classification as an ESG investment and provision of a second party opinion by a recognised sustainability rating agency
- In addition to exclusion criteria, sensitive areas for potential investments that are subject to more extensive scrutiny are defined in order to identify characteristics that are controversial, morally objectionable, or harmful to the climate or the environment.

Compliance with these criteria is reviewed by reference to data from external ESG research partners. If no data is available or the intended use is not known, the valuation is carried out on the basis of available company information.

#### Planned

#### Extended NCNR analysis to derive specific measures

The evaluation of the individual industry sectors delivered an initial indication of potential risks and opportunities in the own-account investment portfolio. In order to derive specific measures in this area, Hypo Vorarlberg will potentially conduct an extended analysis next year including geographical data at country level (e.g. data relevant for biodiversity).

**Application of the "Principles for Responsible Banking" (PRB)** in order to analyse potential risks and opportunities in the portfolio in greater detail. A sector analysis and a dialogue with companies are planned for 2025. Three categories of interaction are to be considered:

- Supporting companies to pursue joint opportunities ("seek out")

<sup>68</sup> <https://unglobalcompact.org/what-is-gc/mission/principles>

<sup>69</sup> [https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_81f92357-en.html](https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html)

- Engaging in dialogue with companies to obtain sufficient information ("engage")
- Engaging in dialogue with companies to obtain the necessary data to minimise risks ("challenge")

#### Expected results

##### Expected results concerning environmental risks (NCNR analysis)

Based on the analysis launched this year, a methodology was developed that will enable the company to identify potential areas of action for the portfolios in the coming years in order to minimise material negative impacts and risks, support positive impacts and pursue opportunities in the environmental topics (air pollution, biodiversity and circular economy). To this end, the analysis must be applied at least once a year in order to periodically evaluate Hypo Vorarlberg's own-account investment portfolio for environmental risks and to integrate the pool of data from publicly available databases, which are constantly updated and expanded. Engaging in dialogue with companies in accordance with the Principles for Responsible Banking is also expected to raise awareness of environmental risks, which can help to improve the results.

##### Contribution to the realisation of the objectives and targets of the policy

The measures already taken are consistent with the objective of the "ESG in own-account investments (Treasury: APM & Investments)" policy, which essentially involves promoting sustainable investments and minimising the potential impact of problematic forms of investment on the environment, the climate and people. The material impacts, risks and opportunities identified in the double materiality assessment are addressed as follows:

#### Impacts

##### Increase in resource consumption: Negative impact on the environment due to financing of resource-intensive companies without measures to reduce consumption

Consideration of sensitive areas:

- Characteristics that are harmful to the environment or the climate:
  - Flagrant disregard of environmental laws
  - Disregard of generally recognised environmental standards or rules of conduct by large-scale projects
- Controversial or morally objectionable characteristics:
  - Flagrant disregard of statutory provisions

Compliance with international standards through norm-based screening:

- Norm-based screening enables compliance with international norms and standards relating to the environment. No investments are made in companies that violate international environmental norms and standards. The basis for screening is as follows:
  - United Nations Global Compact: Principle 7, 8, 9<sup>70</sup>
  - OECD Guidelines for Multinational Enterprises: Chapter VI – Environment<sup>71</sup>

##### Reduction in resource consumption: Positive impact on the environment due to financing that contributes to a sustainable circular economy

Positive criteria are reviewed by checking for the presence of the following two characteristics:

- Conformity with the Green Bond Principles, the Social Bond Principles, the Sustainability-Linked Bond Principles or the Sustainability Bond Guidelines
- Classification as an ESG investment and provision of a second party opinion by a recognised sustainability rating agency

#### Reputational opportunity

##### Transactions with a positive contribution to minimising resource consumption

Positive criteria are reviewed by checking for the presence of the following two characteristics:

- Conformity with the Green Bond Principles, the Social Bond Principles, the Sustainability-Linked Bond Principles or the Sustainability Bond Guidelines
- Classification as an ESG investment and provision of a second party opinion by a recognised sustainability rating agency

#### Scope and area of application

The measures taken are designed to be consistent with the policy and apply throughout the Group. The planned measures will also cover the entire value chain.

#### Time horizon

The measures taken have a long-term time horizon (more than five years). The planned measures have a short-term perspective (up to 1 year). All measures are regularly reviewed as part of a continuous process (PDCA) and adjusted as necessary.

#### Key remedial measures

The measures taken have a direct effect. The criteria to be taken into account contribute directly to remedial action.

#### Progress

The measures taken have already been implemented and are reviewed annually to determine whether they need to be adjusted. There was no need for any qualitative adjustments compared to the previous year. No quantitative measurements were carried out.

#### ESRS 2 69) Disclosure requirements for action plans with significant OpEx and/or CapEx requirements

##### ESRS 2 69a) Disclosure of current and future resources allocated to the action plan

The allocation of current and future operating expenditures and capital expenditures was not carried out in the current reporting period.

##### ESRS 2 69b-c) Disclosure of the amount of current and future resources and discussion of how they relate to the most relevant amounts presented in the financial statements

As this data was not collected in the reporting period, no information is available.

<sup>70</sup> <https://unglobalcompact.org/what-is-gc/mission/principles>

<sup>71</sup> [https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct\\_81f92357-en.html](https://www.oecd.org/en/publications/oecd-guidelines-for-multinational-enterprises-on-responsible-business-conduct_81f92357-en.html)

## METRICS AND TARGETS

### DISCLOSURE REQUIREMENT E5-3 – TARGETS RELATED TO RESOURCE USE AND CIRCULAR ECONOMY

#### DOWNSTREAM VALUE CHAIN

##### 81) If the undertaking has not set any measurable outcome-oriented targets

##### 81a) Disclosure of whether the undertaking intends to set such targets and the timeframe for doing so, or the reasons why the undertaking does not set such targets

Thanks to the comprehensive data on impacts, risks and opportunities it collected in 2024, Hypo Vorarlberg has laid the foundations for an effective strategy in the area of resource use and the circular economy. In addition to the previous focus on internal activities (Hypo Vorarlberg has been documenting resource consumption and waste within the Group for a number of years, continuously makes its employees aware of issues such as paper and water consumption and also makes a meaningful contribution to waste avoidance and resource conservation by reusing furniture and electronics), the future focus will be on the question of how and with what measures the core business can also contribute to risk prevention and the pursuit of opportunities. Hypo Vorarlberg intends to work with its stakeholders to set targets on the basis of reliable data and define the time periods in which these can be achieved by means of suitable measures.

No measurable time-bound targets were defined for the current reporting period as the Group initially focused on a comprehensive analysis of the various portfolios (see NCNR analysis, E5 IRO-1.11a, E5 IRO-1.11b, BP-2.10, BP-2.11). Quantitative measurement methods will be evaluated on the basis of the qualitative assessment. This will be followed by the definition of targets. This step-by-step approach is intended to ensure that the planned measures can be implemented in a targeted and effective manner and that impacts, risks and opportunities are addressed directly.

##### 81bi and ii) Disclosure of whether the undertaking tracks the effectiveness of its policies and actions in relation to impacts, risks and opportunities, including the procedures, the targets set and the time periods

The effectiveness of the strategies and actions in relation to impacts, risks and opportunities is ensured by the monitoring process defined in the policies (E5-1, E5-2). The strategies and actions are reviewed regularly (at least annually) and adjusted as necessary. The monitoring process takes account of various internal stakeholders (specialist departments, the Managing Board and, as part of its regular auditing activities, Internal Audit).

## ESRS S1: OWN WORKFORCE

### STRATEGY

#### DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-3 – MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

**14) Disclosure of whether all people in the undertaking's own workforce who are materially affected by the undertaking are included in the ESRS 2 disclosures**

The following information relates to all people in Hypo Vorarlberg's own workforce.

**14a) Description of the types of employees and non-employee workers in the undertaking's own workforce who are subject to material impacts**

The disclosures relate to the group of permanent employees who, as a whole, are potentially or actually affected by the material impacts identified in the materiality analysis. Hypo Vorarlberg does not have any employees who are not covered by employment contracts or who are unpaid.

**14b) Disclosures on material negative impacts**

**14bi) Disclosure of whether material negative impacts are widespread or systemic in contexts in which the undertaking operates**

The material negative impacts identified in the materiality analysis potentially affect the Group's entire workforce.

**14bii) Disclosure of whether material negative impacts are related to individual incidents**

There are no reported and documented incidents in connection with material negative impacts.

**14c) Description of material positive impacts on employees and non-employee workers and their identification through the double materiality assessment**

**CONTRIBUTIONS TO WORK-LIFE BALANCE AND RECONCILING CAREER AND FAMILY HAVE A POSITIVE INFLUENCE ON THE WORKING CONDITIONS FOR THE COMPANY'S OWN EMPLOYEES**

A good balance between the various areas of life (work, family and private life) is essential for the health and well-being of employees and a key component of a corporate culture that emphasises diversity and equal opportunities. This makes it easier to retain well-qualified employees who have been with the company for many years. Hypo Vorarlberg currently utilises various family-friendly measures such as parental leave and part-time models, job-sharing models, flexitime, working from home, mobile working, and comprehensive support for employees starting parental leave and returning to work (see S1-1).

**TRAINING AND PROFESSIONAL DEVELOPMENT OPPORTUNITIES CONTRIBUTE TO THE CREATION OF ATTRACTIVE JOBS AND HAVE A POSITIVE INFLUENCE ON THE COMPANY'S OWN WORKFORCE**

Personnel development at Hypo Vorarlberg focuses on promoting the training and professional development of all Bank employees in the areas of professional, social, methodological and leadership skills. The educational partner Hypo Bildung and other external providers are consulted as required. The HR departments and HR managers at the subsidiaries Hypo Immobilien & Leasing, Hypo Vorarlberg Immo Italia and Hypo Vorarlberg Leasing are also available to employees and managers as sparring partners for the selection and organisation of training courses (see S1-4.38c Creation of attractive jobs through training and professional development opportunities).

**EMPLOYMENT LAW AND SOCIAL SECURITY IN THE FORM OF REMUNERATION AND HEALTHCARE PROVISION HAVE A POSITIVE INFLUENCE ON THE COMPANY'S OWN WORKFORCE**

Hypo Vorarlberg cares greatly about its employees' health and well-being. The company's health management system supports employees in the prevention of physical and mental illness. In Austria, the protection of employee health is regulated by law, for example by the Employee Protection Act (ASchG), the Working Hours Act (AZG) and the Rest Periods at Work Act (ARG). Topics relating to employee health and prevention are also addressed by the Health Committee for all of the banking locations in Austria under the motto #gesundmiteinanderarbeiten ("healthy cooperation"; see S1-1.19 and S1-4.38a).

Hypo Vorarlberg strictly complies with legal requirements (in Austria, these include employment law, the Labour Constitution Act (ArbVG), the ASchG, the AZG, the ARG and collective agreements). A variety of remuneration schemes are applied. The remuneration components, their amount and the payment process are specified on the basis of the principle of equal treatment of all genders, i.e. the same work is rewarded with the same basic salary. In order to review progress in this area, the gender pay gap (see S1-16.97a) is regularly calculated and the company works to continuously reduce it. In addition, various works agreements for all of the banking locations in Austria (see S1-1.19 Works agreements) provide an essential basis for ensuring social security in the area of remuneration.

The subsidiaries and the St. Gallen branch have their own arrangements for this (e.g. crisis intervention teams, health coaches). However, they can also make use of some of the services provided by Hypo Vorarlberg.

**INITIATIVES TO REDUCE INEQUALITIES HAVE A POSITIVE IMPACT ON EQUAL OPPORTUNITIES AND DIVERSITY**

Hypo Vorarlberg offers all of its employees the same opportunities and takes care to ensure diversity in its workforce. The Austrian legislator has enshrined equal rights and the prohibition of discrimination in various laws (including the Austrian Labour Constitution Act). Hypo Vorarlberg strictly complies with the law and creates working conditions that enable everyone to contribute to the company and develop to their full potential. Hypo Vorarlberg's Code of Conduct forms the basis for dealing with customers, business partners and employees. It provides an overview of important regulations that support employees when it comes to legal and ethical issues. In particular, this includes the principles of equal treatment and respect for human rights. Hypo Vorarlberg's Code of Conduct applies to all employees at Hypo Vorarlberg's banking locations (see S1-1.19).

**14d) Disclosure of material risks and opportunities arising from impacts and dependencies in connection with the undertaking's own workforce**

The materiality assessment has identified the following significant opportunities that both actually and potentially affect the Group's entire workforce (see S1 SBM 3.14a for more details on the types of employees and non-employee workers):

- Creation of attractive workplaces by enabling an appropriate work-life balance
- Creation of attractive jobs through training and professional development opportunities

- Creation of attractive and secure jobs through fair pay and adequate healthcare provision

Hypo Vorarlberg owes its economic success in particular to the expertise, commitment and motivation of its employees. By enabling an appropriate balance between work and private life, providing training and further education and creating attractive and secure jobs, Hypo Vorarlberg can successfully retain its employees, promote their health and optimally support their professional and personal development. This creates the foundations for Hypo Vorarlberg's continued success.

#### 14e) Disclosures on impacts on the undertaking's own workforce from transition plans and actions to reduce carbon emissions

The disclosures relate to the results of the materiality analysis; a transition plan was not implemented for this reporting period.

#### 15) Understanding of whether people with particular characteristics in the undertaking's own workforce may be at greater risk of harm

No distinction was made between the workforce and a group of employees with particular characteristics. The disclosures apply to the entire workforce.

#### 16) Disclosures on which material risks and opportunities relate to specific groups of people in the undertaking's own workforce

In the same way as for S1 SBM 3.15, no distinction is made between the workforce and a group of employees with particular characteristics with respect to material risks and opportunities. The disclosures apply to all employees of Hypo Vorarlberg.

### IMPACT, RISK AND OPPORTUNITY MANAGEMENT

#### DISCLOSURE REQUIREMENT S1-1 – POLICIES RELATED TO OWN WORKFORCE

##### 19) Policies to manage material impacts, risks and opportunities related to the undertaking's own workforce in accordance with the principles set out in ESR 2 MDR-P

In terms of material impacts, risks and opportunities, the following policies are particularly relevant for the company's own workforce:

- Code of Conduct: Applies to the entire workforce at Hypo Vorarlberg's banking locations in Austria and Switzerland
- "Mindful Cooperation" guidelines: Apply to the entire workforce at Hypo Vorarlberg's banking locations in Austria
- Various works agreements: Apply to the entire workforce at Hypo Vorarlberg's banking locations in Austria
- Employee manual: Applies to the entire workforce of Hypo Vorarlberg Leasing and Immo Italia in Italy

#### "Code of Conduct" policy

##### Key content

Hypo Vorarlberg's Code of Conduct provides an overview of important regulations that support employees when it comes to legal and ethical issues. It forms the basis for dealing with customers, business partners and employees by setting out rules, values and principles concerning the conduct of all employees in the Group. The Code of Conduct is reviewed annually and was most recently updated in December 2024. The Code of Conduct is structured in such a way that the relevant topics for employees and customers are set out for each group of recipients. In particular, the following content is documented for employees:

- Appropriate remuneration system
- Principles of equal treatment and respect for human rights
- Channels and measures for open communication with managers
- Personal appraisals and feedback
- "Mindful Cooperation" guidelines
- Whistleblowing system
- Employee representation by the Works Council
- Development opportunities through training and further education
- Health and safety in the workplace
- Models for flexible working hours
- Regulations for mobile working and working from home

##### General objectives

The Code of Conduct acts as a framework for a variety of ESG-relevant topics. It has a clear focus on social issues that affect customers, business partners and employees in particular. Accordingly, the main objective of the Code of Conduct is to protect these groups of people from identified negative impacts and risks to the greatest possible extent or to reduce these impacts and risks for them, as well as to support identified positive impacts and pursue opportunities.

##### References to material impacts, risks or opportunities

The following topics were identified as material for the policy based on the double materiality assessment:

##### Impact

- Training and professional development opportunities contribute to the creation of attractive jobs and have a positive influence on the company's own workforce

##### Opportunities

- Reputational opportunity: Creation of attractive workplaces by enabling an appropriate work-life balance
- Initiatives to reduce inequalities have a positive impact on equal opportunities and diversity
- Employment law and social security in the form of remuneration and healthcare provision have a positive influence on the company's own workforce
- Reputational opportunity: Creation of attractive and secure jobs through fair pay and adequate healthcare provision

##### Monitoring process

The Compliance and Outsourcing department is responsible for ensuring that all employees are informed about the requirements of the Code of Conduct and are obliged to observe the standards contained therein in their work at Hypo Vorarlberg. To this end, Compliance may also introduce policies to identify, control and minimise actual and potential conflicts of interest.

#### Area of application

Compliance with the Code of Conduct is mandatory for all employees and executive bodies of Hypo Vorarlberg. All suppliers and business partners are expected to comply with these standards or define identical or at least similar principles. Compliance also includes day-to-day business dealings, with all parties involved being required to observe the Code of Conduct.

#### Responsible organisational level

The Managing Board of Hypo Vorarlberg issues the standards of conduct for all employees and is responsible for compliance with the Code of Conduct as the highest executive body. Managers are also required to implement the Code of Conduct in their management function. To this end, the Compliance and Outsourcing department ensures that regulatory requirements and other legal provisions are complied with.

#### References to third-party standards or initiatives

The Code of Conduct is based on the following standards:

- United Nations Guiding Principles on Business and Human Rights
- International Bill of Human Rights
- OECD Guidelines for Multinational Enterprises
- ILO core labour standards

This is not an exhaustive list. A complete list can be found in the annex to the Code of Conduct. It is checked regularly to ensure that it is up-to-date and, where necessary, is expanded as part of the content review of the Code of Conduct.

#### Consideration of stakeholder interests

As the Code of Conduct covers a wide range of different subject areas, various specialists are involved in preparing and regularly reviewing its content. In particular, stakeholders and knowledge holders from the specialist departments for Communications and Marketing, HR, Sales, Logistics, Compliance and Sustainability and the Works Council must be involved in the process. Any amendment to this policy requires the renewed involvement of the aforementioned stakeholders and the Supervisory Board as well as the approval of the Code of Conduct by the Managing Board.

#### Availability of the policy for stakeholders

The entire Code of Conduct is publicly accessible on Hypo Vorarlberg's website and is communicated to customers and other parties involved in business dealings.<sup>72</sup>

### "Mindful Cooperation" guidelines

#### Key content

Hypo Vorarlberg's "Mindful Cooperation" guidelines were created and published in December 2024 under the name "Concern Management" for all of the banking locations in Austria and subsequently expanded and renamed in cooperation with the Works Council.

In order to ensure a good working environment for employees and to counteract discrimination, the guidelines set out Hypo Vorarlberg's standardised process for dealing with specific employee concerns. These include (work-related) topics such as discrimination, physical and mental health concerns, conflict situations, sexual harassment, violence and bullying in the workplace. In these cases, employees have access to a number of persons of trust, including their direct manager, department or division head, the HR department, the Works Council, the occupational psychologist, the company doctor, and the Managing Board of Hypo Vorarlberg.

#### General objectives

The main objective of the "Mindful Cooperation" guidelines is to prevent or minimise (potential) negative impacts on the human rights of the company's own employees (e.g. discrimination), to promote employee satisfaction and the mental and physical health of all employees at Hypo Vorarlberg's banking locations and to counteract undesirable developments that have already taken place. The "Mindful Cooperation" guidelines also include various initiatives and measures to ensure that all employees can enjoy a safe and attractive workplace.

#### References to material impacts, risks or opportunities

The following topics were identified as material for the guidelines based on the double materiality assessment:

##### Impacts

- Physical and mental health problems caused by negative working conditions have a negative impact on the company's own workforce
- Employment law and social security in the form of remuneration and healthcare provision have a positive influence on the company's own workforce

##### Opportunities

- Reputational opportunity: Creation of attractive and secure jobs (e.g. through fair pay and adequate healthcare provision)
- Contributions to work-life balance and reconciling career and family have a positive influence on the working conditions for the company's own employees
- Reputational opportunity: Creation of attractive workplaces by enabling an appropriate work-life balance
- Initiatives to reduce inequalities have a positive impact on equal opportunities and diversity

#### Monitoring process

The HR department regularly evaluates the "Mindful Cooperation" guidelines and includes relevant stakeholders in their further development.

#### Area of application

The "Mindful Cooperation" guidelines cover Hypo Vorarlberg's own business operations and apply to all employees at its banking locations in Austria.

#### Responsible organisational level

The HR department is responsible for creating and updating the "Mindful Cooperation" guidelines and for implementing them.

#### Consideration of stakeholder interests

All relevant stakeholders and knowledge bearers at Hypo Vorarlberg's banking locations, in particular the Managing Board, the HR department and the Works Council, are involved in the creation of the "Mindful Cooperation" guidelines.

#### Availability of the policy for stakeholders

The "Mindful Cooperation" guidelines are an internal company document that is made available to all Hypo Vorarlberg employees on the intranet.

<sup>72</sup> [https://www.hypovbg.at/fileadmin/Hypovbg/Hypo-Vorarlberg/Verhaltenskodex\\_Hypo-Vorarlberg.pdf](https://www.hypovbg.at/fileadmin/Hypovbg/Hypo-Vorarlberg/Verhaltenskodex_Hypo-Vorarlberg.pdf)



## Various works agreements

### Key content

In order to implement the legal requirements and internal regulations in the area of human resources, binding regulations in the form of works agreements are an integral part of human resources management at Hypo Vorarlberg's banking locations in Austria. The works agreements cover various topics and content:

- Employee appraisals including the agreement of targets/measures and performance assessment: This works agreement sets out the conditions and internal regulations for employee appraisals, which are the central management tool for ensuring dialogue between employees and managers
- Flexible working hours: This works agreement is intended to enable employees to determine their own start and end times, taking the company's interests and their personal interests as well as the legal framework into account, thereby making a positive contribution to a healthy work-life balance
- Working from home and mobile working: These works agreements govern the conditions for working from home and mobile working. The aim is to enable employees to organise their work freely and practically, thereby making a positive contribution to a healthy work-life balance.
- Employee bonus: The employee bonus is a modern, forward-looking and sustainable instrument for attracting and retaining employees. The works agreement regulates topics such as the area of application, amount, implementation and payment of the employee bonus
- Pension fund: The works agreement establishes the basis for the implementation of the company pension via the pension fund and regulates how contributions to the pension fund are paid by the employer on behalf of employees

### General objectives

The main objectives of the works agreements are to ensure transparency, clarity and equal treatment in order to promote employee satisfaction so that Hypo Vorarlberg can successfully retain employees for the long term. Works agreements also various initiatives and measures to ensure that employees can enjoy a safe and attractive workplace.

### References to material impacts, risks or opportunities

The following topics were identified as material for the works agreements based on the double materiality assessment:

#### Impacts

- Physical and mental health problems caused by negative working conditions have a negative impact on the company's own workforce
- Employment law and social security in the form of remuneration and healthcare provision have a positive influence on the company's own workforce

#### Opportunities

- Reputational opportunity: Creation of attractive and secure jobs (e.g. through fair pay and adequate healthcare provision)
- Contributions to work-life balance and reconciling career and family have a positive influence on the working conditions for the company's own employees
- Reputational opportunity: Creation of attractive workplaces by enabling an appropriate work-life balance
- Initiatives to reduce inequalities have a positive impact on equal opportunities and diversity

### Monitoring process

When a works agreement is agreed and prepared for the first time, it is valid for a limited period of time. Before this time limit expires, the content is evaluated by the Managing Board, the Human Resources department and the Works Council. Following any revisions, the corresponding works agreement is extended or concluded for an indefinite period and incorporated into regular operations.

### Area of application

The works agreements cover Hypo Vorarlberg's own business operations and apply to all employees at Hypo Vorarlberg's banking locations in Austria

### Responsible organisational level

The Managing Board, the HR department and the Works Council are responsible for creating and updating the works agreements as required and for their implementation.

### References to third-party standards or initiatives

The works agreements are based on the following standards:

- Austrian Working Hours Act (AZG)
- Collective agreement of the Austrian provincial mortgage banks
- Austrian Employment Contract Law Amendment Act (AVRAG)
- Austrian Labour Constitution Act (ArbVG)
- Austrian Rest Periods at Work Act (ARG)
- Austrian Employee Protection Act (ASchG)

### Consideration of stakeholder interests

All relevant stakeholders and knowledge bearers at Hypo Vorarlberg's banking locations in Austria were involved in the creation of the works agreements, in particular the Managing Board, the HR department and the Works Council. Any amendments to these works agreements require the renewed involvement of the aforementioned stakeholders and, if necessary, approval by the Managing Board.

### Availability of the policy for stakeholders

The aforementioned works agreements are internal company documents that are made available to all Hypo Vorarlberg employees on the intranet.

## "Employee Manual – Italy" policy

### Key content

The "Employee Handbook" policy for Hypo Vorarlberg Leasing/Hypo Immo Italia contains fundamental rules and regulations relating to cooperation and working procedures within the company. It is reviewed regularly and was most recently updated in April 2024. This policy forms the basis for the organisation of the working environment, compliance with company values and statutory requirements, and day-to-day interaction in the workplace. The central topics include:

- Organisational chart, job descriptions and deputisation
- Social responsibility
- Employment relationships, including working time regulations, overtime, time recording and regulations governing absence
- Work-life balance



- Use of company property (including keys, company vehicles, e-bikes and IT resources)
- Code of Ethics, organisational, management and control model
- Whistleblowing
- Health and safety in the workplace

#### General objectives

The main objectives of the policy are to promote a positive and productive corporate culture, to comply with ethical and legal standards and to ensure a respectful and safe working environment. The policy also aims to increase transparency within the company and inform employees of their rights and obligations.

#### References to material impacts, risks or opportunities

The following topics were identified as material for the policy based on the double materiality assessment:

##### Impacts

- Employment law and social security in the form of remuneration and healthcare provision have a positive influence on the company's own workforce
- Contributions to work-life balance and reconciling career and family have a positive influence on the working conditions for the company's own employees

##### Opportunity

- Reputational opportunity: Creation of attractive workplaces by enabling an appropriate work-life balance

#### Monitoring process

Compliance with the policy is monitored by the team leaders and department heads.

#### Area of application

The employee manual covers the company's own business operations and applies to all employees at the Bolzano and Como branches of Hypo Vorarlberg Leasing/Hypo Immo Italia.

#### Responsible organisational level

The Hypo Vorarlberg Leasing management team is responsible for creating and continuously updating the policy as well as for its implementation. It has ultimate responsibility for the strategic orientation of the company and ensures that the policy is regularly reviewed, updated and effectively implemented in all relevant areas of the company. Responsibility for the actual implementation of the policy lies with the division heads and team leaders, who ensure that employees comply with the requirements set out therein.

#### Consideration of stakeholder interests

All relevant stakeholders and knowledge bearers at Hypo Vorarlberg Leasing were involved in the creation of this policy, in particular the specialist departments for Human Resources, Legal, Compliance and Finance. Any amendment to this policy requires the renewed involvement of the aforementioned stakeholders and the Managing Board.

#### Availability of the policy for stakeholders

The policy is an internal company document that is made available to all employees of Hypo Leasing and Hypo Immo Italia in Bolzano and Como.

## 20) Human rights policy commitments for the undertaking's own employees

The human rights policy commitments are defined in the Code of Conduct for Hypo Vorarlberg's banking locations in Austria and the St. Gallen branch and in the employee manual for Hypo Vorarlberg Leasing/Immo Italia in Italy.

### 20a) Respect for the human rights, including labour rights, of people in the undertaking's own workforce

The human rights policy commitments are set out in the Code of Conduct for Hypo Vorarlberg's banking locations in Austria and the St. Gallen branch and in the Code of Ethics for Hypo Vorarlberg Leasing/Immo Italia in Italy.

Hypo Vorarlberg's Code of Conduct provides an overview of important regulations that support employees when it comes to legal and ethical issues. It forms the basis for dealing with customers, business partners and employees by setting out rules, values and principles that guide the conduct of all employees at the Bank. Hypo Vorarlberg's Code of Conduct applies to all employees at Hypo Vorarlberg's banking locations. It also serves as a guideline for the subsidiaries (see ESRs 2.19).

In addition, Hypo Vorarlberg is guided by the following international standards and norms in ensuring compliance with human and labour rights:

- United Nations Guiding Principles on Business and Human Rights
- International Bill of Human Rights
- OECD Guidelines for Multinational Enterprises
- International Labour Organisation's Declaration on Fundamental Principles and Rights at Work (ILO core labour standards) to prevent forced labour, slavery and human trafficking within the company and its supply chain

### 20b) Engagement with people in the undertaking's own workforce

Hypo Vorarlberg's Code of Conduct is available to all employees both on the intranet and on the company's website. The "Mindful Cooperation" guidelines give employees the opportunity to express concerns, wishes, suggestions and problems.

### 20c) Measures to provide remedy for negative human rights impacts

In order to provide remedy for potential negative human rights impacts, employees at Hypo Vorarlberg's banking locations have access to the "Mindful Cooperation" guidelines, which are described in detail under disclosure requirement S1-3.

## 21) Disclosures on whether and how the policies are consistent with internationally recognised instruments

Hypo Vorarlberg in Austria, its subsidiaries in Italy and the St. Gallen branch in Switzerland as well as Hypo Vorarlberg are guided by the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights, the OECD Guidelines for Multinational Enterprises and the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work (see S1-1.19).

## 23) Disclosure of whether the undertaking has a workplace accident prevention policy

Hypo Vorarlberg's health management system supports employees in the prevention of physical and mental illness. In Austria, the protection of employee health is regulated by law, for example by the ASchG, the AZG and the ARG.

For Hypo Vorarlberg's banking locations in Austria, there are various committees (e.g. Occupational Health and Safety Committee, Health Committee, Safety Committee). Together with the company doctor and the occupational psychologist as well as the safety officer, these committees ensure compliance with statutory requirements and the provisions of collective agreements and look after employee health and safety (see S1-1.19).

**24a) Disclosure of whether the undertaking has a specific policy aimed at the elimination of discrimination**

Hypo Vorarlberg's Code of Conduct (see S1-1.19), which applies to all employees at Hypo Vorarlberg's banking locations and also guides the actions of the subsidiaries, states that working conditions must be put in place that enable everyone to contribute to the company and develop to their full potential, regardless of their gender, age, nationality, ethnic and social origin, skin colour, religion or ideology, personal limitations, political or other convictions, sexual orientation or identity. No one should be disadvantaged, discriminated against or marginalised. In addition, the "Mindful Cooperation" guidelines are intended to help prevent or minimise (potential) negative human rights impacts and provide employees with guidance on the specific cases described if necessary.

The St. Gallen branch and the subsidiaries in Italy do not have any specific policies aimed at the elimination of discrimination.

**24b) Disclosure of whether certain grounds for discrimination are specifically covered by the policies**

See the list of grounds for discrimination in S1-1.24a.

**24c) Disclosure of whether there are specific policies related to inclusion and positive action for groups at particular risk of vulnerability**

Hypo Vorarlberg's Code of Conduct and Hypo Vorarlberg Leasing's Code of Ethics (see S1-1.19) cover all of the employees of the respective companies. No distinction was made based on groups at particular risk of vulnerability.

**24d) Disclosure of whether and how the policies are implemented through specific procedures**

Hypo Vorarlberg is committed to raising awareness with the Code of Conduct in order to contain, prevent and combat discrimination (see S1-1.19). The aim is to promote diversity and inclusion within the company. In addition, the "Mindful Cooperation" guidelines (see S1-1.19) provide guidance for all employees at the Bank's locations in Austria on how to deal with perceived disruptions to mindful cooperation. The aim is to ensure that disruptions and threats to mindful cooperation due to discrimination, physical and mental health concerns, conflict situations, sexual harassment, violence and aggression as well as bullying are identified and documented and that measures and improvements are derived.

**DISCLOSURE REQUIREMENT S1-2 – PROCESSES FOR ENGAGING WITH OWN WORKFORCE AND WORKERS' REPRESENTATIVES ABOUT IMPACTS**

**27) Disclosures on whether and how the perspectives of the undertaking's workforce inform decisions on impacts**

For its banking locations in Austria, Hypo Vorarlberg has a Works Council which represents employees and promotes their economic, social, health and cultural interests. The legal basis for Works Council activities is governed by the Austrian Labour Constitution Act. Through the Works Council, employees have the right to participate in the organisation of company policies that directly affect them. In addition to representing employees as a whole and individual employees, the Works Council performs an information, control and communication function within the company and serves as a link between the workforce and the company management.

In Austria, stock corporations with a Works Council are obliged to have employee representation on the Supervisory Board. Employee representatives make up one-third of the entire Supervisory Board and are therefore also involved in important decisions and participate directly in any operational changes and plans discussed by this body.

**27a) Engagement directly with the undertaking's own workforce or workers' representatives**

Employees are engaged in a targeted manner using the formats listed. They also have access to various platforms and formats for contributing their opinions and ideas, which strengthens the development of a transparent and dialogue-oriented corporate culture.

**27b) Stages, type and frequency of engagement**

Hypo Vorarlberg has various formats for engaging with its employees:

- Standardised employee appraisals at least once a year
- Regular dialogue between the Works Council, the HR department and the Managing Board
- Legally required evaluation of physical and mental stress in the workplace
- "Mindful Cooperation" guidelines for reporting concerns and complaints for affected persons, observers, informees and persons of trust

The dialogue formats are actively used and thus contribute to a positive assessment of employee engagement.

**27c) Function and most senior role within the undertaking that has responsibility for ensuring that this engagement happens**

At Hypo Vorarlberg, the Managing Board and, in particular, the Chairman of the Managing Board ensure that this engagement happens at regular meetings.

**27d) Disclosures on global framework agreements or agreements related to the respect of human rights of the undertaking's own workforce**

Hypo Vorarlberg's Code of Conduct (see S1-1.19) provides an overview of important regulations that support employees when it comes to legal and ethical issues. It forms the basis for dealing with customers, business partners and employees by setting out rules, values and principles that guide the conduct of all employees at the Bank. In addition, Hypo Vorarlberg is guided by the following international standards and norms in ensuring compliance with human and labour rights:

- United Nations Guiding Principles on Business and Human Rights
- International Bill of Human Rights
- OECD Guidelines for Multinational Enterprises
- International Labour Organisation's Declaration on Fundamental Principles and Rights at Work (ILO core labour standards) to prevent forced labour, slavery and human trafficking within the company and its supply chain

**27e) Disclosures on how the undertaking assesses the effectiveness of its engagement with its own workforce**

Under the Austrian Employee Protection Act (ASchG), companies are obliged to regularly evaluate physical and mental stress in the workplace. Hypo Vorarlberg in Austria meets this obligation at regular intervals. The evaluation covers the legal requirements and is supplemented by aspects that are important for the company. In this context, stress factors are identified and assessed and measures are derived. In the evaluation

conducted with an occupational psychologist in 2023, 66.7 % of employees at the Bank's locations in Austria provided feedback via a standardised questionnaire and open comment fields.

Open dialogue between employees and managers is firmly enshrined in Hypo Vorarlberg's corporate culture. Employee appraisals and target agreement meetings are held annually. Employees also have the opportunity to assess the skills, performance and management conduct of their managers at regular intervals as part of a 270° management feedback process.

In this way, the company gains insights into employee engagement in the form of feedback from its own employees via various channels and covering a wide range of topics.

#### **28) Steps taken to gain insight into the perspectives of particularly vulnerable or marginalised employees**

Throughout the Group, no distinction is made between the entire workforce and employees requiring particular protection.

### **DISCLOSURE REQUIREMENT S1-3 – PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR OWN WORKERS TO RAISE CONCERNS**

#### **32a) General approach and processes to remediate of negative impacts on the undertaking's own workforce, including assessment of effectiveness**

Hypo Vorarlberg cares greatly about its employees' health and well-being. The health management system supports employees in the prevention of physical and mental illness and helps to prevent or minimise negative impacts. In Austria, the protection of employee health is regulated by law, for example by the ASchG, the ARG and the AZG. Topics relating to employee health are also addressed by the Health Committee for all of the banking locations in Austria, as well as in Switzerland in some cases, under the motto #gesundmiteinanderarbeiten ("healthy cooperation"). The Health Committee adopted mental fitness as a focus topic for 2024 and 2025. The resulting measures that have already been implemented and will be implemented in future (for example, the new occupational psychology consultation hours introduced at the company) help to prevent negative impacts.

Disruptions to mindful cooperation must be identified as early as possible in order to maintain good working conditions for employees and to ensure an environment of respect, motivation and enjoyment both now and in future, thereby preventing physical and mental illness in particular. All employees have the right to a workplace and working conditions that are free from mental and physical disruptions and hazards. Hypo Vorarlberg's "Mindful Cooperation" guidelines (see S1-1.19), works agreements and measures to promote health (S1-4.38a) provide support in this regard.

#### **32b) Specific channels through which employees can raise their concerns or needs and have them addressed**

The following channels are available to employees for raising their concerns and needs:

- "Mindful Cooperation": Provided by the company itself
- Employee appraisal database: Provided by the company itself
- Whistleblowing system: Provided by the company itself

#### **32c) Disclosure of grievance handling mechanisms related to employee matters**

Hypo Vorarlberg's "Mindful Cooperation" guidelines were created and published in December 2024 under the name "Concern Management" and subsequently expanded and renamed in cooperation with the Works Council.

#### **32d) Disclosure of processes through which the undertaking supports the availability of communication channels in the workplace**

The "Mindful Cooperation" guidelines and the employee appraisal database are available to employees at Hypo Vorarlberg's banking locations via the internal knowledge database. All employees throughout the Group have unrestricted access to a whistleblowing system.

#### **32e) Disclosure of how issues raised are tracked and monitored and how the effectiveness of the aforementioned channels is ensured**

The aim of the "Mindful Cooperation" guidelines is to identify disruptions and risks to mindful cooperation as early as possible and find a solution for the affected persons as quickly as possible. Once an individually selected person of trust has been consulted, the HR department at Hypo Vorarlberg's banking locations must be involved as a central point of contact. It evaluates the incident and participates in identifying and implementing a solution. Next, a follow-up meeting concerning the incident is held at which the effectiveness of the planned remedial measures is evaluated. The "Mindful Cooperation" process is regularly evaluated and enhanced with the involvement of key stakeholders.

### 33) Disclosures on whether and how the undertaking assesses that people in its own workforce are aware of and trust the aforementioned channels

Information on the “Mindful Cooperation” guidelines, employee appraisals and the whistleblowing system is available to all employees at Hypo Vorarlberg’s banking locations in Austria via the internal knowledge database. Employees of the St. Gallen branch and Hypo Immobilien can use Hypo Vorarlberg’s whistleblowing system and are made aware of this option via the internal knowledge database and annual internal events. The subsidiaries in Italy have their own whistleblowing systems. These are accessible to employees via the respective company website.

### 33) Disclosure of whether the undertaking has policies in place to protect individuals that use the aforementioned channels against retaliation

The “Mindful Cooperation” guidelines reinforce the protection of employees against stigmatisation and retaliation in the event of them using these channels. This does not apply to cases of deliberate misinformation.

## DISCLOSURE REQUIREMENT SI-4 – TAKING ACTION ON MATERIAL IMPACTS AND APPROACHES TO MITIGATING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO OWN WORKFORCE, AND EFFECTIVENESS OF THOSE ACTIONS AND APPROACHES

### 37) Disclosure of action plans and resources to manage material impacts, risks and opportunities related to the undertaking’s own workforce in accordance with the principles set out in ESRS 2 MDR-A

As Vorarlberg’s largest single bank in the German-speaking region, Hypo Vorarlberg is confronted with a challenging labour market that results in a particular competitive situation. Successful employee retention for the long term is a key factor in Hypo Vorarlberg’s future success. This forms the basis for the measures for pursuing, preventing and mitigating the impacts, risks and opportunities identified in the materiality analysis.

Hypo Vorarlberg considers the promotion of training and professional development and the physical and mental health of its own workforce to be essential factors in ensuring successful employee retention. The measures and action plans concerning the material impacts and opportunities for the company’s own workforce – which have already been implemented or are planned for the future and are described in greater detail below – focus on these two areas.

| Measures to promote health                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Key measures</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Taken</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <ul style="list-style-type: none"><li>▪ The Health Committee adopted “mental fitness” as a focus topic for 2024/2025</li><li>▪ As a result, the following measures were taken in 2024:<ul style="list-style-type: none"><li>▪ In addition to the consultation hours offered by the company doctor, anonymous psychological counselling sessions with an occupational psychologist have been offered since 2024</li><li>▪ Furthermore, a presentation focusing on mental fitness and sleep was held for all employees during working hours on two different dates</li><li>▪ Hypo Vorarlberg Leasing and Hypo Vorarlberg Immo Italia hosted a presentation by a mental and sports performance coach focusing on mental health and physical fitness. In addition, weekly yoga classes are offered</li></ul></li></ul> |
| <b>Planned</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <ul style="list-style-type: none"><li>▪ A series of workshops for managers entitled “Staff Care” was launched for Hypo Vorarlberg’s banking locations at the end of December and will run throughout 2025. The Health Committee is evaluating further potential measures</li><li>▪ The presentation on mental health and physical fitness at Hypo Vorarlberg Leasing and Hypo Vorarlberg Immo Italia will be continued and intensified in a workshop. The focus on healthy eating for employees will also be intensified</li></ul>                                                                                                                                                                                                                                                                                 |
| <b>Expected results</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| The number of sick days is expected to be reduced if the range of employee health services is expanded further. In addition, the aim is to promote a culture in which the company’s own workforce remains healthy and productive in the long term. In turn, this will increase the attractiveness of the company as an employer and improve employee retention.                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Contribution to the realisation of the objectives and targets of the policy</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| The measures taken are consistent with the objectives of various works agreements which primarily seek to promote employee satisfaction and reduce negative health impacts. The health promotion measures implemented and planned help to minimise the downstream negative impact on the company’s own workforce identified in the double materiality assessment: <ul style="list-style-type: none"><li>▪ Physical and mental health problems caused by negative working conditions have a negative impact on the company’s own workforce.</li></ul>                                                                                                                                                                                                                                                               |
| <b>Scope</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| The measures apply to all employees at Hypo Vorarlberg’s banking locations in Austria and the St. Gallen branch and also cover the entire management level. The “Individual coaching for all employees of Hypo Vorarlberg Leasing” measure applies solely to employees and managers at Hypo Vorarlberg Leasing.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Time horizons</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| As further activities are being planned, this is considered to be a long-term initiative. Employee health and well-being are critical to Hypo Vorarlberg’s long-term success.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Key remedial measures</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Promoting employee health helps to reduce the physical and mental health problems that can arise at work. It also improves mindfulness with regard to oneself and others, strengthens mental flexibility and resilience, and creates opportunities for respectful interaction.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Progress</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Hypo Vorarlberg regularly evaluates the health-related conditions and needs of its employees in Austria. The results are rated by the occupational psychologist as good to very good in comparison to other employers. This serves as encouragement for the Health Committee to develop additional focus topics and measures. For a number of years now, the company has created sports programmes, enabled in-house health checks, implemented coaching and team-building measures and sought individual solutions for employees returning from extended periods of sick leave.                                                                                                                                                                                                                                   |

## Creation of attractive jobs through training and professional development opportunities

### Key measures

#### Taken

- A newly designed management training programme for all of Hypo Vorarlberg's banking locations, which comprises several modules, promotes dialogue between managers and allows them to strengthen their methodological and social skills
- Individual coaching for all Hypo Vorarlberg Leasing employees in Bolzano

#### Planned

- Further expansion of training programmes for managers at Hypo Vorarlberg's banking locations

### Expected results

Improved leadership skills result in greater employee satisfaction, which will have a positive impact on employee retention.

### Contribution to the realisation of the objectives and targets of the policy

The measures contribute to improving employee satisfaction. The measures also help to promote downstream positive impacts and ensure that potential downstream opportunities resulting from the double materiality assessment are pursued:

- Training and professional development opportunities contribute to the creation of attractive jobs and have a positive influence on the company's own workforce
- Reputational opportunity: Creation of attractive jobs through training and professional development opportunities

### Scope

The measures apply to all employees at Hypo Vorarlberg's banking locations in Austria and the St. Gallen branch and cover the entire management level. Individual coaching is provided to all Hypo Vorarlberg Leasing employees and their managers.

### Time horizons

Medium-term implementation, as this involves the continued expansion of the training programme.

### Key remedial measures

The management training course is mandatory for junior managers at Hypo Vorarlberg's banking locations in Austria and Switzerland. Participation is also open to all managers at Hypo Vorarlberg's banking locations.

### Progress

A pilot project that was launched in February 2024 was transferred to regular operations starting from 2025 due to its success and positive feedback.

## ESRS 2 69) Disclosure requirements for action plans with significant OpEx and/or CapEx requirements

### ESRS 2 69a) Disclosure of the type and amount of current and future financial resources allocated to the action plan

An allocation of current and future operating expenditures and capital expenditures was not carried out in the current reporting period.

### ESRS 2 69b-c) Disclosure of the amount of current and future resources and discussion of how they relate to the most relevant amounts presented in the financial statements

As this data was not collected in the reporting period, no information is available.

### 38b) Measures implemented to provide or enable remedy in relation to an actual material impact

Reference is made to S1-4.38a, as the measures to provide or enable remedy in relation to an actual negative material impact are already taken into account there.

### 38d) Tracking and assessing the effectiveness of actions and initiatives

The effectiveness of the actions is assessed by means of various evaluations carried out at regular intervals (e.g. evaluation of physical and mental stress in the workplace, 270° management feedback).

### 39) Disclosure of processes to identify the need for action in response to negative impacts

Due to the numerous preventive measures already in place, there is currently no need for additional processes.

### 40) Disclosures on material risks and opportunities

#### 40a) Planned or ongoing measures to mitigate material risks arising from the undertaking's own workforce

As the materiality analysis did not identify any (financial) risks for the area of own employees (see S1-4.40), no measures were planned in this regard.

#### 40b) Planned or ongoing measures to pursue material opportunities

The following opportunities were identified on the basis of the double materiality assessment:

- Reputational opportunity: Creation of attractive workplaces by enabling an appropriate work-life balance
- Reputational opportunity: Creation of attractive jobs through training and professional development opportunities
- Reputational opportunity: Creation of attractive and secure jobs

Hypo Vorarlberg takes advantage of these material opportunities by actively promoting training and professional development opportunities, ensuring social dialogue, enabling adequate healthcare provision, supporting employees' work-life balance and providing secure jobs with fair pay.

### 41) Disclosure of whether and how the undertaking ensures that its own practices do not cause or contribute to material negative impacts on its own workforce

Hypo Vorarlberg considers raising awareness and prevention to be the basis for avoiding, containing and combating material negative impacts on its own workforce. Internal policies play an important role in this process, as does the Health Committee, whose aim is to ensure compliance with statutory requirements and the provisions of collective agreements and to maintain and strengthen employee well-being. The Occupational Health and Safety Committee also deals with operational safety and accident prevention.

#### 43) Allocation and administration of resources for the management of material impacts

The financial resources for implementing the measures are covered by the personnel budget. Additional resources, such as a dedicated personnel development team, are also available to support employees with training and professional development programmes.

#### AR 43) Measures to mitigate the negative impacts of the transition to a climate-neutral economy on the undertaking's own workforce

Hypo Vorarlberg promotes more environmentally friendly means of transportation through the travel allowance, the opportunity to purchase a company bicycle and the provision of electric cars. Among other things, this can also help to contain, prevent and combat physical and mental health problems.

### METRICS AND TARGETS

#### DISCLOSURE REQUIREMENT S1-5 – TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

#### 46) Description of the targets set to manage the material impacts, risks and opportunities related to the undertaking's own workforce in accordance with the principles set out in ESRS 2 MDR-T

As Vorarlberg's largest single bank in the German-speaking region, Hypo Vorarlberg is confronted with a challenging labour market that results in a particular competitive situation. From 2025, the HR strategy will therefore focus on attracting the best talent and successfully retaining employees for the long term.

The material impacts and opportunities defined in the materiality analysis and the resulting measures should be closely connected to Hypo Vorarlberg's HR strategy, which itself is aligned with the company's objectives.

| Successful employee retention for the long term                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Relationship between target and policy/strategy objective</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| In order to ensure employee retention for the long term, the defined measures for health promotion and training and professional development are implemented with the aim of maintaining staff turnover at a rate of 9.6 % or lower.                                                                                                                                                                                                                                                                                                                                               |
| <b>Defined target level</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| The staff turnover rate recorded in 2023 should at least be maintained.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Scope of the target</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| This target applies to the entire workforce at Hypo Vorarlberg's banking locations in Austria.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| <b>Baseline value and base year</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| In 2023 (base year), the staff turnover rate adjusted for holiday workers, interns and employees on maternity leave was 9.6 % (baseline value). As the staff turnover rate calculated for 2024 is not in line with the norm, 2023 was applied as the base year.                                                                                                                                                                                                                                                                                                                    |
| <b>Period to which the target applies, including any milestones and interim targets</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| Both the target and the target level apply to the 2025 reporting year.<br>Intermediate target: A staff turnover rate of 7.5 % was calculated for 2024, which is below the target of 9.6 %.                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>Methodologies and significant assumptions</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| Hypo Vorarlberg owes its economic success in particular to the expertise, commitment and motivation of its employees. In addition to recruiting new talent, retaining existing employees is an essential component of Hypo Vorarlberg's continued success.<br>In particular, the targeted promotion of employees through a well-rounded talent management package, including an interesting range of training and professional development opportunities and measures to strengthen physical and mental health, makes a significant contribution to successful employee retention. |
| <b>Relationship with environmental aspects and scientific evidence</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| There is no relationship with environmental aspects and scientific evidence.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Stakeholder involvement</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| The target was defined by the HR department.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Changes in targets, metrics or measurement methodologies</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| There were no changes in the 2024 reporting year.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <b>Progress</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| Performance is assessed on the basis of the number of people joining and leaving the company in the 2025 reporting year.                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

#### 47) Process for setting targets including engagement with the undertaking's own workforce or workers' representatives

##### 47a) Definition of targets

The target of "successful employee retention for the long term" was defined by the HR department without engagement with the workforce or workers' representatives.

##### 47b) Tracking the undertaking's performance against these targets

The staff turnover rate is calculated once a year in order to monitor target achievement.

##### 47c) Identification of lessons and improvements as a result of the undertaking's performance

The dialogue formats defined in S1-2.27b give employees the opportunity to get involved. The insights gained as a result are incorporated into any recommendations for improvement and action.

- Standardised employee appraisals at least once a year
- Regular dialogue between the Works Council, the HR department and the Managing Board
- Legally required evaluation of physical and mental stress in the workplace
- "Mindful Cooperation" guidelines for reporting concerns and complaints for affected persons, observers, informees and persons of trust

## DISCLOSURE REQUIREMENT S1-6 – CHARACTERISTICS OF THE UNDERTAKING'S EMPLOYEES

50a) Disclosure of the total number of employees on a headcount basis, disaggregated by gender and by countries with at least 50 employees and at least 10 % of the total workforce

|               | Group      |            | Austria    |            | Switzerland |           | Italy     |           |
|---------------|------------|------------|------------|------------|-------------|-----------|-----------|-----------|
|               | 2024       | 2023       | 2024       | 2023       | 2024        | 2023      | 2024      | 2023      |
| Male          | 410        | 387        | 361        | 347        | 23          | 14        | 26        | 26        |
| Female        | 528        | 510        | 487        | 469        | 15          | 15        | 26        | 26        |
| Other         | 0          | 0          | 0          | 0          | 0           | 0         | 0         | 0         |
| Not disclosed | 0          | 0          | 0          | 0          | 0           | 0         | 0         | 0         |
| <b>Total</b>  | <b>938</b> | <b>897</b> | <b>848</b> | <b>816</b> | <b>38</b>   | <b>29</b> | <b>52</b> | <b>52</b> |

50b) Number of permanently contracted employees, temporary employees and employees without guaranteed working hours, disaggregated by gender

|                                                   | Group      |            | Austria    |            | Switzerland |           | Italy     |           |
|---------------------------------------------------|------------|------------|------------|------------|-------------|-----------|-----------|-----------|
|                                                   | 2024       | 2023       | 2024       | 2023       | 2024        | 2023      | 2024      | 2023      |
| Male                                              | 410        | 387        | 361        | 347        | 23          | 14        | 26        | 26        |
| Female                                            | 528        | 510        | 487        | 469        | 15          | 15        | 26        | 26        |
| Other                                             | 0          | 0          | 0          | 0          | 0           | 0         | 0         | 0         |
| Not disclosed                                     | 0          | 0          | 0          | 0          | 0           | 0         | 0         | 0         |
| <b>Total employees (incl. parental leave)</b>     | <b>938</b> | <b>897</b> | <b>848</b> | <b>816</b> | <b>38</b>   | <b>29</b> | <b>52</b> | <b>52</b> |
| Male                                              | 406        | 387        | 357        | 347        | 23          | 14        | 26        | 26        |
| Female                                            | 501        | 473        | 460        | 433        | 15          | 15        | 26        | 25        |
| Other                                             | 0          | 0          | 0          | 0          | 0           | 0         | 0         | 0         |
| Not disclosed                                     | 0          | 0          | 0          | 0          | 0           | 0         | 0         | 0         |
| <b>Total employees (excl. parental leave)</b>     | <b>907</b> | <b>860</b> | <b>817</b> | <b>780</b> | <b>38</b>   | <b>29</b> | <b>52</b> | <b>51</b> |
| Male                                              | 0          | 0          | 0          | 0          | 0           | 0         | 0         | 0         |
| Female                                            | 0          | 0          | 0          | 0          | 0           | 0         | 0         | 0         |
| Other                                             | 0          | 0          | 0          | 0          | 0           | 0         | 0         | 0         |
| Not disclosed                                     | 0          | 0          | 0          | 0          | 0           | 0         | 0         | 0         |
| <b>Temporary employees</b>                        | <b>0</b>   | <b>0</b>   | <b>0</b>   | <b>0</b>   | <b>0</b>    | <b>0</b>  | <b>0</b>  | <b>0</b>  |
| Male                                              | 0          | 0          | 0          | 0          | 0           | 0         | 0         | 0         |
| Female                                            | 0          | 0          | 0          | 0          | 0           | 0         | 0         | 0         |
| Other                                             | 0          | 0          | 0          | 0          | 0           | 0         | 0         | 0         |
| Not disclosed                                     | 0          | 0          | 0          | 0          | 0           | 0         | 0         | 0         |
| <b>Employees without guaranteed working hours</b> | <b>0</b>   | <b>0</b>   | <b>0</b>   | <b>0</b>   | <b>0</b>    | <b>0</b>  | <b>0</b>  | <b>0</b>  |

Details for the Bank can be found in the footer<sup>73</sup>.

50c) Total number of employees who left the undertaking during the reporting period and staff turnover rate during the reporting period

|                                   | Group |       | Austria |       | Switzerland |       | Italy |       |
|-----------------------------------|-------|-------|---------|-------|-------------|-------|-------|-------|
|                                   | 2024  | 2023  | 2024    | 2023  | 2024        | 2023  | 2024  | 2023  |
| Employees joining the undertaking | 115   | 98    | 104     | 88    | 11          | 7     | 0     | 3     |
| Employees leaving the undertaking | 71    | 92    | 69      | 87    | 2           | 3     | 0     | 2     |
| Total employees (previous year)   | 897   | 896   | 816     | 819   | 29          | 25    | 52    | 52    |
| Staff turnover in %               | 7.0 % | 9.3 % | 7.5 %   | 9.6 % | 5.0 %       | 9.4 % | 0.0 % | 3.6 % |

50d) Description of the methodologies, procedures, averages and assumptions used to compile the data

The data used in calculating the key figures is collected, aggregated and prepared on a Group-wide basis as at 31 December 2024. The data collected is comprehensive, so no assumptions are required to be made. The data presented is based on the actual number of employees at Hypo Vorarlberg.

50e) Disclosure of contextual information necessary to understand the data

No contextual information is necessary to understand the data.

<sup>73</sup> Bank (2024): Total employees (active and passive) per capita: 838; total employees (active and passive) per capita on average: 785

## DISCLOSURE REQUIREMENT S1-8 – COLLECTIVE BARGAINING COVERAGE AND SOCIAL DIALOGUE

### 60a, 60b and 63a) Workers covered by workers' representatives

| Degree of coverage | Collective bargaining coverage                                                       |                                                                                                           | Social dialogue                                                                                          |
|--------------------|--------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|
|                    | Employees – EEA (for countries with >50 employees accounting for >10 % of the total) | Employees – non-EEA countries (estimate for regions with >50 employees accounting for >10 % of the total) | Workplace representation (EEA only) (for countries with >50 employees accounting for >10 % of the total) |
| 0 – 19 %           |                                                                                      |                                                                                                           |                                                                                                          |
| 20 – 39 %          |                                                                                      |                                                                                                           |                                                                                                          |
| 40 – 59 %          |                                                                                      |                                                                                                           |                                                                                                          |
| 60 – 79 %          |                                                                                      |                                                                                                           |                                                                                                          |
| 80 – 100 %         | Austria, Italy                                                                       |                                                                                                           | Austria, Italy                                                                                           |

The Group-wide collective bargaining coverage is 95.4 %.

### 60c) Percentage of employees covered by collective bargaining agreements in each non-EEA region

As the St. Gallen branch has fewer than 50 employees and accounts for less than 10 % of the total workforce, it is not included in the table.

### 63b) Disclosure of any agreements with employees regarding representation by a European Works Council (EWC), Societas Europaea (SE) Works Council or Societas Cooperativa Europaea (SCE) Works Council

Representation by a European Works Council (EWC), Societas Europaea (SE) Works Council or Societas Cooperativa Europaea (SCE) Works Council is not relevant for Hypo Vorarlberg.

## DISCLOSURE REQUIREMENT S1-9 – DIVERSITY METRICS

### 66a) Disclosure of gender distribution at top management level as absolute and relative figures

|                   | Group        |              | Austria      |              |
|-------------------|--------------|--------------|--------------|--------------|
|                   | 2024         | 2023         | 2024         | 2023         |
| Male              | 3            | 3            | 3            | 3            |
| in %              | 100.0        | 100.0        | 100.0        | 100.0        |
| Female            | 0            | 0            | 0            | 0            |
| in %              | 0.0          | 0.0          | 0.0          | 0.0          |
| Other             | 0            | 0            | 0            | 0            |
| in %              | 0.0          | 0.0          | 0.0          | 0.0          |
| No data           | 0            | 0            | 0            | 0            |
| in %              | 0.0          | 0.0          | 0.0          | 0.0          |
| <b>Total</b>      | <b>3</b>     | <b>3</b>     | <b>3</b>     | <b>3</b>     |
| <b>Total in %</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b> |

### 66b) Disclosures on employees at top management level by age group

|                   | Group        |              | Austria      |              |
|-------------------|--------------|--------------|--------------|--------------|
|                   | 2024         | 2023         | 2024         | 2023         |
| 0-29 years        | 0            | 0            | 0            | 0            |
| in %              | 0.0          | 0.0          | 0.0          | 0.0          |
| 30-49 years       | 1            | 1            | 1            | 1            |
| in %              | 33.3         | 33.3         | 33.3         | 33.3         |
| 50+ years         | 2            | 2            | 2            | 2            |
| in %              | 67.7         | 67.7         | 67.7         | 67.7         |
| <b>Total</b>      | <b>3</b>     | <b>3</b>     | <b>3</b>     | <b>3</b>     |
| <b>Total in %</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b> | <b>100.0</b> |

### AR 71) Definition of top management or reasons for an alternative undertaking-specific definition

There is no deviation from the above definition.

## DISCLOSURE REQUIREMENT S1-10 – ADEQUATE WAGES

### 69) Adequate wages in line with applicable benchmarks

Statutory provisions and collective bargaining agreements ensure that all Hypo Vorarlberg employees receive adequate wages.



## DISCLOSURE REQUIREMENT S1-14 – HEALTH AND SAFETY METRICS

### 88a-c) Disclosure of the coverage of the workforce by the health and safety management system and work-related incidents

|                                                                                                                                                      | Group  |        | Austria |        | Switzerland |       | Italy   |         |
|------------------------------------------------------------------------------------------------------------------------------------------------------|--------|--------|---------|--------|-------------|-------|---------|---------|
|                                                                                                                                                      | 2024   | 2023   | 2024    | 2023   | 2024        | 2023  | 2024    | 2023    |
| Proportion of employees covered by the health and safety management system based on statutory requirements and/or recognised standards or guidelines | 90.8 % | 91.4 % | 94.3 %  | 94.1 % | 0.0 %       | 0.0 % | 100.0 % | 100.0 % |
| Number of deaths as a result of accidents at work and/or work-related illnesses                                                                      | 0      | 0      | 0       | 0      | 0           | 0     | 0       | 0       |
| Number of reportable accidents at work                                                                                                               | 5      | 5      | 3       | 5      | 0           | 0     | 2       | 0       |
| Rate of reportable accidents at work                                                                                                                 | 3.2    | 3.4    | 2.1     | 3.7    | 0.0         | 0.0   | 21.2    | 0.0     |

The data relates to the reporting date of 31 December 2024.

## DISCLOSURE REQUIREMENT S1-16 – COMPENSATION METRICS (PAY GAP AND TOTAL COMPENSATION)

### 97a) Disclosures on the gender pay gap

| Country                           | Employee category | 2024    |
|-----------------------------------|-------------------|---------|
| <b>Austria</b>                    |                   |         |
| Hypo Vorarlberg                   | ID staff          | 2.5 %   |
| Hypo Vorarlberg                   | Employees         | 21.1 %  |
| Hypo Vorarlberg                   | Managing Board    | 0.0 %   |
| Hypo Real Estate & Leasing        | ID staff          | 0.0 %   |
| Hypo Real Estate & Leasing        | Employees         | 23.5 %  |
| <b>Switzerland</b>                |                   |         |
| Hypo Vorarlberg St. Gallen branch | ID staff          | 0.0 %   |
| Hypo Vorarlberg St. Gallen branch | Employees         | 12.3 %  |
| <b>Italy</b>                      |                   |         |
| Hypo Vorarlberg Immo Italia       | ID staff          | 0.0 %   |
| Hypo Vorarlberg Immo Italia       | Employees         | -34.6 % |
| Hypo Vorarlberg Leasing           | ID staff          | 0.0 %   |
| Hypo Vorarlberg Leasing           | Employees         | 15.9 %  |

### 97b) Annual total remuneration ratio of the highest-paid individual to the median remuneration for all other employees

In 2024, the ratio of the annual total remuneration of the highest-paid individual to the median remuneration for all other employees was 6.06:1.

### 97c) Disclosure of contextual information necessary to understand the data

The basis for calculating the gender pay gap (see S1-16.97a) is the gross annual income including paid overtime, overtime allowances, benefits in kind, any bonuses and meal allowances. Any social supplements and travel allowances paid by Hypo Vorarlberg in Austria were not taken into account, as these do not apply to all employees in the same way and hence impede comparability.

Part-time employees were extrapolated to 100 % and people joining or leaving the company during the year were extrapolated to a full year.

Where a pay gap of 0 % is disclosed for the reporting year, this means the category comprises one gender and it was not possible to calculate a pay gap.

The "ID staff" group comprises senior management (first level directly below the Managing Board), the managers defined as risk buyers, managers with control functions and the members of the Works Council in the Credit Committee.

## DISCLOSURE REQUIREMENT S1-17 – INCIDENTS, COMPLAINTS AND SEVERE HUMAN RIGHTS IMPACTS

### 103a-d and 104a-b) Disclosure of the number of work-related incidents and/or complaints and severe human rights impacts

|                                                                                                                                                                                        | 2024 | 2023 |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------|------|
| Number of cases of discrimination                                                                                                                                                      | 0    | 0    |
| Number of complaints submitted through channels for own employees to raise concerns                                                                                                    | 0    | 0    |
| Number of complaints submitted to the National Contact Points for OECD Multinational Enterprises                                                                                       | 0    | 0    |
| Amount of material fines, penalties and compensation for damages as a result of violations of social and human rights factors                                                          | 0    | 0    |
| Number of severe human rights violations and incidents related to own employees                                                                                                        | 0    | 0    |
| Number of severe human rights issues and incidents related to own employees that violate the principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises | 0    | 0    |
| Amount of material fines, penalties and compensation for damages as a result of severe human rights violations and incidents related to employees                                      | 0    | 0    |
| Number of severe human rights cases in which the undertaking played a role in providing remedy to those affected                                                                       | 0    | 0    |

# ESRS S3: AFFECTED COMMUNITIES

## ESRS 2 GENERAL DISCLOSURES

### DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-2 – INTERESTS AND VIEWS OF STAKEHOLDERS

**7) Disclosure of how affected communities, including human rights, inform the strategy and business model**

As a regional bank in Vorarlberg, Hypo Vorarlberg’s strategy and business model are not negatively influenced by affected communities.

## STRATEGY

### DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-3 – MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

**9) Disclosure of whether all affected communities are included in the scope of disclosure under ESRS 2 and provision of relevant information**

The communities affected by Hypo Vorarlberg include people, associations and institutions in the context of sponsoring partnerships and the awarding of donations. All affected communities that are affected by Hypo Vorarlberg’s activities are included in the scope of disclosure under ESRS 2.

**9a) Description of affected communities according to S3 SBM-3.9ai-iv**

For the 2024 non-financial statement, Hypo Vorarlberg describes the affected communities as follows:

Individuals or groups who live or work in the core regions in which Hypo Vorarlberg is active. This also includes communities that are directly affected by Hypo Vorarlberg’s products, services or business relationships (e.g. suppliers) or in its value chain.

**9b) Information on material negative impacts**

Due to the focus on regional value creation and support for regional companies, no negative impacts were identified in this context as part of the double materiality assessment.

**9c) Description of activities that lead to material positive impacts**

Hypo Vorarlberg makes a positive contribution to regional development and is a reliable and long-term sponsorship partner for numerous cultural and sporting organisations in its market areas, especially in its home market of Vorarlberg. With its charitable fund, Hypo Vorarlberg supports people who are in need through no fault of their own, as well as institutions in the social sector and eligible projects in the areas of education, culture and science. The charitable fund celebrated its tenth anniversary in the 2024 reporting year and is a key element of the Bank’s social responsibility. Hypo Vorarlberg also makes a positive contribution through the implementation of the “Sustainable procurement and circular economy” policy (S3-1.14), which aims to ensure that services and products are procured in the region in order to strengthen the local value chain.

**9d) Material risks and opportunities arising from impacts and dependencies in connection with affected communities**

Targeted support for projects through sponsoring partnerships and the active selection of local suppliers create opportunities for regional value creation and strengthen Hypo Vorarlberg’s reputation as a regional bank. In addition, the public image of the charitable fund helps to promote awareness of the company’s regional support and commitment. No risks arising from impacts and dependencies were identified in the preparation of the materiality analysis.

**10) Disclosure of whether and how the undertaking has recognised greater risks of harm for particularly affected communities**

As no negative impacts were identified in the course of the materiality analysis, no analysis was carried out to understand how affected communities could be exposed to a risk of harm.

**11) Disclosure of the material risks and opportunities related to specific affected communities**

Various opportunities, but no risks, were identified in the course of the materiality analysis. The following table provides an overview of the opportunities relating to the affected communities identified as part of the double materiality assessment:

| Opportunities                                                                                                                | Affected communities                                                                                   |
|------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------|
| Reputational opportunity: Creation of jobs in the region through local and regional value creation                           | Initiatives, partnerships, local suppliers and producers                                               |
| Reputational opportunity: Support for regional initiatives through the charitable fund and sponsorship                       | Local suppliers and producers, sponsoring partnerships, recipients of support from the charitable fund |
| Operational opportunity: Contribution to local and regional value creation through the use of regional services and products | Sponsoring partnerships, recipients of support from the charitable fund                                |
| Operational opportunity: Promotion of positive relationships between companies and affected communities                      | Persons who live or work in the areas in which Hypo Vorarlberg operates                                |

## IMPACT, RISK AND OPPORTUNITY MANAGEMENT

### DISCLOSURE REQUIREMENT S3-1 – POLICIES RELATED TO AFFECTED COMMUNITIES

**14) Policies to manage material impacts, risks and opportunities related to affected communities in accordance with ESRS 2 MDR-P, including the scope of application**

No specific strategies or policies for dealing with affected communities have been implemented. Nevertheless, the following relevant policies relating to all affected communities have been identified for the material topics identified (positive impacts and potential opportunities). These policies cover Hypo Vorarlberg’s upstream and downstream value chain.

- “Sponsorship at Hypo Vorarlberg” policy
- “Sustainable procurement and circular economy in business operations” policy

## "Sponsorship at Hypo Vorarlberg" policy

### Key content

Hypo Vorarlberg's sponsorship policy describes the central procedure for partnerships in this area. It applies to all employees and is regularly reviewed and updated. The individual sections cover the methodology, principles and guidelines for reviewing and evaluating potential new sponsoring partnerships.

The sponsorship policy is aligned with Hypo Vorarlberg's corporate, marketing and communication objectives and brand values. It helps to ensure a predictable and credible communication policy in respect of employees, customers and other stakeholders. The policy also defines benchmarks for monitoring success.

### General objectives

Hypo Vorarlberg actively supports projects in various areas (sport and leisure, art and culture, education and social affairs, energy and the environment) where the sponsorship partner and Hypo Vorarlberg demonstrate the same personal commitment and professionalism as well as a shared understanding of sustainability.

Sponsorship is therefore a good opportunity for the company to promote projects that reflect positively on its image, appeal to a wide audience and contribute to maintaining contacts, customer loyalty and the generation of new contacts. In all of its activities in this area, Hypo Vorarlberg pays attention to regionality and seeks to establish long-term partnerships. Hypo Vorarlberg's sponsorship portfolio comprises around 60 institutions and projects, the majority of which are located in Vorarlberg.

### References to material impacts, risks or opportunities

The following topics were identified as material for the policy based on the double materiality assessment:

#### Impact

- Positive impact on affected communities through contribution to regional economic responsibility (e.g. sponsorship or local procurement)

#### Opportunities

- Reputational opportunity: Creation of jobs in the region through local and regional value creation
- Reputational opportunity: Support for regional initiatives through the charitable fund and sponsorship

### Monitoring process

Compliance is monitored by Hypo Vorarlberg employees or the branch managers at the individual branches. Internal Audit also takes the "Sponsorship at Hypo Vorarlberg" policy into account in its continuous audits. The policy applies to all employees of Hypo Vorarlberg.

### Area of application

The policy applies to all employees of Hypo Vorarlberg who are involved in sponsorship in their business segment, irrespective of their position. The standards set out therein apply to customers (new and existing customers), business partners and other stakeholders.

The target area for sponsorship is in Vorarlberg, Vienna, Graz, Salzburg, Wels and the St. Gallen branch. Nationwide (Austria-wide) sponsorship is avoided due to the considerable scatter loss this entails. Hypo Vorarlberg endeavours to enter into reliable, long-term partnerships. Only ethically sound projects that also fulfil Hypo Vorarlberg's sustainability criteria are supported.

### Responsible organisational level

The Communication and Marketing department is responsible for creating the policy and updating it as required, as well as for its implementation. Coordination is performed by the Sponsorship & Events Group, which reports directly to the Managing Board.

### References to third-party standards or initiatives

The policy is based on the following standards:

- Austrian Media Cooperation and Funding Transparency Act

### Consideration of stakeholder interests

The policy is prepared by the Sponsorship and Events specialist department. In dialogues and annual meetings with the regional partners, the requirements and perspectives of both parties are discussed, planned and recorded in writing.

### Availability of the policy for stakeholders

The "Sponsorship at Hypo Vorarlberg" policy is an internal company document that is made available to all Hypo Vorarlberg employees on the intranet.

## "Sustainable procurement and circular economy in business operations" policy

### Key content

Hypo Vorarlberg's "Sustainable procurement and circular economy in business operations" policy describes the process and the criteria applied for the procurement of products and services by all employees who perform procurement processes. The policy is reviewed regularly and was most recently updated at the end of 2024. The individual sections are organised according to product groups and services and include the defined requirements to ensure sustainable procurement in each case:

- Scope of application and regulatory requirements
- Application of the policy for product groups/services:
  - IT equipment
  - Waste management
  - Vehicle fleet
  - Construction
  - Purchase of energy for business operations
  - Office equipment
  - Advertising materials
  - Customer events and gifts

### General objectives

As Hypo Vorarlberg's core business involves the provision of financial services, its supply and value chain differs fundamentally from that of a manufacturing company. Nevertheless, Hypo Vorarlberg has set itself the goal of defining and implementing sustainable procurement processes and, as a reliable partner, establishing and maintaining good supplier relationships that strengthen value creation in the region.

### References to material impacts, risks or opportunities

The following topics were identified as material for the policy based on the double materiality assessment:

## Impact

- Positive impact on affected communities through contribution to regional economic responsibility (e.g. sponsorship or local procurement).

## Opportunities

- Operational opportunity: Contribution to local and regional value creation through the use of regional services and products
- Operational opportunity: Promotion of positive relationships between companies and affected communities

## Monitoring process

The Logistics department management team monitors compliance by performing regular and ad hoc checks and documentation in internal systems.

## Area of application

The policy applies to the upstream value chain and extends to Hypo Vorarlberg in its entirety. Some parts of the policy are specifically designed for all Group locations in Austria. For locations outside Austria, the requirements apply according to the same principles or must be applied analogously.

## Responsible organisational level

The Logistics department is responsible for creating and continuously updating the policy as well as for its implementation.

## References to third-party standards or initiatives

The policy obliges the company to comply with the following legal principles and guidelines:

- NaBe Action Plan 2021
- ÖGNI standard
- Austrian Federal Act on Health and Safety at Work

## Consideration of stakeholder interests

All relevant stakeholders and knowledge bearers at Hypo Vorarlberg were involved in the creation of this policy, in particular the specialist departments for Logistics (Facility Services, Material and Fleet Management, Construction, Customer Marketing, Sponsorship & Events, IT and Sustainability). Any amendment to this policy requires the renewed involvement of the aforementioned stakeholders.

## Availability of the policy for stakeholders

The "Sustainable procurement and circular economy in business operations" policy is an internal company document that is made available to all Hypo Vorarlberg employees on the intranet.

## 16) Description of the human rights policy commitments for affected communities, including the general approach

### 16a) Respect for human rights, especially those of indigenous peoples

Respect for human rights in relation to affected communities is not currently included in any strategy. A revision of the Code of Conduct to include affected communities is planned for 2025. This is based on the international standards on respect for human rights (see S1-1.19). As a regional bank in Vorarlberg, indigenous peoples are not material in respect of Hypo Vorarlberg's business model and the results of the materiality analysis and hence are not included in the Code of Conduct.

### 16b) Engagement with affected communities

Engagement with affected communities is firmly enshrined in Hypo Vorarlberg's corporate strategy and represents an important contribution to promoting regional value creation. The bank regularly supports initiatives for non-profit and charitable causes through sponsorship and its charitable fund. To ensure that support is targeted, discussions to improve the partnerships take place in the area of sponsorship and with suppliers. In the case of the charitable fund, discussions on the nature and extent of the support take place following the decision to provide support.

### 16c) Measures to remediate human rights impacts

Hypo Vorarlberg has already implemented various measures and is planning additional initiatives to take human rights aspects into account in its business relationships and activities.

## MEASURES ALREADY IMPLEMENTED

### Sponsorship policy

A sponsorship policy ensures that sponsorship commitments are only entered into with trustworthy institutions and associations from defined sectors. This is intended to ensure that human rights are respected in the sponsoring partnerships. All sponsorship requests are reviewed internally by the Sponsorship and Events Group or independently by the branches in order to ensure compliance with the policy and to manage the allocation of funds responsibly.

### "Sustainable procurement and circular economy in business operations" policy

In its procurement practices, Hypo Vorarlberg pays attention to sustainability labels and carefully checks whether products and services meet internal standards. These measures promote social and environmental responsibility within the value chain and strengthen the Bank's sustainable orientation. The policy is based on national quality standards.

## PLANNED MEASURES

### Supplier Code of Conduct

A comprehensive Supplier Code of Conduct will be introduced in the 2025 reporting period. It will oblige all of the Bank's suppliers to comply with human rights standards and assume responsibility throughout the entire supply chain. The Supplier Code of Conduct is intended to ensure that the Bank only works with partners who share its values. It will incorporate the same international standards as stated in the Code of Conduct. The Supplier Code of Conduct is an extension of the "Sustainable procurement and circular economy in business operations" policy.

### Expansion of the Code of Conduct

In spring 2025, the existing Code of Conduct will be expanded to include the topic of affected communities. The updated Code of Conduct is based on internationally recognised guidelines and obliges all employees to actively uphold human rights principles. This will strengthen the Bank's human rights obligations and establish a clear framework for action for all business segments.

### 17) Disclosure of whether and how the policies are aligned with internationally recognised standards

To promote reliability and transparency, Hypo Vorarlberg bases its internal policies on national and international standards. The sustainable procurement policy is based on established standards such as the NaBe Action Plan 2021, the ÖGNI standard and the Austrian Federal Act on Health and Safety at Work.

Going forward, the expansion of the Code of Conduct will also increase the focus on human rights for affected communities. The Code of Conduct is based on the international standards on respect for human rights (see S1-1.19).

## DISCLOSURE REQUIREMENT S3-2 – PROCESSES FOR ENGAGING WITH AFFECTED COMMUNITIES ABOUT IMPACTS

### 21) Disclosure of how decisions and actions to address impacts are influenced by the inclusion of affected communities' perspectives

In dialogues and annual meetings with the regional partners, the requirements and perspectives of both parties are discussed, planned and recorded in writing. This is intended to support institutions and associations in their ability to continue fulfilling their social, cultural and sporting tasks, thereby creating added value for their area and the region.

Discussions aimed at improving supplier relationships take place on an ad hoc basis. However, there is no regular dialogue with suppliers in this regard. In the case of projects supported by the charitable fund, regular dialogues take place with the recipients to identify requirements so that targeted support can be provided.

### 21a) Disclosure of whether engagement occurs with affected communities directly, with their legitimate representatives or with credible proxies

Engagement takes place directly with local companies or with legitimately authorised representatives of institutions and associations.

### 21b) Description of the engagement process in terms of the type and frequency of engagement

#### SUPPLIER RELATIONSHIPS

The procurement of products/services takes account of sustainability criteria and is regularly reviewed.

#### ASSOCIATIONS AND INSTITUTIONS

A written concept must be submitted along with the sponsorship request and is reviewed in accordance with the sponsorship policy. Only ethically sound projects that fulfil Hypo Vorarlberg's criteria are supported. Existing or prospective business relationships are favoured. In addition, financial resources from the charitable fund are made available for non-profit causes in the areas of social welfare, science/education and culture. Applications can be submitted via an online form, by post or by telephone. A board of trustees decides on the allocation of funds. A committee of representatives from various social institutions and backgrounds manages the charitable fund on a voluntary basis. The members of the board of trustees decide on the allocation of funds at quarterly meetings.

### 21c) Function and most senior role within the undertaking that has operational responsibility for engagement

The respective specialist department and the individual branches are directly responsible for sponsorship and for implementing the sustainable procurement policy. They report to the Managing Board.

### 21d) Description of how the undertaking assesses the effectiveness of its engagement

In the case of sponsorship with a defined volume and duration, advertising value analyses are occasionally carried out and discussed with the partners. The advertising value analysis is intended to provide information on the added value of sponsorship for Hypo Vorarlberg. It does not aim to measure the impact in terms of market share and market potential. There is no assessment of effectiveness for supplier relationships. Discussions aimed at improving supplier partnerships take place occasionally. The funds allocated by the charitable fund are earmarked for the purpose specified in the application. Recipients must provide evidence that the funds have been earmarked for a specific purpose.

### 22) Disclosure on the inclusion of perspectives of particularly affected communities and specific groups within the communities

Annual discussions with partners and an open dialogue about requirements and objectives ensure that the different perspectives of the affected communities are integrated into the decision-making processes.

## DISCLOSURE REQUIREMENT S3-3 – PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR AFFECTED COMMUNITIES TO RAISE CONCERNS

### 27a) General approach to and processes for remediation and assessment of effectiveness

No negative impacts on affected communities were identified in the course of preparing the materiality analysis.

## DISCLOSURE REQUIREMENT 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

### 31) Actions and resources related to affected communities in accordance with the principles set out in ESRS 2 MDR-A

With regard to regional value creation, Hypo Vorarlberg's employees are required to make purchases in accordance with the principle of environmental protection and resource conservation. This also includes longevity and locality. Hypo Vorarlberg also endeavours to maintain its existing partnerships and to continue promoting and supporting institutions and associations.

The following action plans that apply to Hypo Vorarlberg's entire value chain were drawn up for the relevant strategies:

- Measures for sustainable procurement
- Sponsorship measures

## Promotion of regionality

### Key measures

#### Taken

- Orientation of procurement towards regional and local products and services, taking account of certain criteria in accordance with the procurement policy

#### Planned

- Creation of a Supplier Code of Conduct with specific sustainability criteria
- Intensification of business relationships with regional suppliers and business partners

### Expected results

The focus on regional products and services will strengthen Vorarlberg as a business location and promote Hypo Vorarlberg's image as a reliable business partner. In addition, the focus on the local value chain will potentially create new jobs in the region.

### Contribution to the realisation of the objectives and targets of the policy

The measures taken are consistent with the objective of the "Sustainable procurement and circular economy in business operations" policy, which essentially concerns climate change adaptation through sustainable procurement and handling and limiting greenhouse gas emissions in business operations. The material positive impacts and opportunities are specifically addressed through the measures already taken and planned:

- Positive impact on affected communities through contribution to regional economic responsibility (e.g. sponsorship or local procurement)
- Reputational opportunity: Creation of jobs in the region through local and regional value creation
- Operational opportunity: Contribution to local and regional value creation through the use of regional services and products
- Operational opportunity: Promotion of positive relationships between companies and affected communities

Hypo Vorarlberg sources its products regionally wherever possible. This contributes to regional value creation, which in turn helps to protect jobs. Hypo Vorarlberg sees this as an opportunity to further establish itself as a regional bank by promoting and maintaining long-term relationships.

### Scope

The measures taken are designed to be consistent with the policy and apply to all Group locations in Austria.

### Time horizons

The measures implemented represent a continuous and long-term process (PDCA) that is regularly reviewed so that the measures already taken can be adjusted and additional measures planned as necessary.

### Key remedial measures

The measures taken already address the material impacts; there is no direct need for remedial action.

### Progress

/

## Support for social projects and initiatives in the region

### Key measures

#### Taken

- Targeted support for projects and initiatives in the areas of sport and leisure, art and culture, education and social affairs as well as energy and the environment. These must be ethically sound and fulfil Hypo Vorarlberg's sustainability criteria. Hypo Vorarlberg refrains from sponsoring organisations in which political parties, sub-organisations or related organisations are involved. Sponsorship and event planning are primarily focused on the market areas of Vorarlberg, Vienna, Wels, Graz, Salzburg and the St. Gallen branch with a view to promoting relationships with the affected communities.
- Long-term partnerships with members of the local community
- Establishment of a charitable fund for social initiatives and projects in the region since 2014
- The financial contribution from the annual donation pot also benefits people, associations and institutions in the fields of science, education and culture that are primarily based in Vorarlberg as a business location. The funds are primarily allocated to social causes, e.g. to help families and households that are in need due to low income or through no fault of their own.

### Expected results

The result of the measures already taken is that potential positive impacts and opportunities for the Vorarlberg region and the local community are promoted. The structured approach to the selection of sponsorship partners for projects (art, education, energy, environment) and the allocation of funds is intended to ensure that Hypo Vorarlberg fulfils its regional social responsibility.

### Contribution to the realisation of the objectives and targets of the policy

The measures taken are consistent with the objective of the sponsorship policy, which essentially comprises the appropriate selection and implementation of non-profit projects and initiatives for regional value creation in Vorarlberg. In addition, the measures taken specifically support the identified positive impacts and opportunities:

- Positive impact on affected communities through contribution to regional and economic responsibility (e.g. sponsorship, local procurement)
- Reputational opportunity: Support for regional initiatives through the charitable fund and sponsorship

### Scope

In accordance with the implemented sponsorship policy, the area of application for the measures taken is also focused on the core regions. Nationwide (Austria-wide) sponsorship is avoided due to the considerable scatter loss this entails.

### Time horizons

The measures implemented represent a continuous process (PDCA) that is regularly reviewed so that the measures already taken can be adjusted and additional measures planned as necessary.

### Key remedial measures

The measures taken already address the material impacts and opportunities; there is no direct need for remedial action as no negative impacts or risks have been identified.

### Progress

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**ESRS 2 69) Disclosure requirements for action plans with significant OpEx and/or CapEx requirements**

**ESRS 2 69a) Disclosure of the type and amount of current and future financial resources allocated to the action plan**

The allocation of current and future operating expenditures and capital expenditures was not carried out in the current reporting period.

**ESRS 2 69b-c) Disclosure of the amount of current and future resources and discussion of how they relate to the most relevant amounts presented in the financial statements**

As this data was not collected in the reporting period, no information is available.

**32) Disclosures relating to material impacts**

**32a) Actions implemented, planned or underway to prevent or mitigate material negative impacts**

As no negative impacts were identified in the course of the materiality analysis, no preventive measures have been implemented or are planned or underway.

**32b) Disclosure of whether and how actions have been taken to mitigate a material impact**

No material negative impacts requiring specific remedial action have been identified to date.

**32c) Description of additional actions or initiatives to deliver positive impacts for affected communities**

No initiatives have been taken in addition to the actions already mentioned.

**32d) Description of how the effectiveness of the actions taken for affected communities are tracked and assessed**

The impact of the measures is measured on the basis of the number of projects funded, the amount of financial support and the positive response from the affected communities.

**33) Additional required information**

**33a) Disclosure of how the undertaking determines that action is necessary to avoid negative impacts on communities**

No negative impacts on affected communities requiring additional action were identified as part of the double materiality assessment.

**33b) Disclosure of the approach taken to address specific material negative impacts**

As no material negative impacts have been identified, no further action is required.

**33c) Disclosure of how mitigation measures for material negative impacts on communities are ensured and their effectiveness is assessed**

As no material negative impacts have been identified, no mitigation measures are required.

**34) Descriptions of material risks and opportunities**

**34a) Actions planned or underway to mitigate material risks and how this is tracked in practice**

No potential risks to affected communities were identified on the basis of the double materiality assessment.

**34b) Actions planned or underway to pursue material opportunities**

No initiatives have been taken in addition to the actions already mentioned (see S3-4.31). Hypo Vorarlberg will take every opportunity to strengthen its relationships with local communities and promote sustainable initiatives in order to ensure its long-term business success.

**35) Disclosure of how the undertaking ensures that its own practices do not have a material negative impact on affected communities**

The double materiality assessment did not identify any of the company's own practices as leading to negative impacts.

**36) Disclosure of whether severe human rights violations and incidents related to affected communities have been reported**

No serious human rights violations related to affected communities were reported in the 2024 reporting year.

**38) Disclosure of resources allocated to the management of material impacts, including relevant information on how these impacts are handled**

Various specialist departments at Hypo Vorarlberg, including Sponsorship and Logistics, are responsible for managing the material impacts on affected communities. The processes and criteria in these areas are continuously adapted to ensure that there are no negative impacts on the communities.



## METRICS AND TARGETS

### DISCLOSURE REQUIREMENT S3-5 – TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

**ESRS 2 81) If the undertaking has not set any measurable outcome-oriented targets: Disclosure of whether the effectiveness of the policies and actions in relation to impacts, risks and opportunities can still be tracked. If yes, information on the procedures and the defined targets and timeframes**

No measurable quantitative targets have been defined for standard S3 "Affected communities". However, the strategies focus on promoting sustainable economic activity in the region and on supporting institutions and associations in their ability to continue fulfilling their social, cultural and sporting tasks. In the coming years, the company will examine whether it makes sense to define specific measurable and time-bound targets.

**ESRS 2 81bi-ii) Disclosure of whether the effectiveness of the policies and actions in relation to impacts, risks and opportunities can still be tracked. If yes, information on the procedures and the defined targets and timeframes**

The effectiveness of the strategies and actions in relation to positive impacts and opportunities is ensured by the monitoring process defined in the policies (see S3-1, S3-4). The strategies and actions are reviewed regularly (at least annually) and adjusted as necessary. The monitoring process takes account of various internal stakeholders (the relevant specialist department, the Managing Board and, as part of its auditing activities, Internal Audit).

## ESRS S4: CONSUMERS AND END-USERS

### ESRS 2 GENERAL DISCLOSURES

#### DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-2 – INTERESTS AND VIEWS OF STAKEHOLDERS

##### 8) Disclosure of how consumer interests and rights, including human rights, influence the strategy and business model

Hypo Vorarlberg endeavours to offer high-quality services to its private and corporate customers. With the help of training and professional development, employees are able to identify the needs and interests of customers and offer tailor-made products. This is also reflected in Hypo Vorarlberg's core values. Hypo Vorarlberg's Code of Conduct obliges all employees to observe the basic rules of conduct towards their customers regardless of their background.

#### DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-3 – MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

##### 10) Disclosure of all consumers and end-users materially impacted by the undertaking and its value chain

###### CORPORATE CUSTOMERS

One focus of Hypo Vorarlberg's business activities is corporate customer business. Vorarlberg and the surrounding regions are characterised by a very SME-dominated economic structure with a high export ratio. Hypo Vorarlberg supports these companies in all financial issues that are important to them. The Bank has particular expertise in the areas of real estate financing, investment and project financing, subsidies, foreign services, working capital financing and as a provider of alternative forms of financing and in investment.

###### PRIVATE CUSTOMERS AND PRIVATE BANKING

Hypo Vorarlberg offers private customers extensive services with a focus on residential construction financing, pension advice and investment advice. Customers benefit from individual, flexible solutions as well as fair and transparent conditions. The varied product range for high-net-worth individuals and institutional clients is oriented towards customers' needs in all areas and offers contemporary solutions through the use of flexible optimisation policies adapted to the market situation in asset management, the use of viable alternatives to the money market in the investment business, further developments in online banking in payment transactions and, not least, through tailored financing.

###### TREASURY/FINANCIAL MARKETS

The Financial Markets business segment is responsible for asset/liability management, Hypo Vorarlberg's refinancing and various services for customers and different groups within the Bank, including money market, foreign exchange and interest rate derivatives as well as securities trading. Hypo Vorarlberg does not engage in any proprietary trading that is not connected to customer business.

###### CORPORATE CENTRE

The Corporate Centre essentially bundles the subsidiaries and holdings that expand the Bank's service range with banking-related products. In particular, it includes the property and leasing subsidiaries in Austria and Italy and the shareholdings in comit Versicherungsmakler GmbH and MASTERINVEST Kapitalanlage GmbH.

##### 10a) Description of the consumer and end-user groups affected and the material impacts

###### 10ai) Harmful products: Consumers of products that are inherently harmful to health or increase risks for chronic disease

Hypo Vorarlberg does not sell any products or services that are inherently harmful to health. Accordingly, no consumer or end-user groups have been identified in this area.

###### 10aii) Data protection and rights: Consumers with potential risks to privacy, personal data, freedom of expression and non-discrimination

The handling of personal and sensitive data of all customers and consumers is a valuable commodity for Hypo Vorarlberg. Hypo Vorarlberg endeavours to ensure that security measures regarding data protection and data security are maintained at the highest level. Specific work instructions and policies have been implemented for this purpose and are regularly reviewed and modified (see S4-1.15).

###### 10aiii) Information requirements: Consumers who require accurate and accessible information on safe use

Hypo Vorarlberg aims to offer high-quality advice to all its customers. To this end, its advisors attend various training and professional development courses on a continuous basis and in consultation with their managers. Hypo Vorarlberg's website also provides information on services and current projects. Product sheets are also freely available to customers at the branches and can be discussed in consultations with advisors.

###### 10aiv) Vulnerable groups: Consumers who are vulnerable to health, data protection or marketing risks, e.g. children or financially vulnerable individuals

Customer data protection is a top priority for Hypo Vorarlberg. The company is aware of its responsibility and the trust that goes along with it. In addition to compliance with banking secrecy, Hypo Vorarlberg invests in the continuous improvement of data protection. Care is taken to ensure that the provisions of the General Data Protection Regulation (GDPR) are implemented throughout the Group. To this end, measures for the proper handling of personal data have been implemented and are regularly checked for effectiveness. The internal communication rules are designed to ensure that all customers are protected from being misled by marketing campaigns.

##### 10b) Disclosure of material negative impacts on consumers, whether systemic or individual

The material negative impacts on consumers and end-users in the area of data protection and information security have been identified. Potential incidents of data protection violations or information and communication technology (ICT)-related incidents may affect individual natural persons or a group of consumers or end-users.

##### 10c) Description of positive impacts and (potentially) affected consumer groups

Hypo Vorarlberg has implemented measures that offer material positive impacts for consumers and end-users. These include accessible branches and digital banking for people with physical disabilities, transparent and responsible advice and communication by trained employees, as well as a data protection management system to safeguard personal data. These activities improve access to financial services, promote trust and customer satisfaction and protect the customer's personal security (see S4-4).

#### 10d) Material risks and opportunities due to impacts and dependencies on consumers

Material risks include data loss, data protection violations and hacker attacks, which can lead to operational disruption and a loss of customer confidence. In addition, inadequate data protection can lead to a loss of reputation and to customers leaving the company.

Opportunities arise from investments in data protection and information security, which strengthen the resilience of companies. The transparent communication of safe products and a policy of active information and advice serve to promote customer confidence. The targeted inclusion of disadvantaged groups also makes the company more attractive to customers and creates competitive advantages.

#### 11) Disclosure of whether and how particularly vulnerable consumers were identified in accordance with ESRS 2 IRO-1

Hypo Vorarlberg performs comprehensive customer segmentation every two years in order to identify potentially vulnerable consumers and end-users and to determine individual support requirements. Private customers are divided into categories such as top customers, advisory customers and service customers, while specialised support is provided in the private banking area.

At the St. Gallen branch, the customer segments are strategically defined as private banking/wealth management customers, corporate customers, cross-border commuters and Group customers. No additional segmentation was performed as part of the materiality assessment in accordance with ESRS 2 IRO-1.

#### 12) Disclosure of which material risks and opportunities affect specific consumer groups

The material risks and opportunities identified in the materiality analysis affect all end-users and consumers of Hypo Vorarlberg equally. No distinction is made in this respect.

### IMPACT, RISK AND OPPORTUNITY MANAGEMENT

#### DISCLOSURE REQUIREMENT S4-1 – POLICIES RELATED TO CONSUMERS AND END-USERS

#### 15) Disclosure of the policies to manage material impacts on consumers in accordance with ESRS 2 MDR-P

The following relevant strategies have been identified for the material topics. The strategies are aimed at all identified customers in Hypo Vorarlberg's downstream value chain:

- Code of Conduct
- Sales strategy (corporate and private customers)
- Complaints management and ombudsman
- Information security guideline
- "Data protection organisation" policy

##### "Code of Conduct" policy

###### Key content

In order to inform consumers and end-users about their rights and obligations in business dealings with Hypo Vorarlberg in a transparent and comprehensive manner, special regulations and procedures for compliance with due diligence obligations are documented and must be applied by Hypo Vorarlberg employees:

- Compliance with rules of conduct and due diligence obligations
- Compliance with banking secrecy and data protection
- Processes for products and services:
  - Employee expertise and specialist knowledge
  - Credit check and recommendations for customers
  - Responsible lending
  - Communication and access to products
- Complaints management system:
  - Enquiries and suggestions
  - Complaints
  - Opportunities for improvements

###### General objectives

The Code of Conduct acts as a framework for a variety of ESG-relevant topics. It has a clear focus on social issues that affect customers, business partners and employees in particular. Accordingly, the main objective of the Code of Conduct is to protect these groups of people from identified negative impacts and risks to the greatest possible extent or to reduce these impacts and risks for them, as well as to support identified positive impacts and pursue opportunities.

###### References to material impacts, risks or opportunities

The context for the material impacts, risks and opportunities is determined on the basis of the double materiality analysis for the social standards (S1, S4) and governance standards (G1). It should be noted that the Code serves as a framework for a wide range of subject areas. Accordingly, the treatment of individual impacts, risks and opportunities is regulated in detail by various substantive work instructions, works agreements and various policies. The following positive impact was identified as material based on the double materiality assessment:

###### Impact

- Positive impact on the social inclusion of all customers by making banking and financial services accessible

###### Opportunity

- Market opportunity: Customer acquisition through active involvement of disadvantaged groups

The Code of Conduct is binding for all employees and provides information on the conduct they are expected to display in respect of customers. One positive impact is ensuring that all customers have access to products and services regardless of their background. Actively involving different groups of people allows different customer needs to be recognised and incorporated into the product development process.

###### Monitoring process

The Compliance and Outsourcing department ensures that the content of the Code is communicated at all levels of the Group, thereby ensuring compliance. In this capacity, the department checks that all employees are informed about the requirements of the Code of Conduct and are obliged to comply with the standards. To this end, Compliance may also introduce policies to identify, control and minimise actual and potential conflicts of interest.

#### Area of application

Compliance with the Code of Conduct is mandatory for all employees and executive bodies of Hypo Vorarlberg. All suppliers and business partners are expected to comply with these standards or define identical or at least similar principles. Compliance also includes day-to-day business dealings, with all parties involved being required to observe the Code of Conduct.

#### Responsible organisational level

The Managing Board of Hypo Vorarlberg issues the standards of conduct for all employees and is responsible for compliance with the Code of Conduct as the highest executive body. Managers are also required to implement the Code of Conduct in their management function. To this end, the Compliance and Outsourcing department ensures that regulatory requirements and other legal provisions are complied with.

#### References to third-party standards or initiatives

The Code of Conduct is based on the following standards:

- United Nations Guiding Principles on Business and Human Rights
- International Bill of Human Rights
- OECD Guidelines for Multinational Enterprises
- ILO core labour standards

This is not an exhaustive list. A complete list can be found in the annex to the Code of Conduct. It is checked regularly to ensure that it is up-to-date and, where necessary, is expanded as part of the content review of the Code of Conduct.

#### Consideration of stakeholder interests

As the Code of Conduct covers a wide range of different subject areas, various specialists are involved in preparing and regularly reviewing its content. In particular, stakeholders and knowledge bearers from the specialist departments for Human Resources, Sponsorship, Product and Sales Management, Compliance and Sustainability must be involved. Any amendment to this policy requires the renewed involvement of the aforementioned stakeholders and the Supervisory Board as well as the approval of the Code of Conduct by the Managing Board.

#### Availability of the policy for stakeholders

The entire Code of Conduct is publicly accessible on Hypo Vorarlberg's website and is actively communicated to customers and other parties involved in business dealings.

### "Sales strategy (corporate and private customers)" policy

#### Key content

The "Sales strategy" policy at Hypo Vorarlberg comprises the central guidelines for communication and advice for both corporate and private customers. The focus is on observing basic ethical values and implementing them in day-to-day business, both through the company's own conduct and in its selection of partners and transactions. Employees respond carefully to customer needs and increasingly raise the issue of sustainability with customers in order to contribute to a low-emission, resilient economy based on responsible resource management. The policy is reviewed regularly and was most recently updated in January 2024. The individual sections describe the holistic approach to supporting new and existing customers in order to ensure a transparent basis for decision-making when it comes to selecting products and services:

- Positioning and goals
- Market presence:
  - Market segmentation
  - Customer segmentation
  - Communication policy
  - Personnel policy
- Expertise
- Service portfolio:
  - Products and product development
  - Product range policy
  - Distribution policy
- Pricing and conditions policy

#### General objectives

Hypo Vorarlberg's goal is to be one of the most qualified banks in Austria and to set corresponding standards in advising and providing services to its customers. To achieve this, it places the needs of its customers at the heart of everything it does. The policies in place are intended to ensure a responsible market presence and transparent communication with customers in the context of consultations with advisors. Products and services are also offered in a targeted manner in order to provide customers with a clear basis for decision-making.

#### References to material impacts, risks or opportunities

The following topics were identified as material for the policy based on the double materiality assessment:

##### Impacts

- Positive impact on consumers and end-users through transparent labelling of products and services
- Responsible communication in sales and marketing has a positive influence on customers' decision-making processes

##### Opportunities

The sales strategies for private and corporate customers are aimed at providing high-quality, trustworthy advice and support. This is ensured through mandatory labelling and transparency. Hypo Vorarlberg endeavours not to communicate any misleading information so that customers have a truthful basis for making decisions. Involving different groups of people helps to ensure that the products continue to be designed in a needs-oriented manner.

#### Monitoring process

Compliance monitoring is integrated into the internal control system. It takes place as part of the product and business introduction process, during which compliance with all relevant internal policies is checked. In addition, Internal Audit regularly monitors compliance with the policies and work instructions in order to ensure long-term compliance.

#### Area of application

The "Private Customers sales strategy" policy covers the downstream value chain and is based on the defined market areas for Private Customers/Private Banking sales. Austria is defined as a core market. It comprises the following actively addressed and cross-border regions: Vorarlberg, Vienna and the surrounding Lower Austria, Burgenland, Styria, Upper Austria incl. parts of Salzburg and southern Germany. Vienna and Lower Austria are also defined as

core markets for the digital sales channels. Customers from Germany, Switzerland and Liechtenstein can also take out products online, although the product range may vary from region to region.

The "Corporate Customers sales strategy" policy covers the downstream value chain and is based on the defined market areas for the Corporate Customers segment. It includes all of the corporate customer branches in Vorarlberg, as well as the branches in Salzburg, Wels, Graz and Vienna, the branch in Switzerland and the Corporate Customer Centre Germany in Bregenz. The catchment area of the Corporate Customer Centre Germany includes Baden-Württemberg, Bavaria excluding the eastern Bavarian districts of Rosenheim, Traunstein, Berchtesgader Land, Mühldorf am Inn and Altötting (this catchment area is served by the Salzburg branch), Kleinwalsertal.

#### Responsible organisational level

The Strategic Bank Management department, which reports directly to the full Managing Board, is responsible for creating and continuously updating the policy as well as for its implementation.

#### References to third-party standards or initiatives

The sales strategy policies for private and corporate customers are based on the following standards:

- MiFID II in the area of investment services
- HIKrG (Austrian Mortgage and Real Estate Credit Act) and DaKRÄG (Austrian Loan and Credit Law Amendment Act) in the area of lending
- ZADIG (Austrian Payment Services Act) in the area of payment transactions

#### Consideration of stakeholder interests

All relevant stakeholders and knowledge bearers at Hypo Vorarlberg were involved in the creation of this policy, in particular the Strategic Bank Management specialist department, the Managing Board and the sales managers. Any amendments to this policy require the renewed involvement of the aforementioned stakeholders in order to take their interests into account.

#### Availability of the policy for stakeholders

The sales strategies for corporate and private customers are internal documents that are made available to employees on Hypo Vorarlberg's intranet.

### "Complaints management and ombudsman" policy

#### Key content

Hypo Vorarlberg has had a complaints management system in place since 2004. Hypo Vorarlberg's "Complaints management and ombudsman" policy came into force in January 2017 in response to new legislation in this area. It has been continuously updated in the meantime and was most recently approved in July 2023. The policy covers the identification, recording and processing of complaints in order to ensure the satisfaction of external stakeholders and strengthen their trust in the company. As part of complaints management, a clearly defined process has been established for receiving, investigating and responding to complaints. This process includes an option to submit complaints anonymously and ensures that all reported cases are dealt with fairly, promptly and objectively. There are also specific guidelines for passing on complaint information to affected departments and for involving relevant decision-makers in order to develop improvements.

#### General objectives

The main aim of complaints management is to create a high degree of transparency and trust. By handling complaints consistently and objectively, the company aims to promote a culture of open communication that enables stakeholders to raise concerns without fear of reprisals. Another aim is to identify potential grievances at an early stage and implement improvements through suitable measures in order to minimise the risk of recurring complaints and strengthen long-term business relationships.

#### References to material impacts, risks or opportunities

The following topics were identified as material for the policy based on the double materiality assessment:

##### Impact

- Positive impact on the social inclusion of customers by making banking and financial services accessible

##### Opportunity

- Market opportunity: Customer acquisition through active involvement of disadvantaged groups

Complaints management is accessible to all customers via the typical communication channels. This is intended to ensure accessibility and give customers the opportunity to provide good and constructive feedback. Hypo Vorarlberg sees this feedback as an opportunity to adapt its existing product portfolio to the changing needs of existing customers and to acquire new customers as a result.

#### Monitoring process

The complaints management monitoring process is based on regular reporting and complaint analysis. These reports are prepared every six months and submitted to management. Internal audits and checks verify compliance with the defined processes. Any deviations are documented and remedied by means of suitable measures. In addition, complaints must be reported annually to the Austrian National Bank. These reports provide the FMA with information on the number of complaints, broken down by category and reason for complaint. The FMA may conduct an audit of complaints management as part of its audits.

#### Area of application

The policy is aimed at customers and non-customers of Hypo Vorarlberg in Austria who make complaints in connection with banking transactions. The complaints management channels are accessible to all participants in the value chain. If concerns do not fall within the actual remit of Hypo Vorarlberg's ombudsman, they are forwarded to the relevant specialist departments.

#### Responsible organisational level

The ombudsman is an executive department reporting to the Managing Board. Responsibility for the implementation of complaints management lies with the company's Managing Board. The Managing Board receives regular reports on the status of complaints management and intervenes in the case of strategically relevant complaints in order to approve or adjust necessary measures.

#### References to third-party standards or initiatives

The complaints management policy is based on the following standards:

- Joint Committee guidelines on complaints handling for the securities (ESMA) and banking (EBA) sectors, JC 2018 35
- Art. 26, Del. Reg. 565/2017
- Austrian Banking Act (BWG)
- MiFID II
- PSD II
- VERA Ordinance (Ordinance on the Statement of Assets, Income and Risks)

### Consideration of stakeholder interests

The Austrian Banking Act requires Hypo Vorarlberg to establish transparent procedures for handling complaints in order to identify and eliminate potential legal and operational risks. These legal requirements help the Bank to protect the interests of its customers and integrate them into the strategic orientation of the complaints management policy.

### Availability of the policy for stakeholders

The "Complaints management and ombudsman" policy is an internal company document that is made available to all Hypo Vorarlberg employees. All customers can lodge complaints via various channels and the process can be viewed on Hypo Vorarlberg's website.

## Information security guideline

### Key content

Hypo Vorarlberg's information security guideline comprises the principles for the organisation of an information security management system (ISMS) and thus represents the framework and scope of application for information security at Hypo Vorarlberg. It is reviewed regularly and was most recently updated in December 2024. The guideline forms the basis for the information security policy in terms of the scope of application and defining the importance of information security. The document also describes the conditions for fulfilling the defined security objectives and strategies as well as the roles and responsibilities that contribute to the implementation and control of the information security requirements. The individual sections describe the holistic approach to information security and its implementation and monitoring at Hypo Vorarlberg. The main contents are structured as follows:

- Goal and purpose
- Scope of the policy
- Information security goals and strategy
- Development of information security management (ISM)
- Development of an information security process (PDCA)
- Setting up an information security organisation (roles and responsibilities)

### General objectives

The main objectives of the guideline are to achieve an appropriate level of information security and to comply with all legal obligations, regulatory requirements and contractual provisions, as well as to apply recognised security standards

### References to material impacts, risks or opportunities

The following topics were identified as material for the policy based on the double materiality assessment:

#### Impacts

- Damage caused by data protection violations and hacker attacks have a negative impact on customers
- Positive impact on the personal security of customer data through the creation of internal monitoring bodies

#### Risk

- Reputational and operating cost risk due to data loss and hacker attacks

#### Opportunity

- Operational opportunity: Investments in data protection and information security

The handling of customer data is extremely sensitive and hence poses a risk to customer trust and security. For this reason, Hypo Vorarlberg endeavours to make additional investments in information security and data protection above and beyond the regulatory requirements. This is also intended to prevent potential reputational and operating cost risk due to data loss and hacker attacks.

### Monitoring process

The owner of this document is the Information Security Officer (CISO-R). The document owner is responsible for publishing and continuously updating this document and for reviewing it both annually and on an ad hoc basis.

### Area of application

The requirements of this document apply to all of Hypo Vorarlberg banking locations in Austria and the branch in Switzerland, with the exception of the subsidiaries in Austria and Italy and the holdings. The latter prepare their own specifications based on those of the Bank. Compliance with the provisions of the guideline is mandatory. If an exception to these documented requirements is necessary, an application with accompanying rationale must be submitted to the document owner, who is responsible for approving the exception.

### Responsible organisational level

The IT GRC specialist department is responsible for creating and continuously updating the guideline as well as for its implementation. The CISO-R is responsible for the information security process. The department reports directly to the Managing Board.

### References to third-party standards or initiatives

The information security guideline is based on the following standards:

- Regulation (EU) 2022/2554 Digital Operational Resilience Act (DORA)
- European Banking Authority Guidelines on ICT and Security Risk Management (EBA/GL/2019/04)
- European Banking Authority Guidelines on ICT Risk Assessment under the Supervisory Review and Evaluation Process (SREP) (EBA/GL/2017/05)
- General requirements for information security management systems (BSI 200-1)
- BSI methodology for establishing a solid information security management system (BSI 200-2)
- Risk-related work steps in the implementation of IT-Grundschutz (BSI 200-3)
- Information Security Management System (ISO 27001)
- Information Security, Cybersecurity and Privacy Protection – Information Security Controls (ISO 27002)
- Information Security Risk Management (ISO 27005)

### Consideration of stakeholder interests

All relevant stakeholders and knowledge bearers at Hypo Vorarlberg were involved in the creation of this guideline, in particular the specialist departments for Information Security, Data Protection and Compliance. Any amendment to this policy requires the renewed involvement of the aforementioned stakeholders.

### Availability of the policy for stakeholders

The information security guideline is an internal company document that is made available to all Hypo Vorarlberg employees on the intranet.

## "Data protection organisation" policy

### Key content

Hypo Vorarlberg's "Data protection organisation" policy describes the implementation of the General Data Protection Regulation at the company and defines the framework and scope of application for data protection. It is reviewed regularly and was most recently updated in July 2023. The central principles and requirements for compliance are aimed at all employees who process or store personal data. The document also describes the roles and responsibilities of the data protection organisation, which is responsible for implementing and monitoring data protection. The individual sections describe a holistic approach and are structured as follows:

- Principles of data processing
- Roles and responsibilities
- Procurement/hardware and software
- Employee obligations and training
- Transparency of data processing
- Collection and processing of personal data
- Data storage, transfer and erasure
- External service providers, processing and maintenance
- Security of processing
- Accountability and documentation obligation

### General objectives

The main objective of this guideline is to fulfil data protection requirements in order to ensure the proper processing of personal data. Potential risks or damage to natural persons (e.g. employees, suppliers or customers) due to data loss or data protection violations are reduced or avoided preventively by means of a predefined data protection organisation and internal controls.

### References to material impacts, risks or opportunities

The following topics were identified as material for the policy based on the double materiality assessment:

#### Impacts

- Positive impact on the personal security of customer data through the creation of internal monitoring bodies
- Damage caused by data protection violations and hacker attacks have a negative impact on customers

#### Risk

- Reputational and operating cost risk due to data loss and hacker attacks

#### Opportunity

- Operational opportunity: Investments in data protection and information security

The handling of customer data is extremely sensitive and hence poses a risk to customer trust and security. For this reason, Hypo Vorarlberg endeavours to make additional investments in information security and data protection above and beyond the regulatory requirements. This is also intended to reduce the potential reputational and operating cost risk due to data loss, hacker attacks and data protection violations.

### Monitoring process

The document owner of this policy is the Data Protection Officer (DPO), who is responsible for publishing and continuously updating this document and for reviewing it both annually and on an ad hoc basis. In addition, the DPO prepares an annual activity report to the Managing Board on audits that have taken place, complaints and any organisational deficiencies that still need to be remedied. Where this report concerns the processing of personnel data or matters relating to operational organisation, it is also made available to the Works Council.

### Area of application

The requirements of this policy apply to all employees and departments at Hypo Vorarlberg's banking locations. This includes people or departments that decide on the deployment and use of application systems (e.g. IT departments and specialist departments) as well as people or users who use these systems to perform their operational tasks. Finally, the policy applies to the DPO, who supports its implementation and monitors compliance.

### Responsible organisational level

The Data Protection specialist department is responsible for creating and continuously updating the policy as well as for its implementation. The DPO informs and advises the Managing Board and employees with regard to their data protection obligations. They are responsible for monitoring compliance with data protection regulations and strategies for the protection of personal data. The DPO reports directly to the Managing Board.

### References to third-party standards or initiatives

- The complaints management policy is based on the following standards:
- Regulation (EU) 2016/679 General Data Protection Regulation (GDPR)
  - Austrian Data Protection Act (DSG)

### Consideration of stakeholder interests

All relevant stakeholders and knowledge bearers at Hypo Vorarlberg were involved in the creation of this guideline, in particular the specialist departments for Data Protection, Information Security and Compliance. Any amendment to this policy requires the renewed involvement of the aforementioned stakeholders.



#### Availability of the policy for stakeholders

The "Data protection organisation" policy is an internal company document that is made available to all Hypo Vorarlberg employees on the intranet.

#### 16) Description of human rights commitments relevant to consumers and end-users, including

##### 16a) Respect for the human rights of consumers and/or end-users

In its Code of Conduct, Hypo Vorarlberg has defined regulations analogous to the standards of the UN, the ILO and the OECD that are intended to ensure transparency and compliance with due diligence obligations in dealings with all consumers and end-users in the downstream value chain (see S4-1.15). Various training courses and work instructions are designed to ensure appropriate conduct in respect of customers. Discussions with customers are documented and decisions are recorded. In addition, reports of human rights violations are documented and processed by the ombudsman and reported to the Managing Board at regular intervals.

##### 16b) Engagement with consumers and/or end-users

Customers and non-customers have the opportunity to seek a dialogue or exchange via the channels implemented, regardless of their concerns. The channels and formats for engaging with consumers and end-users are listed under S4-2.

##### 16c) Measures to provide and/or enable remedy for human rights impacts

Customers have the opportunity to express their concerns via the ombudsman, including with regard to possible human rights violations or similar concerns. The ombudsman ensures that such issues are carefully examined and appropriate remedial action is initiated. In 2025, the company also plans to develop a dedicated Code of Ethics that will set out clear guidelines for dealing with human rights issues in the Bank's business processes.

#### 17) Disclosure of whether the strategies are aligned with international consumer rights standards and whether violations have occurred in the value chain

Hypo Vorarlberg's strategies comply with international standards for consumer rights, including the United Nations Guiding Principles on Business and Human Rights. To date, no violations or cases of non-compliance with these principles have been reported in the downstream value chain

#### DISCLOSURE REQUIREMENT S4-2 – PROCESSES FOR ENGAGING WITH CONSUMERS AND END-USERS ABOUT IMPACTS

#### 20) Disclosure of whether and how consumer perspectives inform the management of impacts, including a discussion of

##### 20a) Engagement with consumers and end-users, whether directly or via proxies

Hypo Vorarlberg in Austria and Italy does not currently engage with customers as part of the product development process. However, customer feedback is recorded and taken into account via the website and online banking, in consultations with advisors and via the ombudsman. The aim is to adapt products and services to the needs of customers to the greatest possible extent.

The branch in St. Gallen conducted a survey of private customers, corporate customers and non-customers in 2021 in order to find out what customers need and expect from their bank.

##### 20b) Disclosure of the stage at which engagement occurs, the type of engagement and the frequency of engagement

There is no fixed stage at which private and corporate customers are engaged as part of the product development process. To date, the survey at the St. Gallen branch has not been conducted regularly. However, the branch plans to repeat the survey every four to five years in future. The implemented channels for dialogue and exchange with customers and consumers are:

| Dialogue format                                  | Type of engagement                                                                                                                                                        | Frequency                                      |
|--------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|
| Customer feedback via website and online banking | Customers provide direct feedback on products, services or general concerns.<br>Objective: Identification of opportunities for improvements and need for customisation.   | Continuously available                         |
| Advisory consultations                           | Direct interaction with customers through personal consultations with advisors.<br>Objective: Recording of needs, wishes and potential for improvements.                  | Continuous, depending on customer interactions |
| Ombudsman                                        | Customers can submit complaints or suggestions for improvements.<br>Objective: Focus on conflict resolution and customer satisfaction.                                    | Continuously available                         |
| Customer survey (St. Gallen branch)              | Direct survey of private customers, corporate customers and non-customers on needs and expectations.<br>Objective: Adaptation of products and services to changing needs. | Every 4-5 years                                |

The feedback received from the various channels is shared with the responsible specialist departments, checked for implementation and, if the assessment is positive, incorporated by means of a revision process or product launch process.

##### 20c) Responsible function and most senior role with responsibility for engagement and implementation

The Managing Board of Hypo Vorarlberg has operational responsibility and is responsible for adjusting the policies based on the potential for improvements identified as a result of the engagement.

##### 20d) Disclosures on how the undertaking assesses the effectiveness of its interaction with consumers and end-users

The branch in St. Gallen takes the assessment into account in its survey, but there is no specific analysis of customer satisfaction.

#### 21) Disclosure of steps taken to gain insight into the perspectives of consumers and end-users that may be particularly vulnerable to impacts and/or marginalised

No further steps are taken in addition to the aforementioned procedures for recording customer perspectives, needs and opinions.



## **DISCLOSURE REQUIREMENT S4-3 – PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR CONSUMERS AND END-USERS TO RAISE CONCERNS**

### **25) Procedures to address negative impacts on consumers and end-users**

#### **25a) Approach to and processes for remedial action in case of negative impacts on consumers**

A complaints management system has been in place for Hypo Vorarlberg's banking locations in Austria since 2004; the current regulations are set out in the "Complaints management and ombudsman" policy. The policy covers the identification, recording and processing of complaints in order to ensure external stakeholder satisfaction and strengthen trust in the company. As part of complaints management, a clearly defined process has been established for receiving, investigating and responding to complaints. This includes an option to submit complaints anonymously and ensures that all reported cases are dealt with fairly, promptly and objectively. There are also specific guidelines for passing on complaint information to affected departments and for involving relevant decision-makers in order to develop effective solutions and improvements. This procedure is implemented in order to identify negative impacts and effects on customers, such as potential damage from data protection violations or hacker attacks, at an early stage and to support positive effects, such as the inclusion of consumers through accessibility and the active involvement of disadvantaged groups (see also S4-3.25d).

At the St. Gallen branch, complaints management is handled centrally by the Swiss Banking Ombudsman. Customers can contact this body directly with their concerns. The Swiss Banking Ombudsman then contacts the Bank to work out a solution together. Complaints and claims can also be submitted via the usual channels.

Hypo Vorarlberg Leasing Italy and Hypo Vorarlberg Immo Italia have a complaints management system that can be used by all customers. The complaints received are coordinated and processed internally. There is a state banking ombudsman that liaises with the complaints management department in the event of a complaint being submitted.

#### **25b) Channels for consumer feedback and concerns**

Dialogue with customers is important to the company. The following channels are available to both private and corporate customers (and potential customers) for this purpose:

- Personal discussion with advisor or the ombudsman
- E-mail to [Ombudsstelle@hypovbg.at](mailto:Ombudsstelle@hypovbg.at)
- Website<sup>74</sup>
- Customer service centre
- Social media

In addition to the channels mentioned above, customers can contact the external ombudsman's offices of the professional associations for financial service providers (e.g. the ombudsman of the Association of Financial Service Providers of the Austrian Economic Chambers).

Customers of the St. Gallen branch also have access to the other usual channels mentioned above. The link to the Swiss Banking Ombudsman can be found on the Bank's website(<https://www.hypobank.ch/rechtliches>). In addition to the channels mentioned above, customers contact the Swiss Banking Ombudsman.

At Hypo Vorarlberg Leasing Italy and Immo Italia, customers are required to contact the respective ombudsman directly in the event of a complaint or claim. The usual channels are available for this purpose. Customers can also contact the state banking ombudsman.

#### **25c) Disclosures on the processes through which the undertaking supports the availability of such channels**

The availability of the channels is ensured by various measures. Customers are actively informed by advisors and service employees about the possibility of contacting the ombudsman. In addition, "Your opinion is important to us" cards are available at the branches and can be used by customers to submit their feedback. This feedback is then forwarded directly to the ombudsman. Furthermore, all information on the ombudsman and the complaints procedure is publicly and easily accessible on the Bank's website.

#### **25d) Monitoring and effectiveness of feedback channels**

Hypo Vorarlberg's complaints management system is designed to record all relevant customer concerns, including complaints, claims, requests, ideas and suggestions. Any concerns raised in person or by telephone are clarified directly wherever possible. If an immediate solution is not possible, the persons concerned are informed as to the date by which they can expect to receive a response.

Written submissions are initially reviewed by the responsible employees or the ombudsman, with an initial response being provided immediately. If it is not possible to clarify the content of the submission in the short term, confirmation of receipt of the complaint is provided including details of who is dealing with the matter and the date by which a response can be expected. As a rule, feedback on the content of the submission is provided within 14 days. However, this may take longer in the case of particularly complex topics or circumstances such as illness or holidays. The final processing of complaints in connection with payment services covered by the Austrian Payment Services Act (ZaDiG) takes place within no more than 35 working days. The effectiveness of the channels and processes is ensured by the ICS. The entire complaints process is documented in the ICS and is regularly reviewed by checking individual process steps to ensure high quality and reliability.

#### **26) Disclosures on whether and how the undertaking establishes that consumers and end-users are aware of and trust the structures or processes as a way to raise their concerns or needs and have them addressed**

Hypo Vorarlberg endeavours to continuously improve its products and services, which is why it uses various channels (see S4-2) to survey customer satisfaction and allow customers to provide feedback. The level of awareness of the respective feedback channels among customers is not explicitly surveyed but can be derived from the number of reports received.

<sup>74</sup> <https://www.hypovbg.at/service/kontakt/ombudsstelle-beschwerdeverfahren>

## 26) Disclosures on whether there are strategies in place to protect individuals that use the above processes against retaliation

Protection against retaliation is ensured by the "Complaints management and ombudsman" policy and the following measures (see S4-1.15):

- Customers can submit complaints anonymously.
- Complaints can be escalated in a multi-stage procedure. Customers start by contacting their advisor, followed by the ombudsman if they are dissatisfied.
- The ombudsman reports directly to the Managing Board. This ensures independent and objective processing. All ombudsman cases are recorded in a report and forwarded to the Managing Board and relevant department heads.

## DISCLOSURE REQUIREMENT 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

### 30) Actions and resources to manage material consumer impacts in accordance with ESRS 2 MDR-A

The following measures have been identified for the description of the planned measures to manage the material topics:

- Promotion of customer transparency and information
- Promotion of customer centricity and access
- Measures to improve data protection
- Measures to improve information security

These measures not only fulfil the regulatory requirements, but also make a sustainable contribution to increasing customer satisfaction and safety.

| Promotion of customer transparency and information                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Measures</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Taken</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <ul style="list-style-type: none"><li>■ The establishment of competence centres at several branches has helped to facilitate access to products by providing information and advice. This gives customers a clear basis for making decisions.</li><li>■ Expertise among sales staff is continuously developed, especially for advice-intensive solutions (investment and residential property financing), in order to provide customers with clear and transparent advice.</li><li>■ The data quality of sustainability-related customer information from corporate customers has been improved using the OeKB ESG questionnaire.</li><li>■ Hypo Vorarlberg sets industry limits in corporate customer business in order to prevent cluster risks arising from excessive concentration on individual business segments.</li></ul>            |
| <b>Planned</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <ul style="list-style-type: none"><li>■ Hypo Vorarlberg's redesigned website is to be made available to customers in spring 2025 in order to optimise user-friendliness and create greater transparency.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <b>Expected results</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| The expected result of these measures is increased customer satisfaction, which will be beneficial to the Bank's business success in the long term. Improved transparency and targeted advice will give customers a clearer basis for making decisions, which strengthens trust and increases customer loyalty.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Contribution to the realisation of the objectives and targets of the policy</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| The measures taken are consistent with the objective of the strategies, policies and work instructions of the sales departments, which essentially seek to ensure a responsible market presence through transparent communication with customers. The material positive impacts and opportunities identified are specifically addressed through the measures already implemented and planned: <ul style="list-style-type: none"><li>■ Positive impact on consumers and end-users through transparent labelling of products and services</li><li>■ Responsible communication in sales and marketing has a positive influence on customers' decision-making processes</li><li>■ Reputational and market opportunity: Clear decision-making principles, transparent communication and secure products strengthen customer confidence.</li></ul> |
| <b>Scope</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| In accordance with the sales strategy for private and corporate customers, the scope of application for the measures taken is the defined market area served by Hypo Vorarlberg.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Time horizons</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| The measures already implemented are regularly reviewed so that they can be adjusted and additional measures planned as necessary. The planned measures will be implemented in the medium term.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Key remedial measures</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| The measures taken already address the material impacts, risks and opportunities; there is no direct need for remedial action.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Progress</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| /                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

| Promotion of customer centricity and access                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Measures</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Taken</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <ul style="list-style-type: none"><li>■ In order to facilitate physical access to products and services, accessible entrances have been installed at almost all Hypo Vorarlberg branches where possible. The measures include wheelchair-accessible entrances, lifts and toilets as well as tactile guidance systems at ATMs for visually impaired and blind people.</li><li>■ The Hypo basic account (Basiskonto) was introduced in order to offer everyone in the European Union access to financial services.</li><li>■ Digital accessibility in the area of online banking is achieved through a high-contrast colour display for visually impaired people, among other things. Text-to-voice software has also been implemented.</li></ul> |
| <b>Planned</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| <ul style="list-style-type: none"><li>■ Ongoing implementation of the legal requirements of the Austrian Accessibility Act.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

#### Expected results

The expected result of the measures is that services will be accessible to all customers, thereby strengthening customer satisfaction and trust in the Bank.

#### Contribution to the realisation of the objectives and targets of the policy

The measures taken are consistent with the objective of the strategies, policies and work instructions of the sales departments. The material positive impacts and opportunities identified are specifically addressed through the measures already implemented and planned:

- Positive impact on the social inclusion of customers by making banking and financial services accessible
- Market opportunity: Customer acquisition through active involvement of disadvantaged groups

#### Scope

In accordance with the sales strategy policies for private and corporate customers, the scope of application for the measures taken is the defined market area served by Hypo Vorarlberg.

#### Time horizons

The measures implemented are regularly reviewed so that they can be improved or supplemented with additional measures as necessary. The Austrian Accessibility Act will be implemented in 2025.

#### Key remedial measures

The measures taken already address the material impacts, risks and opportunities; there is no direct need for remedial action.

#### Progress

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### Measures related to data protection

#### Measures

##### Taken

- Defined data protection organisation: Hypo Vorarlberg has defined specific roles and responsibilities in order to ensure compliance with the regulatory data protection requirements. The DPO advises and informs the Managing Board and employees directly on compliance with their data protection obligations. To this end, the role of data protection manager has been implemented in each department. The data protection manager liaises directly with the DPO on data protection issues in their own organisational unit. Potential suspicions of a data breach are reported directly to the DPO, who contacts the data protection authority if necessary.
- Security of processing: For each defined process, an evaluation of the protection requirements and an analysis of the potential risks for the data subject (customer, consumer, end-user, employee) must be prepared (covering the type, scope, circumstances and purpose of processing and the likelihood of occurrence of potential risks).
- Compliance with banking secrecy and data protection obligations: Every employee is informed about and required to comply with data protection obligations. Leaflets are also handed out to employees.
- Awareness and training: Employees participate in mandatory data protection training as part of the onboarding process. The content of the training includes the presentation of data protection principles, the importance of the proper handling of personal data and the procedure to be followed in the event of suspected or actual data protection violations.

##### Planned

- Various measures to advance and improve data protection are planned for the following years.

#### Expected results

The result of the measures already taken is that potential negative impacts or risks as well as potential damage or data loss have been minimised. In addition, the implemented processes enable identified data breaches and any damage that has occurred to be identified and clarified promptly. This is covered by a dedicated procedural instruction.

#### Contribution to the realisation of the objectives and targets of the policy

The measures taken are consistent with the objective of the "Data protection organisation at Hypo Vorarlberg Bank AG" policy, which essentially defines the fulfilment of data protection requirements with a view to ensuring the proper processing of personal data:

- Damage caused by data protection violations and hacker attacks have a negative impact on customers
- Positive impact on the personal security of customer data through the creation of internal monitoring bodies
- Reputational and operating cost risk due to data protection violations and hacker attacks
- Operational opportunity: Investments in data protection and information security.

#### Scope

In accordance with the implemented data protection policy, the scope of application for the measures taken is Hypo Vorarlberg.

#### Time horizons

The measures implemented represent a continuous process that is regularly reviewed so that the measures already taken can be adjusted and additional measures planned as necessary.

In the event of data breaches with a material impact, a process to minimise and rectify the damage is initiated promptly. In addition, the IT department and the DPO are informed immediately when a breach is suspected.

#### Key remedial measures

A centralised reporting option for data breaches has been established. This is used by the reporting office to record the data breach; the DPO and the CISO-R are then informed directly. The data breach and any measures already taken are analysed by the Data Protection department, further measures are initiated if necessary and a risk assessment is carried out. If there is a risk to the rights and freedoms of data subjects, a report is made to the data protection authority; in the event of a high risk, an additional report is made to the data subjects.

#### Progress

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## Information security

### Measures

#### Taken

- Defined information security roles: Hypo Vorarlberg has defined specific roles and responsibilities in order to ensure compliance with information security requirements. The regulatory Information Security Officer (CISO-R) advises and informs the Managing Board directly, while the technical Information Security Officer (CISO-T) advises employees on information security issues. The CISO-R promotes the information security process and ensures that regulatory requirements are met. Any potential suspicion of a cyber attack is reported directly to the CISO-T, who liaises with the information security authorities if necessary.
- Compliance with information security requirements: Every employee is informed about and required to comply with information security obligations. To this end, employees are responsible for maintaining information security at their workstations and within their working environment.
- Awareness and training: Employees receive mandatory training on information security as part of the onboarding process and subsequently during their employment at Hypo Vorarlberg. The content of the training courses includes the importance of information security, highlighting the dangers of cyber attacks and what protective measures can be taken.

#### Planned

- As part of the implementation of the Digital Operational Resilience Act (DORA), further comprehensive measures are being implemented in the areas of governance and organisation, the ICT risk management framework, learning processes and further development, handling ICT-related incidents, testing digital operational resilience and managing third-party ICT service providers.

### Expected results

The result of the measures already taken is that the risks of potential cyber attacks are minimised and potential damage caused by the loss of availability, confidentiality, integrity and authenticity of information is minimised. The implemented information security management system (ISMS) ensures a high level of security. This also guarantees prompt identification, reaction and clarification in the event of security gaps and potential damage.

### Contribution to the realisation of the objectives and targets of the policy

The measures taken are consistent with the objective of the information security guideline, which essentially also defines the fulfilment of data protection requirements with a view to ensuring the proper processing of personal data:

- Damage caused by data protection violations and hacker attacks have a negative impact on customers
- Positive impact on the personal security of customer data through the creation of internal monitoring bodies
- Reputational and operating cost risk due to data protection violations and hacker attacks
- Operational opportunity: Investments in data protection and information security

### Scope

In accordance with the implemented information security guideline, the scope of application extends to all areas of Hypo Vorarlberg with the exception of subsidiaries and holdings.

### Time horizons

Information security is not a static state, but should be understood as a continuous process according to the PDCA model. The measures taken are therefore also aligned with the PDCA model, meaning that a regular review takes place and the measures are enhanced or additional measures are planned if necessary.

In the event of cyber attacks or information leaks with a material impact, a process to minimise and rectify the damage is initiated promptly. In addition, the IT department and the technical information security officer (CISO-T) are involved immediately when an incident is suspected.

### Key remedial measures

If an ICT-related incident occurs, defined reporting centres are also informed immediately. In addition to the IT GRC and the CISO-T, the first point of contact is the Computer Emergency Response Team (CERT Hypo Vorarlberg), which can take urgent action to prevent major damage. If the analysis by CERT Hypo Vorarlberg establishes that the ICT-related incident is serious and not merely a malfunction, it is escalated to the IT Security Organisation team, which comprises the IT department management, the CISO-T, the CISO-R, the Data Protection Officer and, if necessary, other bodies such as the Works Council. This team can then declare an emergency depending on its assessment of the situation. In this case, the crisis management team and emergency response teams, which constitute a special organisational structure, take over further decisions on handling the emergency and communicating with stakeholders.

### Progress

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**ESRS 2 69) If the implementation of an action plan requires significant operational expenditure (OpEx) and/or capital expenditure (CapEx), the following disclosure requirements apply (the table below can be used for the quantitative information)**

**ESRS 2 69a) Disclosure of the type and amount of current and future financial and other resources allocated to the action plan**

An allocation of current and future operating expenditures and capital expenditures was not carried out in the current reporting period.

**ESRS 2 69b-c) Disclosure of the amount of current and future resources and discussion of how they relate to the most relevant amounts presented in the financial statements**

As this data was not collected in the reporting period, no information is available.

### 31) Further disclosures related to material impacts

#### 31a) Actions planned or underway to prevent, mitigate or remediate negative impacts on consumers and end-users

Hypo Vorarlberg endeavours to continuously improve its products and services and make them accessible to customers (see S4-4).

### **31b) Actions to provide or enable remedy for actual material impacts**

To remediate any actual material impacts, measures have been implemented to ensure the immediate escalation of and response to ICT-related incidents (information and communication technology) (see S4-4). In the event of serious incidents, a crisis team is activated to manage the emergency and coordinate communication with stakeholders. A process has also been implemented in the area of material impacts due to data protection violations or actual data breaches in order to ensure an immediate response in the event of a potential risk to data subjects, including informing data subjects of this potential risk (see S4-4).

### **31c) Initiatives to support positive impacts for consumers and end-users**

The St. Gallen branch conducts surveys of customers and non-customers of Hypo Vorarlberg in order to find out what they need and expect from a bank and implement these needs and expectations accordingly. The survey takes place every 4-5 years.

### **31d) Tracking and assessing the effectiveness of actions for consumers and end-users**

Hypo Vorarlberg continuously analyses the sales figures and transaction data for its products and services and takes customer feedback into account. These key figures can be used to assess the effectiveness of the measures taken.

## **32) Further disclosures related to material impacts**

### **32a) Procedure for determining appropriate action in the event of material negative impacts on consumers and end-users**

A process for determining the necessary and appropriate action has been established on the basis of the identified impacts, risks and opportunities. The measures taken are divided into four areas that specifically target the handling of IROs (see S4-4.32b). Measures that relate exclusively to negative impacts have been taken in the area of data protection and information security in order to minimise or prevent potential negative impacts on customers in the event of damage caused by data protection violations and hacker attacks.

### **32b) Approach to actions related to material impacts on consumers and end-users, including own practices**

Based on the identified impacts, risks and opportunities, a series of strategies and measures aimed at providing targeted support to consumers and end-users have been defined and have already been implemented. This is achieved by promoting positive impacts, such as the inclusion of customers by making financial services accessible to all and pursuing opportunities by actively involving disadvantaged groups. The approach also aims to minimise negative impacts and risks for consumers in the area of information security and data protection. The measures implemented cover the following areas: Pursuit of a transparent information strategy, implementation of accessibility measures and stronger data protection and security practices. In addition, a structured product development process involving all relevant departments has been established at Hypo Vorarlberg in order to ensure that the measures taken are taken into account and implemented.

### **32c) Ensuring processes to provide or enable remedy in the event of material negative impacts on consumers**

Remedial action is available in the area of data protection and information security. If a data protection breach occurs or is suspected, a centralised reporting option has been established to identify and process cases at an early stage. Similarly, if an ICT-related incident occurs, defined reporting centres are informed immediately so that urgent action can be taken if necessary. A detailed description of these remedial measures, including the processes defined for this purpose, can be found in the section on data protection and information security (see S4-4).

## **33) Further disclosures related to material risks and opportunities**

### **33a) Disclosure of actions planned or taken to minimise risks and tracking of effectiveness**

Planned measures to minimise risks include improving customer transparency, ensuring the accessibility of services and strengthening data protection and information security measures. These measures are intended to minimise potential risks such as data protection violations or barriers to accessing financial services.

### **33b) Disclosure of actions planned or taken to pursue material opportunities for consumers and end-users**

The planned measures aim to increase customer transparency, improve access to services and strengthen trust in data protection and information security. This includes transparent advice, accessibility and robust data protection and security management.

### **34) Disclosure of whether and how the undertaking ensures that its own marketing, sales and data use practices do not contribute to negative impacts on consumers and end-users**

Hypo Vorarlberg conducts a product development process for new products and services. All departments that affect the product business in any way must be involved in the product development process. This ensures that all perspectives, regulatory requirements and risks are taken into account and included in the development process at an early stage (see "Product and business introduction process" work instruction).

### **35) Disclosure of severe human rights issues and incidents connected to consumers and/or end-users**

No serious incidents connected to consumers and/or end-users were reported at Hypo Vorarlberg in the 2024 reporting year.

### **37) Disclosure of resources allocated to the management of material impacts**

Various specialist departments at Hypo Vorarlberg, including Sales and Product Management, are responsible for managing material impacts on consumers and end-users. The processes and criteria in these areas are continuously adapted to ensure that there are no negative impacts on consumers and end-users.

## METRICS AND TARGETS

### DISCLOSURE REQUIREMENT S4-5 – TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

**ESRS 2 81) If the undertaking has not set any measurable outcome-oriented targets**

**ESRS 2 81a) Can the undertaking disclose whether it intends to set such targets and the timeframe for doing so, or the reasons why it does not intend to set such targets?**

Hypo Vorarlberg has not yet set any measurable outcome-oriented targets this year. The reason for this is the ongoing evaluation and development of strategies and measures for impacts, risks and opportunities. The task for 2025 will be to define specific targets based on the strategies and measures and to disclose them in the next reporting period.

**ESRS 2 81bi-ii) Disclosure of whether the effectiveness of the policies and actions in relation to impacts, risks and opportunities can still be tracked. If yes, information on the procedures and the defined targets and timeframes**

The effectiveness of the strategies and actions in relation to impacts, risks and opportunities is ensured by the monitoring process defined in the policies (see S4-1, S4-4). The strategies and actions are reviewed regularly (at least annually) and adjusted as necessary. The monitoring process takes account of various internal stakeholders (specialist departments, the Managing Board and, as part of its regular auditing activities, Internal Audit).

## ESRS G1: BUSINESS CONDUCT

### IMPACT, RISK AND OPPORTUNITY MANAGEMENT

#### DISCLOSURE REQUIREMENT G1-1 – CORPORATE CULTURE AND BUSINESS CONDUCT POLICIES

##### 7) Disclosure of policies with respect to business conduct and fostering corporate culture in accordance with ESRS 2 MDR-P

Hypo Vorarlberg pursues a strategy of basing its business conduct and corporate culture on ethics and sustainability principles. The aim is to create a working environment characterised by integrity, transparency and reliability that forms the basis for long-term success. The following policies and guidelines have been identified for this purpose:

- Code of Conduct
- Whistleblowing system
- Corruption policy
- Sustainable procurement and circular economy in business operations

They form the basis for this strategy. They define standards of conduct, promote compliance with rules and strengthen the trust of customers, business partners and employees.

##### **"Code of Conduct" policy**

###### **Key content**

Hypo Vorarlberg's Code of Conduct contains important regulations that support employees when it comes to legal and ethical issues. It serves as a basis for dealing with customers, business partners and employees by setting out rules, values and principles concerning the conduct of all Hypo Vorarlberg employees (see S1-1, S4-1).

In addition, the Code describes how Hypo Vorarlberg ensures that rules of conduct are observed and monitored through the implementation of proper governance. It lists the most important measures for the prevention and avoidance of corruption, bribery and money laundering and for combating terrorism. In addition to the Code of Conduct, Hypo Vorarlberg has its own policies on corruption and bribery (see G1-1.7) which contribute to appropriate business conduct.

###### **References to material impacts, risks or opportunities**

The following topics were identified as material based on the double materiality assessment:

###### **Impact**

- Strengthening the corporate culture: Positive impact on the company and society through contribution to corporate culture

###### **Opportunity**

- Operational opportunity: Promotion of a trust-based working culture (e.g. shared values).

###### **Area of application**

Compliance with the standards of conduct is mandatory for all employees and executive bodies of Hypo Vorarlberg. All suppliers and business partners are expected to comply with these standards or define identical or at least similar principles. The standards also include day-to-day business dealings, with all parties involved being required to comply with the Code of Conduct.

###### **Responsible organisational level**

The Managing Board of Hypo Vorarlberg issues the Code of Conduct for all employees and is responsible for compliance as the highest executive body. Managers are also required to implement the Code of Conduct in their management function. To this end, the Compliance department ensures that regulatory requirements and other legal provisions are complied with.

##### **"Whistleblowing system for reporting violations" policy**

###### **Key content**

Hypo Vorarlberg's "Whistleblowing system for reporting violations" policy governs the reporting of white-collar crime and violations of statutory and internal provisions. It ensures that all indications of such violations reported by employees are documented and examined. It also protects whistleblowers from being penalised if they submit reports in good faith and ensures that the accused persons are protected from unjustified accusations. The statutory obligations of employees to report unlawful acts remain unaffected. The policy also enables employees to report serious grievances and hazards.

###### **General objectives**

The policy enables employees to report indications of violations of external regulations (statutory provisions), as well as loss-relevant violations of internal company regulations or general hazards and serious grievances, without having to fear negative consequences. This system helps to identify risks at an early stage while simultaneously protecting employees.

###### **References to material impacts, risks or opportunities**

The following topic was identified as material based on the double materiality assessment for the "Whistleblowing system" policy:

###### **Impact**

- Positive impact on society through conscientious compliance and integrity within the company

###### **Monitoring process**

The whistleblowing system is monitored by a committee consisting of the Head of Compliance and Outsourcing and the Head of Group Internal Audit and Internal Audit. This committee decides on how to proceed in the event of reports, monitors compliance with the GDPR and submits regular reports to the Managing Board or Supervisory Board on significant cases.

###### **Area of application**

The document applies to all employees of Hypo Vorarlberg.

###### **Responsible organisational level**

The full Managing Board is responsible for implementing the requirements relating to the whistleblowing system and for defining the implementation strategy. Operational implementation is assigned to the Head of Group Internal Audit and Internal Audit, which prepares the corresponding policy/instruction that is reviewed annually and amended as required.

###### **References to third-party standards or initiatives**

The policy is based on the following standards:

- Austrian Banking Act (BWG)
- Austrian Whistleblower Protection Act (HinSchG)

#### Consideration of stakeholder interests

The instruction was prepared by the Head of Group Audit and Internal Audit and the Head of Compliance and Outsourcing with the involvement of the Data Protection Officer (GDPR data protection impact assessment) and the Works Council. In addition to the policy, Hypo Vorarlberg has concluded a works agreement on the whistleblowing system. Stakeholders are involved accordingly in the event of significant changes to the content. Changes to the content require the renewed approval of the Managing Board. This is ensured by a corresponding approval system.

#### Availability of the policy for stakeholders

The policy is an internal company document that is made available to all Hypo Vorarlberg employees on the intranet.

### "Corruption prevention" policy

#### Key content

Hypo Vorarlberg's "Corruption prevention" policy, which was expanded in October 2024, comprehensively describes the provisions for the prevention of corruption and defines the requirements for adherence to compliance standards. It includes a detailed description of the definition of a public official in accordance with section 74 of the Austrian Criminal Code (StGB), including the provisions relating to accepting and granting benefits, avoiding conflicts of interest and ensuring transparency in business activities. Particular emphasis is placed on transparency and integrity in order to strengthen the trust of business partners, customers and the public. The policy clarifies conduct-related requirements and specific prohibitions (e.g. in connection with benefits and accepting gifts) and illustrates these using practical examples in order to prevent misunderstandings and potential violations.

#### General objectives

The main objective of this policy is to promote legally and ethically correct conduct within Hypo Vorarlberg and to ensure compliance with both internal and legal requirements.

#### References to material impacts, risks or opportunities

The following negative impact was identified as material for the "Corruption prevention" policy based on the double materiality assessment:

#### Impact

- Negative impact due to lack of risk-minimising measures in business activities with a heightened risk of corruption or bribery
- The policy helps to minimise the negative impact and provides legal certainty by minimising the risk of violations of laws or regulations.

#### Monitoring process

Compliance with this policy is monitored through regular compliance training, clear communication of the policies to employees and an anonymous whistleblowing system. In addition, the Compliance department ensures that all reports of violations are promptly investigated, with disciplinary action being taken if necessary.

#### Area of application

The document applies to all employees of Hypo Vorarlberg.

#### Responsible organisational level

The "Corruption prevention" policy is a Managing Board directive. The Compliance specialist department is responsible for the operational preparation and implementation of the policy and for updating it.

#### References to third-party standards or initiatives

The policy is based on the following standards:

- Austrian Criminal Code (StGB)
- United Nations Convention against Corruption (UNCAC Coalition)

#### Availability of the policy for stakeholders

The "Corruption prevention" policy is an internal company document that is made available to all Hypo Vorarlberg employees on the intranet.

### "Sustainable procurement and circular economy in business operations" policy

#### Key content

Hypo Vorarlberg's "Sustainable procurement and circular economy in business operations" policy describes the process and the criteria applied for the procurement of products and services by all employees who perform procurement processes. The policy is reviewed regularly and was most recently updated in December 2024. The individual sections are organised according to product groups and services and include the defined requirements to ensure sustainable procurement in each case:

- Application of the policy for product groups/services:
  - IT equipment
  - Waste management
  - Vehicle fleet
  - Construction
  - Purchase of energy for business operations
  - Office equipment
  - Advertising materials
  - Customer events and gifts

#### General objectives

As Hypo Vorarlberg's core business involves the provision of financial services, its supply and value chain differs fundamentally from that of a manufacturing company. Nevertheless, Hypo Vorarlberg has set itself the goal of defining and implementing sustainable procurement processes and establishing and maintaining good supplier relationships as a reliable partner.

#### References to material impacts, risks or opportunities

The following topics were identified as material based on the double materiality assessment:



## Impact

- Positive impact on society through sustainable procurement criteria

## Opportunity

- Reputational opportunity/market opportunity: Contribution to local and regional value creation

## Monitoring process

The processes are monitored by the Logistics department management team.

## Area of application

The policy applies to all employees of Hypo Vorarlberg.

## Responsible organisational level

The Logistics department is responsible for creating and continuously updating the policy as well as for its implementation.

## References to third-party standards or initiatives

The policy is based on the following standards:

- NaBe Action Plan 2021
- ÖGNI standard
- Austrian Federal Act on Health and Safety at Work

## Consideration of stakeholder interests

All relevant stakeholders and knowledge bearers at Hypo Vorarlberg were involved in the creation of this policy, in particular the specialist departments for Logistics, Fleet Management, Construction, Customer Marketing, Sponsorship & Events and IT.

## Availability of the policy for stakeholders

The "Sustainable procurement and circular economy in business operations" policy is made available to all employees on Hypo Vorarlberg's intranet.

### 9) Description of how the undertaking establishes, develops, promotes and evaluates its corporate culture

The Code of Conduct forms the basis for conduct and cooperation at Hypo Vorarlberg. Hypo Vorarlberg's seven brand values (Excellent, Mindful, Interconnected, Reliable, Consistent, Efficient and Ambitious) shape day-to-day cooperation and create a shared corporate culture.

Key policies are made available in a separate section of the intranet for human resources, corporate culture and communication. New employees are familiarised with the company values during onboarding. This is achieved through a training presentation that illustrates the company's values and expectations and a handout containing the brand values.

The company has defined clear and binding management principles that are consistent with the seven brand values. These are actively practised by the company's managers.

In order to promote and reflect the corporate culture, joint events such as Christmas parties and company outings are organised. This helps to strengthen the corporate culture.

### 10a) Description of mechanisms for identifying unlawful conduct and accommodation of internal/external stakeholders

Hypo Vorarlberg has established the following mechanisms for reporting, identifying and investigating violations of statutory provisions or internal policies.

#### WHISTLEBLOWING SYSTEM

An independent whistleblowing system is available for reporting violations. Information can be submitted anonymously or accompanied by personal data. The system guarantees the protection of the whistleblower's personal data.

Reports received via the whistleblowing system are documented in a protected database that can only be accessed by the Head of Compliance and Outsourcing, the Head of Group Internal Audit and Internal Audit and the Chair of the Works Council (to a limited extent). The whistleblower is free to choose whether to submit an open report or a protected (anonymous) report.

In the event of an offence, the information received is examined and measures are initiated if there are reasonable grounds for suspicion. These measures are always proportionate and limited to what is necessary so as not to place an unreasonable burden on the data subject.

#### COMPLAINTS MANAGEMENT

In addition to the internal mechanisms, the Bank has a centralised complaints management system that is accessible to all customers. The rules governing the complaints procedure are published on Hypo Vorarlberg's website to ensure transparent communication. Customers can submit complaints in various ways, including in writing, by telephone or in person.

Complaints received are forwarded to the ombudsman, where they are carefully examined and processed. A complaint form is available on the Bank's website to facilitate the submission of complaints. Hypo Vorarlberg is guided by tried-and-tested standards such as those used by its subsidiaries in Bolzano, where similar systems for whistleblower protection and customer complaints have been established.

### 10ci-ii, d) Disclosures on whistleblower protection mechanisms, including internal reporting channels and protection against retaliation

The whistleblowing procedure ensures the protection of personal data. Whistleblowing reports are entered into a database that can only be accessed by the Head of Compliance and Outsourcing, the Head of Group Internal Audit and Internal Audit and the Chair of the Works Council (to a limited extent). The whistleblower can choose whether to submit an open report or a protected report, which allows information to be submitted anonymously. All employees are made aware of the whistleblowing system during the onboarding days at the start of their employment. The corresponding policy is made available to all employees on the intranet.

Under the requirements of the GDPR and the HinSchG, all notices and associated correspondence must be deleted if the purpose of storage no longer applies and there are no legal obligations requiring their continued storage. Personal data that is not required for processing a report must not be collected or must be erased immediately.

#### **10e) Disclosure of whether the undertaking has procedures in place to investigate business conduct incidents promptly, independently and objectively**

Hypo Vorarlberg has clearly defined procedures for investigating business conduct incidents, including cases of corruption and bribery. In the event of an initial suspicion of actions that correspond to the organisation-specific definition of fraud, Internal Audit is responsible for clarifying the matter promptly as part of a special forensic investigation. This also applies to violations of the Code of Conduct with regard to offences of bribery or corruption.

The basic principles for the professional practice of internal auditing include but are not limited to integrity, objectivity and independence.

#### **10g) Disclosures on the undertaking's strategy for training within the organisation on business conduct, including target audience, frequency and depth of coverage**

Hypo Vorarlberg's basic values as communicated in the onboarding days are conveyed through the mission statement, reinforced in internal meetings, day-to-day interactions and dealings with customers, and actively practised by management. A wide-ranging internal training programme ensures that employees are made aware of the corporate culture.

Employees receive regular refresher courses on various topics as part of the training programme, including online tests via the internal "Hypo Bildung" platform. In addition, new employees are provided with a summary of the general compliance rules, the compliance policy and other relevant documents as part of the onboarding days. They are also provided with basic knowledge on important topics such as corruption, data protection, combating money laundering and terrorism, and whistleblowing. All employees are required to complete 25 minutes of corruption prevention training each year. In addition, all employees must complete mandatory annual compliance knowledge checks (lasting 30 minutes) and money laundering knowledge checks (lasting 30 minutes).

#### **10h) Identification of the functions within the undertaking that are most at risk in respect of corruption**

All Hypo Vorarlberg employees can potentially be affected by corruption, but certain functions have a higher risk in respect of bribery and corruption. These are analysed in more detail below.

#### **SALES AND CUSTOMER SERVICE**

Employees in sales and customer service roles come into direct contact with customers and have decision-making powers that could be misused to gain unlawful advantages.

#### **PURCHASING AND PROCUREMENT**

Important decisions about suppliers and contracts are made in this function. This entails a considerable risk of bribery and corruption.

#### **FINANCE AND ACCOUNTING**

Employees in this area have access to financial information and resources that could be misused to conceal unlawful payments or transfers.

#### **MANAGERS**

Managers often have far-reaching decision-making powers and influence over company management, which could make them a target for bribery attempts.

#### **COMPLIANCE AND LEGAL EMPLOYEES**

Employees of the Compliance and Legal departments are responsible for compliance with laws and regulations and may be tempted to cover up violations.

### **DISCLOSURE REQUIREMENT G1-2 – MANAGEMENT OF RELATIONSHIPS WITH SUPPLIERS**

#### **14) Description of the strategy to prevent late payments, specifically to small and medium-sized enterprises (SMEs)**

As a matter of principle, Hypo Vorarlberg endeavours to pay its incoming invoices without delay, regardless of the payment terms granted by suppliers. It does not distinguish between large companies and SMEs or perform any other categorisation of suppliers. The process is ensured and evaluated using the strict dual control principle prescribed by the ICS. The procedure for invoices is summarised in the "Material expenses" work instruction, which also states that additional monitoring must be performed above and beyond the dual control principle depending on the amount of the invoice.

#### **15a) Disclosure of the undertaking's approach to relationships with its suppliers**

Under the "Sustainable procurement and circular economy in business operations" policy, the company focuses on existing business relationships and regionality when selecting suppliers (see G1-1).

#### **15b) Disclosures on whether and how social and environmental criteria are taken into account in the selection of suppliers**

The standards to be complied with are defined for different product groups (e.g. ISO Type 1 Ecolabel). Companies that implement environmental, social and sustainability standards can be favoured or actively approached when awarding contracts. For example, these standards may include an environmental management system according to EMAS or ISO 14001, an energy management system according to ISO 50001, or being an Ökopart partner.

### **DISCLOSURE REQUIREMENT G1-3 – PREVENTION AND DETECTION OF CORRUPTION AND BRIBERY**

#### **18a) Description of the procedures in place to prevent, detect and address incidents of corruption and bribery**

There is a dedicated work instruction on preventing and combating corruption and bribery. It stipulates that, as a matter of principle, giving, offering or accepting money, material or other benefits is not permitted in respect of customers, suppliers, public officials or third parties in any and all activities. This applies regardless of whether or not this is done with the intention of generating a profit or gaining an advantage. The work instruction also specifies how employees must handle gifts and invitations from customers or business partners. The guidelines issued by the Austrian Ministry of Justice in connection with the introduction of the Corruption Criminal Code Amendment Act 2012 serve as the basis for the internal work instruction. Hypo Vorarlberg is also guided by the UNCAC guidelines.

#### **18b) Disclosure of whether the investigators or investigating committee are separate from the chain of management involved in the matter**

Both Compliance and Internal Audit are defined as internal but independent executive departments. The utmost care is taken to ensure their complete independence. The structure corresponds to the three lines of defence model.

Employees in control functions do not perform any operational tasks that fall within an area of activity that is monitored and controlled by the respective department. The independence of the control functions is also ensured through the organisational separation of the business activities to be controlled.

### 18c) Disclosure of the process to report outcomes to the administrative, management and supervisory bodies

The Compliance and Outsourcing department reports to the Managing Board and Supervisory Board annually. In addition to reporting to the Managing Board, Internal Audit regularly reports to the Chairman of the Supervisory Board and participates in the meetings of both the Supervisory Board and the Risk Committee, where it reports and answers questions.

### 20) Disclosure of how the undertaking communicates its policies in an understandable and accessible manner

The policies listed (see G1-1.7) can be viewed by all employees on Hypo Vorarlberg's intranet.

### 21) Disclosures related to training

#### 21a) Nature, scope and depth of anti-corruption and anti-bribery training programmes

Hypo Vorarlberg ensures that the policies for identifying and preventing corruption and bribery are effectively communicated to all relevant stakeholders and made accessible to them at all times. This is achieved in various ways. Firstly, all relevant documents are regularly updated and made available to new employees during the onboarding days, which are mandatory for all new employees. A general compliance and money laundering training course (lasting 120 minutes) is completed as part of the onboarding days. Hypo Vorarlberg also offers interactive web-based training courses that must be completed annually to ensure that all employees are familiar with the policies. The training programme is regularly reviewed so that content can be expanded or updated as necessary.

#### 21b) Percentage of functions at risk covered by training programmes

In the reporting year, 295 out of 334 people at risk (88.32 %) took part in one of the training courses listed below.

#### 21c) The extent to which training is given to members of the administrative, management and supervisory bodies

The following table provides an overview of the training courses for members of the administrative, management and supervisory bodies in 2024 at Group level.

|                                                 | Functions at risk | Managers | Executive bodies | Other own employees |
|-------------------------------------------------|-------------------|----------|------------------|---------------------|
| <b>Coverage through training</b>                |                   |          |                  |                     |
| Total <sup>75</sup>                             | 334               | 136      | 18               | 553                 |
| Total number of people trained                  | 295               | 121      | 18               | 523                 |
| <b>Training method and duration</b>             |                   |          |                  |                     |
| Classroom-based training <sup>76</sup>          | 2 hours           | 2 hours  |                  | 2 hours             |
| Computer-based training                         | 85 min            | 85 min   | 60 min           | 85 min              |
| Voluntary computer-based training <sup>77</sup> | 300 min           | 300 min  |                  | 300 min             |
| <b>Frequency</b>                                |                   |          |                  |                     |
| How often is training required?                 | Annually          | Annually | Annually         | Annually            |
| <b>Topics covered</b>                           |                   |          |                  |                     |
| Corruption prevention                           | X                 | X        |                  | X                   |
| Fraud and embezzlement                          | X                 | X        |                  | X                   |
| Whistleblowing                                  | X                 | X        |                  | X                   |
| Compliance                                      | X                 | X        |                  | X                   |
| Fit & Proper                                    |                   |          | X                |                     |

Hypo Vorarlberg offers training, learning programmes and knowledge checks relating to compliance, money laundering and corruption to all employees. This includes both mandatory and voluntary training. Mandatory training programmes (knowledge checks) lasting 85 minutes must be completed annually. Employees may complete up to 300 minutes of voluntary web-based learning covering the topics listed above.

### COMPLIANCE TRAINING IN 2024

In 2024, a total of 681 people took part in the mandatory compliance knowledge check lasting 30 minutes. 29 people also completed a voluntary learning programme on the subject of compliance, including a test, lasting at least 60 minutes in total. Of the 681 participants, 257 were at risk, including 98 managers who also successfully completed the mandatory knowledge check. 16 persons at risk also voluntarily completed the extended compliance learning programme, including a test, lasting at least 60 minutes.

### MONEY LAUNDERING TRAINING IN 2024

In 2024, a total of 399 people successfully completed the mandatory annual knowledge check on the subject of money laundering lasting 30 minutes. 94 people also completed a voluntary learning programme on money laundering, including a test, lasting at least 60 minutes.

Of the 399 participants, 191 were at risk, including 56 managers who successfully completed the mandatory knowledge check. 93 people, including 43 persons at risk, also voluntarily took part in the extended money laundering learning programme including a test. At Hypo Vorarlberg

<sup>75</sup> Overlaps are possible, e.g. where employees complete more than one unit (training courses, learning programme, knowledge check).

This table does not include employees who were on parental leave, who retired or who left the company in 2024.

<sup>76</sup> Classroom-based training sessions lasting up to two hours were held for all new employees.

<sup>77</sup> Lasting up to 300 minutes.

Leasing, two employees completed a money laundering training programme, including a test, lasting 120 minutes in total. Both employees are managers and are at risk.

At the St. Gallen branch, ten people completed a 60-minute money laundering training course, including five persons at risk.

At the subsidiaries Hypo Vorarlberg Leasing in Bolzano and Hypo Vorarlberg Immo Italia, 49 people completed a money laundering training programme lasting 180 minutes, including 16 persons at risk and 13 managers.

**CORRUPTION PREVENTION TRAINING IN 2024**

In 2024, a total of 697 people successfully completed the mandatory annual knowledge check on corruption prevention lasting 25 minutes. 248 of the participants were persons at risk, including 91 managers. At the subsidiary Hypo Vorarlberg Leasing, four employees participated in anti-corruption training lasting 25 minutes. All of the participants were persons at risk, including one manager.

A quarterly meeting at the St. Gallen branch addressing the topic of corruption is attended by five people, including five persons at risk. No training courses on the subject of corruption were held at the subsidiaries Hypo Vorarlberg Leasing in Bolzano and Hypo Vorarlberg Immo Italia in 2024.

In 2024, 13 out of 18 members of executive bodies participated in a Fit & Proper regulatory update lasting at least 60 minutes. In addition, all executive bodies undergo continuous self-study.

**METRICS AND TARGETS**

**DISCLOSURE REQUIREMENT G1-4 – CONFIRMED INCIDENTS OF CORRUPTION OR BRIBERY**

**24a) Number of convictions and amount of fines for violations of anti-corruption and anti-bribery laws**

There were no convictions at Hypo Vorarlberg for violations of anti-corruption and anti-bribery laws in the 2024 reporting year.

**24b) Disclosures on actions taken to address violations and to prevent corruption and bribery**

| Preventing and combating corruption                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Key measures</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
| <b>Taken</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <ul style="list-style-type: none"><li>▪ All employees can report potential violations relating to corruption or bribery via the whistleblowing system if they have suspicions they wish to report.</li><li>▪ In the event of an initial suspicion of actions that correspond to the organisation-specific definition of fraud, Group Internal Audit and Internal Audit are responsible for clarifying the matter promptly as part of a special forensic investigation. This also applies to violations of the Code of Conduct with regard to offences of bribery or corruption.</li><li>▪ If an offence involving an employee is confirmed, appropriate disciplinary action is taken. Depending on the severity of the offence, this may involve consequences up to and including dismissal.</li><li>▪ As a preventive measure, all external stakeholders are actively informed about the rules of conduct via the Code of Conduct and the “Corruption prevention” policy.</li><li>▪ All new employees receive introductory training on various Hypo Vorarlberg policies as well as web-based training on the “Corruption prevention” policy. The policies are also made available to all employees on the company’s intranet.</li></ul> |
| <b>Planned</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| <ul style="list-style-type: none"><li>▪ The creation of a Supplier Code of Conduct is planned for the next reporting period. This will become an integral part of contractual agreements with business partners. The Code will form part of the due diligence process when selecting suppliers and business partners.</li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Expected results</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| The expected result of the measures already taken is that, as has been the case to date, there will be no violations or cases of corruption or bribery. In addition, the implemented processes are expected to allow potential suspected and actual violations to be identified and clarified promptly.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

|                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Contribution to the realisation of the objectives and targets of the policy</b>                                                                                                                                                                                                                                                                                                                                                                                           |
| The measures taken are consistent with the objective of the “Whistleblowing” and “Corruption prevention” policies, which essentially contain provisions on preventing violations of anti-corruption and anti-bribery standards. The material impacts, risks and opportunities are addressed in a targeted manner through the measures already taken and planned: <ul style="list-style-type: none"><li>▪ Conscientious compliance and integrity within the company</li></ul> |
| <b>Scope</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| In accordance with the “Whistleblowing” and “Corruption prevention” policies, the scope of application for the measures taken is also Hypo Vorarlberg.                                                                                                                                                                                                                                                                                                                       |
| <b>Time horizons</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| The measures implemented represent a long-term process (PDCA) that is regularly reviewed so that measures already taken can be adjusted and potential measures planned.                                                                                                                                                                                                                                                                                                      |
| <b>Key remedial measures</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| In the event of violations of the Code of Conduct with regard to offences of bribery or corruption with a material impact, a prompt, independent and objective investigation is initiated. Employees can also submit reports anonymously via the secure whistleblowing system if they have suspicions they wish to report.                                                                                                                                                   |
| <b>Progress</b>                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| The measures taken to prevent corruption and bribery have already been implemented. They are reviewed annually and adjusted as necessary. The results to date have shown that no incidents of bribery or corruption were reported or identified in the 2024 reporting year.                                                                                                                                                                                                  |

**ESRS 2 69) Disclosure requirements for action plans with significant OpEx and/or CapEx requirements****ESRS 2 69a) Disclosure of current and future resources allocated to the action plan**

An allocation of current and future operating expenditures and capital expenditures was not carried out in the current reporting period.

**ESRS 2 69b-c) Disclosure of the amount of current and future resources and discussion of how they relate to the most relevant amounts presented in the financial statements**

As this data was not collected in the reporting period, no information is available.

**DISCLOSURE REQUIREMENT G1-6 – PAYMENT PRACTICES****33a) Disclosure of the average time the undertaking takes to pay an invoice**

The average processing time was determined on the basis of a random sample of ten suppliers – consisting of large, small and medium-sized companies – and a total of 432 invoices. The average processing time for invoices (receipt – processing – payment) was 4.7 calendar days (median: 4 calendar days). The sample contains both invoices that were paid on the same day and invoices that were settled with a delay for various reasons.

As a matter of principle, Hypo Vorarlberg endeavours to pay all invoices on the day they are received, regardless of the supplier. Invoices are carefully checked and processed in accordance with the relevant work instructions. The invoice payment process is defined in the internal control system.

**33b) Disclosure of the undertaking's standard payment terms in number of days, disaggregated by main categories of suppliers**

The Group's internal requirements provide for the immediate settlement of invoices received. Hypo Vorarlberg does not allocate suppliers to different categories. All suppliers (large, small and medium-sized companies) are treated equally.

**33b) Percentage of payments aligned with these standard payment terms**

The percentage of payments aligned with the standard payment terms is almost 100 %. In a small number of exceptional cases, this period may be exceeded in the event of problems with the delivery or provision of services.

**33c) Disclosure of the number of legal proceedings for late payments currently outstanding**

There were no legal proceedings for late payments in 2024.

**33d) Complementary information necessary to provide context on payment practices**

The payment practices are based on rules and work instructions that originally served to ensure regular payment runs. The content of these regulations is intended to ensure that the payment process is audit-proof and traceable.

Bregenz, 27 March 2025

**Hypo Vorarlberg Bank AG**  
The Managing Board



Michel Haller  
Chairman of the Managing Board



Wilfried Amann  
Member of the Managing Board



Philipp Hämmerle  
Member of the Managing Board

## INDEPENDENT AUDITOR'S REPORT

To the members of the Managing Board and Supervisory Board of  
Hypo Vorarlberg Bank AG  
Hypo-Passage 1, 6900 Bregenz

Independent auditor's limited assurance report on the group non-financial statement for 2024

We have performed a limited assurance engagement of the consolidated non-financial statement included in the group management report of Hypo Vorarlberg Bank AG for the fiscal year ended 31. December 2024.

### **Limited assurance conclusion**

Based on the procedures we have performed and the evidence we have obtained, nothing has come to our attention that causes us to believe that the group non-financial statement included in the group non-financial statement section of the group management report is not prepared, in all material respects, in accordance with the legal requirements of Sec. 243b und 267a UGB ["Unternehmensgesetzbuch": Austrian Company Code], including

- Compliance with the legal reporting requirements pursuant to Art. 8 of Regulation (EU) 2020/852 ("EU Taxonomy Regulation") as well as
- Compliance with the standards applicable to non-financial statements (European Sustainability Reporting Standards, "ESRS");
- The consistency of the process to identify information required to be reported under ESRS ("materiality assessment process") with the Company's description in the disclosure IRO-1 in accordance with ESRS 2.

### **Basis for conclusion**

We conducted our limited assurance engagement in accordance with the generally accepted standards for other assurance engagements as applied in Austria and supplementary opinions as well as with International Standard on Assurance Engagements (ISAE) 3000 (Revised), which is applicable to such engagements. The procedures in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

Our responsibilities under these requirements and standards are further described in the "Responsibilities of the auditor of the group non-financial statement" section of our assurance report.

We are independent of the Hypo Vorarlberg Bank AG in accordance with the requirements of Austrian commercial and professional law, and we have fulfilled our other professional responsibilities in accordance with these requirements.

Our audit firm operates a comprehensive system of quality management, including documented policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

We believe that the evidence we obtained by the date of our assurance report is sufficient and appropriate to provide a basis for our conclusion on this date.

### **Other information**

Management is responsible for the other information. The other information comprises all the information included in the consolidated annual financial statements and in the group management report 2024 but does not include the group non-financial statement and our assurance report thereon.

Our conclusion on the group non-financial statement does not cover this other information and we do not express any form of assurance conclusion thereon. In connection with our assurance engagement on the group non-financial statement, our responsibility is to read this other information and, in doing so, consider whether the other information is materially inconsistent with the group non-financial statement, or our knowledge obtained in the assurance engagement, or otherwise appears to be materially misstated. If, based on the work we have performed, we conclude that there is a material misstatement of this other information, we are required to report that fact. We have nothing to report in this regard.

### **Responsibilities of management, the supervisory board**

Management is responsible for designing and implementing a materiality assessment process and describing this process in the disclosure IRO-1 in accordance with ESRS 2. These responsibilities include:

- Obtaining an understanding of the environment in which the Hypo Vorarlberg Bank AG's activities and business relationships take place and obtaining an understanding of the affected stakeholders;
- Identifying actual and potential (both negative and positive) impacts related to sustainability matters as well as risks and opportunities that affect or could reasonably be expected to affect the Hypo Vorarlberg Bank AG's financial position, financial performance, cash flows, access to finance or cost of capital over the short, medium or long term;
- Assessing the materiality of the identified impacts, risks and opportunities related to sustainability matters by selecting and applying appropriate estimates and thresholds; and
- Making assumptions and estimates that are appropriate in the circumstances

Management is also responsible for the preparation of group a non-financial statement that includes all information identified by the process in accordance with the applicable requirements and standards, including:

- Compliance with the requirements of Sec. 243b und 267a UGB and
- Inclusion of disclosures in the group non-financial statement in accordance with the EU Taxonomy Regulation as well as
- Compliance with ESRS.

These responsibilities also include

- Designing, implementing and maintaining such internal control as management determines is relevant to enable the preparation of a group non-financial statement that is free from material misstatement, whether due to fraud or error; and
- Selecting and applying appropriate methods for a group non-financial statement well as making assumptions and estimates about certain sustainability disclosures that are appropriate in the circumstances

The supervisory board is responsible for overseeing the process to assess materiality and prepare the group non-financial statement.

#### **Inherent limitations in preparing the group non-financial statement**

When reporting on forward-looking information, the Company is required to prepare such forward-looking information on the basis of disclosed assumptions about events that could occur in the future and possible future actions by the Company. The actual outcome is likely to differ, as expected events often do not occur as assumed.

When determining the disclosures in accordance with the EU Taxonomy Regulation, management is required to interpret undefined legal terms. Undefined legal terms may be interpreted differently, also with regard to the legal conformity of their interpretation and are therefore subject to uncertainties.

#### **Responsibilities of the auditor of the group non-financial statement**

Our objectives are to plan and perform an assurance engagement to obtain limited assurance about whether the group non-financial statement in accordance with the requirements of Sec. 243b und 267a UGB, the reporting in accordance with the EU Taxonomy Regulation and the reporting in accordance with the requirements of ESRS, including the materiality assessment process, is free from material misstatement, whether due to fraud or error, and to issue an assurance report that includes our conclusion. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of this group non-financial statement.

We exercise professional judgment and maintain professional skepticism throughout the engagement.

Our responsibility for the assurance engagement on the group non-financial statement with regard to the materiality assessment process encompasses:

- Performing risk-based procedures, including obtaining an understanding of internal control relevant to the engagement, to identify risks that cause the process to not comply with the applicable requirements of ESRS, but not for the purpose of providing a conclusion on the effectiveness of that process and
- Designing and performing procedures to assess whether the process is consistent with the Company's description in the disclosure IRO-1 in accordance with ESRS 2.

Our other responsibilities in relation to the reasonable assurance engagement on the group non-financial statement include

- Performing risk-based procedures, including obtaining an understanding of internal control relevant to the engagement, to identify representations that are more likely to be materially misstated, whether due to fraud or error, but not for the purpose of providing a conclusion on the effectiveness of the Company's internal control; and
- Designing and performing procedures responsive to disclosures in the group non-financial statement where material misstatements are more likely. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.

#### **Summary of work performed**

A limited assurance engagement involves performing procedures to obtain evidence about the group non-financial statement.

The nature, timing and extent of procedures selected depend on professional judgment, including the identification of disclosures in the group non-financial statement that could be materially misstated, whether due to fraud or error.



In conducting our limited assurance engagement in relation to the materiality assessment process,

- We obtain an understanding of the process by
  - Making inquiries to understand the sources of information used by management (e.g., stakeholder engagement, business plans and strategy documents); and
  - Reviewing the Company's internal process documentation.
- We assess whether the evidence obtained from our procedures on the processes implemented by the Company is consistent with the description in the disclosure IRO-1 in accordance with ESRS 2.
- We assess whether all information obtained through the process to determine the group non-financial statement has been included in the group non-financial statement.

In conducting our limited assurance engagement on the group non-financial statement,

- We assess whether the structure and presentation of the consolidated non-financial statement is in accordance with ESRS.
- We make inquiries of relevant personnel and perform analytical procedures regarding selected disclosures in the consolidated non-financial statement.
- We perform procedures on a test basis on selected disclosures in the consolidated non-financial statement
- We reconcile selected disclosures in the consolidated non-financial with the corresponding disclosures in the consolidated financial statements and the other sections of the group management report.
- We obtain evidence about the methods presented to develop estimates and forward-looking information.
- We assess whether the requirements of Section 243b and 267a UGB have been adequately addressed.

Delimitation of scope of services:

- Prior-year figures were not audited unless this was necessary for plausibility checks.
- We base our audit scope on the assumption that no relevant information for the audit has been outsourced to the website of Hypo Vorarlberg Bank AG.
- Figures taken from external studies were not audited. Only the correct inclusion of the relevant information and data in the consolidated financial statements was checked.
- The financial performance indicators and statements audited as part of the audit of the annual or consolidated financial statements, as well as information from the corporate governance report and risk reporting, were not subjected to any further audit by us.

#### **Limitation of liability and publication**

The limited assurance engagement on the group non-financial statement is a voluntary assurance engagement

We issue this assurance report on the basis of the engagement agreement signed with the client, which is governed, also in relation to third parties, by the attached General Conditions of Contract for the Public Accounting Professions ["Allgemeine Auftragsbedingungen für Wirtschaftstreuhandberufe": AAB 2018].

With regard to our responsibility and liability arising from the engagement, Item 7 of the AAB 2018 applies. We shall only be liable in cases of willful intent and gross negligence. In cases of gross negligence, our maximum liability for damages shall be tenfold the minimum insurance sum of the professional liability insurance according to Sec. 11 WTBG ["Wirtschaftstreuhandberufsgesetz": Austrian Public Accounting Professions Act] 2017, i.e., a total of EUR 726,730. The limitation period shall be determined in accordance with Item 7 (4) of the AAB 2018.

Our report on the assurance engagement may only be distributed to third parties in complete and unabridged form together with the consolidated non-financial reporting included in the non-financial reporting section of the group management report. Since our report is prepared solely at the request and in the interest of the company, it does not serve as a basis for any potential reliance by third parties on its content. Therefore, claims by third parties cannot be derived from it.

Vienna, 28 March 2025

Ernst & Young  
Wirtschaftsprüfungsgesellschaft m.b.H.

Roland Unterweger

p.p. Lukas Kirchmair

This report has been translated from German to English for referencing purposes only. Please refer to the officially legally binding version as written and signed in German. Only the German version is the legally binding version.

# CONSOLIDATED FINANCIAL STATEMENTS (IFRS)

# A GOOD TRACK RECORD

## CONSOLIDATED FINANCIAL STATEMENTS IN ACCORD- ANCE WITH INTERNATIONAL FINANCIAL REPORTING STANDARDS FOR THE YEAR ENDED 31 DECEMBER 2024

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# I. STATEMENT OF COMPREHENSIVE INCOME

FOR THE PERIOD FROM 1 JANUARY TO 31 DECEMBER 2024

## Income statement

| TEUR                                                              | Notes      | 2024           | 2023           | Change<br>in TEUR | Change<br>in % |
|-------------------------------------------------------------------|------------|----------------|----------------|-------------------|----------------|
| Interest and similar income according to the effective interest   |            | 474,199        | 449,844        | 24,355            | 5.4            |
| Other interest and similar income                                 |            | 192,735        | 164,064        | 28,671            | 17.5           |
| Interest and similar expenses according to the effective interest |            | -246,488       | -221,900       | -24,588           | 11.1           |
| Other interest and similar expenses                               |            | -186,753       | -158,347       | -28,406           | 17.9           |
| <b>Net interest income</b>                                        | <b>(5)</b> | <b>233,693</b> | <b>233,661</b> | <b>32</b>         | <b>0.0</b>     |
| Dividend income                                                   | (6)        | 381            | 186            | 195               | >100.0         |
| Fee and commission income                                         |            | 47,139         | 41,571         | 5,568             | 13.4           |
| Fee and commission expenses                                       |            | -8,189         | -6,168         | -2,021            | 32.8           |
| <b>Net fee and commission income</b>                              | <b>(7)</b> | <b>38,950</b>  | <b>35,403</b>  | <b>3,547</b>      | <b>10.0</b>    |
| Net result from financial instruments at amortised cost           | (8)        | 94             | 2,325          | -2,231            | -96.0          |
| Net result from financial instruments at fair value               | (9)        | -2,608         | -38,122        | 35,514            | -93.2          |
| Other income                                                      | (10)       | 19,533         | 53,482         | -33,949           | -63.5          |
| Other expenses                                                    | (11)       | -25,086        | -30,304        | 5,218             | -17.2          |
| Administrative expenses                                           | (12)       | -132,564       | -116,507       | -16,057           | 13.8           |
| Depreciation and amortisation                                     | (13)       | -8,184         | -8,180         | -4                | 0.0            |
| Loan loss provisions and impairment of financial assets           | (14)       | -66,209        | -78,486        | 12,277            | -15.6          |
| Impairment of non-financial assets                                | (15)       | -666           | -1,006         | 340               | -33.8          |
| Net result from shares in companies measured at equity            |            | 724            | 605            | 119               | 19.7           |
| <b>Earnings before taxes</b>                                      |            | <b>58,058</b>  | <b>53,057</b>  | <b>5,001</b>      | <b>9.4</b>     |
| Taxes on income                                                   | (16)       | -15,608        | -12,958        | -2,650            | 20.5           |
| <b>Net income for the year</b>                                    |            | <b>42,450</b>  | <b>40,099</b>  | <b>2,351</b>      | <b>5.9</b>     |
| of which attributable to owners of the parent company             |            | 42,434         | 40,097         | 2,337             | 5.8            |
| of which attributable to non-controlling interests                |            | 16             | 2              | 14                | >100.0         |

## Other income

| TEUR                                                          | 2024          | 2023          | Change<br>in TEUR | Change<br>in % |
|---------------------------------------------------------------|---------------|---------------|-------------------|----------------|
| <b>Net income for the year</b>                                | <b>42,450</b> | <b>40,099</b> | <b>2,351</b>      | <b>5.9</b>     |
| <b>Other income (OCI)</b>                                     | <b>-4,690</b> | <b>8,819</b>  | <b>-13,509</b>    | <b>-</b>       |
| <b>OCI w/o recycling</b>                                      | <b>-4,750</b> | <b>8,668</b>  | <b>-13,418</b>    | <b>-</b>       |
| Actuarial result IAS 19                                       | -76           | -2,340        | 2,264             | -96.8          |
| Measurement of own credit risks for liabilities at fair value | -6,089        | 13,490        | -19,579           | -              |
| Income tax effects                                            | 1,415         | -2,482        | 3,897             | -              |
| <b>OCI with recycling</b>                                     | <b>60</b>     | <b>151</b>    | <b>-91</b>        | <b>-60.3</b>   |
| Foreign currency translation                                  | 60            | 151           | -91               | -60.3          |
| <b>Comprehensive income for the year</b>                      | <b>37,760</b> | <b>48,918</b> | <b>-11,158</b>    | <b>-22.8</b>   |
| of which attributable to owners of the parent company         | 37,744        | 48,916        | -11,172           | -22.8          |
| of which attributable to non-controlling interests            | 16            | 2             | 14                | >100.0         |

## II. BALANCE SHEET

### AS AT 31 DECEMBER 2024

#### Assets

| TEUR                                                 | Notes | 31.12.2024        | 31.12.2023        | Change<br>in TEUR | Change<br>in % |
|------------------------------------------------------|-------|-------------------|-------------------|-------------------|----------------|
| Cash reserve                                         | (17)  | 509,933           | 976,271           | -466,338          | -47.8          |
| Trading assets                                       | (18)  | 104,076           | 117,735           | -13,659           | -11.6          |
| Financial assets at fair value (non-SPPI)            | (19)  | 584,583           | 593,409           | -8,826            | -1.5           |
| of which equity instruments                          |       | 17,809            | 12,371            | 5,438             | 44.0           |
| of which debt securities                             |       | 134,566           | 145,940           | -11,374           | -7.8           |
| of which loans and advances to customers             |       | 432,208           | 435,098           | -2,890            | -0.7           |
| Financial liabilities at fair value (option)         | (20)  | 199,208           | 213,528           | -14,320           | -6.7           |
| of which debt securities                             |       | 59,069            | 56,240            | 2,829             | 5.0            |
| of which loans and advances to customers             |       | 140,139           | 157,288           | -17,149           | -10.9          |
| Financial assets at amortised cost                   | (22)  | 13,294,829        | 13,261,300        | 33,529            | 0.3            |
| of which debt securities                             |       | 2,494,272         | 2,345,583         | 148,689           | 6.3            |
| of which loans and advances to banks                 |       | 235,195           | 418,305           | -183,110          | -43.8          |
| of which loans and advances to customers             |       | 10,565,362        | 10,497,412        | 67,950            | 0.6            |
| Positive market values of hedges                     | (23)  | 345,693           | 377,849           | -32,156           | -8.5           |
| Fair value change portfolio from interest rate risks |       | 13,829            | 11,767            | 2,062             | 17.5           |
| Holdings                                             |       | 746               | 968               | -222              | -22.9          |
| Shares in companies measured at equity               | (24)  | 4,025             | 3,805             | 220               | 5.8            |
| Property, plant and equipment                        | (25)  | 82,915            | 80,859            | 2,056             | 2.5            |
| Investment property                                  | (26)  | 45,237            | 44,073            | 1,164             | 2.6            |
| Intangible assets                                    | (27)  | 2,876             | 3,285             | -409              | -12.5          |
| Income tax assets                                    |       | 18,265            | 1,471             | 16,794            | >100.0         |
| Deferred tax assets                                  | (28)  | 2,004             | 3,113             | -1,109            | -35.6          |
| Other assets                                         | (30)  | 42,106            | 37,102            | 5,004             | 13.5           |
| <b>Assets</b>                                        |       | <b>15,250,325</b> | <b>15,726,535</b> | <b>-476,210</b>   | <b>-3.0</b>    |

#### Liabilities and shareholders' equity

| TEUR                                                  | Notes | 31.12.2024        | 31.12.2023        | Change<br>in TEUR | Change<br>in % |
|-------------------------------------------------------|-------|-------------------|-------------------|-------------------|----------------|
| Trading liabilities                                   | (32)  | 54,440            | 101,024           | -46,584           | -46.1          |
| Financial liabilities at fair value (option)          | (33)  | 782,761           | 789,412           | -6,651            | -0.8           |
| of which securitised liabilities                      |       | 670,482           | 666,381           | 4,101             | 0.6            |
| of which liabilities to customers                     |       | 112,279           | 123,031           | -10,752           | -8.7           |
| Financial liabilities at amortised cost               | (34)  | 12,543,471        | 12,872,355        | -328,884          | -2.6           |
| of which securitised liabilities                      |       | 7,134,663         | 6,952,353         | 182,310           | 2.6            |
| of which liabilities to banks                         |       | 439,049           | 783,867           | -344,818          | -44.0          |
| of which liabilities to customers                     |       | 4,969,759         | 5,136,135         | -166,376          | -3.2           |
| Negative market values of hedges                      | (35)  | 269,952           | 392,161           | -122,209          | -31.2          |
| Provisions                                            | (36)  | 41,454            | 38,085            | 3,369             | 8.8            |
| Income tax obligations                                | (37)  | 2,450             | 2,458             | -8                | -0.3           |
| Deferred tax liabilities                              | (38)  | 12,643            | 17,891            | -5,248            | -29.3          |
| Other liabilities                                     | (39)  | 46,297            | 49,617            | -3,320            | -6.7           |
| Shareholders' equity                                  | (40)  | 1,496,857         | 1,463,532         | 33,325            | 2.3            |
| of which attributable to owners of the parent company |       | 1,496,810         | 1,463,501         | 33,309            | 2.3            |
| of which attributable to non-controlling interests    |       | 47                | 31                | 16                | 51.6           |
| <b>Liabilities and shareholders' equity</b>           |       | <b>15,250,325</b> | <b>15,726,535</b> | <b>-476,210</b>   | <b>-3.0</b>    |

# III. STATEMENT OF CHANGES IN SHAREHOLDERS' EQUITY

## Statement of changes in shareholders' equity

| TEUR                           | Subscribed capital | Capital reserve | Retained earnings and other reserves | Accumulated other income | Total parent company shareholders | Non-controlling interests | Total shareholders' equity |
|--------------------------------|--------------------|-----------------|--------------------------------------|--------------------------|-----------------------------------|---------------------------|----------------------------|
| <b>Balance at 01.01.2023</b>   | <b>162,152</b>     | <b>44,674</b>   | <b>1,207,787</b>                     | <b>4,408</b>             | <b>1,419,021</b>                  | <b>52</b>                 | <b>1,419,073</b>           |
| Consolidated net income        | 0                  | 0               | 40,097                               | 0                        | 40,097                            | 2                         | 40,099                     |
| Other income                   | 0                  | 0               | 0                                    | 8,819                    | 8,819                             | 0                         | 8,819                      |
| <b>Comprehensive income at</b> | <b>0</b>           | <b>0</b>        | <b>40,097</b>                        | <b>8,819</b>             | <b>48,916</b>                     | <b>2</b>                  | <b>48,918</b>              |
| Disposals from consolidation   | 0                  | 0               | 1                                    | 0                        | 1                                 | 0                         | 1                          |
| Reclassifications              | 0                  | 0               | 169                                  | -169                     | 0                                 | 0                         | 0                          |
| Other changes                  | 0                  | 0               | -2                                   | 0                        | -2                                | 1                         | -1                         |
| Dividends                      | 0                  | 0               | -4,434                               | 0                        | -4,434                            | -24                       | -4,458                     |
| <b>Balance at 31.12.2023</b>   | <b>162,152</b>     | <b>44,674</b>   | <b>1,243,617</b>                     | <b>13,058</b>            | <b>1,463,501</b>                  | <b>31</b>                 | <b>1,463,532</b>           |
| <b>Balance at 01.01.2024</b>   | <b>162,152</b>     | <b>44,674</b>   | <b>1,243,617</b>                     | <b>13,058</b>            | <b>1,463,501</b>                  | <b>31</b>                 | <b>1,463,532</b>           |
| Consolidated net income        | 0                  | 0               | 42,434                               | 0                        | 42,434                            | 16                        | 42,450                     |
| Other income                   | 0                  | 0               | 0                                    | -4,690                   | -4,690                            | 0                         | -4,690                     |
| <b>Comprehensive income at</b> | <b>0</b>           | <b>0</b>        | <b>42,434</b>                        | <b>-4,690</b>            | <b>37,744</b>                     | <b>16</b>                 | <b>37,760</b>              |
| Reclassifications              | 0                  | 0               | 85                                   | -85                      | 0                                 | 0                         | 0                          |
| Other changes                  | 0                  | 0               | -1                                   | 0                        | -1                                | 0                         | -1                         |
| Dividends                      | 0                  | 0               | -4,434                               | 0                        | -4,434                            | 0                         | -4,434                     |
| <b>Balance at 31.12.2024</b>   | <b>162,152</b>     | <b>44,674</b>   | <b>1,281,701</b>                     | <b>8,283</b>             | <b>1,496,810</b>                  | <b>47</b>                 | <b>1,496,857</b>           |

Further details on equity and the composition of capital components – in particular accumulated other comprehensive income – are given in note (40).

## IV. CASH FLOW STATEMENT

### Cash flow from operating activities

| TEUR                                                            | 2024            | 2023           |
|-----------------------------------------------------------------|-----------------|----------------|
| Consolidated net income                                         | 42,450          | 40,099         |
| <b>Non-cash items included in consolidated net income</b>       |                 |                |
| Write-downs/reversals of write-downs on property,               | 8,214           | 9,248          |
| Write-downs/reversals of write-downs on financial instruments   | 3,109           | 72,334         |
| Allocations/reversals to/from reserves and loan loss provisions | 46,364          | 62,508         |
| Change in other non-cash items                                  | -128,770        | -27,315        |
| Other adjustments (interest and income taxes)                   | -207,575        | -275,689       |
| <b>Change in assets from operating activities</b>               |                 |                |
| Loans and advances at fair value (non-SPPI)                     | -8,400          | -32,343        |
| Loans and advances at fair value (option)                       | 31,221          | 37,142         |
| Loans and advances at amortised cost                            | 20,511          | -561,046       |
| Income tax assets                                               | -8,589          | 3,622          |
| Other assets                                                    | -5,706          | 39,609         |
| <b>Change in liabilities from operating activities</b>          |                 |                |
| Non-subordinated liabilities at fair value (option)             | -18,893         | 87,288         |
| Non-subordinated liabilities at amortised cost                  | -360,578        | 421,801        |
| Provisions                                                      | -3,229          | -15,250        |
| Income tax obligations                                          | 1,108           | -1,415         |
| Other liabilities                                               | -3,313          | 4,391          |
| Interest received                                               | 639,417         | 594,656        |
| Dividends received                                              | 381             | 186            |
| Interest paid                                                   | -417,549        | -333,415       |
| Income taxes paid                                               | -18,665         | -14,451        |
| <b>Cash flow from operating activities</b>                      | <b>-388,492</b> | <b>111,960</b> |

### Cash flow from investing activities

| TEUR                                           | 2024           | 2023          |
|------------------------------------------------|----------------|---------------|
| <b>Cash inflows from the sale/repayment of</b> |                |               |
| Financial instruments                          | 542,704        | 523,153       |
| Property, plant and equipment and intangible   | 2,883          | 970           |
| Subsidiaries                                   | 15             | 0             |
| <b>Cash outflows for investments in</b>        |                |               |
| Financial instruments                          | -632,237       | -487,636      |
| Property, plant and equipment and intangible   | -13,207        | -9,952        |
| <b>Cash flow from investing activities</b>     | <b>-99,842</b> | <b>26,535</b> |

### Cash flow from financing activities

| TEUR                                                            | 2024          | 2023           |
|-----------------------------------------------------------------|---------------|----------------|
| Cash outflows for repayments of subordinated and tier 2 capital | -60           | -55,500        |
| Cash inflows from issuance of subordinated and tier 2 capital   | 22,499        | 0              |
| Lease payments from operating leases                            | -1,931        | -1,710         |
| Dividends                                                       | -4,434        | -4,458         |
| <b>Cash flow from financing activities</b>                      | <b>16,074</b> | <b>-61,668</b> |

### Reconciliation to cash reserve

| TEUR                                | 2024           | 2023           |
|-------------------------------------|----------------|----------------|
| <b>Cash reserve as at 01.01.</b>    | <b>976,271</b> | <b>869,021</b> |
| Cash flow from operating activities | -388,492       | 111,960        |
| Cash flow from investing activities | -99,842        | 26,535         |
| Cash flow from financing activities | 16,074         | -61,668        |
| Effects of exchange rate changes    | 5,922          | 30,423         |
| <b>Cash reserve as at 31.12.</b>    | <b>509,933</b> | <b>976,271</b> |

Further disclosures on the cash flow statement are shown under note (43).



# V. NOTES

## A. ACCOUNTING PRINCIPLES

### (1) GENERAL INFORMATION

Hypo Vorarlberg Bank AG and its subsidiaries offer customers a broad spectrum of financial services. The core business segments are Corporate Customers, Private Customers and Private Banking. A range of leasing, insurance and real estate services are additionally offered. The Group's core market is Vorarlberg, as well as Eastern Switzerland, Southern Germany and South Tyrol. The Bank has offices in Vienna, Graz and Wels in Eastern Austria and in Salzburg in Central Austria.

The Bank is a stock corporation with its registered office in Bregenz, Austria, and is registered in Feldkirch, Austria, in the commercial register (FN145586y). The Bank is the ultimate parent company of the companies included in the consolidated financial statements. The shareholders of the Bank are presented under note (50). The Bank's address is Hypo-Passage 1, 6900 Bregenz, Austria.

The consolidated financial statements for the 2023 financial year and the comparative figures for 2024 were prepared in accordance with the International Financial Reporting Standards (IFRS) issued by the International Accounting Standards Board (IASB) and the international accounting standards adopted by the EU on the basis of IAS Regulation (EC) No 1606/2002 including the applicable interpretations by the International Financial Reporting Interpretations Committee (IFRIC/SIC), and therefore fulfil the requirements of section 59a of the Austrian Banking Act (BWG) and section 245a of the Austrian Commercial Code (UGB).

On 27 March 2025, the Managing Board of Hypo Vorarlberg Bank AG authorised the release of these annual financial statements.

All amounts are stated in thousands of euro (TEUR) unless otherwise specified. The tables below may contain rounding differences.

### (2) PRINCIPLES AND SCOPE OF CONSOLIDATION

The consolidated financial statements comprise the financial statements of Hypo Vorarlberg Bank AG and its subsidiaries for the year ended 31 December 2024. Subsidiaries are fully consolidated from the acquisition date, i.e. from the date on which the Group obtains control. Consolidation ends as soon as the parent company ceases to control the subsidiary. The financial statements of the subsidiaries are prepared using the same accounting policies and reporting period as the financial statements of the parent company. Intragroup expenses, income, receivables and liabilities are eliminated on consolidation. Currency-related differences from debt consolidation and the elimination of income and expenses are recognised through profit and loss in the net result from financial instruments at fair value (9). The results of intragroup transactions are eliminated unless they are immaterial. The deferred taxes required by IAS 12 are recognised on temporary differences from consolidation. The amount of non-controlling interests is determined according to the interests of minority shareholders in the equity of the subsidiaries.

In addition to the parent company, the consolidated financial statements include 28 subsidiaries (2023: 28) in which Hypo Vorarlberg directly or indirectly holds more than 50 % of the voting rights or over which it otherwise exercises a controlling influence. Of these companies, 25 are domiciled in Austria (2023: 25) and three abroad (2023: three).

Vorarlberger Kommunalgebäudeleasing Gesellschaft m.b.H. was wound up effective 24 October 2024 and deconsolidated as at 31 December 2024.

The Group's investments in associates in accordance with IAS 28 and joint ventures in accordance with IFRS 11 are accounted for using the equity method. Associates are companies that are not controlled by Hypo Vorarlberg but over which it has significant influence, either directly or indirectly. Significant influence is typically considered to exist where Hypo Vorarlberg holds at least 20 % of the shares in the respective company. Where it holds less than 20 % of the shares, it may also be considered to have significant influence if its approval is required for key decisions or if it is represented on management or supervisory bodies, for example.

Two (2023: three) significant domestic companies are accounted for using the equity method.

Hypo Vorarlberg holds shares in one associate that is not accounted for using the equity method due to immateriality. These shares are reported at fair value under holdings. Based on the available financial statement data, the (aggregated) total assets of this holding amounted to TEUR 518 in the past financial year (2023: TEUR 442). The aggregate equity of this holding amounts to TEUR 37 (2023: TEUR 37). No earnings after taxes were generated in the 2024 reporting year or in the previous year.

The reporting date of the consolidated financial statements corresponds to the reporting date of the companies included in the consolidated financial statements with the exception of the subsidiaries specified in section J., which have a different reporting date of 30 September 2024 and have prepared interim financial statements as at 31 December 2024.

A full presentation of the subsidiaries and associates included in the consolidated financial statements can be found in section J of the consolidated financial statements.

### (3) ACCOUNTING POLICIES

The significant accounting policies applied in the preparation of these consolidated financial statements are outlined below. Unless stated otherwise, the consolidated companies applied the policies described uniformly and consistently to the reporting periods presented. Items were recognised and measured on a going concern basis.

| Accounting policies                                                        | Notes                                                                                                                                                                                       | IFRS                                 |
|----------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------|
| Currency translation                                                       | (3a) Currency translation                                                                                                                                                                   | IAS 21                               |
| Segment reporting                                                          | E. Segment Reporting                                                                                                                                                                        | IFRS 8                               |
|                                                                            | (17) Cash reserve                                                                                                                                                                           |                                      |
|                                                                            | (18) Trading assets                                                                                                                                                                         |                                      |
| Financial instruments – classification and measurement                     | (19) Financial assets at fair value (non-SPPI)<br>(20) Financial liabilities at fair value (option)<br>(21) Financial assets at fair value (OCI)<br>(22) Financial assets at amortised cost | IFRS 9 / IFRS 7 / IAS 32             |
|                                                                            | (9) Net result from financial instruments at fair value                                                                                                                                     |                                      |
| Hedges                                                                     | (23) Positive market values of hedges<br>(35) Negative market values of hedges                                                                                                              | IFRS 9 / IFRS 7 / IAS 39             |
| Net interest income                                                        | (5) Net interest income                                                                                                                                                                     | IAS 1                                |
| Financial instruments – impairment                                         | (57) Impairment of financial instruments                                                                                                                                                    | IFRS 9 / IFRS 7                      |
| Fair value disclosures                                                     | (55) Fair value disclosures                                                                                                                                                                 | IFRS 9 / IFRS 7 / IFRS 13            |
| Net fee and commission income                                              | (7) Net fee and commission income                                                                                                                                                           | IFRS 9 / IFRS 15                     |
| Investment property                                                        | (26) Investment property                                                                                                                                                                    | IAS 40                               |
| Leases                                                                     | (22) Financial assets at amortised cost<br>(34) Financial liabilities at amortised cost                                                                                                     | IFRS 16                              |
|                                                                            | (27) Intangible assets                                                                                                                                                                      |                                      |
| Intangible assets and property, plant and equipment                        | (25) Property, plant and equipment<br>(13) Depreciation and amortisation<br>(31) Statement of changes in assets                                                                             | IAS 38 / IAS 16                      |
| Impairment of non-financial assets                                         | (15) Impairment of non-financial assets                                                                                                                                                     | IAS 36                               |
| Provisions                                                                 | (36) Provisions                                                                                                                                                                             | IAS 19 / IAS 37                      |
|                                                                            | (16) Taxes on income                                                                                                                                                                        |                                      |
| Taxes                                                                      | (28) Deferred tax assets<br>(37) Income tax obligations<br>(38) Deferred tax liabilities                                                                                                    | IAS 12                               |
|                                                                            | IV. Cash flow statement                                                                                                                                                                     |                                      |
| Consolidated cash flow statement                                           | (43) Disclosures on the cash flow statement                                                                                                                                                 | IAS 7                                |
| Investments in subsidiaries and associates and interests in joint ventures | (2) Principles and scope of consolidation<br>J. Subsidiaries and Holdings                                                                                                                   | IAS 28 / IFRS 10 / IFRS 11 / IFRS 12 |

#### a) Currency translation

These consolidated financial statements are prepared in euro, which is both the functional and the reporting currency of the Group. Monetary assets and liabilities not denominated in euro are translated into euro at the spot rate on the reporting date.

Gains and losses from the settlement of transactions in foreign currencies are recognised in the income statement in the net result from financial instruments at fair value (9). The translation differences from financial assets allocated to the categories at fair value (non-SPPI) and fair value (option) are recognised through profit or loss in the income statement in the net result from other financial instruments at fair value (9).

Assets and liabilities of the companies included in the consolidated financial statements are measured in the currencies that reflect their economic environments (functional currency). Where the functional currency of a company differs from the functional currency of the Group, the balance sheet and income statement are translated in accordance with IAS 21. Foreign exchange gains and losses resulting from capital consolidation are reported in other comprehensive income (40) in a separate item (OCI with recycling – Foreign currency translation).

#### b) Cash

The balance sheet item “Cash reserve” (17) comprises cash on hand and balances payable on demand with central banks and banks. For the purposes of the cash flow statement (section IV.), cash and cash equivalents comprise the cash defined above. The cash reserve was measured at its nominal amount less any valuation allowances.

#### c) Financial instruments

A financial instrument is any contract that gives rise to a financial asset of one entity and a financial liability or equity instrument of another entity. In accordance with IFRS 9, derivatives are also financial instruments.

##### Initial recognition and subsequent measurement

Financial instruments are recognised for the first time when the Group becomes a party to the contract for the financial instrument. On initial recognition, financial instruments are measured at the transaction price (=amortised cost), i.e. at fair value, irrespective of the measurement category to which they are allocated. Regular way purchases or sales are recognised at fair value on the settlement date in the case of financial assets, i.e. the date on which the asset is delivered, and on the trade date in the case of derivatives. Financial instruments are subsequently accounted for on the basis of the principles of categorisation and measurement stipulated by IFRS 9. With regard to the classification and measurement of financial instruments, IFRS 9 distinguishes between debt instruments, equity instruments and derivatives. On initial recognition, a financial instrument is allocated to a measurement category that determines its

subsequent measurement. The following table illustrates the categories of financial instruments and their measurement and presentation.

| Category                                                                           | Abbreviation | Measurement                       | Presentation<br>Transaction/acquisition costs | Gains/losses on remeasurement +                                                                                                                                                                                                                                                                                                                                                                                                      | Impairment                                                   | Interest payments<br>Dividend payments         |
|------------------------------------------------------------------------------------|--------------|-----------------------------------|-----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------|------------------------------------------------|
| (18) Trading assets                                                                | TA           | Fair value through profit or loss | (7) Net fee and commission income             | (9) Net result from financial instruments at fair value                                                                                                                                                                                                                                                                                                                                                                              | Implicitly included in FV                                    | (5) Net interest income<br>(6) Dividend income |
| (19) Financial assets at fair value (non-SPPI)                                     | NON-SPPI     | Fair value through profit or loss | (7) Net fee and commission income             | (9) Net result from financial instruments at fair value                                                                                                                                                                                                                                                                                                                                                                              | Implicitly included in FV                                    | (5) Net interest income<br>(6) Dividend income |
| (20) Financial liabilities at fair value (option)                                  | FVO          | Fair value through profit or loss | (7) Net fee and commission income             | (9) Net result from financial instruments at fair value                                                                                                                                                                                                                                                                                                                                                                              | Implicitly included in FV                                    | (5) Net interest income                        |
| (22) Financial assets at amortised cost                                            | AC           | Amortised cost                    | (22) Financial assets at amortised cost       | Amortisation using the effective interest method<br>(5) Net interest income<br>Premiums/discounts + accrued interest:<br>(22) Financial assets at amortised cost<br>Realised income and expenses / write-downs / reversals of write-downs:<br>(8) Net result from financial instruments at amortised<br>Measurement effects for hedged items (hedging transactions):<br>(9) Net result from financial instruments at fair value      | (14) Loan loss provisions and impairment of financial assets | (5) Net interest income                        |
| (32) Trading liabilities                                                           | TL           | Fair value through profit or loss | (7) Net fee and commission income             | (9) Net result from financial instruments at fair value                                                                                                                                                                                                                                                                                                                                                                              | -                                                            | (5) Net interest income                        |
| (33) Financial liabilities at fair value (option)                                  | FLFVO        | Fair value through profit or loss | (7) Net fee and commission income             | (9) Net result from financial instruments at fair value<br>(40) Other comprehensive income - Measurement of own credit risks for liabilities at fair value                                                                                                                                                                                                                                                                           | -                                                            | (5) Net interest income                        |
| (34) Financial liabilities at amortised cost                                       | FLAC         | Amortised cost                    | (34) Financial liabilities at amortised cost  | Amortisation using the effective interest method<br>(5) Net interest income<br>Premiums/discounts + accrued interest:<br>(34) Financial liabilities at amortised cost<br>Realised income and expenses / write-downs / reversals of write-downs:<br>(8) Net result from financial instruments at amortised<br>Measurement effects for hedged items (hedging transactions):<br>(9) Net result from financial instruments at fair value | -                                                            | (5) Net interest income                        |
| (23) Positive market values of hedges<br><br>(35) Negative market values of hedges | -            | Fair value through profit or loss | -                                             | (9) Net result from financial instruments at fair value                                                                                                                                                                                                                                                                                                                                                                              | -                                                            | (5) Net interest income                        |

For allocation to the respective category, an allocation to the business models must be made for financial assets in advance depending on the intended business activity with the respective financial instrument. Determining and assessing

the business model is based on portfolios. The portfolios cannot be freely allocated, but must be based on the management of the business activity. In addition,

the allocation to the respective category depends on the cash flow (SPPI) criteria being met.

#### **Hypo Vorarlberg's business models**

- "Hold to collect" business model  
This business model aims to hold the debt instrument to the end of its term, thereby generating contractual cash flows (i.e. interest income) and collecting the nominal value on maturity. Immaterial sales can generally be made in this business model, but also occasionally material transactions; however, these are uncommon and occur rarely. Compliance with this regulation is reviewed at regular ALM board meetings.
- "Trading book" business model  
This business model aims to generate cash flows by selling debt instruments. The acquisition takes place with the intention of generating short-term gains. The Bank maintains only a small trading book according to CRR for servicing its customer securities business. All debt securities that cannot be clearly assigned to one of the other business models must also be assigned to this business model.
- "Hold to collect and sell" business model  
The objective of this business model is to collect the contractual cash flows or sell the debt instruments. The Group does not use this business model.

#### **Cash flow criterion for financial assets**

In addition to the allocation of debt instruments to the business models, the contractual cash flow conditions also apply to the categorisation of financial instruments. If a contract of a financial instrument does not exclusively provide for the payment of interest and principal that is closely related to the underlying financial instrument, the payment criterion (SPPI – solely payment of principal and interest) is not met and subsequent measurement must be at fair value in accordance with IFRS 9.

#### **Trading assets**

This category recognises financial assets that are allocated to the "trading book" business model. Derivative financial instruments in the banking book are also recognised in this category if they have a positive market value. The derivatives were mainly concluded to hedge market price risks of financial instruments in the banking book. Although this means there is largely no intention to trade, these derivatives must be recognised in this category in accordance with IFRS.

#### **Financial assets at fair value (non-SPPI)**

Financial instruments that were allocated to the "hold to collect" business model but that do not fulfil the cash flow criterion of IFRS 9 (non-SPPI – non solely payment of principal and interest) are allocated to this category. These are generally debt instruments whose interest rate conditions include levers or financing arrangements in which the Group bears a significant share of the project risk. Due to their nature, equity instruments cannot fulfil the cash flow criterion. Equity instruments that are not allocated to the "trading book" business model and that are not voluntarily measured via other comprehensive income are therefore recognised in this category.

#### **Financial liabilities at fair value (option)**

This category includes those debt securities that have been allocated to the "hold" business model and that also fulfil the cash flow criterion, but which have been voluntarily designated at fair value. This option, referred to as a fair value option, may only be used if it eliminates or significantly reduces inconsistencies in measurement. Hypo Vorarlberg applies this option to financial assets whose interest rate and currency risks have been hedged using an interest rate swap, currency swap or cross-currency swap and where hedge accounting is not used for economic hedging.

#### **Financial assets at amortised cost**

This category includes those debt securities that have been allocated to the "hold to collect" business model and that fulfil the cash flow criterion. The objective of these financial instruments is to collect contractual cash flows. This category also includes trade receivables. The amount of these receivables is immaterial in absolute

terms. As they also do not include any financing elements, these receivables are recognised at their nominal amount.

#### **Trading liabilities**

Financial liabilities held for trading purposes are assigned to this category. Derivative financial instruments in the banking book are also recognised in this category if they have a negative market value. The derivatives were mainly concluded to hedge market price risks of financial instruments in the banking book. Although this means there is largely no intention to trade, these derivatives must be recognised in this category in accordance with IFRS.

#### **Financial liabilities at fair value (option)**

Liabilities voluntarily designated at fair value are recognised in this category. This option, referred to as a fair value option, may only be used if it eliminates or significantly reduces inconsistencies in measurement. The financial liabilities primarily relate to issues and fixed-term deposits from institutional investors with interest rates that were fixed for the term. Interest rate swaps were concluded to hedge the resulting interest rate risk. New issues containing embedded derivatives, fixed-rate issues and fixed-term deposits are assigned to this category upon acquisition to avoid an accounting mismatch with the hedging derivative.

#### **Financial liabilities at amortised cost**

Liabilities for which there is no intention to trade and for which the fair value option was not selected are recognised in this category. This category is also used to report trade payables and liabilities from leases, the amount of which is immaterial.

#### **Derecognition of financial assets and financial liabilities**

A financial liability is derecognised when the obligation is settled, cancelled, or otherwise expires. Statute-barred liabilities from deposit business (dormant savings accounts) are derecognised against prior-period income after the end of the respective statutory period.

#### **Fair value**

Fair value is the amount at which an asset could be exchanged, or a liability settled, in an orderly transaction between market participants on the measurement date.

#### **Active market**

When assessing the accounting policies for financial instruments, it is relevant whether there is an active market for them. A market is considered active if transactions with the asset or liability occur with sufficient frequency and volume to ensure that price information is available on an ongoing basis. In accordance with the requirements of IFRS 13, the active market corresponds to the principal market or the most advantageous market.

### Judgements, assumptions and estimates

As Hypo Vorarlberg acquires or issues the majority of securities via OTC markets (proprietary portfolio/own issues), it must be examined in each individual case which market is the main market for these securities or, if this is not available, which market is the most favourable market.

The Group is guided by several indicators when assessing whether there is an active market. Firstly, certain asset classes are analysed to establish whether current price quotations are available. Further indicators include the currency-specific minimum size (issue volume) of a security and the trade score (BVAL score) offered by Bloomberg. Bloomberg's BVAL score indicates the level of availability and the quantity of transactions, and hence also the reliability of the calculated market value. Securities that are actively traded at binding prices are given a high score.

#### Fair values on an active market

If a market price from an active market is available, it is used. If no current price quotations are available, the price of the most recent transaction indicates the fair value. However, if economic circumstances have changed significantly since the date of the most recent transaction, appropriate methods (e.g. premiums and discounts) are used to determine the current fair value. The primary sources of information for market prices of financial instruments are stock exchange listings, but also the Bloomberg and Reuters price information systems that are important for the OTC secondary market.

#### Measurement models in the event of an inactive or non-existent market

The measurement models (mark to model) used include deriving the fair value from the market value of a comparable financial instrument (reference bonds) or several comparable identical financial instruments (reference portfolio) as well as present value and option pricing models. The following distinction is made in the measurement process depending on the type of financial instrument.

- For interest-bearing instruments, such as receivables, liabilities and interest-bearing OTC securities, the fair value is determined as the present value of future cash flows. The value of this group of financial instruments is therefore determined according to the recognised DCF method, in which the expected cash flows are first discounted using the risk-free swap curve. To measure credit risk, the credit spread is derived from a financial instrument that is comparable in terms of duration, currency and credit rating or, if necessary, using a credit-risk-adjusted credit spread matrix.

Reuters calculates the rating- and duration-specific credit spreads of corporate bonds. This data is used to create a spread matrix. Spreads for intermediate levels and lower ratings are calculated by linear interpolation (or extrapolation) on the basis of Moody's WARF table. If the current credit spread of a counterparty is unknown, the last known credit spread is used. These derivations and calculations are based on input factors observable on the market to the greatest possible extent. If there are no sufficiently usable input factors on the market, the calculation is based on internally measured input factors. These include internal ratings and internal probabilities of default. In the case of liabilities, own credit risk is measured using reference portfolios. The financial instruments to be measured are assigned to the categories of public placements, private placements and retail issues depending on their placement type. Furthermore, they are divided into senior unsecured, subordinated and covered bonds. Depending on the currency and remaining term, own credit risk is now derived taking into account the internal rating from the available reference portfolios with the same characteristics. An adjustment is made for private placements in order to accommodate the current issue level for private placements compared to public placements. If there is no market data for certain remaining terms, the calculation uses linear interpolation or extrapolation of market data.

- For equity securities, the following hierarchy of valuation techniques may be derived for the purposes of reliable fair value measurement:

1. Market approach  
Calculation based on derivation from comparable input factors observable on the market
2. Income approach  
Discounted cash flow (DCF) method based on the entity/equity approach

- For derivatives, fair value is determined using input factors observable on the market, such as yield curves and exchange rates. Specifically, derivatives are discounted – especially in hedge accounting – using the OIS yield curve and the swap curve customary on the interbank market. For derivatives collateralised in euros, a swap curve based on the EONIA ("Euro Over Night Index Average") is used as the discount rate. The EONIA is to be replaced by the ESTR ("EURO Short Term Rate") under the EU Benchmarks Regulation. This changeover will lead to a change in discounting. The resulting changes in measurement will be compensated for with equalisation payments. With regard to accounting for credit spreads, each counterparty's credit spread is measured on a net basis, provided that a corresponding netting agreement exists and in consideration of cash and/or securities collateral. Input factors observable on the market, such as CDS spreads, are also taken into account when determining credit spreads. If no CDS spread is available for the respective counterparty, the credit spread is measured using internal probabilities of default.

### Judgements, assumptions and estimates

For information on the sensitivities of the measurement models used, please refer to note (55). In the income statement, these assumptions and estimates affect the net result from financial instruments at fair value in note (9). The effect from the recognition of credit risk for financial assets and derivatives amounted to TEUR 43,584 (2023: TEUR 45,864) and was recognised in the net result from financial instruments at fair value. The effect from the recognition of credit risk for financial liabilities amounted to TEUR 4,722 (2023: TEUR 7,130) and was recognised directly in other comprehensive income (40) from changes in the Bank's own credit risk. The carrying amount of the assets subject to judgements, assumptions and estimates was TEUR 865,653 (2023: TEUR 927,564), while the carrying amount of the liabilities subject to judgements, assumptions and estimates was TEUR 410,436 (2023: TEUR 556,274).

#### d) Financial guarantees

In accordance with IFRS 9, a financial guarantee contract is a contract under which the guarantor is obliged to make specified payments to reimburse the holder for a loss it incurs because a specified debtor fails to make payment when due in accordance with the original or modified terms of a debt instrument.

The obligation under a financial guarantee is recognised as soon as the guarantee holder becomes a contracting party, i.e. at the time the guarantee offer is accepted. Initial measurement is at fair value at the date of recognition. Overall, the fair value of a financial guarantee is generally zero at the inception of the contract, as the value of the agreed premium corresponds to the value of the guarantee obligation in the case of fair market contracts. If the guarantee premium is collected in full at the inception of the contract, the premium is initially recognised as a liability and amortised over the term of the contract. If regular premiums are paid under the guarantee, they are recognised on an accrual basis in fee and commission income. If there are indications of a deterioration in the creditworthiness of the guarantee holder, provisions are recognised in the amount of the expected utilisation.

#### e) Embedded derivatives

The separate recognition and measurement of embedded derivatives (derivatives that form part of a primary financial instrument) as standalone derivatives at their market value relates solely to financial liabilities that are not already measured at fair value. Financial

assets with embedded derivatives are already measured at fair value due to the cash flow criterion.

Hypo Vorarlberg holds embedded derivatives in the area of bonds with conversion options, inflation-linked, fund-linked and equity-linked own-account revenues, CMS steepeners, CMS floaters, reverse, floaters, multi-tranches and PRDCs. To reduce interest rate risks in connection with these instruments, interest rate swaps are typically concluded as economic hedges. The fair value option is applied to these financial liabilities in order to prevent an accounting mismatch, meaning there is no longer a separation requirement.

#### f) Repurchase and securities lending agreements

Repo agreements are a combination of regular way purchases or regular way sales of securities with a simultaneous agreement on forward sale or repurchase with the same counterparty. As Hypo Vorarlberg retains substantially all the risks (credit, market price and liquidity risk) and rewards incidental to ownership of the securities sold in repo agreements (regular way sales), these continue to be recognised and measured on the consolidated balance sheet. Inflows of liquidity from repo agreements are shown on the balance sheet as liabilities to banks or to customers depending on the respective counterparty. Agreed interest payments are recognised as interest expenses based on maturity. Outflows of liquidity resulting from reverse repos are recognised as loans and advances to banks or customers and measured accordingly. The securities received (regular way purchases) underlying the money market transaction are not reported or measured on the balance sheet. Agreed interest from reverse repos is recognised as interest income based on maturity. Receivables from reverse repos and liabilities from repos with the same counterparty are not offset. However, securities may be collateralised on a net basis. In the case of reverse repos and repos with the same counterparty, this means that the securities sold or received in repo agreements collateralise the net exposure arising from reverse repos and repos.

The Group accounts for securities lending transactions in the same way as securities from repurchase agreements. Lent securities remain in the securities portfolio and are measured according to the rules of IFRS 9. Borrowed securities are not recognised or measured. Collateral provided for securities lending transactions is still reported in loans and advances on the balance sheet. The Group recognises securities received from securities lending transactions as liabilities.

The Group generally uses internationally recognised clearing houses, such as EUREX Clearing AG or Swiss National Bank, when concluding repurchase agreements. Settlement is standardised and collateralised to the greatest possible extent, meaning that no delivery risk is to be expected on the part of the counterparties. Settlement very often takes the form of a tri-party repo transaction.

#### g) Impairment of financial assets

The impairment requirements of IFRS 9 cover the following financial assets:

- Financial assets measured at amortised cost in accordance with IFRS 9 (22)
- Lease receivables within the scope of IFRS 16 (22)
- Loan commitments, excluding loan commitments accounted for at fair value through profit or loss (FVTPL) in accordance with IFRS 9 (44)
- Financial guarantees that fall within the scope of IFRS 9 and that are not measured at fair value through profit or loss (44)

No impairment is recognised for trade receivables that are immaterial in terms of their amount and maturity. Outstanding items already due are written down directly.

Under IFRS 9, a loan loss provision is required to be recognised at an amount equal to the expected losses over the remaining lifetime. For financial assets whose credit risk has not increased significantly since initial recognition (stage 1) and for financial assets whose credit risk is classified as low, the expected loss is recognised over the next twelve months. For financial assets whose credit risk has

increased significantly since initial recognition (stage 2), the expected loss is recognised over the remaining lifetime. A loan loss provision is recognised based on estimated cash flows (estimated cash flow approach) for defaulted financial assets; expected losses are recognised over the remaining lifetime for defaulted financial assets below the materiality threshold.

The following formula is generally used to calculate the expected losses:

Exposure at default (EAD) x probability of default (PD) x loss given default (LGD)

The expected losses are recognised at the present value and discounted at the relevant effective interest rate for a financial instrument.

The EAD for off-balance-sheet items (especially open commitments) is estimated using the credit conversion factor (CCF).

The LGD amount depends on whether it relates to the unsecured portion of the financing or what collateral has been used to secure the financing. Collateral is accounted for using the internal lending value – the LGD is calibrated to this value. The calculation involves breaking a financial instrument down into EAD layers based on collateral and the uncovered portion; the relevant applicable LGD is then applied for each layer.

#### Exemption for financial assets with low credit risk

For financial assets with a low credit risk at the reporting date, impairment is also recognised in the amount of the expected loss over the next twelve months if the credit risk has increased significantly since their addition. The Group applies this exemption exclusively to securities with an external investment grade rating (BBB- / Baa3 or higher).

#### Allocation to stages

A financial instrument is typically allocated to stage 1 on initial recognition (for exception see POCI). A stage transfer only takes place if the credit quality has deteriorated significantly since initial recognition or there is a reason for default. A significant increase in credit risk is determined via quantitative and qualitative factors.

The quantitative increase in the credit risk is ascertained by comparing the forward lifetime PD of the original rating with the lifetime PD of the current rating for the remaining lifetime of a financial instrument. If the quotient of the two values exceeds a certain level, the financial instrument is allocated to stage 2. This certain level is defined such that the rating must have deteriorated by more than two notches on average since initial recognition. For information on the rating scale and the rating systems used, see section G. Financial risks and risk management.

The Group uses the following qualitative indicators to determine a significant increase in the credit risk:

- No original rating available
- No current rating available
- 30 days or more in arrears
- Forbearance measure active
- Dunning level reached

The presumption that the credit risk has increased significantly since initial recognition if financial assets are more than 30 days past due is not rebutted.

#### Back transfer

When a financial instrument no longer exhibits a significant increase in credit risk, it is allocated to stage 1 (for exception see POCI). In the event of a forbearance measure, there is a two-year good conduct period before the measure is erased. During this period, the customer remains in stage 2. There are no good conduct periods for transfers back from stage 2 to stage 1.

#### Original rating



The current rating when a financial instrument is initially recognised is recorded as the original rating of the financial instrument. This is normally the customer rating. Internal and external ratings are used. Issue ratings are also used for securities (for mortgage bonds, the issue rating may be better than the issuer's rating).

#### Identification of losses

The Bank uses various instruments to detect default characteristics and incurred losses early on. The corporate segment reassesses its significant customers every year based on up-to-date documents including customers' statements of account and budget calculations. For small liabilities from private and commercial customers, automated performance ratings are prepared on a quarterly basis. Customer ratings must be as up-to-date as possible. There are control processes in place to ensure that the number of old ratings is kept to a minimum.

The qualitative indicators used in the staging process are intended to ensure a prompt transfer to stage 2; the 30 days in arrears indicator is a particularly important one. The measures taken are designed to ensure that there are no significant losses that have not yet been identified.

#### Stage 3: Credit-impaired financial instruments

All loans with a default rating that matches the definition of default in Article 178 CRR are classified as stage 3 financial instruments. The Group has decided to adopt the regulatory definition of default for the IFRS impairment model. This applies equally to all financial instruments.

The Group uses the following approaches and indicators to determine whether a financial asset has defaulted:

- Fourth unsuccessful reminder
- 90 days in arrears
- Insolvency: daily requests and comparisons of newly registered insolvency proceedings
- Economic deterioration: continuous credit assessment within the scope of the review and rating process by the operating credit risk management and sales units
- Customer "unlikely to pay": insufficient expected cash flows – identified by credit risk management
- Significant financial difficulty of the issuer or the borrower (need for restructuring)
- Eroded economic equity in connection with losses

Monitoring is either automated or ensured through close cooperation between the sales, credit risk management and restructuring management units.

Impairment/reversals of impairment of financial assets in stage 3 are calculated using either a general approach or the estimated cash flow (ECF) approach. Both approaches are based on the individual customer level. The general approach is used for non-significant customers. These are customers whose total exposure is less than TEUR 150.

The calculation is performed with a probability of default (PD) of 100 %, solely on a monthly basis and using the LGDs for the default category.

The ECF approach is used for significant defaulted customers in stage 3. A customer is classified as significant if their total loans and off-balance-sheet items exceed a customer exposure of TEUR 150. The amount of the loan loss provision equates to the difference between the carrying amount of the asset and the present value of estimated future cash flows (contractual cash flows and collateral cash flows). The scenario-weighted impairment requirement is calculated based on the expected returns including the expected collateral.

Different scenarios must be presented and weighted accordingly when calculating the requirement for loan loss provisions based on the customer's status.

The Group has defined the following scenarios:

#### Contractual cash flow scenario

In this scenario, only capital and interest rate cash flows arising from contractual arrangements are applied over the entire remaining lifetime. Any potential proceeds from the realisation of collateral are not taken into account. When estimating the cash flow amount, it is assumed that these cash flows will be completely fulfilled over the remaining lifetime of the item. This also applies to off-balance-sheet items.

This scenario only applies to customers who are in a good conduct period following recovery.

#### Going concern scenario

In the going concern scenario, it is assumed that the customer is making all its interest and/or capital payments and the realisation of available collateral is not necessary.

#### Gone concern scenario

The gone concern scenario is based on the assumption that the customer is now only generating limited contractual cash flows and is therefore only able to cover its outstanding loans largely through proceeds generated from the realisation of collateral provided.

#### Loan loss provisions based on stage of proceedings

The going concern and gone concern scenarios are weighted differently depending on the stage of proceedings (still in restructuring or already in liquidation). The closer the stage of the proceedings is to liquidation, the higher the weighting of the gone concern scenario. The weighting according to stage of proceedings is defined in a work instruction. Any change to this defined weighting is documented by the responsible person.

#### Recovery

Requirements for the return of an exposure to standard support include adhering to a good conduct period of at least six months. Requirements for the commencement of the good conduct period include the customer's recovery and:

- No arrears on accounts
- No impairment (except for global valuation allowances)
- No active forbearance measures
- There have been no (partial) loan write-downs

If there are objections during the good conduct period (see definition of good conduct below), the good conduct period will be ended. For the duration of the good conduct period, the customer remains in default and retains its default rating (5 rating).

#### Definition of good conduct:

- Repayments are made as agreed
- No new forbearance measures
- No new impairment (except for global valuation allowances)
- No new default event
- No third-party executive measures
- No returns on the account

If the customer is still in the probationary phase on account of a legitimate forbearance measure, the good conduct period may end no earlier than the expiration date of the minimum forbearance observation period. Once the good conduct period expires, the customer receives the rating grade "NR" (not rated) until a performing rating is issued.

#### Derecognition

Loans or parts of loans and securities that are no longer likely to be recoverable shall be derecognised. An unrecoverable loan exists, for example, if at least two execution runs have been unsuccessful, the customer does not earn any seizable income in the long term or there are other liabilities in an equally high amount, meaning there is no prospect of the loan or parts of the loan being recoverable. Loans and securities are also derecognised, in part or in full, if a part of or the full amount outstanding has been waived. This may occur within the context of insolvency proceedings (restructuring plan, payment schedule, absorption proceedings) or an out-of-court settlement.

## Forbearance

Forborne exposures are exposures for which concessions have been made towards borrowers who are in danger of no longer meeting their payment obligations on account of financial difficulties. A forbore exposure exists only if both of the following criteria are met:

- The modified/refinanced contract includes a concession and
- Payment difficulties are identified

Forbearance concessions can be granted to borrowers with performing ratings (rating 1A to 4E) and non-performing ratings (rating 5A to 5E). A borrower is continued to be classified as performing if the forbearance measure does not lead to non-performing status and the borrower was in the performing range at the time of the forbearance measure.

All of the following conditions must be met in order for the forbearance status to be discontinued:

- An economic circumstances analysis leads to the belief that the borrower is able to meet its payment obligations.
- The loan is classified as performing.
- At least two years (probation period) have passed since the contract was classified as performing.
- The borrower has met its payment obligations regularly to a significant extent and during at least half of the probation period.
- All of the borrower's exposures are less than 30 days past due during and at the end of the probation period.

Transactions involving forbearance measures that are classified as performing are monitored continuously. Furthermore, transactions involving forbearance measures undergo special observation to check for overdrafts exceeding 30 days.

These measures ensure that transactions involving a forbearance measure are classified as non-performing as soon as the following occur:

- The desired outcome of the forbearance measure (re-establishing the contractually agreed servicing of the loan) does not materialise or is no longer guaranteed.
- There is a payment default exceeding 30 days.
- Another forbearance measure is issued during the probation period.
- The customer fulfils another stipulated default criterion.

A loan loss provision in stage 2 is generally determined for all transactions involving a forbearance measure that are classified as performing. A loan loss provision in stage 3 is recognised for transactions involving a forbearance measure that are already classified as non-performing. Loans and advances with forbearance measures are shown in note (61).

## Determining parameters for calculating expected loss

The starting point for determining the parameters are the through-the cycle (TTC) estimates for these parameters. A TTC estimate aims to be relatively stable over the business cycle.

### TTC PD

PD for customer business is estimated on the basis of a history of the Bank's own defaults. The calculation takes into account portfolios of the Bank that are large enough for statistically stable assumptions and that contained a sufficient number of defaults for the default rates for the vast majority of current rating grades to be estimated. This is the case for private and corporate customers of the Bank. This approach cannot be used for banks and states, as only very few defaults have been observed in these customer groups in the Bank's portfolio. For these two customer groups, PD curves are calculated using matrix multiplication based on publications from rating agencies.

### LGD

For a description of the main types of collateral, see section G. Financial risks and risk management. LGD is defined as a workout LGD. The Bank's LGD is calculated based on its default data. It factors in proceeds and direct costs from realisation. The cash flows are

discounted at the respective effective interest rate of a financial instrument. If this is not available, they are discounted at the average interest rate of the respective defaulted non-current financial instruments. To calculate unsecured and secured LGDs, the proceeds are distributed according to the waterfall principle. They are firstly allocated to the collateral, starting with the collateral with the lowest LGD. This means that proceeds are firstly allocated to cash collateral and guarantees, followed by mortgage-backed securities. For this purpose, collateral is calculated at the time of default in order to determine the estimated proceeds. Proceeds not yet distributed are then allocated to the unsecured portion. A mark-up is applied to ensure an undistorted estimate of the parameter over an economic cycle.

The real estate LGD for the leasing portfolio in Bolzano is calculated using the same method. A mark-up is applied to offset the effects on this parameter of the declining property market in northern Italy in order to obtain an undistorted estimate over the economic cycle.

Data gathering also takes place for the Swiss portfolio and the Austrian leasing portfolio. However, the number of defaults and realisations are much too low to be able to make a statement on this basis.

The Group estimates its own LGDs for the unsecured portions of defaulted exposures. The ECF valuation allowance is used as the best estimate of the anticipated future loss. It is assumed that the LGDs depend on the different processing steps at the Bank.

## CCF (credit conversion factor)

The Bank calculates the CCF of defaulted loans. This measures the extent to which the loan is drawn down during the twelve months before a default. The results can vary greatly; the small data basis is a factor in this regard. In the same way as for internal risk management, the Bank therefore uses the regulatory CCF in conjunction with the maturity profiles from internal risk management. This currently represents the best available estimate.

## Early repayments

Early repayments over a twelve-month period have little relevance in stage 1. It can be assumed that no significant early repayments are possible for stage 2 cases. Early repayment profiles are not taken into account.

## Repayments of instruments with an indefinite term

For instruments with an indefinite term, the maturity is estimated on the basis of the Bank's portfolio. The same maturity profiles are applied as for internal risk management.

## Point in time (PIT) adjustment

PIT adjustment of parameters that are found to be dependent on macroeconomic variables is used to take account of the current and expected (forward-looking information, FLI) macroeconomic situation and to estimate the impact of such on the expected loss.

An assessment is carried out to determine whether the parameters PD, LGD and CCF are dependent on independent variables. For the CCF and the LGD, no significant dependencies with an economically explicable cause and effect can be identified.

For the PD, dependencies and models can be identified for the segments established. The approach for establishing the segments is described below. Based on the Bank's customer segments, consolidation was performed in line with the following criteria:

- similar types of institution
- similar risk characteristics (PD, default rate, warranties)
- similar rating methods

This results in the following segments:

- Banks
- States
- Private customers
- Corporate customers



Given that banks and states represent low-default portfolios, it does not make sense to adjust the PIT on the basis of internal data. Similarly, no suitable possibility to take account of the macroeconomic situation on the basis of external data can be identified without requiring disproportionate cost and effort. The TTC PD is therefore used as the best estimate for the PIT PD for these two segments.

For the Private Customers and Corporate Customers segments, the Group examines whether the default rates in the regions where it operates differ. Based on this examination, the Group differentiates between the segments of the leasing subsidiary in Bolzano and the rest of the Group. This results in the following segments for which PIT models were estimated:

- corporate customers in Austria (and other countries except Italy)
- corporate customers in Italy
- private customers in Austria (and other countries except Italy)
- private customers in Italy

The model search is based on the linear regression method. This determines the dependency of certain variables (dependent variables, in this case default rates/loss rates) on other variables (independent variables, in this case a selection of macroeconomic parameters). To determine this dependency, time series of the variables in question covering the modelling period are compared against one another. Annual default rates in the period from 2007 to 2019 are used.

The following independent variables are used:

- Real GDP Austria, Italy – y-o-y change, real, in %
- HICP Austria, Italy – y-o-y change, in %
- Unemployment rates Austria, Italy, in % of labour force
- Unit labour costs Austria, Italy – y-o-y change, in %
- Private consumption Austria – y-o-y change, in real terms based on previous year's prices, in %
- Public-sector consumption Austria – y-o-y change, in real terms based on previous year's prices, in %
- Gross fixed capital formation (GFCF) Austria – y-o-y change, in real terms based on previous year's prices, in %
- Exports Austria – y-o-y change, in real terms based on previous year's prices, in %
- Imports Austria – y-o-y change, in real terms based on previous year's prices, in %
- Net exports Austria = exports Austria less imports Austria
- Housing price index Austria total – y-o-y change, in %

Regional GDP and GFCF growth data was used for the Italian regions of Lombardy, South Tyrol, Trento and Veneto. The use of interest rates and credit spreads is being examined. Economically speaking, an increase in interest rates would be expected here in economically uncertain times. However, this context obviously does not apply to the phase of the central banks' low interest rate policy. This represents a problem for the PIT adjustment in particular as, when using interest rates, the ECL results would fall instead of rising when the economic conditions are weak and interest rates are low.

To take account of the fact that the Group's Italy exposure is concentrated in northern Italy and that the northern Italian economy tends to post better key figures than Italy as whole, synthetic macro-variables ("mix" variables) for northern Italy are created for use in the regional adjustment of the models for corporate customers and private customers.

Based on the model estimate, the following macro-variables are selected for each PIT model:

- Corporate customers in Austria (and other countries except Italy): GDP change Austria, lag of 1 year
- Corporate customers in Italy: GDP change mix, lag of 1 year
- Private customers in Austria (and other countries except Italy): HICP Austria, GFCF Austria
- Private customers in Italy: HICP Italy, GFCF mix

Regional differentiation takes place such that the differences between the TTC default rate and the default rate of the estimated model are applied to the result.

When identifying and taking account of FLI in the PIT models, the following approach is taken:

- The forecasts used must come from independent, established institutions.
- The forecasts must be as up-to-date as possible.
- A substantiated adjustment of the forecasts must be possible.
- If scenarios for individual variables are available, these can be used in conjunction with a scenario weighting.
- The FLI adjustment must be applied for up to three years (36 months from the current reference date) if possible. At the end of this period at the latest (from month 37 onwards), the long-term average of the respective variables is used.
- However, forecasts generally relate to calendar years and are available for the current calendar year and the two subsequent calendar years at most. If the forecasts do not cover the full 36 months from the current reference date, the long-term average is used instead of a forecast.
- The variables in the models must be used in line with the model estimate as far as possible. The model estimate was based on calendar years. An even distribution of defaults within the calendar years is assumed. This means that the value for a variable without a lag is calculated as the average from the six months before and the six months after the current reference date. A variable with a lag of one year is calculated as the average from the six months before and the six months after the date one year before the current reference date.
- Parameterisation generally takes place in the second and fourth quarters. In the event of significant changes in the variables, parameterisation may be carried out more frequently.
- The long-term average of a variable is calculated in line with the period that was used in the model estimate.

The portfolio of private customers in Italy is of very minor importance, and the model results are also not plausible. Accordingly, the model for corporate customers in Italy is also applied to this portfolio.

The following weights and macroeconomic parameters are used as at the end of 2024. The values for the main scenario are forecasts by the OeNB, Wifo and IHS for Austria and by Banca d'Italia for Italy. The forecasts were downwardly revised at the end of the year, in some cases significantly. Following a downturn, Austria is expected to see a return to weak GDP growth in 2025. Inflation is forecast to decline further. There are considered to be more downside than upside risks. As there are no explicit forecasts for the negative and positive scenarios, the historical forecast errors are determined and applied to the main scenario. The results are consistent with the written assessments of the economic research institutes.

| Country | Variable               | Weight <sup>i</sup> | 2024    | 2025    | 2026+  |
|---------|------------------------|---------------------|---------|---------|--------|
| Austria | GDP Main scenario      | 60.00 %             | -0.63 % | 0.93 %  | 1.50 % |
|         | GDP Negative scenario  | 40.00 %             | -1.11 % | -1.43 % | 1.50 % |
|         | GDP Positive scenario  | 0.00 %              | -0.50 % | 1.61 %  | 1.50 % |
|         | HICP Main scenario     | 60.00 %             | 3.00 %  | 2.30 %  | 2.20 % |
|         | HICP Negative scenario | 40.00 %             | 3.33 %  | 3.95 %  | 2.20 % |
|         | HICP Positive scenario | 0.00 %              | 2.90 %  | 1.82 %  | 2.20 % |
|         | BAI Main scenario      | 60.00 %             | -2.85 % | 0.10 %  | 2.70 % |
|         | BAI Negative scenario  | 40.00 %             | -3.53 % | -3.29 % | 2.70 % |
|         | BAI Positive scenario  | 0.00 %              | -2.43 % | 2.19 %  | 2.70 % |
| Italy   | GDP Main scenario      | 60.00 %             | 0.60 %  | 1.00 %  | 1.20 % |

|                   |         |        |         |        |
|-------------------|---------|--------|---------|--------|
| GDP               |         |        |         |        |
| Negative scenario | 40.00 % | 0.15 % | -1.24 % | 1.20 % |
| GDP               |         |        |         |        |
| Positive scenario | 0.00 %  | 0.80 % | 2.01 %  | 1.20 % |

Compared to the previous year, a higher probability is again assumed for the negative scenario, while a lower probability is assumed for the main scenario. Hypo Vorarlberg continues to see no probability for the positive scenario. Where observed default rates differ significantly from the forecast data, the observed default rates are used. This is also the case for 2024. The downside risks described above (including rising gas prices, falling demand for exports to Germany and the escalation of geopolitical tension) are analysed and do not lead to any adjustments to the model. As previously, we see no reason for collective staging. In our opinion, the risks are already reflected in the ratings, which is why we see no justified reason for collective staging.

There is no indication that sustainability risks will be reflected in increased risk costs in the short term. The Bank is making considerable efforts to ensure that sustainability risks are measured and taken into account in the medium and long term (see section G. Financial risks and risk management).

#### **Purchased or originated credit-impaired (POCI) financial instruments**

POCI financial instruments are financial assets that already show objective evidence of impairment when they are initially recognised (credit-impaired assets). POCI assets can arise in three cases:

- Acquisition of POCI assets through the purchase of a significantly credit-impaired financial instrument (purchased credit-impaired), such as acquiring a financial asset at a price that includes a significant credit discount.
- New transaction with a customer that has a default rating (fresh money and bridge loans): Additions that result in a significant increase in the exposure of the uncovered portion and that are in the early phase of restructuring (recovery still uncertain).
- Substantial modification of a financial asset in stage 3 due to credit rating, resulting in the reclassification of the original financial instrument and the addition of a modified and impaired financial instrument (originated credit-impaired).

Steps are taken to ensure that POCI instruments at least always include an estimated loan loss provision over the remaining lifetime. In the case of a POCI instrument, the expected cash flows are discounted at the credit risk-adjusted effective interest rate and the present value is recognised on initial measurement. The change in present value leads to an impairment loss or the reversal of an impairment loss on subsequent measurement.

#### **Financial assets at amortised cost**

If there is objective evidence of impairment, the amount of the loss is determined as the difference between the carrying amount of the asset and the present value of the estimated future cash flows. The calculation of the present value of the estimated future cash flows of collateralised financial assets reflects the cash flows resulting from realisation less the costs for obtaining and selling the collateral.

For loans and receivables, impairment is netted against the underlying receivable in the respective balance sheet item. The loss (allocation) is reported in the income statement in loan loss provisions and impairment of financial assets (14). Interest income from impaired assets in stage 3 is deferred on the basis of the reduced carrying amount, applying the interest rate used to discount the future cash flows for the purpose of calculating the impairment loss. This interest income is included in net interest income (5).

Loans are derecognised together with the associated impairment if there is no realistic prospect of future recovery and all collateral has been utilised and realised. If the impairment increases or decreases in a subsequent period due to an event occurring after the recognition of impairment, the allowance account previously recognised for

loans and receivables is increased or decreased by the amount of the difference. Reversals of impairment are reported in the income statement under the same item as the impairment loss itself.

#### **Off-balance-sheet transactions**

Loan loss provisions for off-balance-sheet items, such as warranties, guarantees and other loan commitments, are included in provisions (36); the associated expense is recognised through profit and loss in loan loss provisions and impairment of financial assets.

#### **Judgements, assumptions and estimates**

Within the Group, the credit portfolio is tested for impairment at least once per quarter. This involves an assessment of whether observable events lead to a reduction in expected future cash flows in the credit portfolio. Indicators of impairment include non-compliance with due dates and agreements, negative developments in economic conditions and negative rating changes. In its planning for future cash flows, the management includes assumptions based on historical probabilities of default for comparable credit portfolios. An increase of 1 % in the impairment ratio (ratio of loan loss provisions to exposure) in relation to the underlying exposure would increase loan loss provisions by TEUR 1,382 (2023: TEUR 1,597). A reduction of 1 % in the impairment ratio in relation to the underlying exposure would reduce loan loss provisions by TEUR 1,382 (2023: TEUR 1,597). Changes in loan loss provisions are shown in note (57). The effects on the income statement are presented in note (14). The carrying amount of the assets subject to judgements, assumptions and estimates is TEUR 13,294,829 (2023: TEUR 13,261,300).

#### **h) Hedge accounting**

As part of its risk management, Hypo Vorarlberg has identified risks that are hedged using derivative financial instruments. Derivative instruments that are concluded as part of the Group's hedging strategy but do not qualify for hedge accounting are recognised as held for trading in the financial statements. This is the case for customer derivatives and their offsetting hedges.

One of the main driving forces of fluctuations in the market value of fixed income financial instruments is the change in the relevant reference interest rate, such as EURIBOR. In the Group, this interest rate risk is kept within the defined limits by concluding hedging transactions in accordance with the risk management strategy. The hedging instruments convert the fixed rate of return into a variable interest rate linked to the reference interest rate and thus enable the transfer of the interest-induced market price risk. In addition, changes in exchange rates result in fluctuations in the market value of financial instruments in foreign currencies. In the Group, this currency risk is kept within the defined limits by concluding hedging transactions in accordance with the risk management strategy. The hedging instruments convert payments in foreign currencies into fixed payments in euro, thereby enabling the transfer of the currency-induced market price risk.

The hedged items are in the categories of financial assets at amortised cost and financial liabilities at amortised cost. The Group uses derivative instruments such as interest rate swaps, currency swaps and cross-currency swaps to hedge currency and interest rate risks. In the course of assigning a hedging relationship to hedge accounting in accordance with IFRS, formal documentation is prepared that describes, among other things, the type of hedging relationship, the hedged risk, the economic context, the risk management objective of the hedging relationship and the method of assessing effectiveness. The effectiveness of the hedging relationship is an essential condition for the application of hedge accounting. In many cases, the economic relationship is proven qualitatively and on a forward-looking basis by documenting the correspondence between the most important risk-relevant parameters of the underlying and hedging transactions at the time of documentation. This check is referred to as a critical terms match (CTM). If the key business parameters are not aligned or, in the case of amended contracts, are no longer aligned to the usual extent of a standard economic hedge, a purely qualitative assessment would be associated with a high degree of uncertainty. In these cases, the final assessment may be based on the results of quantitative methods. The quantitative

assessment of effectiveness is carried out prospectively using the dollar offset method.

To date, only fair value hedges have been used in the Group. A hedge exists if one or more hedging transactions can be clearly allocated to a hedged item.

#### Fair value hedges

Fair value hedges are employed to reduce market value risk. This primarily involves hedging interest rate risks. The main items hedged are therefore financial instruments with fixed and structured interest rates in the form of acquired and issued securities, loans and fixed-term deposits. In individual cases, interest rate and currency risks are hedged together. For designated and qualified fair value hedges, the change in the fair value of the hedging derivative is recognised through profit and loss in the net result from financial instruments at fair value (9). The change in the fair value of the hedged item resulting from the hedged risk is recognised as part of the carrying amount of the hedged item with an offsetting entry in the same income statement item as the hedge (basis adjustment). Any ineffectiveness will thus be recognised directly in the income statement in note (9).

If a hedging instrument expires, is sold, terminated or exercised, or if the hedge or the hedged item no longer meet the criteria for hedge accounting, the hedging relationship is terminated. In this case, the adjustment of the carrying amount of a hedged financial instrument is reversed through profit and loss in the net result from hedge accounting (9) until the financial instrument matures.

In addition to hedge accounting on an individual transaction basis, the Group has accounted for interest rate hedges on a portfolio basis in accordance with the provisions of IAS 39 since 1 January 2023. The hedging instruments are interest rate swaps in EUR with terms until 2042. These hedging instruments are used to hedge the interest rate risk from loans and advances with fixed interest rates, which are mainly granted to private households and small and medium-sized enterprises. If effective, the changes in market value from the designation of the hedging instruments are recognised in the opposite direction in the adjustment item "Fair value changes in interest rate risk portfolios", which is reported separately in the balance sheet, and in the income statement in the net result from hedge accounting (9). The cumulative fair value measurements of the hedging instruments up to designation are amortised on a straight-line basis over the remaining term of the hedging instruments.

#### i) Offsetting financial instruments

The Group does not offset financial instruments. Although master netting agreements have been concluded in connection with derivatives with the aim of bringing about settlement on a net basis in the event of a counterparty default, taking into account any collateral delivered or pledged, these agreements do not result in any offsetting in the consolidated financial statements. More detailed disclosures on offsetting financial instruments can be found in note (56).

#### j) Leases

A lease is an agreement whereby the lessor conveys to the lessee in return for a payment or series of payments the right to use an asset for an agreed period of time. A lease is classified as a finance lease if it transfers to the lessee substantially all the risks and rewards incidental to ownership of the asset. All other leases are classified as operating leases.

#### Accounting as lessor

Leases are assessed according to whether the risks and rewards of ownership of the leased item are borne by the lessor or the lessee. A lease is classified as a finance lease if it transfers to the lessee substantially all the risks and rewards incidental to ownership of the leased asset. At Hypo Vorarlberg, this primarily relates to leased properties. Finance lease income is reported as interest income (5).

| Finance leases | Presentation | Measurement |
|----------------|--------------|-------------|
|----------------|--------------|-------------|

|                                             |                                          |                |
|---------------------------------------------|------------------------------------------|----------------|
| Loans and advances                          | (22) Financial assets at amortised cost  | Net investment |
| Income                                      | (5) Net interest income                  |                |
| Income/expenses from the reversal of leases | (10) Other income<br>(11) Other expenses |                |

A lease is classified as an operating lease if it does not transfer substantially all the risks and rewards incidental to ownership.

| Operating leases                     | Presentation                                         | Measurement                            |
|--------------------------------------|------------------------------------------------------|----------------------------------------|
| Leased assets                        | (25) Property, plant and<br>(26) Investment property | Principles for the respective category |
| Lease income                         | (10) Other income                                    | Straight-line basis over lease term    |
| Maintenance expenses/operating costs | (11) Other expenses                                  |                                        |
| Deprecia-                            | (13) Depreciation and amorti-                        |                                        |

#### Accounting as lessee

IFRS 16 stipulates that both the asset representing the right of use and the liability representing the lease payment obligation are to be shown in the lessee's balance sheet. At the start of the contract term, an assessment is made as to whether the contract constitutes a lease and whether the contract transfers control of the identified asset for a certain period in exchange for a fee. The right-of-use asset and the liability are recognised at the start of the term.

| Item                                            | Presentation                                 | Measurement/method                          |
|-------------------------------------------------|----------------------------------------------|---------------------------------------------|
| Right-of-use asset                              | (25) Property, plant and equipment           | Cost less cumulative depreciation           |
| Depreciation                                    | (13) Depreciation and amort-                 | Straight-line basis                         |
| Lease liability                                 | (34) Financial liabilities at amortised cost | Present value of outstanding lease payments |
| Interest expense in respect of operating leases | (5) Net interest income                      |                                             |
| Payments for short-term and immaterial leases   | (12) Administrative expenses                 |                                             |

When the leased asset is transferred to the lessee, the lease liability is measured. The outstanding lease payments are discounted at the interest rate implicit in the lease, provided this can be determined on the basis of the contract. If this is not the case, they are discounted on the basis of a calculated borrowing rate. The Group calculates this rate using the risk-free yield curves adjusted by mark-ups based on its own credit risk, the amount of the loan, the term and, if necessary, existing collateral.

The standard provides for exemptions for the recognition of short-term leases and leases for which the value of the underlying asset is immaterial. Specifically, this relates to leases whose term does not exceed one year and whose equivalent value is less than TEUR 5. The Group makes use of the exemptions for short-term and low-value leases.

#### Judgements, estimates and assumptions

From the lessor's perspective, judgements are required in particular to differentiate between finance leases and operating leases, for which the applicable criterion is the transfer of substantially all the risks and rewards from the lessor to the lessee. The carrying amount of the finance leases subject to judgements, assumptions and estimates was TEUR 1,020,284 (2023: TEUR 1,020,051), while the carrying

amount of the operating leases subject to judgements, assumptions and estimates was TEUR 9,160 (2023: TEUR 9,619).

#### k) Investment property

Investment property includes properties held to earn rental income and/or for capital appreciation, but not for providing services, for administrative purposes or for sale in the ordinary course of business. These buildings all have a limited useful life. Leased properties are also reported under this balance sheet item if the leased assets are attributable to the lessor (operating leases). Lease income is recognised on a straight-line basis over the term of the contract.

| Component                 | Presentation                            | Recognition                                                                      |
|---------------------------|-----------------------------------------|----------------------------------------------------------------------------------|
| Asset                     | (26) Investment property                | Cost incl. ancillary costs less cumulative depreciation and/or impairment losses |
| Impairment                | (15) Impairment of non-financial assets |                                                                                  |
| Depreciation/amortisation | (13) Depreciation and amortisation      | Straight-line basis over typical useful life                                     |
| Rental income             | (10) Other income                       |                                                                                  |
| Maintenance expenses      | (11) Other expenses                     |                                                                                  |

Valuation appraisals for investment property are prepared at regular intervals by an employee of Hypo Immobilien & Leasing GmbH who is a sworn and court-certified expert. The expert uses the capitalised earnings value method, the comparative value method and other methods to assess the value of these assets. The expert then compares the value determined in this way with the property market and, if necessary, makes an adjustment to reflect market value. For larger properties, appraisals are also prepared by independent third parties.

| Typical useful life | In years |
|---------------------|----------|
| Investment property | 25 - 50  |

#### l) Intangible assets

| Component                 | Presentation                            | Measurement/method                                                               |
|---------------------------|-----------------------------------------|----------------------------------------------------------------------------------|
| Asset                     | (27) Intangible assets                  | Cost incl. ancillary costs less cumulative amortisation and/or impairment losses |
| Impairment                | (15) Impairment of non-financial assets |                                                                                  |
| Depreciation/amortisation | (13) Depreciation and amortisation      | Straight-line basis over useful life                                             |

Intangible assets are recognised only if it is probable that the expected benefits will flow to the enterprise and the cost can be determined reliably. Hypo Vorarlberg only has intangible assets with finite useful lives. The amortisation period and the amortisation method are reviewed at least at the end of each reporting period.

| Typical useful life | In years |
|---------------------|----------|
| Standard software   | 3        |
| Other software      | 4        |
| Specialist software | 10       |

#### m) Property, plant and equipment

| Component                                         | Presentation                             | Measurement/method/recognition                                                   |
|---------------------------------------------------|------------------------------------------|----------------------------------------------------------------------------------|
| Asset                                             | (25) Property, plant and equipment       | Cost incl. ancillary costs less cumulative depreciation and/or impairment losses |
| Cost of replacement part                          | (25) Property, plant and equipment       |                                                                                  |
| Borrowing costs (if criteria for recognition met) | (25) Property, plant and equipment       |                                                                                  |
| Depreciation                                      | (13) Depreciation and amortisation       | Straight-line basis over estimated useful life                                   |
| Impairment                                        | (15) Impairment of non-financial assets  |                                                                                  |
| Gain/loss on disposal                             | (10) Other income<br>(11) Other expenses | Difference between net disposal proceeds and carrying amount                     |

Physical wear and tear, technical obsolescence and legal and contractual restrictions are considered when determining the useful life of property, plant and equipment. Land is not depreciated.

| Typical useful life             | In years |
|---------------------------------|----------|
| Buildings                       | 25 - 50  |
| Operating and office equipment  | 5 - 10   |
| Construction on leased premises | 10       |
| IT hardware                     | 3        |

In addition, impairment is recognised if the recoverable amount is lower than the carrying amount of the asset. Property, plant and equipment is derecognised either on disposal or when no further economic benefit is expected from the continued use or sale of the recognised asset.

#### **n) Impairment of non-financial assets**

At each reporting date, the Group determines whether there are indications of impairment of non-financial assets. It performs impairment testing if there are any circumstances indicating potential impairment. If there are such indications or if an annual impairment test is required for an asset, the Group estimates the recoverable amount of the respective asset. The recoverable amount of an asset is the higher of the asset or cash-generating unit's fair value less costs to sell and the value in use. The recoverable amount is determined for each individual asset unless the asset does not generate cash inflows that are largely independent of those from other assets or groups of assets. If the carrying amount of an asset or cash-generating unit exceeds the recoverable amount, the asset is impaired and written down to its recoverable amount. To determine value in use, the estimated future cash flows are discounted to their present value on the basis of a pre-tax discount rate that reflects current market expectations regarding the time value of money and the specific risks of the asset. An appropriate measurement model is used to determine the fair value less costs to sell.

The Group bases its impairment testing on detailed budgets and forecasts prepared separately for each of its cash-generating units to which individual assets are attributable. Such budgets and forecasts usually cover a period of five years. Impairment losses on continuing operations are recognised through profit or loss in the expense categories corresponding to the impaired asset's function within the Group. This does not apply to previously remeasured assets if the increases in value resulting from remeasurement were recognised in other comprehensive income. In this case, the impairment is also recognised in other comprehensive income (40) up to the amount from a preceding remeasurement.

#### **o) Income tax assets**

##### **Current income taxes**

Current income tax assets and liabilities are calculated on the basis of the tax provisions of each country using current tax rates, which determine the reimbursement from and payment to the respective tax authorities. Assets and liabilities are recognised only for expected claims and obligations in respect of the tax authorities. Current income tax assets and liabilities are set off only if the Group has a legally enforceable right to set off the reported amounts and actually intends to settle on a net basis. This occurs in connection with Group taxation at the level of the subgroup parent "Hypo-Rent" Leasing- und Beteiligungsgesellschaft mbH and its subsidiaries. Performance-based current tax expenses are recognised in the Group's income statement in taxes on income (16).

##### **Deferred taxes**

Deferred taxes are recognised and measured using the balance sheet liability method. Deferred taxes are calculated for each taxable entity at the tax rates that have been enacted or substantively enacted during the taxable period. Deferred taxes are not discounted. The effects of the recognition or reversal of deferred taxes are also included in the consolidated statement of income in income taxes (16) unless deferred tax assets and liabilities relate to items recognised in other comprehensive income. In this case, the deferred taxes are recognised or reversed in other comprehensive income (40).

Deferred tax assets (28) reflect the potential tax benefits from temporary differences between the carrying amounts of assets and liabilities on the IFRS consolidated balance sheet and the tax base according to the local tax provisions of Group companies. Deferred tax assets are only recognised if there are sufficient deferred tax liabilities within the same tax entity or it is sufficiently likely that taxable income will be generated in the same tax entity in future. This also applies to the recognition of deferred tax assets on tax loss carryforwards.

Deferred tax liabilities (38) reflect the potential tax expenses from temporary differences between the carrying amounts of assets and liabilities on the IFRS consolidated balance sheet and the tax base according to the local tax provisions of Group companies.

#### **Judgements, estimates and assumptions**

The Group is subject to income taxes in multiple tax jurisdictions. There are significant estimates in relation to the calculation of the tax provision in note (37). Using reconciliation accounts, the taxable earnings for each company are calculated based on their earnings under local commercial law. In addition, anticipated additional tax obligations in the context of current/announced tax audits are recognised in the tax provision. After the tax audit has been completed, the difference between the anticipated and the actual tax arrears is recognised in the income statement item prior-period income taxes as well as in deferred taxes. Judgements are required to determine the amount of deferred tax assets to be recognised based on the probable timing and amount of future taxable profits and future tax planning strategies. Tax receivables are recognised on the basis of budget planning over a period of five years. Information on deferred taxes is presented in notes (28) and (38). The effects on the income statement are shown in note (16), while the effects on other comprehensive income are shown in note (40). The carrying amount of the assets subject to judgements, assumptions and estimates was TEUR 20,269 (2023: TEUR 4,584), while the carrying amount of the liabilities subject to judgements, assumptions and estimates was TEUR 15,093 (2023: TEUR 20,349).

#### **p) Non-current assets held for sale and liabilities in connection with assets held for sale**

Non-current assets are classified as held for sale if they can be sold in their current condition and the sale is probable within twelve months of classification as such. Assets classified as held for sale are recognised in the balance sheet item non-current assets held for sale. Non-current assets classified as held for sale are recognised at the lower of carrying amount and fair value less costs to sell.

The item non-current assets held for sale may include property that was the subject of finance leases. These finance leases were terminated or cancelled prematurely. This item may also include leased properties that are to be sold at the end of a lease agreement. In addition to real estate, holdings may also be recognised under this item. However, the Group only recognises assets in this balance sheet item if there is a realistic possibility of realisation within twelve months. No current depreciation is recognised for these assets; instead, an impairment loss is recognised if the fair value less costs to sell is lower than the carrying amount. If it is not possible to realise these assets in the medium term, the properties are generally leased out. In these cases, they are reclassified to investment property. If neither a sale within twelve months nor a medium-term lease appears realistic, the property is reclassified to the balance sheet item other assets.

All income and expenses relating to assets held for sale are recognised in the income statement under the net result from non-current assets held for sale.

#### **q) Provisions**

A provision is recognised when the Group has a present legal or constructive obligation as a result of a past event, it is probable that an outflow of resources embodying economic benefits will be required to settle the obligation and a reliable estimate can be made of the amount of the obligation. Provisions are therefore recognised for uncertain liabilities to third parties and anticipated losses from pending transactions in the amount of the expected claims. The amount recognised for a provision represents the best estimate of the expenditure required to settle the present obligation at the reporting date. Risks and uncertainties are taken into account in the estimate. Provisions are recognised at their present value where the interest effect is material. Provisions (36) also include provisions for losses on loans and advances for off-balance-sheet transactions (in particular guarantees and warranties) and provisions for litigation. Expenses or income from the reversal of allowances for losses on loans and advances for off-balance-sheet items are recognised in the income statement under allowances for losses on loans and advances and impairment losses on financial assets (14). All other expenses or income in connection with provisions are reported under administrative expenses (12) and other expenses (11).



The Group's social capital is also reported in provisions. Social capital describes provisions for defined benefit plans for employees. Social capital includes provisions for pensions, severance, anniversary bonuses and disability risk. The liability recognised in connection with a defined benefit plan equals the present value of the obligation less the fair value of the plan assets out of which the obligations are to be settled directly. The present value of the obligation exceeds the fair value of the plan assets in all plans.

### Pensions

At Hypo Vorarlberg, ten (2023: ten) pensioners and surviving dependants are entitled to a defined benefit bank pension. This is a final salary pension plan based on a company agreement. Defined contribution pension fund agreements have been concluded with the employees who are still active and entitled to a pension. Due to the legal requirements of the Occupational Pensions Act (BVG), 37 employees of the St. Gallen branch (2023: 30) are entitled to a defined benefit pension. The Group and the employees make contributions to the BVG collective foundation Swiss Life, which is managed by Swiss Life Ltd. There is no further de facto obligation arising from normal company practice.

### Severance

Austrian labour law previously required a severance payment to be made to employees on termination of their employment relationship under certain circumstances. Severance entitlements are governed by section 23 of the Austrian Salaried Employees Act. In particular, this includes termination of employment due to retirement. All employees who joined the company before 1 January 2003 are entitled to this severance. Depending on the length of service, the maximum severance entitlement is one year's salary calculated on the basis of the employee's final salary. This is a defined benefit plan. The Group has recognised a severance provision for these entitlements.

### Anniversary bonuses

Each employee of Hypo Vorarlberg is entitled to one month's salary after 25 years of service and two months' salary after 40 years of service as an anniversary bonus. The entitlement to anniversary bonuses is based on the collective agreement, which regulates both the requirements for the entitlement and its amount.

### Defined contribution plans

The agreed payments to pension funds in connection with defined contribution plans are recognised as an expense on an ongoing basis. Similarly, the statutory "new severance payment" (for employees who joined the company on or after 1 January 2003) is recognised as an expense on an ongoing basis. There are no further obligations.

### Judgements, estimates and adjustments

The amount recognised for provisions represents the best possible estimate of the expenditure required to meet the current obligations as at the end of the reporting period. Risks and uncertainties are taken into account in the estimate. The provisions recognised in the balance sheet are shown in note (36). The effects on the income statement are shown in note (14) in the case of liability and credit risks and in notes (12), (10) and (11) in other cases. The carrying amount of the provisions subject to judgements, assumptions and estimates – not including social capital – is TEUR 18,746 (2023: TEUR 15,351).

The provisions for pensions, old severance payment claims and anniversary bonuses represent defined benefit provisions. The present value of social capital is calculated based on the following actuarial assumptions:

- Provisions for defined benefit commitments are recognised using the projected unit credit method.
- The expected retirement age is calculated individually for each employee based on the current provisions. The gradual raising of the retirement age to 65 for men and women is taken into account.
- Use of "Generation tables for employees: AVÖ 2018-P" as the basis of calculation for pensions.

| Actuarial assumptions for the calculation of the present value of social capital                    | 2024    | 2023   |
|-----------------------------------------------------------------------------------------------------|---------|--------|
| Actuarial interest rate                                                                             | 3.50 %  | 3.50 % |
| Annual indexing for pension provisions                                                              | 3.00 %  | 2.80 % |
| Annual indexing (collective bargaining and performance-based salary increases) for other provisions | 2.80 %  | 3.10 % |
| Employee turnover rate for severance provisions                                                     | 0.50 %  | 0.50 % |
| Employee turnover rate for other provisions                                                         | 10.00 % | 9.00 % |
| Individual career trend                                                                             | 2.00 %  | 2.10 % |

Actuarial gains and losses from the adjustment of actuarial assumptions were recognised in other comprehensive income in the amount of TEUR -76 (2023: TEUR -2,340). The deferred taxes resulting from this recognition were also recognised directly in other comprehensive income in the amount of TEUR 14 (2023: TEUR 523). Pension payments of TEUR 394 (2024: TEUR 377), severance payments of TEUR 807 (2024: TEUR 501) and anniversary bonuses of TEUR 160 (2024: TEUR 144) are expected for 2025.

The amount of the provisions for social capital is based on actuarial calculations. One significant factor determining the amount of the social capital is the actuarial interest rate. A reduction of 0.5 % in the actuarial interest rate would increase staff costs by TEUR 1,058 (2023: TEUR 1,104), while an increase of 0.5 % in the actuarial interest rate would reduce staff costs by TEUR 979 (2023: TEUR 1,019). A reduction of 0.5 % in the salary trend or the pension trend would reduce staff costs by TEUR 966 (2023: TEUR 1,003), while an increase of 0.5 % in the salary trend or the pension trend would increase staff

costs by TEUR 1,033 (2023: TEUR 1,074). A reduction of 0.5 % in the turnover rate would increase staff costs by TEUR 89 (2023: TEUR 87), while an increase of 0.5 % in the turnover rate would reduce staff costs by TEUR 89 (2023: TEUR 87). The carrying amounts of social capital are shown in note (36). Effects on the income statement are shown in administrative expenses in note (12) and other comprehensive income in note (40). The carrying amount of the social capital subject to judgements, assumptions and estimates is TEUR 22,708 (2023: TEUR 22,734).

#### r) Fiduciary transactions

Fiduciary transactions that involve the holding or placing of assets on behalf of third parties are not reported on the balance sheet. Commission payments for these transactions are reported in the income statement in net fee and commission income (7).

#### s) Recognition of income and expenses and description of income statement items

Income is recognised if it is probable that the economic benefit will flow to the company and the income can be measured reliably. The following designations and criteria are used for the recognition of income in the income statement items:

##### Net interest income

Interest income (5) is recognised on an accrual basis as long as the interest is expected to be collectible. In this context, income that predominantly represents consideration for the use of capital (mostly interest or similar income calculated on the basis of the passage of time or the amount of the receivable) is allocated to similar income. Interest expense is recognised in the same way as interest income. Differences arising from the purchase and issue of securities are allocated using the effective interest method. Negative interest is disclosed in the income statement under interest income from deposits and liabilities and interest expenses for loans and debt instruments (note 5). Negative interest amounts with respect to derivatives are offset. As derivatives that are not assigned to hedge accounting are generally used to hedge interest rate risks, the interest from derivatives is netted against the interest from the hedged items and reported in the respective interest item in order to show the interest result taking into account the economic hedge.

##### Dividend income

Income from holdings (dividends) is recognised in this item (6). Dividends are recognised in the income statement only after the legal right to receive payment of the dividend is established.

##### Net fee and commission income

Fee and commission income and expenses (7) include income from service business and expenses to third parties attributable to this business. This item primarily includes income and expenses in connection with fees and commissions from payment transactions, securities business, lending business, insurance and real estate brokerage business and foreign exchange/currency business. Loan fees in connection with new financing are not recognised in commission income, but as a proportion of the effective interest rate in interest income.

##### Net result from financial instruments at amortised cost

This item (8) includes realised gains and losses on financial instruments measured at amortised cost.

##### Net result from financial instruments at fair value

This item (9) comprises several components:

- Net trading result
- Net result from the remeasurement of derivatives
- Net result from financial assets and liabilities measured at fair value through profit or loss
- Net result from hedge accounting

As well as realised gains/losses, the net trading result also includes gains/losses on the remeasurement of trading activities. The net result from financial instruments at fair value also includes ineffective portions from hedging and currency gains and losses. The net result from financial instruments at fair value does not include interest and similar income or refinancing costs, which are shown in net interest income. The net result from the use of the fair value option does not include the net result from change in own credit risk, which is directly recognised in equity.

##### Other income

This item (10) includes income that is not directly attributable to the operating activities of the Bank. This includes rental income from leased properties, revenue from instalment purchases from leasing customers, gains on the disposal of assets, other income from leasing business and operating cost income.

##### Other expenses

This item (11) includes those expenses that are not directly attributable to the operating activities of the Bank. These include losses on the disposal of assets, cost of goods for instalment purchases from leasing customers, expenses from leasing business and operating expenses. This item also includes other tax expenses, insofar as these do not represent taxes on income and earnings, as well as expenses from claims and from operational risk.

##### Administrative expenses

Administrative expenses (12) include staff costs and material expenses accrued in the reporting period.

The staff costs include wages and salaries, statutory and voluntary social benefits, employees taxes and levies. Expenses and income from severance, pension and service anniversary provisions are also included in this item if they are not reported in other comprehensive income (40). In addition to IT expenses, material expenses include building expenses, advertising and PR expenses, legal and consulting expenses, staff development expenses (training, recruiting) and other expenses required for running an office.

**Depreciation, amortisation and write-downs**

This item (13) comprises depreciation and amortisation of property, plant and equipment, intangible assets, investment property and right-of-use assets from leases. Impairment losses are not recognised in this item.

**Loan loss provisions and impairment of financial assets**

This item (14) shows the recognition and reversal of valuation allowances and provisions in respect of financial instruments. Direct write-downs and amounts received on loans and advances are also reported in this item.

**Impairment of non-financial assets**

This item (15) shows the recognition and reversal of valuation allowances in respect of non-financial assets. These impairments relate to the balance sheet items property, plant and equipment, investment property, intangible assets and other assets.

**Taxes on income**

This item (16) includes all income-based taxes broken down into current tax expenses, deferred tax expenses and taxes from previous periods.

**t) Material judgements, assumptions and estimates**

To prepare the consolidated financial statements, the management has to make estimates and assumptions affecting disclosures on the balance sheet and in the notes and the recognition of income and expenses during the reporting period. These relate primarily to estimating the value of assets, determining standard economic lives for property, plant and equipment throughout the Group and recognising and measuring provisions. The estimates and judgements are based on assumptions reflecting the latest information available. Expected future business development is estimated on the basis of the prevailing circumstances on the date the consolidated financial statements are prepared and realistic assumptions about the future development of the global and industry-specific environment. Developments in these conditions that deviate from these assumptions and lie outside of the management's sphere of influence may lead to differences between the actual amounts and the original estimates. Where estimates were required to a substantial extent, the assumptions made for the respective items are described in the above sections.

**(4) APPLICATION OF NEW AND REVISED IFRSs AND IASs**

IFRSs that are already effective at the end of the reporting period are taken into account in the consolidated financial statements.

**a) First-time application of new and amended standards and interpretations**

The International Accounting Standards Board (IASB) has adopted a number of amendments to existing standards and issued new standards and interpretations that are mandatory for 2024. These regulations are also applicable in the EU and relate to the following areas.

| Standards and interpretations |                                                                                                    | Endorsement      | Mandatory application | Impact on the Group |
|-------------------------------|----------------------------------------------------------------------------------------------------|------------------|-----------------------|---------------------|
| IAS 1                         | Classification of Liabilities as Current or Non-current and Non-current Liabilities with Covenants | 19 December 2023 | 1 January 2024        | None                |
| IFRS 16                       | Lease Liability in a Sale and Leaseback                                                            | 20 November 2023 | 1 January 2024        | None                |
| IAS 7 and IFRS 7              | Supplier Finance Arrangements                                                                      | 15 May 2024      | 1 January 2024        | None                |

**b) New standards and interpretations not yet applied**

The IASB has issued further standards and revisions of standards that are not mandatory for the 2024 financial year. Hypo Vorarlberg chooses not to apply them early.

| Standards and interpretations |                                                                              | Endorsement      | Mandatory application | Impact on the Group               |
|-------------------------------|------------------------------------------------------------------------------|------------------|-----------------------|-----------------------------------|
| IAS 21                        | The Effects of Changes in Foreign Exchange Rates – Lack of Exchangeability   | 12 November 2024 | 1 January 2025        | None                              |
| IFRS 7 and IFRS 9             | Classification and Measurement of Financial Instruments                      | Pending          | 1 January 2026        | Impact analysis still in progress |
| IFRS 7 and IFRS 9             | Contracts Referencing Nature-dependent Electricity                           | Pending          | 1 January 2026        | Impact analysis still in progress |
| Volume 11 IASB                | Annual Improvements to the IFRSs (IFRS 1, IFRS 7, IFRS 9, IFRS 10 and IAS 7) | -                | 1 January 2026        | None                              |



|         |                                                     |         |                |          |
|---------|-----------------------------------------------------|---------|----------------|----------|
| IFRS 18 | Presentation and Disclosure in Financial Statements | Pending | 1 January 2027 | Material |
| IFRS 19 | Subsidiaries without Public Accountability          | Pending | 1 January 2027 | None     |

## B. NOTES TO THE STATEMENT OF COMPREHENSIVE INCOME

### (5) NET INTEREST INCOME

| TEUR                                                                            | 2024            | 2023            |
|---------------------------------------------------------------------------------|-----------------|-----------------|
| Interest income from cash reserve                                               | 9,172           | 12,658          |
| Interest income from financial assets at amortised cost                         | 465,027         | 437,186         |
| <b>Interest and similar income according to the effective interest method</b>   | <b>474,199</b>  | <b>449,844</b>  |
| Interest income from trading assets                                             | 25,649          | 18,683          |
| Interest income from hedging instruments                                        | 112,374         | 94,278          |
| Interest income from financial assets at fair value (non-SPPI)                  | 40,210          | 37,631          |
| Interest income from financial assets at fair value (option)                    | 14,502          | 13,472          |
| <b>Other interest and similar income</b>                                        | <b>192,735</b>  | <b>164,064</b>  |
| Interest expenses on financial liabilities at amortised cost                    | -246,430        | -221,828        |
| Interest expenses on other financial liabilities                                | -58             | -72             |
| <b>Interest and similar expenses according to the effective interest method</b> | <b>-246,488</b> | <b>-221,900</b> |
| Interest expenses on trading liabilities                                        | -2,090          | -1,051          |
| Interest expenses on hedging instruments                                        | -145,281        | -128,425        |
| Interest expenses on financial liabilities at fair value (option)               | -39,382         | -28,871         |
| <b>Other interest and similar expenses</b>                                      | <b>-186,753</b> | <b>-158,347</b> |
| <b>Net interest income</b>                                                      | <b>233,693</b>  | <b>233,661</b>  |

Interest income from leasing business amounted to TEUR 37,919 (2023: TEUR 37,525).

### (6) DIVIDEND INCOME

| TEUR                                      | 2024       | 2023       |
|-------------------------------------------|------------|------------|
| Financial assets at fair value (non-SPPI) | 8          | 0          |
| Holdings                                  | 373        | 186        |
| <b>Dividend income</b>                    | <b>381</b> | <b>186</b> |

### (7) NET FEE AND COMMISSION INCOME

| TEUR                                                               | 2024          | 2023          |
|--------------------------------------------------------------------|---------------|---------------|
| Fee and commission income from financing                           | 5,647         | 5,856         |
| Fee and commission income from securities                          | 23,272        | 18,571        |
| Fee and commission income from account management/payment transac- | 15,484        | 14,457        |
| Other fee and commission income                                    | 2,736         | 2,687         |
| <b>Fee and commission income</b>                                   | <b>47,139</b> | <b>41,571</b> |

| TEUR                                                                 | 2024          | 2023          |
|----------------------------------------------------------------------|---------------|---------------|
| Fee and commission expenses from financing                           | -4,091        | -2,361        |
| Fee and commission expenses from securi-                             | -2,505        | -2,258        |
| Fee and commission expenses from account management/payment transac- | -1,428        | -1,381        |
| Other fee and commission expenses                                    | -165          | -168          |
| <b>Fee and commission expenses</b>                                   | <b>-8,189</b> | <b>-6,168</b> |

Fee and commission income from financial assets or liabilities not classified as measured at fair value through profit or loss amounted to TEUR 13,394 (2023: TEUR 12,381). Fee and commission expenses from financial assets or liabilities not classified as measured at fair value through profit or loss amounted to TEUR 36 (2023: TEUR 30).

Fee and commission income from fiduciary activities amounted to TEUR 1,695 (2023: TEUR 1,641).

### (8) NET RESULT FROM FINANCIAL INSTRUMENTS AT AMORTISED COST

| TEUR                                                                | 2024      | 2023         |
|---------------------------------------------------------------------|-----------|--------------|
| Realised gains on financial assets at amortised cost                | 10        | 1,768        |
| Reversals of write-downs on financial assets at amortised cost      | 0         | 218          |
| Realised expenses for financial assets at amortised cost            | 0         | -1,048       |
| Impairment losses on financial assets at amortised cost             | 0         | -224         |
| Realised gains on financial liabilities at amortised cost           | 206       | 1,812        |
| Reversals of write-downs on financial liabilities at amortised cost | 20        | 0            |
| Realised expenses for financial liabilities at amortised cost       | -142      | -201         |
| <b>Net result from financial instruments at amortised cost</b>      | <b>94</b> | <b>2,325</b> |

### (9) NET RESULT FROM FINANCIAL INSTRUMENTS AT FAIR VALUE

| TEUR                                                       | 2024          | 2023           |
|------------------------------------------------------------|---------------|----------------|
| Net trading result                                         | -2,239        | 5,787          |
| Gain/loss on measurement of derivative fi-                 | 9,966         | -146           |
| Gain/loss on financial assets at fair value (non-SPPI)     | 1,291         | -8,570         |
| Gain/loss on financial assets at fair value (option)       | 2,988         | 3,085          |
| Gain/loss on financial liabilities at fair value (option)  | -10,511       | -30,672        |
| Net result from hedge accounting                           | -4,103        | -7,606         |
| <b>Net result from financial instruments at fair value</b> | <b>-2,608</b> | <b>-38,122</b> |

The net trading result includes currency translation differences recognised through profit or loss from financial instruments at amortised cost in the amount of TEUR -54,031 (2023: TEUR 93,013) and currency translation differences from financial instruments measured at fair value through profit or loss in the amount of TEUR 51,780 (2023: TEUR -87,175).

### Net result from hedge accounting

| TEUR                                                                           | 2024           | 2023           |
|--------------------------------------------------------------------------------|----------------|----------------|
| Measurement of hedging instruments for financial assets at amortised cost      | -98,188        | -194,739       |
| Measurement of hedging instruments for financial liabilities at amortised cost | 169,624        | 261,144        |
| <b>Gain/loss on hedging instruments</b>                                        | <b>71,436</b>  | <b>66,405</b>  |
| Measurement of hedged items for financial assets at amortised cost             | 92,061         | 190,647        |
| Measurement of hedged items for financial liabilities at amortised cost        | -167,600       | -264,658       |
| <b>Gain/loss on hedged items</b>                                               | <b>-75,539</b> | <b>-74,011</b> |
| <b>Net result from hedge accounting</b>                                        | <b>-4,103</b>  | <b>-7,606</b>  |

Four hedges were terminated in 2024 (2023: two hedges). The basis adjustment to the hedged item of TEUR 108 (2023: TEUR 640) has therefore been distributed over the remaining term and recognised in net interest income.

**(10) OTHER INCOME**

| TEUR                                             | 2024          | 2023          |
|--------------------------------------------------|---------------|---------------|
| Income from operating leases                     | 4,637         | 4,201         |
| Other income from leasing business               | 1,215         | 1,524         |
| Operating cost income                            | 2,808         | 2,687         |
| Income from the disposal of non-financial assets | 4,683         | 5,549         |
| Income from consultancy and other services       | 726           | 710           |
| Miscellaneous other income                       | 5,464         | 38,811        |
| <b>Other income</b>                              | <b>19,533</b> | <b>53,482</b> |

Income from operating leases relates to rental income from leased properties. The change in miscellaneous other income was due to a reversal of the provision for operational risks in the previous year. The minimum lease income from non-cancellable operating leases for future periods is shown in the table below.

**Minimum lease income from operating leases**

| TEUR                                                        | 2024          | 2023          |
|-------------------------------------------------------------|---------------|---------------|
| Up to 1 year                                                | 4,031         | 3,646         |
| 1 to 2 years                                                | 3,115         | 3,024         |
| 2 to 3 years                                                | 2,918         | 2,764         |
| 3 to 4 years                                                | 784           | 1,020         |
| 4 to 5 years                                                | 564           | 844           |
| More than 5 years                                           | 752           | 1,252         |
| <b>Minimum lease payments for operating leases (lessor)</b> | <b>12,164</b> | <b>12,550</b> |

**(11) OTHER EXPENSES**

| TEUR                                                 | 2024           | 2023           |
|------------------------------------------------------|----------------|----------------|
| Other expenses from leasing business                 | -1,564         | -1,380         |
| Operating cost expenses                              | -2,973         | -3,133         |
| Expenses resulting from loss events                  | -7,160         | -5,272         |
| Other tax expenses                                   | -3,871         | -3,953         |
| Losses on the disposal of non-financial assets       | -1,683         | -2,554         |
| Amounts from resolution and deposit protection funds | 0              | -7,555         |
| Miscellaneous other expenses                         | -7,835         | -6,457         |
| <b>Other expenses</b>                                | <b>-25,086</b> | <b>-30,304</b> |

Other tax expenses include the stability fee of TEUR 2,810 (2023: TEUR 2,895).

The abolition of the interbank exemption from Austrian VAT law with effect from 1 January 2025 gives rise to operational risks for Hypo Vorarlberg. The European Court of Justice could rule that the previous exemption constituted an unlawful subsidy and seek to recover the amounts exempted.

**(12) ADMINISTRATIVE EXPENSES**

Group administrative expenses consist of staff costs and material expenses.

| TEUR                           | 2024            | 2023            |
|--------------------------------|-----------------|-----------------|
| Staff costs                    | -83,484         | -75,386         |
| Material expenses              | -49,080         | -41,121         |
| <b>Administrative expenses</b> | <b>-132,564</b> | <b>-116,507</b> |

**Staff costs**

| TEUR                                    | 2024           | 2023           |
|-----------------------------------------|----------------|----------------|
| Wages and salaries                      | -63,020        | -56,641        |
| Statutory social security contributions | -15,205        | -13,890        |
| Voluntary social benefits               | -1,697         | -1,070         |
| Expenses for retirement benefits        | -2,742         | -2,437         |
| Expenses for social capital             | -353           | -430           |
| Severance                               | -467           | -918           |
| <b>Staff costs</b>                      | <b>-83,484</b> | <b>-75,386</b> |

Expenses for retirement benefits include payments for defined contribution plans in the context of an employee benefit fund and pension fund contributions of TEUR 2,283 (2023: TEUR 2,003).

**Material expenses**

| TEUR                                 | 2024           | 2023           |
|--------------------------------------|----------------|----------------|
| Building expenses                    | -5,274         | -5,308         |
| Leasing expenses                     | -13            | -128           |
| IT expenses                          | -23,355        | -18,864        |
| Advertising and PR expenses          | -4,372         | -4,401         |
| Legal and advisory expenses          | -6,004         | -3,324         |
| Communications expenses              | -1,021         | -1,068         |
| Organisational form-related expenses | -2,977         | -2,272         |
| Staff development expenses           | -2,092         | -1,759         |
| Other material expenses              | -3,972         | -3,997         |
| <b>Material expenses</b>             | <b>-49,080</b> | <b>-41,121</b> |

Rental payments are expected to total TEUR 1,808 in 2025 (2024: TEUR 1,743) and TEUR 9,326 over the next five years (2024: TEUR 9,177).

**(13) DEPRECIATION AND AMORTISATION**

| TEUR                                            | 2024          | 2023          |
|-------------------------------------------------|---------------|---------------|
| Depreciation of property, plant and equip-      | -3,893        | -4,050        |
| Write-downs of investment property              | -1,681        | -1,631        |
| Amortisation of intangible assets               | -863          | -973          |
| Amortisation of right-of-use assets from leases | -1,747        | -1,526        |
| <b>Depreciation and amortisation</b>            | <b>-8,184</b> | <b>-8,180</b> |

**(14) LOAN LOSS PROVISIONS AND IMPAIRMENT OF FINANCIAL ASSETS**

| TEUR                                                                   | 2024           | 2023           |
|------------------------------------------------------------------------|----------------|----------------|
| Provision allocations for commitments/guarantees                       | -7,133         | -8,580         |
| Reversals of provisions for commitments/guarantees                     | 9,438          | 10,090         |
| Allocations to other provisions in lending business                    | -752           | -488           |
| <b>Provisions for financial assets</b>                                 | <b>1,553</b>   | <b>1,022</b>   |
| Allocation of impairment losses for financial assets at amortised cost | -66,984        | -105,107       |
| Reversal of impairment losses for financial assets at amortised cost   | 26,114         | 30,798         |
| Direct write-downs on receivables                                      | -28,174        | -6,489         |
| Recoveries on receivables previously written                           | 1,282          | 1,290          |
| <b>Impairment of financial assets</b>                                  | <b>-67,762</b> | <b>-79,508</b> |
| <b>Loan loss provisions and impairment of financial assets</b>         | <b>-66,209</b> | <b>-78,486</b> |

In 2024, the loss from direct write-downs and the utilisation of recognised loan loss provisions amounted to TEUR 94,480 (2023: TEUR 20,445).

**(15) IMPAIRMENT OF NON-FINANCIAL ASSETS**

| TEUR                                                    | 2024        | 2023          |
|---------------------------------------------------------|-------------|---------------|
| Recognition of impairment losses on investment property | -107        | -31           |
| <b>Impairment losses on investment property</b>         | <b>-107</b> | <b>-31</b>    |
| Recognition of impairment losses on other assets        | -559        | -975          |
| <b>Impairment losses on other assets</b>                | <b>-559</b> | <b>-975</b>   |
| <b>Impairment losses on non-financial assets</b>        | <b>-666</b> | <b>-1,006</b> |

**(16) TAXES ON INCOME**

| TEUR                      | 2024           | 2023           |
|---------------------------|----------------|----------------|
| Current income taxes      | -9,344         | -14,503        |
| Deferred income taxes     | 2,690          | 1,431          |
| Prior-period income taxes | -8,954         | 114            |
| <b>Taxes on income</b>    | <b>-15,608</b> | <b>-12,958</b> |

The prior-period income taxes comprise effects resulting from the tax audit. These are mainly temporary differences resulting in the recognition of deferred tax assets and the offsetting of the tax burden for the current financial year.

**Reconciliation of the tax rate (23 %) to taxes on income**

| TEUR                                        | 2024           | 2023           |
|---------------------------------------------|----------------|----------------|
| Earnings before taxes                       | 58,058         | 53,057         |
| Applicable tax rate                         | 23 %           | 24 %           |
| <b>Calculated income tax</b>                | <b>-13,353</b> | <b>-12,734</b> |
| <b>Tax effects</b>                          |                |                |
| from tax-exempt investment income           | 66             | 45             |
| from investment allowances                  | 26             | 27             |
| from other tax-exempt income                | 49             | 9              |
| from previous years and tax rate changes    | 3,226          | -60            |
| from prepayments and tax rate changes       | -22            | -77            |
| from differing tax rates in other countries | 608            | 343            |
| from other non-deductible expenses          | -6,439         | -2,083         |
| from other differences                      | 231            | 1,572          |
| <b>Taxes on income</b>                      | <b>-15,608</b> | <b>-12,958</b> |

The change in social capital from defined benefit plans recognised in other comprehensive income (40) in the reporting year amounted to TEUR -76 (2023: TEUR -2,340). The corresponding deferred taxes amounted to TEUR 14 (2023: TEUR 523).

In 2024, the recognition directly in equity of changes in the Bank's own credit risk in the amount of TEUR -6,089 (2023: TEUR 13,490) resulted in deferred taxes of TEUR 1,401 (2023: TEUR -3,005).

## C. NOTES TO THE BALANCE SHEET

### (17) CASH RESERVE

| TEUR                        | 31.12.2024     | 31.12.2023     |
|-----------------------------|----------------|----------------|
| Cash on hand                | 22,381         | 24,180         |
| Balances with central banks | 427,848        | 927,119        |
| Sight deposits with banks   | 59,704         | 24,972         |
| <b>Cash reserve</b>         | <b>509,933</b> | <b>976,271</b> |

Balances with central banks include the minimum reserve in accordance with the ECB Regulation of TEUR 43,289 (2023: TEUR 47,306). According to the OeNB's definition, the minimum reserve represents a working balance for current payment transactions. For this reason, the minimum reserve meets the definition of cash and cash equivalents and is therefore reported in the cash reserve.

### (18) TRADING ASSETS

| TEUR                                    | 31.12.2024     | 31.12.2023     |
|-----------------------------------------|----------------|----------------|
| Equity instruments                      | 148            | 125            |
| Derivatives with positive market values | 103,928        | 117,610        |
| <b>Trading assets</b>                   | <b>104,076</b> | <b>117,735</b> |

#### Trading assets by region

| TEUR                          | 31.12.2024     | 31.12.2023     |
|-------------------------------|----------------|----------------|
| Austria                       | 4,938          | 5,564          |
| Germany                       | 59,601         | 66,756         |
| Switzerland and Liechtenstein | 233            | 3,377          |
| Other foreign countries       | 39,304         | 42,038         |
| <b>Trading assets</b>         | <b>104,076</b> | <b>117,735</b> |

### Nominal amounts and market values of derivatives – breakdown by transaction type

| TEUR                             | Nominal amounts  |                  | Positive market values |                | Negative market values |                |
|----------------------------------|------------------|------------------|------------------------|----------------|------------------------|----------------|
|                                  | 31.12.2024       | 31.12.2023       | 31.12.2024             | 31.12.2023     | 31.12.2024             | 31.12.2023     |
| Interest rate swaps              | 2,811,166        | 2,290,667        | 71,011                 | 74,114         | 37,928                 | 48,941         |
| Cross-currency swaps             | 493,003          | 620,195          | 8,343                  | 1,646          | 11,831                 | 43,163         |
| Interest rate options            | 344,803          | 355,270          | 20,978                 | 28,312         | 1,129                  | 2,051          |
| <b>Interest rate derivatives</b> | <b>3,648,972</b> | <b>3,266,132</b> | <b>100,332</b>         | <b>104,072</b> | <b>50,888</b>          | <b>94,155</b>  |
| FX forward transactions          | 224,663          | 236,655          | 3,152                  | 6,143          | 2,931                  | 6,040          |
| FX swaps                         | 158,179          | 401,370          | 436                    | 7,392          | 614                    | 826            |
| FX options                       | 2,059            | 4,462            | 8                      | 3              | 7                      | 3              |
| <b>Currency derivatives</b>      | <b>384,901</b>   | <b>642,487</b>   | <b>3,596</b>           | <b>13,538</b>  | <b>3,552</b>           | <b>6,869</b>   |
| <b>Derivatives</b>               | <b>4,033,873</b> | <b>3,908,619</b> | <b>103,928</b>         | <b>117,610</b> | <b>54,440</b>          | <b>101,024</b> |

The market values shown include the interest accrued.

### (19) FINANCIAL ASSETS AT FAIR VALUE (NON-SPPI)

| TEUR                                             | 31.12.2024     | 31.12.2023     |
|--------------------------------------------------|----------------|----------------|
| Equity instruments                               | 17,809         | 12,371         |
| Debt securities of public issuers                | 31,242         | 31,711         |
| Debt securities of other issuers                 | 103,324        | 114,229        |
| Loans and advances to customers                  | 432,208        | 435,098        |
| <b>Financial assets at fair value (non-SPPI)</b> | <b>584,583</b> | <b>593,409</b> |

#### Financial assets at fair value (non-SPPI) by product

| TEUR                                             | 31.12.2024     | 31.12.2023     |
|--------------------------------------------------|----------------|----------------|
| Shares                                           | 13,143         | 8,481          |
| Investment certificates                          | 2,713          | 2,545          |
| Other equity interests                           | 1,953          | 1,345          |
| <b>Total equity instruments</b>                  | <b>17,809</b>  | <b>12,371</b>  |
| Debt securities of public issuers                | 31,242         | 31,711         |
| Debt securities of other issuers                 | 103,324        | 114,229        |
| <b>Total debt securities</b>                     | <b>134,566</b> | <b>145,940</b> |
| Overdraft lines                                  | 122,683        | 129,219        |
| Long-term loans                                  | 309,525        | 305,879        |
| <b>Total loans and advances</b>                  | <b>432,208</b> | <b>435,098</b> |
| <b>Financial assets at fair value (non-SPPI)</b> | <b>584,583</b> | <b>593,409</b> |

The overdraft lines relate to project financing under which Hypo Vorarlberg bears the majority of the project risk, hence their classification as non-SPPI.

#### Financial assets at fair value (non-SPPI) by region

| TEUR                                             | 31.12.2024     | 31.12.2023     |
|--------------------------------------------------|----------------|----------------|
| Austria                                          | 428,384        | 422,486        |
| Germany                                          | 69,206         | 69,129         |
| Switzerland and Liechtenstein                    | 500            | 0              |
| Italy                                            | 2,635          | 7,297          |
| Other foreign countries                          | 83,858         | 94,497         |
| <b>Financial assets at fair value (non-SPPI)</b> | <b>584,583</b> | <b>593,409</b> |

#### Financial assets at fair value (non-SPPI) by business segment

| TEUR                                             | 31.12.2024     | 31.12.2023     |
|--------------------------------------------------|----------------|----------------|
| Corporate Customers                              | 431,033        | 429,381        |
| Private Customers                                | 1,175          | 5,717          |
| Financial Markets                                | 119,080        | 130,653        |
| Corporate Centre                                 | 33,295         | 27,658         |
| <b>Financial assets at fair value (non-SPPI)</b> | <b>584,583</b> | <b>593,409</b> |

#### Financial assets at fair value (non-SPPI) by sector

| TEUR                                             | 31.12.2024     | 31.12.2023     |
|--------------------------------------------------|----------------|----------------|
| Public sector                                    | 31,243         | 31,712         |
| Banks                                            | 103,872        | 108,290        |
| Financial companies                              | 11,355         | 11,218         |
| Companies                                        | 437,429        | 441,385        |
| Private households                               | 684            | 804            |
| <b>Financial assets at fair value (non-SPPI)</b> | <b>584,583</b> | <b>593,409</b> |

**Financial assets at fair value (non-SPPI) – companies by industry**

| TEUR                                                         | 31.12.2024     | 31.12.2023     |
|--------------------------------------------------------------|----------------|----------------|
| Agriculture and forestry                                     | 73             | 81             |
| Construction                                                 | 119,895        | 98,468         |
| Trade                                                        | 127            | 127            |
| Transportation and storage                                   | 172            | 109            |
| Accommodation and hospitality                                | 1,821          | 2,077          |
| Information and communication                                | 12             | 12             |
| Financial services                                           | 4,580          | 3,803          |
| Housing                                                      | 248,093        | 272,043        |
| Liberal professions                                          | 62,010         | 64,571         |
| Education                                                    | 61             | 9              |
| Other services                                               | 585            | 85             |
| <b>Financial assets at fair value (non-SPPI) – companies</b> | <b>437,429</b> | <b>441,385</b> |

**Financial assets at fair value (non-SPPI) – disclosures on changes in fair value**

| TEUR                                                  | 31.12.2024     | 31.12.2023     |
|-------------------------------------------------------|----------------|----------------|
| Credit exposure                                       | 584,583        | 593,409        |
| Collateral                                            | 383,587        | 386,092        |
| <b>Total change in market value</b>                   | <b>-13,552</b> | <b>-24,576</b> |
| of which due to market risk                           | -54,883        | -65,767        |
| of which due to credit risk                           | 41,331         | 41,191         |
| <b>Change in market value in the reporting period</b> | <b>11,024</b>  | <b>10,925</b>  |
| of which due to market risk                           | 10,884         | -9,190         |
| of which due to credit risk                           | 140            | 20,115         |

Seven years ago, the bondholders of HETA ASSET RESOLUTION AG (HETA), the wind-down entity of the former Hypo Alpe-Adria-Bank International AG, voted by a large majority to assign their securities to the state of Carinthia and waive part of their receivables. Following the acceptance of the exchange offer by the Kärntner Ausgleichszahlungs-Fonds (Carinthian Compensation Payment Fund), Hypo Vorarlberg acquired a "recovery commitment" that is included in the "contingent additional purchase price". If the realisation proceeds from HETA exceed the anticipated recovery value (plus premium) of the respective instrument, the selling investors will receive an additional payment. At the end of the reporting period, the value of the recovery commitment was 7.48 % or TEUR 8,160. In a notification dated 29 December 2021, the FMA, acting as the resolution authority, determined the end of HETA's operations. HETA thus entered liquidation under the Austrian Stock Corporation Act.

Based on the knowledge of some isolated transactions entered into and available current price indications at other banks, Hypo Vorarlberg recognised the "contingent additional purchase price" as a financial instrument in accordance with IAS 32.11 with a fair value of TEUR 8,160 (2023: TEUR 7,747) and assigned it to level 2. The change in fair value is recognised through profit or loss in the net result from financial instruments at fair value (9) income statement item.

**(20) FINANCIAL ASSETS AT FAIR VALUE (OPTION)**

| TEUR                                           | 31.12.2024     | 31.12.2023     |
|------------------------------------------------|----------------|----------------|
| Debt securities of public issuers              | 51,172         | 51,403         |
| Debt securities of other issuers               | 7,897          | 4,837          |
| Loans and advances to customers                | 140,139        | 157,288        |
| <b>Financial assets at fair value (option)</b> | <b>199,208</b> | <b>213,528</b> |

**Financial assets at fair value (option) by product**

| TEUR                                           | 31.12.2024     | 31.12.2023     |
|------------------------------------------------|----------------|----------------|
| Debt securities of public issuers              | 51,172         | 51,403         |
| Debt securities of other issuers               | 7,897          | 4,837          |
| <b>Total debt securities</b>                   | <b>59,069</b>  | <b>56,240</b>  |
| Long-term loans                                | 140,139        | 157,288        |
| <b>Total loans and advances</b>                | <b>140,139</b> | <b>157,288</b> |
| <b>Financial assets at fair value (option)</b> | <b>199,208</b> | <b>213,528</b> |

**Financial assets at fair value (option) by region**

| TEUR                                           | 31.12.2024     | 31.12.2023     |
|------------------------------------------------|----------------|----------------|
| Austria                                        | 179,225        | 195,375        |
| Other foreign countries                        | 19,983         | 18,153         |
| <b>Financial assets at fair value (option)</b> | <b>199,208</b> | <b>213,528</b> |

**Financial assets at fair value (option) by business segment**

| TEUR                                           | 31.12.2024     | 31.12.2023     |
|------------------------------------------------|----------------|----------------|
| Corporate Customers                            | 116,160        | 129,472        |
| Private Customers                              | 2,793          | 3,248          |
| Financial Markets                              | 68,129         | 68,747         |
| Corporate Centre                               | 12,126         | 12,061         |
| <b>Financial assets at fair value (option)</b> | <b>199,208</b> | <b>213,528</b> |

**Financial assets at fair value (option) by sector**

| TEUR                                           | 31.12.2024     | 31.12.2023     |
|------------------------------------------------|----------------|----------------|
| Public sector                                  | 176,926        | 190,757        |
| Financial companies                            | 12,126         | 12,061         |
| Companies                                      | 10,156         | 10,710         |
| <b>Financial assets at fair value (option)</b> | <b>199,208</b> | <b>213,528</b> |

**Financial assets at fair value (option) – companies by industry**

| TEUR                                                       | 31.12.2024    | 31.12.2023    |
|------------------------------------------------------------|---------------|---------------|
| Manufacturing                                              | 2,994         | 0             |
| Trade                                                      | 4,903         | 4,837         |
| Housing                                                    | 1,692         | 5,028         |
| Other economic services                                    | 567           | 845           |
| <b>Financial assets at fair value (option) – companies</b> | <b>10,156</b> | <b>10,710</b> |

#### Financial assets at fair value (option) – disclosures on changes in fair value

| TEUR                                                  | 31.12.2024    | 31.12.2023    |
|-------------------------------------------------------|---------------|---------------|
| Credit exposure                                       | 199,208       | 213,528       |
| Collateral                                            | 190,614       | 204,379       |
| <b>Total change in market value</b>                   | <b>9,016</b>  | <b>10,497</b> |
| of which due to market risk                           | 6,606         | 7,032         |
| of which due to credit risk                           | 2,410         | 3,465         |
| <b>Change in market value in the reporting period</b> | <b>-1,481</b> | <b>394</b>    |
| of which due to market risk                           | -426          | -156          |
| of which due to credit risk                           | -1,055        | 550           |

#### (21) FINANCIAL ASSETS AT FAIR VALUE (OCI)

As at 31 December 2024 and in the previous year, there were no financial assets at fair value (OCI).

#### (22) FINANCIAL ASSETS AT AMORTISED COST

| TEUR                                                               | 31.12.2024        | 31.12.2023        |
|--------------------------------------------------------------------|-------------------|-------------------|
| Debt securities of public issuers                                  | 635,051           | 486,786           |
| Debt securities of other issuers                                   | 1,861,204         | 1,860,788         |
| Loans and advances to banks                                        | 235,215           | 418,332           |
| Loans and advances to customers                                    | 10,701,092        | 10,654,797        |
| Trade receivables                                                  | 450               | 301               |
| <b>Gross exposure value</b>                                        | <b>13,433,012</b> | <b>13,421,004</b> |
| Valuation allowances for debt securities – stage 1                 | -299              | -302              |
| Valuation allowances for debt securities – stage 2                 | -687              | -692              |
| Valuation allowances for debt securities – stage 3                 | -997              | -997              |
| Valuation allowances for loans and advances to banks – stage 1     | -16               | -26               |
| Valuation allowances for loans and advances to banks – stage 2     | -4                | -1                |
| Valuation allowances for loans and advances to customers – stage 1 | -16,817           | -18,227           |
| Valuation allowances for loans and advances to customers – stage 2 | -27,126           | -20,333           |
| Valuation allowances for loans and advances to customers – stage 3 | -87,180           | -114,013          |
| Provisions for loans and advances to customers – POCI              | -5,057            | -5,113            |
| <b>Valuation allowances</b>                                        | <b>-138,183</b>   | <b>-159,704</b>   |
| <b>Financial assets at amortised cost</b>                          | <b>13,294,829</b> | <b>13,261,300</b> |

In financial assets at amortised cost, the use of hedge accounting led to the amortised cost of TEUR 4,246,964 (2023: TEUR 3,746,044) being adjusted for the hedged fair value of TEUR 113,646 (2023: TEUR 197,174).

#### Financial assets at amortised cost by product

| TEUR                                      | 31.12.2024        | 31.12.2023        |
|-------------------------------------------|-------------------|-------------------|
| Debt securities of public issuers         | 634,442           | 486,124           |
| Debt securities of other issuers          | 1,859,830         | 1,859,459         |
| <b>Total debt securities</b>              | <b>2,494,272</b>  | <b>2,345,583</b>  |
| Interbank accounts                        | 111,478           | 224,577           |
| Money market investments                  | 81,011            | 151,081           |
| Overdraft lines                           | 1,089,993         | 998,445           |
| Cash advances                             | 241,428           | 309,570           |
| Acceptance credits                        | 28,259            | 28,906            |
| Long-term loans                           | 8,227,703         | 8,182,852         |
| Lease receivables                         | 1,020,284         | 1,020,051         |
| Trade receivables                         | 401               | 235               |
| <b>Total loans and advances</b>           | <b>10,800,557</b> | <b>10,915,717</b> |
| <b>Financial assets at amortised cost</b> | <b>13,294,829</b> | <b>13,261,300</b> |

#### Financial assets at amortised cost by region

| TEUR                                      | 31.12.2024        | 31.12.2023        |
|-------------------------------------------|-------------------|-------------------|
| Austria                                   | 7,586,195         | 7,555,384         |
| Germany                                   | 2,001,699         | 1,955,047         |
| Switzerland and Liechtenstein             | 1,362,860         | 1,324,791         |
| Italy                                     | 779,734           | 806,177           |
| Other foreign countries                   | 1,564,341         | 1,619,901         |
| <b>Financial assets at amortised cost</b> | <b>13,294,829</b> | <b>13,261,300</b> |

#### Financial assets at amortised cost by business segment

| TEUR                                      | 31.12.2024        | 31.12.2023        |
|-------------------------------------------|-------------------|-------------------|
| Corporate Customers                       | 7,172,681         | 7,039,297         |
| Private Customers                         | 2,223,319         | 2,277,132         |
| Financial Markets                         | 2,881,350         | 2,930,902         |
| Corporate Centre                          | 1,017,479         | 1,013,969         |
| <b>Financial assets at amortised cost</b> | <b>13,294,829</b> | <b>13,261,300</b> |

#### Financial assets at amortised cost by sector

| TEUR                                      | 31.12.2024        | 31.12.2023        |
|-------------------------------------------|-------------------|-------------------|
| Public sector                             | 1,105,438         | 841,022           |
| Banks                                     | 1,953,992         | 2,126,924         |
| Financial companies                       | 268,766           | 297,852           |
| Companies                                 | 7,439,994         | 7,386,637         |
| Private households                        | 2,526,639         | 2,608,865         |
| <b>Financial assets at amortised cost</b> | <b>13,294,829</b> | <b>13,261,300</b> |

**Financial assets at amortised cost – companies by industry**

| TEUR                                                  | 31.12.2024       | 31.12.2023       |
|-------------------------------------------------------|------------------|------------------|
| Agriculture and forestry                              | 22,087           | 24,046           |
| Mining                                                | 11,954           | 11,942           |
| Manufacturing                                         | 654,361          | 791,904          |
| Energy supply                                         | 112,712          | 121,162          |
| Water supply                                          | 43,777           | 31,807           |
| Construction                                          | 1,072,319        | 1,039,370        |
| Trade                                                 | 509,780          | 553,060          |
| Transportation and storage                            | 284,086          | 256,354          |
| Accommodation and hospitality                         | 413,211          | 411,157          |
| Information and communication                         | 43,815           | 53,828           |
| Financial services                                    | 65,022           | 82,544           |
| Housing                                               | 3,257,576        | 3,105,503        |
| Liberal professions                                   | 722,788          | 632,631          |
| Other economic services                               | 49,744           | 76,410           |
| Public administration                                 | 25,496           | 28,166           |
| Education                                             | 4,063            | 3,739            |
| Health and social care                                | 40,316           | 29,867           |
| Arts, entertainment and recreation                    | 55,204           | 44,205           |
| Other services                                        | 51,683           | 88,942           |
| <b>Financial assets at amortised cost – companies</b> | <b>7,439,994</b> | <b>7,386,637</b> |

**Gross and net investment in leases**

The Group mainly leases real estate and, to a lesser extent, movable assets under finance leases. For the receivables from finance leases included in this item, the gross investment is reconciled to the present value of the minimum lease payments as follows.

| TEUR                                           | 31.12.2024       | 31.12.2023       |
|------------------------------------------------|------------------|------------------|
| Minimum lease payments                         | 1,185,002        | 1,174,651        |
| Non-guaranteed residual values                 | 0                | 0                |
| <b>Gross total investment</b>                  | <b>1,185,002</b> | <b>1,174,651</b> |
| Unrealised financial income                    | -164,718         | -154,600         |
| <b>Net investment</b>                          | <b>1,020,284</b> | <b>1,020,051</b> |
| Present value of non-guaranteed residual       | 0                | 0                |
| <b>Present value of minimum lease payments</b> | <b>1,020,284</b> | <b>1,020,051</b> |

The cumulative impairment loss on finance leases amounts to TEUR 19,243 (2023: TEUR 25,396).

**Leases – breakdown by maturity**

| TEUR                                           | 31.12.2024       | 31.12.2023       |
|------------------------------------------------|------------------|------------------|
| Up to 1 year                                   | 196,834          | 193,321          |
| 2 to 3 years                                   | 165,238          | 149,952          |
| 3 to 4 years                                   | 142,707          | 145,476          |
| 4 to 5 years                                   | 123,045          | 127,438          |
| 5 to 6 years                                   | 97,726           | 108,602          |
| More than 5 years                              | 459,452          | 449,862          |
| <b>Gross total investment</b>                  | <b>1,185,002</b> | <b>1,174,651</b> |
| Up to 1 year                                   | 165,625          | 161,699          |
| 2 to 3 years                                   | 138,922          | 124,014          |
| 3 to 4 years                                   | 121,104          | 123,810          |
| 4 to 5 years                                   | 105,510          | 110,029          |
| 5 to 6 years                                   | 83,590           | 94,760           |
| More than 5 years                              | 405,533          | 405,739          |
| <b>Present value of minimum lease payments</b> | <b>1,020,284</b> | <b>1,020,051</b> |

**(23) POSITIVE MARKET VALUES OF HEDGES**
**Breakdown by type of hedge**

| TEUR                                        | 31.12.2024     | 31.12.2023     |
|---------------------------------------------|----------------|----------------|
| Positive market values of fair value hedges | 311,431        | 338,552        |
| Positive market values of portfolio hedges  | 34,262         | 39,297         |
| <b>Positive market values of hedges</b>     | <b>345,693</b> | <b>377,849</b> |

**Nominal amounts and market values of fair value hedges – breakdown by transaction type**

| TEUR                             | Nominal amounts   |                   | Positive market values |                | Negative market values |                |
|----------------------------------|-------------------|-------------------|------------------------|----------------|------------------------|----------------|
|                                  | 31.12.2024        | 31.12.2023        | 31.12.2024             | 31.12.2023     | 31.12.2024             | 31.12.2023     |
| Interest rate swaps              | 11,186,580        | 10,860,079        | 329,236                | 364,350        | 254,901                | 377,911        |
| Cross-currency swaps             | 354,575           | 370,797           | 16,457                 | 13,499         | 15,051                 | 14,250         |
| <b>Interest rate derivatives</b> | <b>11,541,155</b> | <b>11,230,876</b> | <b>345,693</b>         | <b>377,849</b> | <b>269,952</b>         | <b>392,161</b> |
| <b>Derivatives</b>               | <b>11,541,155</b> | <b>11,230,876</b> | <b>345,693</b>         | <b>377,849</b> | <b>269,952</b>         | <b>392,161</b> |

The market values shown include the interest accrued. The Group did not enter into any cash flow hedge positions in the reporting year or the previous year.



## (24) SHARES IN COMPANIES MEASURED AT EQUITY

### Development of carrying amounts of holdings

| TEUR                               | 2024  | 2023  |
|------------------------------------|-------|-------|
| Carrying amounts as at 1 January   | 3,805 | 3,638 |
| Attributable profit/loss           | 724   | 605   |
| Changes in scope of consolidation  | -15   | 0     |
| Dividends                          | -489  | -438  |
| Carrying amounts as at 31 December | 4,025 | 3,805 |

The difference between the recognised amount of the shareholdings and the pro rata equity of companies included in the consolidated financial statements using the equity method amounted to TEUR 2,628 (2023: TEUR 2,393). This difference was attributed firstly to the value of the shareholding and secondly to retained earnings. The profits and losses of the companies included were only recognised on a pro rata basis in the income statement item net result from equity consolidation. In 2024, these profits and losses amounted to TEUR 724 (2023: TEUR 605).

Further information on holdings and shares in companies measured using the equity method is provided in section J.

## (25) PROPERTY, PLANT AND EQUIPMENT

### Property, plant and equipment – breakdown by type

| TEUR                                | 31.12.2024 | 31.12.2023 |
|-------------------------------------|------------|------------|
| Land                                | 14,976     | 11,037     |
| Buildings                           | 50,307     | 51,186     |
| Operating and office equipment      | 5,545      | 5,471      |
| Other property, plant and equipment | 2,927      | 3,546      |
| Right-of-use assets from leases     | 9,160      | 9,619      |
| Property, plant and equipment       | 82,915     | 80,859     |

The gross carrying amount of fully depreciated property, plant and equipment still in use is TEUR 19,018 (2023: TEUR 18,129). Changes in property, plant and equipment are shown in note (31).

### Reconciliation of right-of-use assets from leases by category

| TEUR<br>2023                    | Opening<br>balance | Additions | Disposals | Remeasure- | Depreciation/<br>amortisation | Closing<br>balance |
|---------------------------------|--------------------|-----------|-----------|------------|-------------------------------|--------------------|
| Real estate                     | 8,896              | 79        | 0         | 1,723      | -1,449                        | 9,249              |
| Parking spaces                  | 306                | 26        | -38       | -29        | -28                           | 237                |
| Motor vehicles                  | 73                 | 123       | 0         | -14        | -49                           | 133                |
| Right-of-use assets from leases | 9,275              | 228       | -38       | 1,680      | -1,526                        | 9,619              |

| TEUR<br>2024                    | Opening<br>balance | Additions | Disposals | Remeasure- | Depreciation/<br>amortisation | Closing<br>balance |
|---------------------------------|--------------------|-----------|-----------|------------|-------------------------------|--------------------|
| Real estate                     | 9,249              | 6         | -411      | 1,580      | -1,667                        | 8,757              |
| Parking spaces                  | 237                | 64        | -19       | 1          | -27                           | 256                |
| Motor vehicles                  | 133                | 67        | 0         | 0          | -53                           | 147                |
| Right-of-use assets from leases | 9,619              | 137       | -430      | 1,581      | -1,747                        | 9,160              |

Amortisation of right-of-use assets is recognised in depreciation and amortisation (13). Lease liabilities pursuant to IFRS 16 are reported in the balance sheet item financial liabilities at amortised cost (34), while interest expenses relating to lease liabilities are recognised in net interest income (5).

## (26) INVESTMENT PROPERTY

| TEUR                      | 31.12.2024 | 31.12.2023 |
|---------------------------|------------|------------|
| Land                      | 11,239     | 10,531     |
| Buildings                 | 33,627     | 33,542     |
| Assets under construction | 371        | 0          |
| Investment property       | 45,237     | 44,073     |

In 2024, the property portfolio comprised 50 properties (2023: 61) in Austria, Switzerland, Germany and Italy. The portfolio includes both residential properties with a carrying amount of TEUR 4,652 (2023: TEUR 4,602) and commercial properties with a carrying amount of TEUR 40,586 (2023: TEUR 39,471). The current market value of the property portfolio is TEUR 73,251 (2023: TEUR 75,386).

The property valuations take into account the key parameters listed below and are based on internal appraisals. They are therefore attributable to level 3 of the fair value hierarchy.

| Key parameters for real estate valuation | 2024        | 2023         |
|------------------------------------------|-------------|--------------|
| Return in %                              | 1.00 - 9.25 | 0.50 - 11.00 |
| Inflation rate in %                      | 1.00 - 6.00 | 1.00 - 10.00 |
| Rental loss risk in %                    | 1.50 - 8.00 | 1.50 - 8.00  |

The properties in Italy are generally measured using the comparative value approach or, for properties rented on a long-term basis, using the income approach. All measurements are made in line with the IVS (International Valuation Standards) criteria.

There are no significant restrictions on the saleability of these assets. Likewise, there are no contractual obligations to purchase, produce or develop such items. The development of investment property is shown in note (31). The rental payments recognised for investment property are shown in other income (10).

## (27) INTANGIBLE ASSETS

### Intangible assets – breakdown by type

| TEUR                     | 31.12.2024   | 31.12.2023   |
|--------------------------|--------------|--------------|
| Purchased software       | 1,519        | 1,237        |
| Other intangible assets  | 1,357        | 1,838        |
| Advance payments         | 0            | 210          |
| <b>Intangible assets</b> | <b>2,876</b> | <b>3,285</b> |

## (28) DEFERRED TAX ASSETS

In the table below, deferred tax liabilities are deducted from tax assets where, on balance, this results in an asset at the respective taxable entity.

| TEUR                                                                               | 31.12.2024    | 31.12.2023   |
|------------------------------------------------------------------------------------|---------------|--------------|
| Temporary differences from the measurement of financial instruments via the income | 72            | 82           |
| Temporary differences from write-downs of assets                                   | 400           | 357          |
| Temporary differences from provisions                                              | 169           | 470          |
| Temporary differences from social capital                                          | 4,031         | 4,128        |
| Temporary differences from impairment losses                                       | 5,171         | 1,727        |
| Other temporary differences                                                        | 434           | 1,484        |
| <b>Deferred tax assets</b>                                                         | <b>10,277</b> | <b>8,248</b> |
| Set-off of deferred taxes                                                          | -8,273        | -5,135       |
| <b>Net deferred tax assets</b>                                                     | <b>2,004</b>  | <b>3,113</b> |

Within the Group, there are tax loss carryforwards of TEUR 1,920 (2023: TEUR 8,473) which can be carried forward indefinitely, but which have not been capitalised because it is unlikely that taxable income will be available. The classification of deferred tax assets by maturity is shown in note (42).

## (29) NON-CURRENT ASSETS HELD FOR SALE

There were no non-current assets held for sale as at 31 December 2024 or in the previous year.

## (30) OTHER ASSETS

| TEUR                 | 31.12.2024    | 31.12.2023    |
|----------------------|---------------|---------------|
| Prepaid expenses     | 685           | 829           |
| Other tax assets     | 4,647         | 3,977         |
| Other properties     | 17,297        | 20,024        |
| Miscellaneous assets | 19,477        | 12,272        |
| <b>Other assets</b>  | <b>42,106</b> | <b>37,102</b> |

Prepaid expenses and any assets not attributable to one of the other asset items are reported under other assets. This item also includes properties that are not classified as property, plant and equipment according to IAS 16, investment property according to IAS 40, or non-current assets held for sale according to IFRS 5. These properties are closely associated with the realisation of collateral from lending business. Other assets include accruals of income that the Group has not yet received, including from asset management.

The breakdown by maturity is shown in note (42). Impairment losses on other real estate are recognised under impairment losses on non-financial assets (15) and amounted to TEUR 559 in 2024 (2023: TEUR 975).

**(31) STATEMENT OF CHANGES IN ASSETS**

| TEUR                                 | Acquisition cost | Currency translation | Company acquisitions | Additions    | Disposals     | Reclassifica- and other | Acquisition cost | Carrying amounts |
|--------------------------------------|------------------|----------------------|----------------------|--------------|---------------|-------------------------|------------------|------------------|
| 2023                                 | 01.01.           |                      |                      |              |               |                         | 31.12.           | 31.12.           |
| Purchased software                   | 11,889           | 0                    | 0                    | 928          | 0             | -1                      | 12,816           | 1,237            |
| Other intangible assets              | 1,505            | 129                  | 0                    | 1,476        | -600          | 0                       | 2,510            | 2,048            |
| <b>Intangible assets</b>             | <b>13,394</b>    | <b>129</b>           | <b>0</b>             | <b>2,404</b> | <b>-600</b>   | <b>-1</b>               | <b>15,326</b>    | <b>3,285</b>     |
| Owner-occupied land and buildings    | 106,986          | 634                  | 0                    | 1,646        | 0             | 302                     | 109,568          | 62,223           |
| Operating and office equipment       | 18,646           | 21                   | 0                    | 2,200        | -889          | 1                       | 19,979           | 5,471            |
| Other property, plant and equipment  | 16,562           | 0                    | 0                    | 2,754        | -65           | 1,219                   | 20,470           | 13,165           |
| <b>Property, plant and equipment</b> | <b>142,194</b>   | <b>655</b>           | <b>0</b>             | <b>6,600</b> | <b>-954</b>   | <b>1,522</b>            | <b>150,017</b>   | <b>80,859</b>    |
| Investment property                  | 82,981           | 0                    | 0                    | 949          | -2,952        | 2,253                   | 83,231           | 44,073           |
| Other properties                     | 38,963           | 0                    | 0                    | 13           | -4,439        | -1,897                  | 32,640           | 20,024           |
| <b>Total</b>                         | <b>277,532</b>   | <b>784</b>           | <b>0</b>             | <b>9,966</b> | <b>-8,945</b> | <b>1,877</b>            | <b>281,214</b>   | <b>148,241</b>   |

| TEUR                                 | Cumulative deprecia- amortisa- | Currency translation | Company acquisitions | Regular deprecia- amortisa- | Disposals of cumula- deprecia- amortisa- | Reclassifica- and other | Impairment losses | Cumulative deprecia- amortisa- |
|--------------------------------------|--------------------------------|----------------------|----------------------|-----------------------------|------------------------------------------|-------------------------|-------------------|--------------------------------|
| 2023                                 | 01.01.                         |                      |                      |                             |                                          |                         |                   | 31.12.                         |
| Purchased software                   | -11,044                        | 0                    | 0                    | -535                        | 0                                        | 0                       | 0                 | -11,579                        |
| Other intangible assets              | -595                           | -29                  | 0                    | -438                        | 600                                      | 0                       | 0                 | -462                           |
| <b>Intangible assets</b>             | <b>-11,639</b>                 | <b>-29</b>           | <b>0</b>             | <b>-973</b>                 | <b>600</b>                               | <b>0</b>                | <b>0</b>          | <b>-12,041</b>                 |
| Owner-occupied land and buildings    | -44,868                        | -243                 | 0                    | -2,234                      | 0                                        | 0                       | 0                 | -47,345                        |
| Operating and office equipment       | -13,625                        | -14                  | 0                    | -1,750                      | 881                                      | 0                       | 0                 | -14,508                        |
| Other property, plant and equipment  | -5,718                         | 0                    | 0                    | -1,592                      | 5                                        | 0                       | 0                 | -7,305                         |
| <b>Property, plant and equipment</b> | <b>-64,211</b>                 | <b>-257</b>          | <b>0</b>             | <b>-5,576</b>               | <b>886</b>                               | <b>0</b>                | <b>0</b>          | <b>-69,158</b>                 |
| Investment property                  | -36,931                        | 0                    | 0                    | -1,631                      | 515                                      | -1,080                  | -31               | -39,158                        |
| Other properties                     | -14,291                        | 0                    | 0                    | 0                           | 1,579                                    | 1,071                   | -975              | -12,616                        |
| <b>Total</b>                         | <b>-127,072</b>                | <b>-286</b>          | <b>0</b>             | <b>-8,180</b>               | <b>3,580</b>                             | <b>-9</b>               | <b>-1,006</b>     | <b>-132,973</b>                |

| TEUR                                 | Acquisition cost | Currency translation | Company acquisitions | Additions     | Disposals     | Reclassification and other | Acquisition cost | Carrying amounts |
|--------------------------------------|------------------|----------------------|----------------------|---------------|---------------|----------------------------|------------------|------------------|
| 2024                                 | 01.01.           |                      |                      |               |               |                            | 31.12.           | 31.12.           |
| Purchased software                   | 12,816           | 0                    | 0                    | 493           | 0             | -982                       | 12,327           | 1,519            |
| Other intangible assets              | 2,510            | -37                  | 0                    | 0             | 0             | -210                       | 2,263            | 1,357            |
| <b>Intangible assets</b>             | <b>15,326</b>    | <b>-37</b>           | <b>0</b>             | <b>493</b>    | <b>0</b>      | <b>-1,192</b>              | <b>14,590</b>    | <b>2,876</b>     |
| Owner-occupied land and buildings    | 109,568          | -172                 | 0                    | 6,637         | -3,252        | 48                         | 112,829          | 65,283           |
| Operating and office equipment       | 19,979           | -4                   | 0                    | 1,734         | -887          | 1                          | 20,823           | 5,545            |
| Other property, plant and equipment  | 20,470           | 0                    | 0                    | 480           | -429          | 683                        | 21,204           | 12,087           |
| <b>Property, plant and equipment</b> | <b>150,017</b>   | <b>-176</b>          | <b>0</b>             | <b>8,851</b>  | <b>-4,568</b> | <b>732</b>                 | <b>154,856</b>   | <b>82,915</b>    |
| Investment property                  | 83,231           | 0                    | 0                    | 3,863         | -917          | -138                       | 86,039           | 45,237           |
| Other properties                     | 32,640           | 0                    | 0                    | 0             | -4,022        | 774                        | 29,392           | 17,297           |
| <b>Total</b>                         | <b>281,214</b>   | <b>-213</b>          | <b>0</b>             | <b>13,207</b> | <b>-9,507</b> | <b>176</b>                 | <b>284,877</b>   | <b>148,325</b>   |

| TEUR                                 | Cumulative depreciation, amortisation | Currency translation | Company acquisitions | Regular depreciation, amortisation | Disposals of cumulative depreciation, amortisation | Reclassification and other | Impairment losses | Cumulative depreciation, amortisation |
|--------------------------------------|---------------------------------------|----------------------|----------------------|------------------------------------|----------------------------------------------------|----------------------------|-------------------|---------------------------------------|
| 2024                                 | 01.01.                                |                      |                      |                                    |                                                    |                            |                   | 31.12.                                |
| Purchased software                   | -11,579                               | 0                    | 0                    | -416                               | 0                                                  | 1,187                      | 0                 | -10,808                               |
| Other intangible assets              | -462                                  | 3                    | 0                    | -447                               | 0                                                  | 0                          | 0                 | -906                                  |
| <b>Intangible assets</b>             | <b>-12,041</b>                        | <b>3</b>             | <b>0</b>             | <b>-863</b>                        | <b>0</b>                                           | <b>1,187</b>               | <b>0</b>          | <b>-11,714</b>                        |
| Owner-occupied land and buildings    | -47,345                               | 68                   | 0                    | -2,226                             | 1,957                                              | 0                          | 0                 | -47,546                               |
| Operating and office equipment       | -14,508                               | 3                    | 0                    | -1,602                             | 829                                                | 0                          | 0                 | -15,278                               |
| Other property, plant and equipment  | -7,305                                | 0                    | 0                    | -1,812                             | 0                                                  | 0                          | 0                 | -9,117                                |
| <b>Property, plant and equipment</b> | <b>-69,158</b>                        | <b>71</b>            | <b>0</b>             | <b>-5,640</b>                      | <b>2,786</b>                                       | <b>0</b>                   | <b>0</b>          | <b>-71,941</b>                        |
| Investment property                  | -39,158                               | 0                    | 0                    | -1,681                             | 32                                                 | 112                        | -107              | -40,802                               |
| Other properties                     | -12,616                               | 0                    | 0                    | 0                                  | 1,915                                              | -835                       | -559              | -12,095                               |
| <b>Total</b>                         | <b>-132,973</b>                       | <b>74</b>            | <b>0</b>             | <b>-8,184</b>                      | <b>4,733</b>                                       | <b>464</b>                 | <b>-666</b>       | <b>-136,552</b>                       |

Right-of-use assets from leases are included in other property, plant and equipment. Other properties are included in other assets (30).

### (32) TRADING LIABILITIES

#### Trading liabilities and derivatives – breakdown by transaction type

| TEUR                                    | 31.12.2024    | 31.12.2023     |
|-----------------------------------------|---------------|----------------|
| Derivatives with negative market values | 54,440        | 101,024        |
| <b>Trading liabilities</b>              | <b>54,440</b> | <b>101,024</b> |

The nominal amounts and the negative market values of the derivative financial instruments are shown in note (18).

### (33) FINANCIAL LIABILITIES AT FAIR VALUE (OPTION)

| TEUR                                                | 31.12.2024     | 31.12.2023     |
|-----------------------------------------------------|----------------|----------------|
| Term deposits from customers                        | 112,279        | 123,031        |
| Debt securities issued                              | 670,482        | 666,381        |
| <b>Financial liabilities at fair value (option)</b> | <b>782,761</b> | <b>789,412</b> |

**Financial liabilities at fair value (option) by product**

| TEUR                                                | 31.12.2024     | 31.12.2023     |
|-----------------------------------------------------|----------------|----------------|
| Mortgage bonds                                      | 20,676         | 20,802         |
| Municipal bonds                                     | 108,571        | 203,260        |
| Bonds                                               | 242,328        | 204,172        |
| Housing construction bank bonds                     | 269,528        | 213,001        |
| Supplementary capital                               | 29,379         | 25,146         |
| <b>Total debt securities issued</b>                 | <b>670,482</b> | <b>666,381</b> |
| Promissory note loans                               | 112,279        | 123,031        |
| <b>Total deposits</b>                               | <b>112,279</b> | <b>123,031</b> |
| <b>Financial liabilities at fair value (option)</b> | <b>782,761</b> | <b>789,412</b> |

**Financial liabilities at fair value (option) by region**

| TEUR                                                | 31.12.2024     | 31.12.2023     |
|-----------------------------------------------------|----------------|----------------|
| Austria                                             | 672,989        | 668,793        |
| Germany                                             | 109,772        | 120,619        |
| <b>Financial liabilities at fair value (option)</b> | <b>782,761</b> | <b>789,412</b> |

**Financial liabilities at fair value (option) by business segment**

| TEUR                                                | 31.12.2024     | 31.12.2023     |
|-----------------------------------------------------|----------------|----------------|
| Financial Markets                                   | 777,045        | 786,527        |
| Corporate Centre                                    | 5,716          | 2,885          |
| <b>Financial liabilities at fair value (option)</b> | <b>782,761</b> | <b>789,412</b> |

**Financial liabilities at fair value (option) by sector**

| TEUR                                                | 31.12.2024     | 31.12.2023     |
|-----------------------------------------------------|----------------|----------------|
| Banks                                               | 670,482        | 666,381        |
| Financial companies                                 | 112,279        | 123,031        |
| <b>Financial liabilities at fair value (option)</b> | <b>782,761</b> | <b>789,412</b> |

**Financial liabilities at fair value (option)**
**Disclosures on changes in fair value**

| TEUR                                                    | 31.12.2024     | 31.12.2023     |
|---------------------------------------------------------|----------------|----------------|
| <b>Carrying amount</b>                                  | <b>782,761</b> | <b>789,412</b> |
| Amount repayable                                        | 805,892        | 830,355        |
| Difference between carrying amount and amount repayable | -23,131        | -40,943        |
| <b>Total change in market value</b>                     | <b>-6,308</b>  | <b>-24,032</b> |
| of which due to market risk                             | 5,740          | -5,336         |
| of which due to credit risk                             | -12,048        | -18,696        |
| <b>Change in market value in the reporting period</b>   | <b>17,724</b>  | <b>18,226</b>  |
| of which due to market risk                             | 11,076         | 31,726         |
| of which due to credit risk                             | 6,648          | -13,500        |

When calculating the fair value of financial liabilities at fair value (option), the credit spread is derived from market data. When determining the change in fair value due to credit risk, a differentiated analysis of the financial instruments is performed with regard to currency, maturity, type of placement and collateralisation or risk structure. The change in fair value due to credit risk is calculated by deducting the change in fair value due to market risk from the total change in fair value using a model calculation.

**Disclosures on changes in supplementary capital (LFVO)**

| TEUR                                              | 2024          | 2023          |
|---------------------------------------------------|---------------|---------------|
| <b>LFVO supplementary capital as at 1 January</b> | <b>25,146</b> | <b>23,560</b> |
| New intake                                        | 2,500         | 0             |
| Change in deferred interest                       | -17           | 254           |
| Change from measurement                           | 1,750         | 1,332         |
| <b>LFVO supplementary capital as at 31 De-</b>    | <b>29,379</b> | <b>25,146</b> |

**(34) FINANCIAL LIABILITIES AT AMORTISED COST**

| TEUR                                           | 31.12.2024        | 31.12.2023        |
|------------------------------------------------|-------------------|-------------------|
| Liabilities to banks                           | 439,049           | 783,867           |
| Demand deposits from customers                 | 4,230,601         | 4,329,224         |
| Savings deposits from customers                | 715,010           | 789,413           |
| Debt securities issued                         | 7,134,663         | 6,952,353         |
| Trade payables                                 | 14,706            | 7,643             |
| Liabilities from leases                        | 9,442             | 9,855             |
| <b>Financial liabilities at amortised cost</b> | <b>12,543,471</b> | <b>12,872,355</b> |

In financial liabilities at amortised cost, the use of hedge accounting led to the amortised cost of TEUR 6,953,307 (2023: TEUR 6,652,670) being adjusted for the hedged fair value of TEUR -113,079 (2023: TEUR -275,560).

**Financial liabilities at amortised cost by product**

| TEUR                                           | 31.12.2024        | 31.12.2023        |
|------------------------------------------------|-------------------|-------------------|
| Mortgage bonds                                 | 4,497,056         | 4,395,711         |
| Municipal bonds                                | 61,912            | 45,009            |
| Medium-term fixed-rate notes                   | 56,296            | 41,978            |
| Bonds                                          | 2,202,975         | 2,180,546         |
| Tier 2 capital (T2)                            | 266,043           | 238,703           |
| Additional core capital (AT1)                  | 50,381            | 50,406            |
| <b>Total debt securities issued</b>            | <b>7,134,663</b>  | <b>6,952,353</b>  |
| Interbank accounts                             | 281,544           | 255,124           |
| Money market deposits                          | 67,772            | 453,258           |
| Demand deposits                                | 2,651,874         | 2,634,644         |
| Term deposits                                  | 1,578,726         | 1,694,581         |
| Savings accounts                               | 678,821           | 668,058           |
| Capital savings accounts                       | 36,189            | 121,354           |
| Promissory note loans                          | 89,734            | 75,485            |
| <b>Total deposits</b>                          | <b>5,384,660</b>  | <b>5,902,504</b>  |
| Trade payables                                 | 14,706            | 7,643             |
| Other financial liabilities                    | 9,442             | 9,855             |
| <b>Total other financial liabilities</b>       | <b>24,148</b>     | <b>17,498</b>     |
| <b>Financial liabilities at amortised cost</b> | <b>12,543,471</b> | <b>12,872,355</b> |

**Financial liabilities at amortised cost by region**

| TEUR                                           | 31.12.2024        | 31.12.2023        |
|------------------------------------------------|-------------------|-------------------|
| Austria                                        | 9,576,942         | 9,977,297         |
| Germany                                        | 737,330           | 686,588           |
| Switzerland and Liechtenstein                  | 1,859,070         | 1,818,427         |
| Italy                                          | 7,599             | 10,597            |
| Other foreign countries                        | 362,530           | 379,446           |
| <b>Financial liabilities at amortised cost</b> | <b>12,543,471</b> | <b>12,872,355</b> |

#### Financial liabilities at amortised cost by business segment

| TEUR                                           | 31.12.2024        | 31.12.2023        |
|------------------------------------------------|-------------------|-------------------|
| Corporate Customers                            | 1,884,196         | 1,850,088         |
| Private Customers                              | 2,749,900         | 2,919,885         |
| Financial Markets                              | 7,547,376         | 7,774,546         |
| Corporate Centre                               | 361,999           | 327,836           |
| <b>Financial liabilities at amortised cost</b> | <b>12,543,471</b> | <b>12,872,355</b> |

#### Financial liabilities at amortised cost by sector

| TEUR                                           | 31.12.2024        | 31.12.2023        |
|------------------------------------------------|-------------------|-------------------|
| Central banks                                  | 16,379            | 333,516           |
| Public sector                                  | 266,499           | 280,370           |
| Banks                                          | 7,506,084         | 7,369,694         |
| Financial companies                            | 484,092           | 572,124           |
| Companies                                      | 1,607,772         | 1,659,800         |
| Private households                             | 2,662,645         | 2,656,851         |
| <b>Financial liabilities at amortised cost</b> | <b>12,543,471</b> | <b>12,872,355</b> |

#### Financial liabilities at amortised cost – companies by industry

| TEUR                                                       | 31.12.2024       | 31.12.2023       |
|------------------------------------------------------------|------------------|------------------|
| Agriculture and forestry                                   | 5,212            | 6,506            |
| Mining                                                     | 71               | 32               |
| Manufacturing                                              | 226,578          | 191,221          |
| Energy supply                                              | 104,587          | 174,666          |
| Water supply                                               | 4,238            | 4,335            |
| Construction                                               | 101,358          | 132,800          |
| Trade                                                      | 217,371          | 238,016          |
| Transportation and storage                                 | 55,007           | 60,749           |
| Accommodation and hospitality                              | 63,554           | 50,387           |
| Information and communication                              | 33,290           | 35,380           |
| Financial services                                         | 71,938           | 44,085           |
| Housing                                                    | 261,769          | 239,008          |
| Liberal professions                                        | 256,414          | 294,345          |
| Other economic services                                    | 44,983           | 64,552           |
| Public administration                                      | 52,895           | 20,498           |
| Education                                                  | 8,863            | 17,462           |
| Health and social care                                     | 73,605           | 51,163           |
| Arts, entertainment and recreation                         | 13,302           | 19,831           |
| Other services                                             | 12,737           | 14,764           |
| <b>Financial liabilities at amortised cost – companies</b> | <b>1,607,772</b> | <b>1,659,800</b> |

#### Disclosures on changes in tier 2 capital and additional tier 1 capital (LAC)

| TEUR                                                                      | 2024           | 2023           |
|---------------------------------------------------------------------------|----------------|----------------|
| <b>LAC tier 2 capital and additional tier 1 capital as at 1 January</b>   | <b>289,109</b> | <b>272,565</b> |
| New intake                                                                | 20,000         | 0              |
| Currency changes                                                          | -1,744         | 6,563          |
| Change in deferred interest                                               | 560            | 7              |
| Change from measurement                                                   | 8,499          | 9,974          |
| <b>LAC tier 2 capital and additional tier 1 capital as at 31 December</b> | <b>316,424</b> | <b>289,109</b> |

Prior-year figures restated to reflect a reclassification from new intake to currency changes.

#### Disclosures on lease liabilities by remaining term

| TEUR                     | 31.12.2024   | 31.12.2023   |
|--------------------------|--------------|--------------|
| Up to 3 months           | 365          | 368          |
| Between 3 and 12 months  | 1,092        | 1,080        |
| Between 1 and 5 years    | 5,686        | 4,867        |
| More than 5 years        | 2,282        | 3,422        |
| <b>Lease liabilities</b> | <b>9,425</b> | <b>9,737</b> |

The lease liabilities shown by remaining term represent undiscounted lease payments. The total amount of the payments therefore does not match the present value of the lease liabilities as shown in the table above. The weighted average interest rate is 2.33 %. Expenses for short-term leases, for low-value leases and from variable lease payments not included in the measurement of the respective lease liability amounted to TEUR 144 (2023: TEUR 32).

#### Change in lease liabilities

| TEUR                                       | 2024         | 2023         |
|--------------------------------------------|--------------|--------------|
| <b>Lease liabilities as at 1 January</b>   | <b>9,855</b> | <b>9,437</b> |
| Interest expense                           | 242          | 256          |
| Remeasurement                              | 1,706        | 1,911        |
| Disposals due to reversals                 | -430         | -39          |
| Lease payments                             | -1,931       | -1,710       |
| <b>Lease liabilities as at 31 December</b> | <b>9,442</b> | <b>9,855</b> |

#### (35) NEGATIVE MARKET VALUES OF HEDGES

##### Breakdown by type of hedge

| TEUR                                        | 31.12.2024     | 31.12.2023     |
|---------------------------------------------|----------------|----------------|
| Negative market values of fair value hedges | 267,133        | 389,936        |
| Negative market values of portfolio hedges  | 2,819          | 2,225          |
| <b>Negative market values of hedges</b>     | <b>269,952</b> | <b>392,161</b> |

The nominal amounts and the negative market values of the hedging instruments are shown in note (23). The Group did not enter into any cash flow hedge positions in the reporting year or the previous year.

#### (36) PROVISIONS

##### Provisions by type

| TEUR                                       | 31.12.2024    | 31.12.2023    |
|--------------------------------------------|---------------|---------------|
| Severance provisions                       | 15,445        | 15,268        |
| Pension provisions                         | 3,988         | 4,268         |
| Service anniversary provisions             | 3,275         | 3,198         |
| <b>Social capital</b>                      | <b>22,708</b> | <b>22,734</b> |
| Provisions for guarantees/liability agree- | 8,838         | 11,398        |
| Provisions for ongoing litigation          | 735           | 1,177         |
| Staff provisions                           | 184           | 173           |
| Provision for other expenses               | 8,989         | 2,603         |
| <b>Other provisions</b>                    | <b>18,746</b> | <b>15,351</b> |
| <b>Provisions</b>                          | <b>41,454</b> | <b>38,085</b> |

A breakdown by maturity and the expected maturities of the resulting outflows is shown in note (42).

Although guarantees and warranties are not shown on the balance sheet, the credit risk they pose is not insubstantial. To account for this default risk, provisions are recognised for customers with a certain deterioration in their credit rating. If a contingent liability from a guarantee or warranty takes effect, we have the right to recourse from the guarantee holder. The collateral provided by the guarantee holder is therefore taken into consideration when recognising the provision. An inflow of economic benefits in excess of the collateral is not expected.

Credit risk provisions are also intended to cover credit risk from unutilised credit lines. Loans granted to customers but not yet drawn down represent contingent liabilities. As these are not shown on the balance sheet, loan loss provisions can only be recognised under provisions. As they constitute loan commitments according to IFRS 9, they do not fall under the scope of IAS 37. These provisions are therefore determined in accordance with IFRS 9.

Provisions for litigation include both the expected costs of proceedings and consulting fees as well as the estimated payment obligations to the other party arising from the proceedings.

No specific assets or funding are in place for social capital other than the pension agreement for employees of the St. Gallen branch. For employees of the St. Gallen branch,

the fund assets are invested by Swiss Life AG, Zürich, within the framework of the BVG collective foundation Swiss Life. The fund assets are professionally managed by Swiss Life AG and risk diversification forms part of the investment strategy.

Employers and employees both pay their contributions into this fund. This means the fund assets, and hence their measurement effects, are not included in these consolidated financial statements. Accordingly, the provision reflects the net obligation from the present value of the defined benefit obligations less the fair value of the fund assets. Gains and losses from the allocation or reversal of provisions are reported directly in administrative expenses and other comprehensive income. For pension provisions, fixed-interest securities are held as collateral for pension recipients' pension entitlements.

#### Expected utilisation of social capital

| TEUR                    | 31.12.2024    | 31.12.2023    |
|-------------------------|---------------|---------------|
| Up to 3 months          | 222           | 126           |
| Between 3 and 12 months | 1,167         | 714           |
| Between 1 and 5 years   | 4,794         | 4,709         |
| More than 5 years       | 16,525        | 17,185        |
| <b>Social capital</b>   | <b>22,708</b> | <b>22,734</b> |

#### Development of social capital

| TEUR<br>2023                                      | Severance<br>provisions | Pension<br>provisions | Service anniver-<br>provisions | Total         |
|---------------------------------------------------|-------------------------|-----------------------|--------------------------------|---------------|
| <b>Present value at 1 January</b>                 | <b>13,913</b>           | <b>3,428</b>          | <b>2,968</b>                   | <b>20,309</b> |
| Years of service expense                          | 333                     | -135                  | 243                            | 441           |
| Interest expense                                  | 481                     | 164                   | 110                            | 755           |
| Actuarial gains/losses from financial assumptions | 1,453                   | 822                   | -76                            | 2,199         |
| Foreign currency risk                             | 0                       | 45                    | 0                              | 45            |
| Benefit payments                                  | -955                    | -56                   | -47                            | -1,058        |
| Subsequent offsetting from settlement             | -14                     | 0                     | 0                              | -14           |
| Other changes                                     | 57                      | 0                     | 0                              | 57            |
| <b>Present value as at 31 December</b>            | <b>15,268</b>           | <b>4,268</b>          | <b>3,198</b>                   | <b>22,734</b> |

| TEUR<br>2024                                      | Severance<br>provisions | Pension<br>provisions | Service anniver-<br>provisions | Total         |
|---------------------------------------------------|-------------------------|-----------------------|--------------------------------|---------------|
| <b>Present value at 1 January</b>                 | <b>15,268</b>           | <b>4,268</b>          | <b>3,198</b>                   | <b>22,734</b> |
| Years of service expense                          | 271                     | -14                   | 248                            | 505           |
| Interest expense                                  | 484                     | 122                   | 112                            | 718           |
| Actuarial gains/losses from financial assumptions | 83                      | 31                    | -167                           | -53           |
| Foreign currency risk                             | 0                       | -18                   | 0                              | -18           |
| Benefit payments                                  | -614                    | -401                  | -116                           | -1,131        |
| Subsequent offsetting from settlement             | 0                       | 0                     | 0                              | 0             |
| Other changes                                     | -47                     | 0                     | 0                              | -47           |
| <b>Present value as at 31 December</b>            | <b>15,445</b>           | <b>3,988</b>          | <b>3,275</b>                   | <b>22,708</b> |

The actuarial gains/losses from severance and pension provisions of TEUR -76 (2023: TEUR -2,340) recognised in other comprehensive income (40) are attributable to changes in financial assumptions.

For the defined benefit obligation for the employees of the St. Gallen branch, the components of the fund assets are presented and the fund assets reconciled below.

## Fund asset components

| TEUR                                                      | 31.12.2024 | 31.12.2023 |
|-----------------------------------------------------------|------------|------------|
| Fair value of assets from defined benefit plans           | 12,010     | 8,463      |
| of which equity instruments                               | 1,574      | 866        |
| of which debt securities                                  | 7,092      | 5,147      |
| of which properties                                       | 2,949      | 2,007      |
| of which other assets from defined benefit plans          | 395        | 443        |
| Present value of obligations from defined benefit plans   | 12,570     | 9,359      |
| <b>Net defined benefit obligation – St. Gallen branch</b> | <b>560</b> | <b>896</b> |

## Reconciliation of fund assets

| TEUR                                                                   | 2024          | 2023         |
|------------------------------------------------------------------------|---------------|--------------|
| <b>Fair value of assets from defined benefit plans as at 1 January</b> | <b>8,463</b>  | <b>5,982</b> |
| Currency translation effects                                           | -137          | 379          |
| Interest income from assets                                            | 141           | 104          |
| Gain/loss on remeasurement of assets                                   | 1,427         | 816          |
| Employer contribution payments                                         | 524           | 440          |
| Employee contribution payments                                         | 359           | 293          |
| Plan participant contribution payments                                 | 1,233         | 1,364        |
| Disbursements                                                          | 0             | -915         |
| <b>Fair value of assets from defined benefit plans on 31 December</b>  | <b>12,010</b> | <b>8,463</b> |

There were no disbursements from fund assets in the 2024 financial year.

## Changes in other provisions

| TEUR                                     | Guarantees and commitments | Credit risks | Ongoing litigation | Staff      | Other         | Total         |
|------------------------------------------|----------------------------|--------------|--------------------|------------|---------------|---------------|
| <b>2023</b>                              |                            |              |                    |            |               |               |
| <b>Carrying amount as at 1 January</b>   | <b>12,866</b>              | <b>24</b>    | <b>1,010</b>       | <b>279</b> | <b>26,697</b> | <b>40,876</b> |
| Addition                                 | 8,609                      | 0            | 569                | 4          | 14,607        | 23,789        |
| Utilisation                              | 0                          | 0            | -295               | -110       | -12,849       | -13,254       |
| Reversal                                 | -10,117                    | -24          | -107               | 0          | -25,852       | -36,100       |
| Unwinding                                | 1                          | 0            | 0                  | 0          | 0             | 1             |
| Remaining adjustment                     | 39                         | 0            | 0                  | 0          | 0             | 39            |
| <b>Carrying amount as at 31 December</b> | <b>11,398</b>              | <b>0</b>     | <b>1,177</b>       | <b>173</b> | <b>2,603</b>  | <b>15,351</b> |

| TEUR                                     | Guarantees and commitments | Credit risks | Ongoing litigation | Staff      | Other        | Total         |
|------------------------------------------|----------------------------|--------------|--------------------|------------|--------------|---------------|
| <b>2024</b>                              |                            |              |                    |            |              |               |
| <b>Carrying amount as at 1 January</b>   | <b>11,398</b>              | <b>0</b>     | <b>1,177</b>       | <b>173</b> | <b>2,603</b> | <b>15,351</b> |
| Addition                                 | 7,313                      | 0            | 905                | 4          | 6,949        | 15,171        |
| Utilisation                              | 0                          | 0            | -813               | -4         | -274         | -1,091        |
| Reversal                                 | -9,618                     | 0            | -544               | 11         | -279         | -10,430       |
| Unwinding                                | -252                       | 0            | 0                  | 0          | 0            | -252          |
| Remaining adjustment                     | -3                         | 0            | 10                 | 0          | -10          | -3            |
| <b>Carrying amount as at 31 December</b> | <b>8,838</b>               | <b>0</b>     | <b>735</b>         | <b>184</b> | <b>8,989</b> | <b>18,746</b> |



### (37) INCOME TAX OBLIGATIONS

#### Income tax obligations – breakdown by type

| TEUR                          | 31.12.2024   | 31.12.2023   |
|-------------------------------|--------------|--------------|
| Tax provision                 | 2,442        | 2,451        |
| Income tax liabilities        | 8            | 7            |
| <b>Income tax obligations</b> | <b>2,450</b> | <b>2,458</b> |

#### Development of the tax provision

| TEUR                                     | 2024         | 2023         |
|------------------------------------------|--------------|--------------|
| Carrying amount as at 1 January          | 2,451        | 3,815        |
| Currency translation                     | -4           | 34           |
| Addition                                 | 1,558        | 1,009        |
| Utilisation                              | -1,563       | -2,392       |
| Reversal                                 | 0            | -15          |
| <b>Carrying amount as at 31 December</b> | <b>2,442</b> | <b>2,451</b> |

The breakdown by maturity is shown in note (42).

### (38) DEFERRED TAX LIABILITIES

In the table below, deferred tax assets are deducted from tax liabilities when they represent a liability in net terms in the respective tax entity. The breakdown by maturity is shown in note (42).

| TEUR                                                                                         | 31.12.2024    | 31.12.2023    |
|----------------------------------------------------------------------------------------------|---------------|---------------|
| Temporary differences from the measurement of financial instruments via the income statement | 12,800        | 12,497        |
| Temporary differences from write-downs of assets                                             | 4,794         | 4,743         |
| Temporary differences from provisions                                                        | 2,754         | 3,016         |
| Temporary differences from impairment losses                                                 | 0             | 2,669         |
| Other temporary differences                                                                  | 568           | 101           |
| <b>Deferred tax liabilities</b>                                                              | <b>20,916</b> | <b>23,026</b> |
| Set-off of deferred taxes                                                                    | -8,273        | -5,135        |
| <b>Net deferred tax liabilities</b>                                                          | <b>12,643</b> | <b>17,891</b> |

TEUR -1,597 (2023: TEUR -1,516) was recognised directly in other comprehensive income (40) for actuarial gains/losses from defined benefit plans. The corresponding deferred taxes (tax liability) amounted to TEUR 367 (2023: TEUR 349). Based on the recognition of changes in the Bank's own credit risk directly in equity in other comprehensive income in the amount of TEUR 12,275 (2023: TEUR 18,364), deferred taxes (tax liability) of TEUR -2,823 (2023: TEUR -4,224) were also reversed directly in equity.

There are no outside basis differences in relation to the companies included in the consolidated financial statements.

### (39) OTHER LIABILITIES

| TEUR                                           | 31.12.2024    | 31.12.2023    |
|------------------------------------------------|---------------|---------------|
| Liabilities in connection with social security | 1,438         | 1,306         |
| Other tax obligations                          | 7,643         | 8,748         |
| Deferred income                                | 8,182         | 10,290        |
| Other accrued benefits                         | 7,083         | 5,437         |
| Miscellaneous liabilities                      | 21,951        | 23,836        |
| <b>Other liabilities</b>                       | <b>46,297</b> | <b>49,617</b> |

### (40) SHAREHOLDERS' EQUITY

#### Shareholders' equity – breakdown by type

| TEUR                                                            | 31.12.2024       | 31.12.2023       |
|-----------------------------------------------------------------|------------------|------------------|
| Share capital                                                   | 162,152          | 162,152          |
| Capital reserve                                                 | 44,674           | 44,674           |
| <b>Accumulated other comprehensive income</b>                   | <b>8,283</b>     | <b>13,058</b>    |
| <b>Total items without recycling</b>                            | <b>8,223</b>     | <b>12,973</b>    |
| Measurement of pension plans                                    | -1,229           | -1,167           |
| Measurement from own change in credit rating                    | 9,452            | 14,140           |
| <b>Total items with recycling</b>                               | <b>60</b>        | <b>85</b>        |
| Foreign currency measurement                                    | 60               | 85               |
| Retained earnings                                               | 1,281,701        | 1,243,617        |
| <b>Total attributable to shareholders of the parent company</b> | <b>1,496,810</b> | <b>1,463,501</b> |
| Non-controlling interests in shareholders' equity               | 47               | 31               |
| <b>Shareholders' equity</b>                                     | <b>1,496,857</b> | <b>1,463,532</b> |

The subscribed capital consists of the fully paid-up share capital of TEUR 162,152 (2023: TEUR 162,152). On 31 December 2024, there were a total of 316,736 shares outstanding (2023: 316,736 shares) with a nominal value of EUR 512.

Retained earnings include the statutory reserve. The reversal of the statutory reserve in the amount of TEUR 10,601 (2023: TEUR 10,601) is attributable to the Austrian Commercial Code (UGB) in conjunction with the Austrian Stock Corporation Act (AktG).

The liable capital pursuant to section 57 (5) of the Austrian Banking Act (BWG) is also shown under retained profits. The reversal of the liable capital in the amount of TEUR 139,082 (2023: TEUR 139,082) is only permitted to the extent that this is necessary in order to meet obligations in accordance with section 93 BWG or to cover other losses reported in the annual financial statements. The liable capital must be replenished in the amount of the reversal within the next five financial years at the latest.

**Reconciliation of accumulated other comprehensive income**

| TEUR                               | Measurement<br>of pension<br>plans | Measurement<br>from own<br>change in<br>credit rating | Foreign<br>currency<br>measurement | Total         |
|------------------------------------|------------------------------------|-------------------------------------------------------|------------------------------------|---------------|
| <b>Balance at 1 January 2023</b>   | <b>672</b>                         | <b>3,655</b>                                          | <b>81</b>                          | <b>4,408</b>  |
| Equity transfer                    | -22                                | 0                                                     | -147                               | -169          |
| OCI measurement, not recyclable    | -2,340                             | 13,490                                                | 0                                  | 11,150        |
| Deferred taxes, not recyclable     | 523                                | -3,005                                                | 0                                  | -2,482        |
| OCI measurement, recyclable        | 0                                  | 0                                                     | 151                                | 151           |
| <b>Balance at 31 December 2023</b> | <b>-1,167</b>                      | <b>14,140</b>                                         | <b>85</b>                          | <b>13,058</b> |
| <b>Balance at 1 January 2024</b>   | <b>-1,167</b>                      | <b>14,140</b>                                         | <b>85</b>                          | <b>13,058</b> |
| Equity transfer                    | 0                                  | 0                                                     | -85                                | -85           |
| OCI measurement, not recyclable    | -76                                | -6,089                                                | 0                                  | -6,165        |
| Deferred taxes, not recyclable     | 14                                 | 1,401                                                 | 0                                  | 1,415         |
| OCI measurement, recyclable        | 0                                  | 0                                                     | 60                                 | 60            |
| <b>Balance at 31 December 2024</b> | <b>-1,229</b>                      | <b>9,452</b>                                          | <b>60</b>                          | <b>8,283</b>  |

Other comprehensive income (40) includes an amount of TEUR 227 (2023: TEUR -332) attributable to financial instruments voluntarily designated at fair value that have already been repaid or sold.

**Dividends of Hypo Vorarlberg**

Hypo Vorarlberg is permitted to distribute as a dividend not exceeding the amount of the net retained profits reported in the single-entity financial statements in accordance with BWG and UGB, namely TEUR 10,136 (2023: TEUR 4,434).

The UGB net profit reported by Hypo Vorarlberg for the 2024 financial year amounted to TEUR 52,027 (2023: TEUR 54,441). Following an allocation to reserves of TEUR 41,891 (2023: TEUR 50,007) and after adding the retained profit of TEUR 0 (2023: TEUR 0), the net retained profits available for appropriation amounted to TEUR 10,136 (2023: TEUR 4,434). Subject to approval by the Annual General Meeting and taking further developments up until the time of this resolution into account, a dividend of EUR 32 (2023: EUR 14) per eligible share is proposed based on the shares and the associated share capital of TEUR 162,152 (2023: TEUR 162,152). With 316,736 shares outstanding (2023: 316,736 shares), this results in a distribution of TEUR 10,136 (2023: TEUR 4,434).

**(41) FOREIGN CURRENCY VOLUME AND FOREIGN-DENOMINATED ASSETS AND LIABILITIES**

| TEUR                                                 | EUR               | USD           | CHF              | JPY           | Other          | Total             |
|------------------------------------------------------|-------------------|---------------|------------------|---------------|----------------|-------------------|
| <b>31.12.2023</b>                                    |                   |               |                  |               |                |                   |
| Cash reserve                                         | 726,594           | 2,596         | 243,152          | 399           | 3,530          | 976,271           |
| Trading assets                                       | 106,055           | 3,385         | 7,897            | 276           | 122            | 117,735           |
| Financial assets at fair value (non-SPPI)            | 521,246           | 50,383        | 10,649           | 11,131        | 0              | 593,409           |
| Financial liabilities at fair value (option)         | 202,033           | 0             | 0                | 0             | 11,495         | 213,528           |
| Financial assets at amortised cost                   | 11,461,870        | 37,544        | 1,631,686        | 4,590         | 125,610        | 13,261,300        |
| Positive market values of hedges                     | 347,733           | 1,460         | 28,656           | 0             | 0              | 377,849           |
| Fair value change portfolio from interest rate risks | 11,767            | 0             | 0                | 0             | 0              | 11,767            |
| Holdings                                             | 968               | 0             | 0                | 0             | 0              | 968               |
| Shares in companies measured at equity               | 3,805             | 0             | 0                | 0             | 0              | 3,805             |
| Property, plant and equipment                        | 74,322            | 0             | 6,537            | 0             | 0              | 80,859            |
| Investment property                                  | 44,073            | 0             | 0                | 0             | 0              | 44,073            |
| Intangible assets                                    | 1,448             | 0             | 1,837            | 0             | 0              | 3,285             |
| Income tax assets                                    | 1,471             | 0             | 0                | 0             | 0              | 1,471             |
| Deferred tax assets                                  | 3,113             | 0             | 0                | 0             | 0              | 3,113             |
| Other assets                                         | 35,290            | 0             | 1,566            | 0             | 246            | 37,102            |
| <b>Assets</b>                                        | <b>13,541,788</b> | <b>95,368</b> | <b>1,931,980</b> | <b>16,396</b> | <b>141,003</b> | <b>15,726,535</b> |

| TEUR                                         | EUR               | USD            | CHF              | JPY           | Other         | Total             |
|----------------------------------------------|-------------------|----------------|------------------|---------------|---------------|-------------------|
| <b>31.12.2023</b>                            |                   |                |                  |               |               |                   |
| Trading liabilities                          | 94,942            | 2,595          | 3                | 3,384         | 100           | 101,024           |
| Financial liabilities at fair value (option) | 789,412           | 0              | 0                | 0             | 0             | 789,412           |
| Financial liabilities at amortised cost      | 10,926,018        | 134,646        | 1,670,294        | 67,485        | 73,912        | 12,872,355        |
| Negative market values of hedges             | 315,824           | 193            | 69,668           | 5,370         | 1,106         | 392,161           |
| Provisions                                   | 37,151            | 0              | 934              | 0             | 0             | 38,085            |
| Income tax obligations                       | 1,920             | 0              | 538              | 0             | 0             | 2,458             |
| Deferred tax liabilities                     | 17,891            | 0              | 0                | 0             | 0             | 17,891            |
| Other liabilities                            | 42,652            | 114            | 6,851            | 0             | 0             | 49,617            |
| Shareholders' equity                         | 1,463,529         | 0              | 3                | 0             | 0             | 1,463,532         |
| <b>Liabilities and shareholders' equity</b>  | <b>13,689,339</b> | <b>137,548</b> | <b>1,748,291</b> | <b>76,239</b> | <b>75,118</b> | <b>15,726,535</b> |

| TEUR                                                 | EUR               | USD            | CHF              | JPY           | Other          | Total             |
|------------------------------------------------------|-------------------|----------------|------------------|---------------|----------------|-------------------|
| <b>31.12.2024</b>                                    |                   |                |                  |               |                |                   |
| Cash reserve                                         | 201,937           | 1,980          | 291,313          | 2,801         | 11,902         | 509,933           |
| Trading assets                                       | 98,152            | 4,807          | 469              | 619           | 29             | 104,076           |
| Financial assets at fair value (non-SPPI)            | 525,483           | 39,381         | 9,644            | 10,075        | 0              | 584,583           |
| Financial liabilities at fair value (option)         | 188,014           | 0              | 0                | 0             | 11,194         | 199,208           |
| Financial assets at amortised cost                   | 11,521,143        | 56,935         | 1,599,415        | 3,719         | 113,617        | 13,294,829        |
| Positive market values of hedges                     | 306,447           | 2,071          | 37,121           | 0             | 54             | 345,693           |
| Fair value change portfolio from interest rate risks | 13,829            | 0              | 0                | 0             | 0              | 13,829            |
| Holdings                                             | 746               | 0              | 0                | 0             | 0              | 746               |
| Shares in companies measured at equity               | 4,025             | 0              | 0                | 0             | 0              | 4,025             |
| Property, plant and equipment                        | 76,501            | 0              | 6,414            | 0             | 0              | 82,915            |
| Investment property                                  | 45,237            | 0              | 0                | 0             | 0              | 45,237            |
| Intangible assets                                    | 1,520             | 0              | 1,356            | 0             | 0              | 2,876             |
| Income tax assets                                    | 18,265            | 0              | 0                | 0             | 0              | 18,265            |
| Deferred tax assets                                  | 2,000             | 0              | 4                | 0             | 0              | 2,004             |
| Other assets                                         | 39,638            | 0              | 2,403            | 0             | 65             | 42,106            |
| <b>Assets</b>                                        | <b>13,042,937</b> | <b>105,174</b> | <b>1,948,139</b> | <b>17,214</b> | <b>136,861</b> | <b>15,250,325</b> |

| TEUR                                         | EUR               | USD            | CHF              | JPY           | Other         | Total             |
|----------------------------------------------|-------------------|----------------|------------------|---------------|---------------|-------------------|
| <b>31.12.2024</b>                            |                   |                |                  |               |               |                   |
| Trading liabilities                          | 52,609            | 19             | 585              | 1,172         | 55            | 54,440            |
| Financial liabilities at fair value (option) | 782,761           | 0              | 0                | 0             | 0             | 782,761           |
| Financial liabilities at amortised cost      | 10,558,120        | 131,303        | 1,714,691        | 82,595        | 56,762        | 12,543,471        |
| Negative market values of hedges             | 237,424           | 78             | 23,036           | 8,940         | 474           | 269,952           |
| Provisions                                   | 40,879            | 0              | 575              | 0             | 0             | 41,454            |
| Income tax obligations                       | 1,499             | 0              | 951              | 0             | 0             | 2,450             |
| Deferred tax liabilities                     | 12,643            | 0              | 0                | 0             | 0             | 12,643            |
| Other liabilities                            | 43,016            | 133            | 3,148            | 0             | 0             | 46,297            |
| Shareholders' equity                         | 1,496,878         | 0              | -21              | 0             | 0             | 1,496,857         |
| <b>Liabilities and shareholders' equity</b>  | <b>13,225,829</b> | <b>131,533</b> | <b>1,742,965</b> | <b>92,707</b> | <b>57,291</b> | <b>15,250,325</b> |

The difference between assets and liabilities in the individual currencies does not represent the Group's open foreign currency position as defined in Article 352 CRR. Open foreign currency positions are hedged using derivative financial instruments such as currency swaps or cross-currency swaps. However, these hedges are not recognised at their nominal amount in the IFRS balance sheet, but instead at market value. As at 31 December 2024, the total of all open foreign currency positions in accordance with Article 352 CRR amounted to TEUR 6,018 (2023: TEUR 13,156).

#### Foreign-denominated assets and liabilities

| TEUR                | 31.12.2024 | 31.12.2023 |
|---------------------|------------|------------|
| Foreign assets      | 5,312,320  | 5,330,175  |
| Foreign liabilities | 3,549,515  | 3,653,272  |

**(42) MATURITIES**

| TEUR<br>31.12.2023                                   | Payable on<br>demand | Up to 3<br>months | Up to 1<br>year  | Up to 5<br>years | More than 5<br>years | No<br>maturity | Total             |
|------------------------------------------------------|----------------------|-------------------|------------------|------------------|----------------------|----------------|-------------------|
| Cash reserve                                         | 952,091              | 0                 | 0                | 0                | 0                    | 24,180         | 976,271           |
| Trading assets                                       | 152                  | 9,362             | 4,623            | 17,307           | 86,166               | 125            | 117,735           |
| Financial assets at fair value (non-SPPi)            | 32,201               | 15,364            | 110,173          | 288,157          | 135,143              | 12,371         | 593,409           |
| Financial liabilities at fair value (option)         | 0                    | 852               | 11,356           | 117,003          | 84,317               | 0              | 213,528           |
| Financial assets at amortised cost                   | 920,429              | 1,618,795         | 1,251,051        | 4,333,014        | 5,097,094            | 40,917         | 13,261,300        |
| Positive market values of hedges                     | 0                    | 551               | 5,718            | 122,556          | 249,024              | 0              | 377,849           |
| Fair value change portfolio from interest rate risks | 0                    | 0                 | 0                | 31               | 11,736               | 0              | 11,767            |
| Holdings                                             | 0                    | 0                 | 0                | 0                | 0                    | 968            | 968               |
| Shares in companies measured at equity               | 0                    | 0                 | 0                | 0                | 0                    | 3,805          | 3,805             |
| Property, plant and equipment                        | 0                    | 0                 | 0                | 0                | 0                    | 80,859         | 80,859            |
| Investment property                                  | 0                    | 0                 | 0                | 0                | 0                    | 44,073         | 44,073            |
| Intangible assets                                    | 0                    | 0                 | 0                | 0                | 0                    | 3,285          | 3,285             |
| Income tax assets                                    | 123                  | 0                 | 881              | 467              | 0                    | 0              | 1,471             |
| Deferred tax assets                                  | 32                   | 0                 | 0                | 3,030            | 97                   | -46            | 3,113             |
| Other assets                                         | 7,839                | 3,401             | 3,030            | 2,925            | -121                 | 20,028         | 37,102            |
| <b>Assets</b>                                        | <b>1,912,867</b>     | <b>1,648,325</b>  | <b>1,386,832</b> | <b>4,884,490</b> | <b>5,663,456</b>     | <b>230,565</b> | <b>15,726,535</b> |

| TEUR<br>31.12.2023                           | Payable on<br>demand | Up to 3<br>months | Up to 1<br>year  | Up to 5<br>years | More than 5<br>years | No<br>maturity   | Total             |
|----------------------------------------------|----------------------|-------------------|------------------|------------------|----------------------|------------------|-------------------|
| Trading liabilities                          | 0                    | 1,981             | 23,894           | 29,166           | 45,983               | 0                | 101,024           |
| Financial liabilities at fair value (option) | 0                    | 0                 | 31,421           | 276,689          | 481,302              | 0                | 789,412           |
| Financial liabilities at amortised cost      | 3,573,896            | 1,129,427         | 1,619,651        | 4,758,738        | 1,784,875            | 5,768            | 12,872,355        |
| Negative market values of hedges             | 0                    | 3,703             | 13,209           | 162,981          | 212,268              | 0                | 392,161           |
| Provisions                                   | 5,715                | 2,822             | 2,511            | 7,593            | 18,703               | 741              | 38,085            |
| Income tax obligations                       | 0                    | 11                | 1,962            | 3                | 0                    | 482              | 2,458             |
| Deferred tax liabilities                     | -940                 | -546              | -7,177           | 12,350           | 12,885               | 1,319            | 17,891            |
| Other liabilities                            | 16,187               | 9,324             | 5,582            | 13,800           | 4,724                | 0                | 49,617            |
| Shareholders' equity                         | 0                    | 0                 | 0                | 0                | 0                    | 1,463,532        | 1,463,532         |
| <b>Liabilities and shareholders' equity</b>  | <b>3,594,858</b>     | <b>1,146,722</b>  | <b>1,691,053</b> | <b>5,261,320</b> | <b>2,560,740</b>     | <b>1,471,842</b> | <b>15,726,535</b> |

| TEUR<br>31.12.2024                                   | Payable on<br>demand | Up to 3<br>months | Up to 1<br>year  | Up to 5<br>years | More than 5<br>years | No<br>maturity | Total             |
|------------------------------------------------------|----------------------|-------------------|------------------|------------------|----------------------|----------------|-------------------|
| Cash reserve                                         | 487,552              | 0                 | 0                | 0                | 0                    | 22,381         | 509,933           |
| Trading assets                                       | 15                   | 6,385             | 4,375            | 16,538           | 76,615               | 148            | 104,076           |
| Financial assets at fair value (non-SPPi)            | 66,027               | 58,212            | 139,548          | 174,199          | 128,788              | 17,809         | 584,583           |
| Financial liabilities at fair value (option)         | 2                    | 13,697            | 49,086           | 63,982           | 72,441               | 0              | 199,208           |
| Financial assets at amortised cost                   | 705,369              | 1,751,373         | 1,363,330        | 4,321,630        | 5,107,620            | 45,507         | 13,294,829        |
| Positive market values of hedges                     | 0                    | 2,751             | 3,379            | 130,547          | 209,016              | 0              | 345,693           |
| Fair value change portfolio from interest rate risks | 0                    | 0                 | 0                | 0                | 13,829               | 0              | 13,829            |
| Holdings                                             | 0                    | 0                 | 0                | 0                | 0                    | 746            | 746               |
| Shares in companies measured at equity               | 0                    | 0                 | 0                | 0                | 0                    | 4,025          | 4,025             |
| Property, plant and equipment                        | 0                    | 0                 | 0                | 0                | 0                    | 82,915         | 82,915            |
| Investment property                                  | 0                    | 0                 | 0                | 0                | 0                    | 45,237         | 45,237            |
| Intangible assets                                    | 0                    | 0                 | 0                | 0                | 0                    | 2,876          | 2,876             |
| Income tax assets                                    | 40                   | 0                 | 17,815           | 410              | 0                    | 0              | 18,265            |
| Deferred tax assets                                  | 55                   | 4                 | 0                | 1,855            | 81                   | 9              | 2,004             |
| Other assets                                         | 15,395               | 3,517             | 2,541            | 3,231            | 122                  | 17,300         | 42,106            |
| <b>Assets</b>                                        | <b>1,274,455</b>     | <b>1,835,939</b>  | <b>1,580,074</b> | <b>4,712,392</b> | <b>5,608,512</b>     | <b>238,953</b> | <b>15,250,325</b> |

| TEUR<br>31.12.2024                           | Payable on<br>demand | Up to 3<br>months | Up to 1<br>year  | Up to 5<br>years | More than 5<br>years | No<br>maturity   | Total             |
|----------------------------------------------|----------------------|-------------------|------------------|------------------|----------------------|------------------|-------------------|
| Trading liabilities                          | 29                   | 2,887             | 2,029            | 17,007           | 32,488               | 0                | 54,440            |
| Financial liabilities at fair value (option) | 0                    | 25,396            | 31,697           | 286,795          | 438,873              | 0                | 782,761           |
| Financial liabilities at amortised cost      | 3,646,163            | 1,215,026         | 985,941          | 5,096,779        | 1,592,174            | 7,388            | 12,543,471        |
| Negative market values of hedges             | 0                    | 3,800             | 1,651            | 164,034          | 100,467              | 0                | 269,952           |
| Provisions                                   | 1,523                | 1,733             | 7,417            | 11,768           | 17,829               | 1,184            | 41,454            |
| Income tax obligations                       | 0                    | 5                 | 1,853            | 3                | 0                    | 589              | 2,450             |
| Deferred tax liabilities                     | 9,722                | 6                 | 0                | 37               | 1,927                | 951              | 12,643            |
| Other liabilities                            | 19,169               | 8,970             | 6,116            | 11,106           | 836                  | 100              | 46,297            |
| Shareholders' equity                         | 0                    | 0                 | 0                | 0                | 0                    | 1,496,857        | 1,496,857         |
| <b>Liabilities and shareholders' equity</b>  | <b>3,676,606</b>     | <b>1,257,823</b>  | <b>1,036,704</b> | <b>5,587,529</b> | <b>2,184,594</b>     | <b>1,507,069</b> | <b>15,250,325</b> |

## D. ADDITIONAL IFRS INFORMATION

### (43) DISCLOSURES ON THE CASH FLOW STATEMENT

The statement of cash flows is presented using the indirect method. This is done by calculating the net cash flow from operating activities based on the consolidated net profit after first adding expenses and deducting income that did not affect cash in the financial year. All expenses and income that affected cash but that are not attributable to operating activities are also eliminated. These payments are instead included in the cash flows from investing activities or financing activities.

### (44) CONTINGENT LIABILITIES AND CREDIT RISKS

#### Off-balance-sheet transactions

| TEUR                                  | 31.12.2024       | 31.12.2023       |
|---------------------------------------|------------------|------------------|
| Loan commitments granted              | 1,670,923        | 2,054,817        |
| Financial guarantees granted          | 282,002          | 354,518          |
| Other guarantees granted              | 20,380           | 21,703           |
| <b>Off-balance-sheet transactions</b> | <b>1,973,305</b> | <b>2,431,038</b> |

Loan commitments granted include loans that have been granted but not yet drawn down by customers. This relates in particular to commitments in lending business, as well as to unutilised credit lines. Credit risks were recognised at their nominal amount in each case. Contingent liabilities from financial guarantees represent commitments to assume liability for our customers for the benefit of a third party. If the guaranteed party does not meet its contractual obligations, the beneficiary can utilise the Bank's financial guarantee. The Bank in turn has the possibility of recourse to the respective customer. The amounts shown represent the maximum amount that could lead to a payment in the event of utilisation. It is difficult to recognise contingent assets in connection with financial guarantees, as the utilisation of the obligation cannot be foreseen or plausibly estimated. Other granted commitments relate to certain fiduciary and documentary credit business.

#### Contingent liabilities – breakdown by remaining term to maturity

| TEUR                          | 31.12.2024     | 31.12.2023     |
|-------------------------------|----------------|----------------|
| Payable on demand             | 19             | 23             |
| Up to 3 months                | 18,017         | 37,737         |
| Up to 1 year                  | 64,721         | 71,764         |
| Up to 5 years                 | 97,514         | 117,562        |
| More than 5 years             | 32,370         | 54,823         |
| Without maturity              | 89,741         | 94,312         |
| <b>Contingent liabilities</b> | <b>302,382</b> | <b>376,221</b> |

In addition to the contingent liabilities described above, there are the following other contingent obligations.

#### Obligation from membership of the deposit protection scheme "Einlagensicherung AUSTRIA Ges.m.b.H. (ESA)" as required by section 8 of the Austrian Federal Act on Deposit Protection and Investor Compensation at Banks (ESAEG):

In accordance with section 8 (1) ESAEG, Hypo Vorarlberg – as a deposit-taking bank (CRR bank) headquartered in Austria – forms part of the uniform deposit protection scheme pursuant to section 1 (1) no. 1 ESAEG. Each deposit protection scheme must establish a deposit protection fund consisting of available financial resources in the amount of at least 0.8 % of the total covered deposits of the member banks (target level). The contribution requirement is based on the amount of covered deposits, applying predefined risk factors (risk-based contribution calculation). A contribution of TEUR 0 was calculated for Hypo Vorarlberg (2023: TEUR 704). In accordance with section 22 (1) ESAEG, ESA must also stipulate and promptly collect special contributions from its member banks equivalent to a maximum of 0.5 % of the total covered deposits of its member banks each calendar year if the available financial resources of a deposit

protection scheme are not sufficient to compensate depositors in the event of default or to service obligations from credit operations.

In the event of default by a member bank, the deposit protection scheme secures balances in accounts and savings accounts up to TEUR 100 per customer per bank. In certain cases, the secured amount increases to up to TEUR 500 per customer per bank. In both cases, there is no deductible for investors. The deposit protection scheme also covers securities deposited by customers in the amount of up to TEUR 20 per customer per bank in the event of default. Customers that are not natural persons must pay a deductible of 10 %.

### (45) INTEREST-FREE LOANS AND ADVANCES

| TEUR                                        | 31.12.2024    | 31.12.2023    |
|---------------------------------------------|---------------|---------------|
| Interest-free loans and advances to banks   | 0             | 13            |
| Interest-free loans and advances to custom- | 62,357        | 23,022        |
| <b>Interest-free loans and advances</b>     | <b>62,357</b> | <b>23,035</b> |

Interest-free loans and advances to banks essentially consist of non-interest-bearing balances at clearing houses and receivables from payment transactions. Loans and advances to customers are classified as interest-free if interest payments can no longer be expected to be collected in future periods. Sufficient valuation allowances have already been recognised for these loans and advances.

### (46) COLLATERAL

#### Assets provided as collateral

| TEUR                                                 | 31.12.2024       | 31.12.2023       |
|------------------------------------------------------|------------------|------------------|
| Financial assets at fair value (non-SPPI)            | 214,675          | 222,120          |
| Financial assets at fair value (option)              | 175,825          | 191,459          |
| Financial assets at amortised cost                   | 8,885,112        | 8,388,207        |
| <b>Assets provided as collateral</b>                 | <b>9,275,612</b> | <b>8,801,786</b> |
| of which cover pool for mortgage bonds               | 5,565,320        | 5,017,400        |
| of which cover pool for public-sector mortgage bonds | 587,461          | 573,683          |

#### Assignment of collateral

| TEUR                                          | 31.12.2024       | 31.12.2023       |
|-----------------------------------------------|------------------|------------------|
| Collateral for refinancing with central banks | 1,058,544        | 1,270,690        |
| Cover pool for mortgage bonds                 | 6,066,020        | 5,600,367        |
| Cover pool for public-sector mortgage         | 587,256          | 565,351          |
| Cover pool for trust savings deposits         | 30,000           | 30,184           |
| Cover for pension provisions                  | 2,038            | 1,993            |
| Repurchase agreements, repos                  | 1,374,242        | 1,041,010        |
| Deposits, collateral, margins                 | 157,512          | 292,191          |
| <b>Assets provided as collateral</b>          | <b>9,275,612</b> | <b>8,801,786</b> |

#### Utilisation of collateral

| TEUR                                          | 31.12.2024       | 31.12.2023       |
|-----------------------------------------------|------------------|------------------|
| Collateral for refinancing with central banks | 16,380           | 333,515          |
| Cover pool for mortgage bonds                 | 4,503,694        | 4,510,862        |
| Cover pool for public-sector mortgage         | 165,789          | 242,457          |
| Cover pool for trust savings deposits         | 20,067           | 22,262           |
| Cover for pension provisions                  | 2,038            | 1,993            |
| Deposits, collateral, margins                 | 157,512          | 292,192          |
| <b>Collateral utilised</b>                    | <b>4,865,480</b> | <b>5,403,281</b> |

The excess cover for mortgage bonds and public-sector mortgage bonds is not reported due to legal changes in the Austrian Mortgage Bond Act.

In the case of the collateral shown, the collateral taker does not have the right to sell or pledge the collateral itself. Accordingly, there were no reclassifications in the balance sheet for the collateral provided.

As a collateral taker, the Bank does not hold any collateral that it is permitted to sell unless the owner defaults or that it is permitted to reuse as collateral without the owner's approval.

The cover pool for mortgage bonds includes loan receivables of the St. Gallen branch in the amount of TEUR 1,045,217 (2023: TEUR 837,656). To ensure the equal legal and economic position of the mortgage bond creditors in relation to these cover assets, the loan receivables including their mortgage collateral have been assigned to HVS Sicherheitenverwaltung GmbH, Switzerland, as the collateral trustee for the mortgage bond creditors by way of a transfer of title. In addition, we hold mortgages with a nominal value of TEUR 132,882 (2023: TEUR 137,938) in connection with syndicated financing for other banks on a fiduciary basis.

#### (47) SUBORDINATED ASSETS

| TEUR                                      | 31.12.2024    | 31.12.2023    |
|-------------------------------------------|---------------|---------------|
| Financial assets at fair value (non-SPPI) | 45,521        | 50,918        |
| Financial assets at amortised cost        | 18,846        | 18,794        |
| <b>Subordinated assets</b>                | <b>64,367</b> | <b>69,712</b> |
| of which debt securities                  | 61,213        | 66,556        |
| of which loans and advances               | 3,154         | 3,156         |

#### (48) FIDUCIARY TRANSACTIONS

| TEUR                            | 31.12.2024    | 31.12.2023    |
|---------------------------------|---------------|---------------|
| Loans and advances to customers | 71,187        | 86,770        |
| <b>Fiduciary assets</b>         | <b>71,187</b> | <b>86,770</b> |
| Liabilities to banks            | 58,005        | 66,939        |
| Liabilities to customers        | 13,181        | 19,960        |
| <b>Fiduciary liabilities</b>    | <b>71,186</b> | <b>86,899</b> |

#### (49) REPURCHASE AGREEMENTS

There were no repurchase agreements as at 31 December 2024 or in the previous year.

#### (50) RELATED PARTY DISCLOSURES

Related parties include:

- the owners of Hypo Vorarlberg, i.e. Vorarlberger Landesbank-Holding and Austria Beteiligungsgesellschaft mbH and their owners
- the Managing Board and Supervisory Board of Hypo Vorarlberg and their close family members

- managing directors of the consolidated subsidiaries and their close family members
- senior executives of Hypo Vorarlberg as defined in section 80 of the Austrian Stock Corporation Act (AktG) and their close family members
- senior executives of the subsidiaries of Hypo Vorarlberg and their close family members
- legal representatives and members of supervisory bodies of the subsidiaries
- subsidiaries and other companies in which Hypo Vorarlberg holds an equity interest
- companies over which related parties have a significant influence

#### Advances, loans and guarantees

As at the end of the year, the Managing Board members and managing directors and their close family members had received advances, loans and guarantees from the Bank amounting to TEUR 886 (2023: TEUR 830) at the usual terms and conditions applicable to Bank employees. As at the end of the year, the Supervisory Board members and their close family members had received advances, loans and guarantees from the Bank amounting to TEUR 18,324 (2023: TEUR 19,452) for themselves and for companies for which they are personally liable, at the customary banking terms and conditions applicable to Bank employees.

#### Remuneration

The remuneration of the Managing Board members consists of a fixed amount. There are no variable remuneration components. Variable remuneration set by the Managing Board on the basis of individual targets has been agreed in some cases for managing directors and senior executives in the Group. There are no share-based payment schemes.

Hypo Vorarlberg's expenditure on remuneration for Managing Board members currently in office was as follows:

| TEUR                               | 2024         | 2023         |
|------------------------------------|--------------|--------------|
| Michel Haller                      | 422          | 387          |
| Wilfried Amann                     | 363          | 333          |
| Philipp Hämmerle                   | 329          | 303          |
| <b>Managing Board remuneration</b> | <b>1,114</b> | <b>1,023</b> |

| TEUR                                                    | 2024         | 2023         |
|---------------------------------------------------------|--------------|--------------|
| Managing Board members and managing                     | 2,040        | 1,890        |
| Retired Managing Board members and surviving dependants | 86           | 78           |
| Senior executives                                       | 6,130        | 5,201        |
| Supervisory Board members                               | 390          | 381          |
| <b>Remuneration paid to related parties</b>             | <b>8,646</b> | <b>7,550</b> |

#### Severance and pensions

The expenses for severance and pensions in respect of related parties comprise the amounts shown in the table below.

| TEUR                                                    | 2024         | 2023         |
|---------------------------------------------------------|--------------|--------------|
| Managing Board members and managing                     | 149          | 135          |
| Retired Managing Board members and surviving dependants | 99           | 80           |
| Senior executives                                       | 1,098        | 1,143        |
| <b>Severance and pensions paid to related parties</b>   | <b>1,346</b> | <b>1,358</b> |

The Group purchased services of TEUR 42 (2023: TEUR 22) from companies in which related parties of the Group have significant holdings.

**Business relationships with affiliated companies**

| TEUR                         | 31.12.2024 | 31.12.2023    |
|------------------------------|------------|---------------|
| Loans and advances           | 262        | 251           |
| <b>Financial assets</b>      | <b>262</b> | <b>251</b>    |
| Deposits                     | 263        | 10,321        |
| <b>Financial liabilities</b> | <b>263</b> | <b>10,321</b> |

Besides the equity interests in affiliated and unconsolidated companies, business relationships with affiliated companies only involve business accounts. The deposits currently bear interest of 0 % (2023: 0 %).

**Income and expenses with affiliated companies**

As in the previous year, income and expenses with affiliated companies amounted to less than TEUR 1 in the reporting year.

**Business relationships with companies measured at equity**

| TEUR                         | 31.12.2024   | 31.12.2023   |
|------------------------------|--------------|--------------|
| Equity instruments           | 12           | 12           |
| <b>Financial assets</b>      | <b>12</b>    | <b>12</b>    |
| Deposits                     | 1,510        | 1,221        |
| <b>Financial liabilities</b> | <b>1,510</b> | <b>1,221</b> |

In addition to equity instruments, transactions with these companies include loans and advances, cash advances, business accounts, savings deposits and fixed-term deposits. These transactions are entered into at arm's-length conditions. As in the previous year, no liability had been assumed for companies measured at equity as at the end of the reporting period. As in the previous year, no derivatives transactions were entered into with companies measured at equity in 2024.

**Income and expenses with companies measured at equity**

| TEUR                                                           | 2024       | 2023       |
|----------------------------------------------------------------|------------|------------|
| Interest expenses                                              | -45        | -32        |
| Dividend income                                                | 489        | 438        |
| Fee and commission income                                      | 1          | 1          |
| <b>Total income/expenses with companies measured at equity</b> | <b>445</b> | <b>407</b> |

**Business relationships with shareholders**

| TEUR                                      | 31.12.2024     | 31.12.2023     |
|-------------------------------------------|----------------|----------------|
| Debt securities                           | 15,159         | 12,949         |
| Loans and advances                        | 156,279        | 63,637         |
| <b>Financial assets</b>                   | <b>171,438</b> | <b>76,586</b>  |
| Deposits                                  | 33,119         | 140,221        |
| <b>Financial liabilities</b>              | <b>33,119</b>  | <b>140,221</b> |
| Nominal amount of off-balance-sheet items | 115,476        | 241,596        |
| Nominal amount of derivatives             | 1,076,725      | 1,269,945      |

The term "shareholders" includes the two holding companies with their direct equity interests in Hypo Vorarlberg as well as the indirect shareholders, namely the state of Vorarlberg, Landesbank Baden-Württemberg and Landeskreditbank Baden-Württemberg Förderbank. Transactions with shareholders with a significant influence mainly include loans and advances, cash advances, business accounts, savings deposits and fixed-term deposits. In addition, we have entered into derivatives with a total market value of TEUR 6,169 (2023: TEUR 43,146) with Landesbank Baden-Württemberg to hedge market price and interest rate risks. The positive market values from derivatives are partially hedged in the context of cash collateral. There is generally no collateral for the remaining receivables. All of these transactions were entered into at arm's-length conditions.

**Income and expenses with shareholders**

| TEUR                                           | 2024        | 2023          |
|------------------------------------------------|-------------|---------------|
| Interest income                                | 29,588      | 30,385        |
| Interest expenses                              | -32,921     | -33,919       |
| Fee and commission income                      | 2,360       | 2,195         |
| Fee and commission expenses                    | 0           | -1            |
| <b>Total income/expenses with shareholders</b> | <b>-973</b> | <b>-1,340</b> |

**Shareholders of Hypo Vorarlberg**

| Shareholders<br>31.12.2024                         | Total<br>shares   | Voting<br>...     |
|----------------------------------------------------|-------------------|-------------------|
| Vorarlberger Landesbank-Holding                    | 76.8732 %         | 76.8732 %         |
| Austria Beteiligungsgesellschaft mbH               | 23.1268 %         | 23.1268 %         |
| - Landesbank Baden-Württemberg                     | 15.4179 %         |                   |
| - Landeskreditbank Baden-Württemberg<br>Förderbank | 7.7089 %          |                   |
| <b>Share capital</b>                               | <b>100.0000 %</b> | <b>100.0000 %</b> |

On the basis of its expertise as a residential construction bank, Hypo Vorarlberg has been commissioned by the state of Vorarlberg to manage the state residential construction fund. The Group does not have any permanent business relationship with Austria Beteiligungsgesellschaft mbH. Several customary banking transactions were executed with Landesbank Baden-Württemberg.

**Business relationships with government-related companies**

| TEUR                                      | 31.12.2024     | 31.12.2023     |
|-------------------------------------------|----------------|----------------|
| Loans and advances                        | 71,755         | 73,148         |
| <b>Financial assets</b>                   | <b>71,755</b>  | <b>73,148</b>  |
| Deposits                                  | 179,017        | 169,192        |
| <b>Financial liabilities</b>              | <b>179,017</b> | <b>169,192</b> |
| Nominal amount of off-balance-sheet items | 35,033         | 37,739         |

Transactions with government-related companies include loans and advances as well as business accounts and fixed-term deposits. The transactions were entered into at arm's-length conditions.

**Income and expenses with government-related companies**

| TEUR                                                           | 2024          | 2023        |
|----------------------------------------------------------------|---------------|-------------|
| Interest income                                                | 1,885         | 1,645       |
| Interest expenses                                              | -4,373        | -2,084      |
| Fee and commission income                                      | 331           | 319         |
| <b>Total income/expenses with government-related companies</b> | <b>-2,157</b> | <b>-120</b> |

There were no bad debts with related parties in the 2024 financial year or in the prior-year period. Apart from the general loan loss provisions, no provisions or impairment losses/write-downs of receivables from related parties were required to be recognised.

**(51) SHARE-BASED PAYMENT AGREEMENTS**

As at 31 December 2024, there were no share-based payment agreements in the Group.



**(52) HUMAN RESOURCES**

|                                                 | 2024       | 2023       |
|-------------------------------------------------|------------|------------|
| Full-time salaried employees                    | 597        | 582        |
| Part-time salaried employees                    | 156        | 148        |
| Apprentices                                     | 6          | 7          |
| Cleaning staff/hourly-paid workers              | 2          | 2          |
| <b>Average number of employees for the year</b> | <b>761</b> | <b>739</b> |

**(53) EVENTS AFTER THE END OF THE REPORTING PERIOD**

No events of particular significance occurred after the end of the reporting period.

## E. SEGMENT REPORTING

### Reporting by business segment

| TEUR                                                    |             | Corporate<br>Customers | Private<br>Customers | Financial<br>Markets | Corporate<br>Centre | Total         |
|---------------------------------------------------------|-------------|------------------------|----------------------|----------------------|---------------------|---------------|
| Net interest income                                     | 2024        | 104,361                | 81,178               | 20,218               | 27,936              | 233,693       |
|                                                         | 2023        | 110,953                | 80,219               | 17,577               | 24,912              | 233,661       |
| Dividend income                                         | 2024        | 0                      | 0                    | 0                    | 381                 | 381           |
|                                                         | 2023        | 0                      | 0                    | 0                    | 186                 | 186           |
| Net fee and commission income                           | 2024        | 14,878                 | 24,620               | 2,140                | -2,688              | 38,950        |
|                                                         | 2023        | 14,255                 | 20,298               | 2,241                | -1,391              | 35,403        |
| Net result from financial instruments at amortised cost | 2024        | 0                      | 0                    | 95                   | -1                  | 94            |
|                                                         | 2023        | 36                     | 0                    | 2,289                | 0                   | 2,325         |
| Net result from financial instruments at fair value     | 2024        | -13,244                | 224                  | 2,800                | 7,612               | -2,608        |
|                                                         | 2023        | -11,490                | 826                  | -26,421              | -1,037              | -38,122       |
| Other income                                            | 2024        | 522                    | 627                  | 32                   | 18,352              | 19,533        |
|                                                         | 2023        | 939                    | 3,288                | 27,577               | 21,678              | 53,482        |
| Other expenses                                          | 2024        | -4,574                 | -3,671               | -6,519               | -10,322             | -25,086       |
|                                                         | 2023        | -1,408                 | -3,921               | -9,623               | -15,352             | -30,304       |
| Administrative expenses                                 | 2024        | -51,272                | -56,459              | -14,480              | -10,353             | -132,564      |
|                                                         | 2023        | -45,652                | -50,994              | -12,412              | -7,449              | -116,507      |
| Depreciation and amortisation                           | 2024        | -1,100                 | -945                 | -46                  | -6,093              | -8,184        |
|                                                         | 2023        | -1,087                 | -982                 | -56                  | -6,055              | -8,180        |
| Loan loss provisions and impairment of financial assets | 2024        | -67,387                | 1,275                | 51                   | -148                | -66,209       |
|                                                         | 2023        | -82,036                | 2,415                | 77                   | 1,058               | -78,486       |
| Impairment of non-financial assets                      | 2024        | 0                      | 0                    | 0                    | -666                | -666          |
|                                                         | 2023        | 0                      | 0                    | 0                    | -1,006              | -1,006        |
| Net result from equity consolidation                    | 2024        | 0                      | 0                    | 0                    | 724                 | 724           |
|                                                         | 2023        | 0                      | 0                    | 0                    | 605                 | 605           |
| <b>Earnings before taxes</b>                            | <b>2024</b> | <b>-17,816</b>         | <b>46,849</b>        | <b>4,291</b>         | <b>24,734</b>       | <b>58,058</b> |
|                                                         | <b>2023</b> | <b>-15,490</b>         | <b>51,149</b>        | <b>1,249</b>         | <b>16,149</b>       | <b>53,057</b> |
| Assets                                                  | 2024        | 8,002,523              | 2,246,463            | 3,739,838            | 1,261,501           | 15,250,325    |
|                                                         | 2023        | 7,852,063              | 2,307,018            | 4,339,393            | 1,228,061           | 15,726,535    |
| Liabilities and shareholders' equity                    | 2024        | 1,893,776              | 2,756,407            | 8,500,202            | 2,099,940           | 15,250,325    |
|                                                         | 2023        | 1,865,473              | 2,925,856            | 8,765,181            | 2,170,025           | 15,726,535    |
| Liabilities                                             | 2024        | 1,893,364              | 2,750,942            | 8,644,754            | 464,408             | 13,753,468    |
|                                                         | 2023        | 1,865,049              | 2,920,990            | 9,048,045            | 428,919             | 14,263,003    |

For the purpose of corporate management, the Group is organised into business units according to customer groups and product groups. It has the following four reportable operating segments. No business segments have been aggregated to form these reportable operating segments. The earnings before taxes of the business units is monitored separately by management in order to make decisions on the allocation of resources and to determine the profitability of the units. The performance of the segments is evaluated on the basis of earnings before taxes and measured in line with the earnings before taxes in the consolidated financial statements.

These segments form the basis for internal reporting in accordance with both the Austrian Commercial Code (UGB) and IFRS. For this reason, no separate reconciliation statement is required. The liabilities presented in the segments include liabilities, provisions, social capital and subordinated capital. The calculation of revenue per product and service and for groups of comparable products and services has been dispensed with due to the excessively high implementation costs that would be required to calculate the data.

In an agenda decision (IASB Update July 2024), the IASB clarified that an entity must disclose all of the amounts required by IFRS 8.23 (a)-(i) (if material) even if these are not presented separately to the decision maker. Interest income and interest expenses are among the items listed in IFRS 8.23 (a)-(i). However, IFRS 8.23 also expressly provides an exception permitting entities to report interest income net of interest expense if the entity generates the majority of its revenues from interest and the chief operating decision maker relies primarily on net interest income in making decisions. As this exception applies to Hypo Vorarlberg, net interest income is – as previously – not reported separately as interest income and interest expense.

Net interest income is calculated for each segment using the internationally recognised Schierenbeck market interest rate method. This involves comparing the effective interest rate with a reference interest rate, irrespective of whether it relates to a receivable or a liability. The contribution margin calculated on this basis is credited to the individual segments. The structural contribution calculated on the basis of the maturity transformation is allocated to the Financial Markets segment. For this reason, it is not possible to report interest income and interest expenses separately. The internal management of the segments is also based on the net interest income calculated in this manner and not on the external interest rate. As the income and expenses for each segment are calculated directly, there are no transactions between the segments and no offsetting takes place. In the Corporate Centre segment, an amount of TEUR 4,025 (2023: TEUR 3,805) was included in assets from consolidation using the equity method.

### Corporate Customers

The Corporate Customers segment comprises customers that are active in the commercial, industrial and trade sectors. The segment covers large customers and small and medium-sized enterprises alike. In addition, income and expenses arising in connection with business relationships with public institutions (federal, state and local governments) are reported in this segment. Customers of the St. Gallen branch are also assigned to this segment irrespective of their customer type or sector. However, self-employed persons whose businesses do not exceed the size of a sole proprietorship are not included. In terms of product groups, this segment includes loans and advances, cash advances, current accounts, demand deposits, term deposits and savings deposits in respect of the above customer groups. Net fee and commission income also includes income from custodian business with these customer groups.

### Private Customers

This segment encompasses all salaried employees (private households) and some self-employed persons (freelancers). It does not include the private households and freelancers served by the St. Gallen branch, as these are all included in the Corporate Customers segment. In addition, earnings contributions from insurance companies and pension funds are counted towards this segment. This segment does not include private individuals closely associated with a business (corporate customer) as an owner or shareholder. In terms of product groups, this segment includes loans and advances, cash advances, current accounts, demand deposits, term deposits and savings deposits in respect of the above customer groups. Net fee and commission income also includes income from custodian business with these customer groups.

### Financial Markets

This segment includes financial assets, trading assets, derivative financial instruments, issuing business and gains and losses from interbank relationships. The net result from the custodian bank function is also allocated to this segment. In terms of product groups, this segment primarily includes financial assets in the form of securities, as well as some individual promissory note loans. Funds raised from issues of securities and some individual large-volume term deposits are also allocated to the Financial Markets segment. Net fee and commission income also includes income from custodian business in connection with the custodian bank function.

### Corporate Centre

All banking transactions with our subsidiaries and associates are reported in this segment. Income from activities that do not constitute banking business is also allocated to this segment, such as leasing business, insurance brokerage, leasing and utilisation of real estate, real estate brokerage, facility management services, other services and income from subsidiaries and holdings.

### Recognition and reversal of impairment losses

| TEUR                             |      | Corporate<br>Customers | Private<br>Customers | Financial<br>Markets | Corporate<br>Centre | Total    |
|----------------------------------|------|------------------------|----------------------|----------------------|---------------------|----------|
| Recognition of impairment losses | 2024 | -60,777                | -2,811               | -125                 | -9,936              | -73,649  |
|                                  | 2023 | -97,187                | -3,151               | -207                 | -5,202              | -105,747 |
| Reversals of impairment losses   | 2024 | 18,079                 | 3,935                | 176                  | 9,928               | 32,118   |
|                                  | 2023 | 19,012                 | 5,559                | 275                  | 6,133               | 30,979   |

## Reporting by region

| TEUR                                                    |             | Austria       | Third countries | Total         |
|---------------------------------------------------------|-------------|---------------|-----------------|---------------|
| Net interest income                                     | 2024        | 181,252       | 52,441          | 233,693       |
|                                                         | 2023        | 184,041       | 49,620          | 233,661       |
| Dividend income                                         | 2024        | 381           | 0               | 381           |
|                                                         | 2023        | 186           | 0               | 186           |
| Net fee and commission income                           | 2024        | 37,948        | 1,002           | 38,950        |
|                                                         | 2023        | 34,642        | 761             | 35,403        |
| Net result from financial instruments at amortised cost | 2024        | 94            | 0               | 94            |
|                                                         | 2023        | 2,289         | 36              | 2,325         |
| Net result from financial instruments at fair value     | 2024        | -5,414        | 2,806           | -2,608        |
|                                                         | 2023        | -44,540       | 6,418           | -38,122       |
| Other income                                            | 2024        | 13,397        | 6,136           | 19,533        |
|                                                         | 2023        | 44,724        | 8,758           | 53,482        |
| Other expenses                                          | 2024        | -20,533       | -4,553          | -25,086       |
|                                                         | 2023        | -24,602       | -5,702          | -30,304       |
| Administrative expenses                                 | 2024        | -115,896      | -16,668         | -132,564      |
|                                                         | 2023        | -102,166      | -14,341         | -116,507      |
| Depreciation and amortisation                           | 2024        | -6,580        | -1,604          | -8,184        |
|                                                         | 2023        | -6,599        | -1,581          | -8,180        |
| Loan loss provisions and impairment of financial assets | 2024        | -65,385       | -824            | -66,209       |
|                                                         | 2023        | -74,295       | -4,191          | -78,486       |
| Impairment of non-financial assets                      | 2024        | 0             | -666            | -666          |
|                                                         | 2023        | 0             | -1,006          | -1,006        |
| Net result from equity consolidation                    | 2024        | 724           | 0               | 724           |
|                                                         | 2023        | 605           | 0               | 605           |
| <b>Earnings before taxes</b>                            | <b>2024</b> | <b>19,988</b> | <b>38,070</b>   | <b>58,058</b> |
|                                                         | <b>2023</b> | <b>14,285</b> | <b>38,772</b>   | <b>53,057</b> |
| Assets                                                  | 2024        | 13,008,828    | 2,241,497       | 15,250,325    |
|                                                         | 2023        | 13,571,256    | 2,155,279       | 15,726,535    |
| Liabilities and shareholders' equity                    | 2024        | 14,786,539    | 463,786         | 15,250,325    |
|                                                         | 2023        | 15,289,063    | 437,472         | 15,726,535    |
| Liabilities                                             | 2024        | 13,452,863    | 300,605         | 13,753,468    |
|                                                         | 2023        | 13,984,311    | 278,692         | 14,263,003    |

Switzerland, Italy and other foreign countries are classified as third countries.

## F. SPECIAL DISCLOSURES ON FINANCIAL INSTRUMENTS

### (54) EARNINGS BY MEASUREMENT CATEGORY

#### Result from financial assets

| TEUR<br>2023                     | TA             | NON-SPPI      | FVO           | AC             | Total          |
|----------------------------------|----------------|---------------|---------------|----------------|----------------|
| Interest income                  | 112,961        | 37,631        | 13,472        | 449,844        | 613,908        |
| <b>Net interest income</b>       | <b>112,961</b> | <b>37,631</b> | <b>13,472</b> | <b>449,844</b> | <b>613,908</b> |
| Dividend income                  | 0              | 186           | 0             | 0              | 186            |
| Addition to valuation allowances | 0              | 0             | 0             | -105,107       | -105,107       |
| Reversal of valuation allowances | 0              | 0             | 0             | 30,798         | 30,798         |
| Reversals of write-downs         | 0              | 10,920        | 4,834         | 190,865        | 206,619        |
| Write-downs                      | -194,739       | -18,645       | -1,459        | -224           | -215,067       |
| Realised gains                   | 10             | 156           | 16            | 1,768          | 1,950          |
| Realised losses                  | -62            | -1,001        | -306          | -1,048         | -2,417         |
| <b>Comprehensive income</b>      | <b>-81,830</b> | <b>29,247</b> | <b>16,557</b> | <b>566,896</b> | <b>530,870</b> |

| TEUR<br>2024                     | TA             | NON-SPPI      | FVO           | AC             | Total          |
|----------------------------------|----------------|---------------|---------------|----------------|----------------|
| Interest income                  | 138,023        | 40,210        | 14,502        | 474,199        | 666,934        |
| <b>Net interest income</b>       | <b>138,023</b> | <b>40,210</b> | <b>14,502</b> | <b>474,199</b> | <b>666,934</b> |
| Dividend income                  | 0              | 381           | 0             | 0              | 381            |
| Addition to valuation allowances | 0              | 0             | 0             | -66,984        | -66,984        |
| Reversal of valuation allowances | 0              | 0             | 0             | 26,114         | 26,114         |
| Reversals of write-downs         | 0              | 15,068        | 5,355         | 92,061         | 112,484        |
| Write-downs                      | -98,188        | -16,418       | -1,525        | 0              | -116,131       |
| Realised gains                   | 18             | 2,903         | 27            | 10             | 2,958          |
| Realised losses                  | -7             | -262          | -869          | 0              | -1,138         |
| <b>Comprehensive income</b>      | <b>39,846</b>  | <b>41,882</b> | <b>17,490</b> | <b>525,400</b> | <b>624,618</b> |

#### Result from financial liabilities

| TEUR<br>2023                                | TL              | FLFVO          | FLAC            | Total           |
|---------------------------------------------|-----------------|----------------|-----------------|-----------------|
| Interest expenses                           | -129,476        | -28,871        | -221,900        | -380,247        |
| <b>Net interest income</b>                  | <b>-129,476</b> | <b>-28,871</b> | <b>-221,900</b> | <b>-380,247</b> |
| Reversals of write-downs                    | 266,837         | -25,667        | 0               | 241,170         |
| Write-downs                                 | 0               | -30,807        | -264,658        | -295,465        |
| Realised gains                              | 0               | 25,859         | 1,812           | 27,671          |
| Realised losses                             | 0               | -57            | -201            | -258            |
| <b>Comprehensive income</b>                 | <b>137,361</b>  | <b>-59,543</b> | <b>-484,947</b> | <b>-407,129</b> |
| Measurement through other comprehensive in- | 0               | 13,490         | 0               | 13,490          |

| TEUR<br>2024                                | TL              | FLFVO          | FLAC            | Total           |
|---------------------------------------------|-----------------|----------------|-----------------|-----------------|
| Interest expenses                           | -147,371        | -39,382        | -246,488        | -433,241        |
| <b>Net interest income</b>                  | <b>-147,371</b> | <b>-39,382</b> | <b>-246,488</b> | <b>-433,241</b> |
| Reversals of write-downs                    | 177,340         | 2,090          | 20              | 179,450         |
| Write-downs                                 | 0               | -12,584        | -167,600        | -180,184        |
| Realised gains                              | 0               | 50             | 206             | 256             |
| Realised losses                             | 0               | -67            | -142            | -209            |
| <b>Comprehensive income</b>                 | <b>29,969</b>   | <b>-49,893</b> | <b>-414,004</b> | <b>-433,928</b> |
| Measurement through other comprehensive in- | 0               | -6,089         | 0               | -6,089          |

**(55) FAIR VALUE DISCLOSURES**

| TEUR                                         | Notes | 31.12.2024 |                 | 31.12.2023 |                 |
|----------------------------------------------|-------|------------|-----------------|------------|-----------------|
|                                              |       | Fair value | Carrying amount | Fair value | Carrying amount |
| Trading assets                               | (18)  | 104,076    | 104,076         | 117,735    | 117,735         |
| Financial assets at fair value (non-SPPI)    | (19)  | 584,583    | 584,583         | 593,409    | 593,409         |
| Financial liabilities at fair value (option) | (20)  | 199,208    | 199,208         | 213,528    | 213,528         |
| Financial assets at amortised cost           | (22)  | 13,394,661 | 13,294,829      | 13,278,805 | 13,261,300      |
| Positive market values of hedges             | (23)  | 345,693    | 345,693         | 377,849    | 377,849         |
| Holdings                                     |       | 746        | 746             | 968        | 968             |
| <b>Assets</b>                                |       |            |                 |            |                 |
| Trading liabilities                          | (32)  | 54,440     | 54,440          | 101,024    | 101,024         |
| Financial liabilities at fair value (option) | (33)  | 782,761    | 782,761         | 789,412    | 789,412         |
| Financial liabilities at amortised cost      | (34)  | 12,436,388 | 12,543,471      | 12,750,247 | 12,872,355      |
| Negative market values of hedges             | (35)  | 269,952    | 269,952         | 392,161    | 392,161         |
| <b>Liabilities</b>                           |       |            |                 |            |                 |

In the case of financial assets at amortised cost, the fair value of fixed-interest transactions – provided they are loans and advances – was determined on the basis of the expected future cash flows taking current market interest rates into account. In the case of bonds, the fair value was determined on the basis of available market prices and quotes. If no reliable market price was available for an asset at the reporting date, the fair value was determined on the basis of market prices of similar financial instruments with comparable yields, credit risks and maturities.

For financial liabilities at amortised cost, the repayment amount recognised for deposits without an agreed maturity and with variable interest rates largely also corresponds to the current market value. The fair value of fixed-interest positions was determined on the basis discounted cash flows. The fair value of bonds was recognised on the basis of available market prices and quotes. If no market prices were available for this category, the fair value was measured on the basis of discounted future cash flows taking current market interest rates and credit spreads into account.

To the extent available, the fair values reported in the financial statements were determined exclusively using valuation techniques based on prices of similar instruments in observable market transactions.

**Fair value hierarchy for financial instruments not recognised at fair value (at amortised cost)**

| TEUR                                    | Level 1   | Level 2 | Level 3    | Total      |
|-----------------------------------------|-----------|---------|------------|------------|
| <b>31.12.2023</b>                       |           |         |            |            |
| Financial assets at amortised cost      | 2,291,146 | 37,560  | 10,950,099 | 13,278,805 |
| Financial liabilities at amortised cost | 5,750,537 | 87,476  | 6,912,234  | 12,750,247 |

| TEUR                                    | Level 1   | Level 2 | Level 3    | Total      |
|-----------------------------------------|-----------|---------|------------|------------|
| <b>31.12.2024</b>                       |           |         |            |            |
| Financial assets at amortised cost      | 2,462,215 | 2,637   | 10,929,809 | 13,394,661 |
| Financial liabilities at amortised cost | 5,869,070 | 112,823 | 6,454,495  | 12,436,388 |

The valuation techniques used for financial instruments not recognised at fair value are generally no different from those used for financial instruments recognised at fair value. The valuation techniques used are described in more detail in note (3c). This note also includes a discussion of changes and improvements to the valuation techniques.

**Fair value hierarchy for financial instruments measured at fair value**

| TEUR                                                          | Level 1        | Level 2        | Level 3        | Total            |
|---------------------------------------------------------------|----------------|----------------|----------------|------------------|
| <b>31.12.2023</b>                                             |                |                |                |                  |
| Trading assets                                                | 125            | 84,055         | 33,555         | 117,735          |
| Financial assets at fair value (non-SPPI)                     | 50,918         | 75,955         | 466,536        | 593,409          |
| Financial liabilities at fair value (option)                  | 16,439         | 39,801         | 157,288        | 213,528          |
| Positive market values of hedges                              | 0              | 108,632        | 269,217        | 377,849          |
| Holdings                                                      | 0              | 0              | 968            | 968              |
| <b>Assets measured at fair value</b>                          | <b>67,482</b>  | <b>308,443</b> | <b>927,564</b> | <b>1,303,489</b> |
| Reclassification of assets from Level 2 and 3 to Level 1      | 0              | 0              | 0              | 0                |
| Reclassification of assets from Level 1 and 3 to Level 2      | -3,849         | 6,898          | -3,049         | 0                |
| Trading liabilities                                           | 0              | 75,337         | 25,687         | 101,024          |
| Financial liabilities at fair value (option)                  | 0              | 382,943        | 406,469        | 789,412          |
| Negative market values of hedges                              | 0              | 268,043        | 124,118        | 392,161          |
| <b>Liabilities measured at fair value</b>                     | <b>0</b>       | <b>726,323</b> | <b>556,274</b> | <b>1,282,597</b> |
| Reclassification of liabilities from Level 2 and 3 to Level 1 | 0              | 0              | 0              | 0                |
| Reclassification of liabilities from Level 1 and 3 to Level 2 | 0              | 14,498         | -14,498        | 0                |
| <b>TEUR</b>                                                   | <b>Level 1</b> | <b>Level 2</b> | <b>Level 3</b> | <b>Total</b>     |
| <b>31.12.2024</b>                                             |                |                |                |                  |
| Trading assets                                                | 148            | 71,378         | 32,550         | 104,076          |
| Financial assets at fair value (non-SPPI)                     | 45,521         | 69,943         | 469,119        | 584,583          |
| Financial liabilities at fair value (option)                  | 30,962         | 28,107         | 140,139        | 199,208          |
| Positive market values of hedges                              | 0              | 122,594        | 223,099        | 345,693          |
| Holdings                                                      | 0              | 0              | 746            | 746              |
| <b>Assets measured at fair value</b>                          | <b>76,631</b>  | <b>292,022</b> | <b>865,653</b> | <b>1,234,306</b> |
| Reclassification of assets from Level 2 and 3 to Level 1      | 11,194         | -11,194        | 0              | 0                |
| Reclassification of assets from Level 1 and 3 to Level 2      | 0              | 0              | 0              | 0                |
| Trading liabilities                                           | 0              | 38,957         | 15,483         | 54,440           |
| Financial liabilities at fair value (option)                  | 0              | 480,798        | 301,963        | 782,761          |
| Negative market values of hedges                              | 0              | 176,962        | 92,990         | 269,952          |
| <b>Liabilities measured at fair value</b>                     | <b>0</b>       | <b>696,717</b> | <b>410,436</b> | <b>1,107,153</b> |
| Reclassification of liabilities from Level 2 and 3 to Level 1 | 0              | 0              | 0              | 0                |
| Reclassification of liabilities from Level 1 and 3 to Level 2 | 0              | 3,071          | -3,071         | 0                |

In the case of financial assets and liabilities recognised in the financial statements on a recurring basis, the Group determines whether transfers have taken place between hierarchy levels by examining their classification – based on the input parameter of the lowest level that is material for fair value measurement – at the end of each reporting period. In doing so, the Group uses a decision tree defined in the internal measurement guidelines.

The Group has a valuation committee for financial instruments. This committee specifies guidelines and procedures for recurring and non-recurring fair value measurements. The members of the valuation committee for financial instruments include the Head of Asset & Liability Management, the Head of Group Risk Controlling, the Head of Debt Capital Markets and a financial mathematician. Once a year, the valuation committee examines the performance of financial instruments that are to be measured in accordance with the Group's accounting policies. It reviews the key input factors that were applied to the last measurement by comparing the results of the measurement calculations with external sources in order to assess whether the internal input parameters are plausible or whether changes need to be made. The valuation committee resolves to adjust the internal input parameters if this is more consistent with the aim of measuring financial instruments as objectively as possible.

The reclassifications to Level 1 and Level 2 described in the tables and text below are shown in the previous tables, while reclassifications to Level 3 are shown in the table of changes in financial instruments in Level 3.

### Reclassification of assets

In the reporting year and in the previous year, there were no reclassifications of assets from Level 1 to Level 3, from Level 2 to Level 3, or from Level 3 to Level 1.

#### From Level 1 to Level 2

| TEUR                                      | 31.12.2024<br>Number | 31.12.2024<br>Carrying | 31.12.2024<br>Carrying<br>in previous | 31.12.2023<br>Number | 31.12.2023<br>Carrying | 31.12.2023<br>Carrying<br>in previous |
|-------------------------------------------|----------------------|------------------------|---------------------------------------|----------------------|------------------------|---------------------------------------|
| <b>From Level 1 to Level 2</b>            | <b>0</b>             | <b>0</b>               | <b>0</b>                              | <b>1</b>             | <b>3,849</b>           | <b>3,855</b>                          |
| Financial assets at fair value (non-SPPI) | 0                    | 0                      | 0                                     | 1                    | 3,849                  | 3,855                                 |

Instead of an OTC secondary market source from Bloomberg, a derived market value calculation was used in the previous year for one financial instrument in the non-SPPI category.

#### From Level 2 to Level 1

| TEUR                                         | 31.12.2024<br>Number | 31.12.2024<br>Carrying | 31.12.2024<br>Carrying<br>in previous | 31.12.2023<br>Number | 31.12.2023<br>Carrying | 31.12.2023<br>Carrying<br>in previous |
|----------------------------------------------|----------------------|------------------------|---------------------------------------|----------------------|------------------------|---------------------------------------|
| <b>From Level 2 to Level 1</b>               | <b>1</b>             | <b>11,194</b>          | <b>11,495</b>                         | <b>0</b>             | <b>0</b>               | <b>0</b>                              |
| Financial liabilities at fair value (option) | 1                    | 11,194                 | 11,495                                | 0                    | 0                      | 0                                     |

In the current year, an OTC secondary market source from Bloomberg was applied for one financial instrument in the FVO category.

#### From Level 3 to Level 2

| TEUR                                      | 31.12.2024<br>Number | 31.12.2024<br>Carrying | 31.12.2024<br>Carrying<br>in previous | 31.12.2023<br>Number | 31.12.2023<br>Carrying | 31.12.2023<br>Carrying<br>in previous |
|-------------------------------------------|----------------------|------------------------|---------------------------------------|----------------------|------------------------|---------------------------------------|
| <b>From Level 3 to Level 2</b>            | <b>0</b>             | <b>0</b>               | <b>0</b>                              | <b>5</b>             | <b>3,049</b>           | <b>3,246</b>                          |
| Trading assets                            | 0                    | 0                      | 0                                     | 1                    | 71                     | 89                                    |
| Financial assets at fair value (non-SPPI) | 0                    | 0                      | 0                                     | 1                    | 2,493                  | 2,484                                 |
| Positive market values of hedges          | 0                    | 0                      | 0                                     | 3                    | 485                    | 673                                   |

In the previous year, one derivative in the trading assets category and three derivatives in the positive market values from hedging transactions category were based on relevant input factors observable on the market. Similarly, it was possible to use input factors observable on the market instead of a counterparty market value for one financial instrument in the non-SPPI category.

### Reclassification of liabilities

In the reporting year and in the previous year, there were no reclassifications of liabilities from Level 1 to Level 2, from Level 1 to Level 3, from Level 2 to Level 1, from Level 2 to Level 3, or from Level 3 to Level 1.

#### From Level 3 to Level 2

| TEUR                                         | 31.12.2024<br>Number | 31.12.2024<br>Carrying | 31.12.2024<br>Carrying<br>in previous | 31.12.2023<br>Number | 31.12.2023<br>Carrying | 31.12.2023<br>Carrying<br>in previous |
|----------------------------------------------|----------------------|------------------------|---------------------------------------|----------------------|------------------------|---------------------------------------|
| <b>From Level 3 to Level 2</b>               | <b>1</b>             | <b>3,071</b>           | <b>2,915</b>                          | <b>7</b>             | <b>14,498</b>          | <b>19,079</b>                         |
| Financial liabilities at fair value (option) | 1                    | 3,071                  | 2,915                                 | 1                    | 2,780                  | 2,652                                 |
| Negative market values of hedges             | 0                    | 0                      | 0                                     | 6                    | 11,718                 | 16,427                                |

In the current year and the previous year, internal valuation parameters were used for one financial instrument in the LFVO category. In the previous year, credit spreads observable on the market were used for six derivatives in the negative market values of hedges category.



**Fair value hierarchy for financial assets and liabilities – breakdown by category**

| TEUR                                                | Level 1       | Level 2        | Level 3        | Total            |
|-----------------------------------------------------|---------------|----------------|----------------|------------------|
| <b>31.12.2023</b>                                   |               |                |                |                  |
| Derivatives                                         | 0             | 84,055         | 33,555         | 117,610          |
| Equity instruments                                  | 125           | 0              | 0              | 125              |
| <b>Trading assets</b>                               | <b>125</b>    | <b>84,055</b>  | <b>33,555</b>  | <b>117,735</b>   |
| Equity instruments                                  | 0             | 0              | 12,371         | 12,371           |
| Debt securities                                     | 50,918        | 75,955         | 19,067         | 145,940          |
| Loans and advances                                  | 0             | 0              | 435,098        | 435,098          |
| <b>Financial assets at fair value (non-SPPI)</b>    | <b>50,918</b> | <b>75,955</b>  | <b>466,536</b> | <b>593,409</b>   |
| Debt securities                                     | 16,439        | 39,801         | 0              | 56,240           |
| Loans and advances                                  | 0             | 0              | 157,288        | 157,288          |
| <b>Financial liabilities at fair value (option)</b> | <b>16,439</b> | <b>39,801</b>  | <b>157,288</b> | <b>213,528</b>   |
| <b>Positive market values of hedges</b>             | <b>0</b>      | <b>108,632</b> | <b>269,217</b> | <b>377,849</b>   |
| <b>Holdings</b>                                     | <b>0</b>      | <b>0</b>       | <b>968</b>     | <b>968</b>       |
| <b>ASSETS</b>                                       | <b>67,482</b> | <b>308,443</b> | <b>927,564</b> | <b>1,303,489</b> |
|                                                     |               |                |                |                  |
| Derivatives                                         | 0             | 75,337         | 25,687         | 101,024          |
| <b>Trading liabilities</b>                          | <b>0</b>      | <b>75,337</b>  | <b>25,687</b>  | <b>101,024</b>   |
| Deposits                                            | 0             | 0              | 123,031        | 123,031          |
| Debt securities issued                              | 0             | 382,943        | 283,438        | 666,381          |
| <b>Financial liabilities at fair value (option)</b> | <b>0</b>      | <b>382,943</b> | <b>406,469</b> | <b>789,412</b>   |
| <b>Negative market values of hedges</b>             | <b>0</b>      | <b>268,043</b> | <b>124,118</b> | <b>392,161</b>   |
| <b>LIABILITIES</b>                                  | <b>0</b>      | <b>726,323</b> | <b>556,274</b> | <b>1,282,597</b> |
|                                                     |               |                |                |                  |
| TEUR                                                | Level 1       | Level 2        | Level 3        | Total            |
| <b>31.12.2024</b>                                   |               |                |                |                  |
| Derivatives                                         | 0             | 71,378         | 32,550         | 103,928          |
| Equity instruments                                  | 148           | 0              | 0              | 148              |
| <b>Trading assets</b>                               | <b>148</b>    | <b>71,378</b>  | <b>32,550</b>  | <b>104,076</b>   |
| Equity instruments                                  | 0             | 0              | 17,809         | 17,809           |
| Debt securities                                     | 45,521        | 69,943         | 19,102         | 134,566          |
| Loans and advances                                  | 0             | 0              | 432,208        | 432,208          |
| <b>Financial assets at fair value (non-SPPI)</b>    | <b>45,521</b> | <b>69,943</b>  | <b>469,119</b> | <b>584,583</b>   |
| Debt securities                                     | 30,962        | 28,107         | 0              | 59,069           |
| Loans and advances                                  | 0             | 0              | 140,139        | 140,139          |
| <b>Financial liabilities at fair value (option)</b> | <b>30,962</b> | <b>28,107</b>  | <b>140,139</b> | <b>199,208</b>   |
| <b>Positive market values of hedges</b>             | <b>0</b>      | <b>122,594</b> | <b>223,099</b> | <b>345,693</b>   |
| <b>Holdings</b>                                     | <b>0</b>      | <b>0</b>       | <b>746</b>     | <b>746</b>       |
| <b>ASSETS</b>                                       | <b>76,631</b> | <b>292,022</b> | <b>865,653</b> | <b>1,234,306</b> |
|                                                     |               |                |                |                  |
| Derivatives                                         | 0             | 38,957         | 15,483         | 54,440           |
| <b>Trading liabilities</b>                          | <b>0</b>      | <b>38,957</b>  | <b>15,483</b>  | <b>54,440</b>    |
| Deposits                                            | 0             | 0              | 112,279        | 112,279          |
| Debt securities issued                              | 0             | 480,798        | 189,684        | 670,482          |
| <b>Financial liabilities at fair value (option)</b> | <b>0</b>      | <b>480,798</b> | <b>301,963</b> | <b>782,761</b>   |
| <b>Negative market values of hedges</b>             | <b>0</b>      | <b>176,962</b> | <b>92,990</b>  | <b>269,952</b>   |
| <b>LIABILITIES</b>                                  | <b>0</b>      | <b>696,717</b> | <b>410,436</b> | <b>1,107,153</b> |

### Changes in Level 3 financial instruments

| TEUR                                                 | Opening balance | Purchases/ issues | Sales/ redemptions | Additions from Level 1 and Level 2 | Disposals to Level 1 and Level 2 | Changes in fair value | Closing balance |
|------------------------------------------------------|-----------------|-------------------|--------------------|------------------------------------|----------------------------------|-----------------------|-----------------|
| <b>2023</b>                                          |                 |                   |                    |                                    |                                  |                       |                 |
| Trading assets                                       | 65,195          | 0                 | 0                  | 0                                  | -71                              | -31,569               | 33,555          |
| Financial assets at fair value (non-SPPI)            | 446,191         | 59,517            | -25,740            | 0                                  | -2,493                           | -10,939               | 466,536         |
| Financial liabilities at fair value (option)         | 177,947         | 0                 | 0                  | 0                                  | 0                                | -20,659               | 157,288         |
| Positive market values of hedges                     | 289,669         | 0                 | 0                  | 0                                  | -485                             | -19,967               | 269,217         |
| Holdings                                             | 968             | 0                 | 0                  | 0                                  | 0                                | 0                     | 968             |
| <b>Assets measured at fair value in Level 3</b>      | <b>979,970</b>  | <b>59,517</b>     | <b>-25,740</b>     | <b>0</b>                           | <b>-3,049</b>                    | <b>-83,134</b>        | <b>927,564</b>  |
| Trading liabilities                                  | 38,014          | 0                 | 0                  | 0                                  | 0                                | -12,327               | 25,687          |
| Financial liabilities at fair value (option)         | 393,136         | 1,241             | 0                  | 0                                  | -2,780                           | 14,872                | 406,469         |
| Negative market values of hedges                     | 211,368         | 0                 | 0                  | 0                                  | -11,718                          | -75,532               | 124,118         |
| <b>Liabilities measured at fair value in Level 3</b> | <b>642,518</b>  | <b>1,241</b>      | <b>0</b>           | <b>0</b>                           | <b>-14,498</b>                   | <b>-72,987</b>        | <b>556,274</b>  |
| <b>2024</b>                                          |                 |                   |                    |                                    |                                  |                       |                 |
| Trading assets                                       | 33,555          | 0                 | 0                  | 0                                  | 0                                | -1,005                | 32,550          |
| Financial assets at fair value (non-SPPI)            | 466,536         | 33,962            | -41,478            | 0                                  | 0                                | 10,099                | 469,119         |
| Financial liabilities at fair value (option)         | 157,288         | 0                 | 0                  | 0                                  | 0                                | -17,149               | 140,139         |
| Positive market values of hedges                     | 269,217         | 0                 | 0                  | 0                                  | 0                                | -46,118               | 223,099         |
| Holdings                                             | 968             | 0                 | 0                  | 0                                  | 0                                | -222                  | 746             |
| <b>Assets measured at fair value in Level 3</b>      | <b>927,564</b>  | <b>33,962</b>     | <b>-41,478</b>     | <b>0</b>                           | <b>0</b>                         | <b>-54,395</b>        | <b>865,653</b>  |
| Trading liabilities                                  | 25,687          | 0                 | 0                  | 0                                  | 0                                | -10,204               | 15,483          |
| Financial liabilities at fair value (option)         | 406,469         | 8,287             | -122,513           | 0                                  | -3,071                           | 12,791                | 301,963         |
| Negative market values of hedges                     | 124,118         | 0                 | 0                  | 0                                  | 0                                | -31,128               | 92,990          |
| <b>Liabilities measured at fair value in Level 3</b> | <b>556,274</b>  | <b>8,287</b>      | <b>-122,513</b>    | <b>0</b>                           | <b>-3,071</b>                    | <b>-28,541</b>        | <b>410,436</b>  |

The changes in fair value shown relate only to financial instruments that were still allocated to Level 3 at the end of the reporting period. The changes in fair value shown in the tables above represent gains/losses of financial instruments that were allocated to Level 3 at the end of the year. The fair value changes are recognised in the net result from financial instruments at fair value (9).

The changes in fair value in the financial liabilities at fair value (option) category (33) amount to TEUR 12,791 (2023: TEUR 14,872), of which TEUR -11,341 (2023: TEUR -18,725) is recognised in the net result from financial instruments at fair value (9) and TEUR -1,450 (2023: TEUR 3,853) in other comprehensive income (40) under measurement of own credit risks for liabilities at fair value.

## Disclosures regarding sensitivity of internal input factors

| TEUR                                         | Positive fair value changes with alternative measurement parameters |               | Negative fair value changes with alternative measurement parameters |            |
|----------------------------------------------|---------------------------------------------------------------------|---------------|---------------------------------------------------------------------|------------|
|                                              | 31.12.2024                                                          | 31.12.2023    | 31.12.2024                                                          | 31.12.2023 |
| Derivatives                                  | 59                                                                  | 20            | -86                                                                 | -31        |
| Financial assets at fair value (non-SPPI)    | 1,098                                                               | 1,096         | -1,524                                                              | -1,767     |
| of which securities                          | 115                                                                 | 74            | -112                                                                | -303       |
| of which loans and advances                  | 983                                                                 | 1,022         | -1,412                                                              | -1,464     |
| Financial liabilities at fair value (option) | 4                                                                   | 5             | -6                                                                  | -9         |
| of which loans and advances                  | 4                                                                   | 5             | -6                                                                  | -9         |
| Financial liabilities at fair value (option) | -2,127                                                              | -2,554        | 2,127                                                               | 2,554      |
| of which debt securities issued              | -1,080                                                              | -1,284        | 1,080                                                               | 1,284      |
| of which deposits                            | -1,047                                                              | -1,270        | 1,047                                                               | 1,270      |
| <b>Total</b>                                 | <b>-966</b>                                                         | <b>-1,433</b> | <b>511</b>                                                          | <b>747</b> |

The relevant internal input factor for the financial assets is determined by calculating the credit risk, expressed as a credit spread. If CDS spreads are available for a counterparty, the credit risk is measured on the basis of these available input factors. If no CDS spread is observable, the credit risk is measured on the basis of the internally determined probability of default in conjunction with the internal rating. In the case of the sensitivity shown above, the internal ratings were shifted in parallel by one notch in each case.

The relevant internal input factor for the financial liabilities results from determining the current issue level of private placements compared with public placements.

In the case of the sensitivity shown above, the credit spreads applied were shifted in parallel by ten basis points in each case.

In the previous year, two derivative hedging instruments in level 3 were measured not by using the internal measurement models, but instead by applying the counterparty's market values in the context of collateral management with institutional counterparties. If the internal measurement model had been applied, this would have resulted in a change in the market values of TEUR 142. As this measurement was also used for the hedged items, this resulted in an offsetting change in measurement of TEUR 160.

## (56) DISCLOSURES ON OFFSETTING FINANCIAL INSTRUMENTS

| TEUR                                                       | Financial instruments (gross) | Financial instruments (net) | Effect of offsetting master agreement | Collateral      | Net amount    |
|------------------------------------------------------------|-------------------------------|-----------------------------|---------------------------------------|-----------------|---------------|
| <b>31.12.2023</b>                                          |                               |                             |                                       |                 |               |
| Positive market values of derivative financial instruments | 495,459                       | 495,459                     | -288,867                              | -174,955        | 31,637        |
| <b>Total assets</b>                                        | <b>495,459</b>                | <b>495,459</b>              | <b>-288,867</b>                       | <b>-174,955</b> | <b>31,637</b> |
| Negative market values of derivative financial instruments | 493,186                       | 493,186                     | -288,867                              | -191,804        | 12,515        |
| <b>Total liabilities</b>                                   | <b>493,186</b>                | <b>493,186</b>              | <b>-288,867</b>                       | <b>-191,804</b> | <b>12,515</b> |
| <b>31.12.2024</b>                                          |                               |                             |                                       |                 |               |
| Positive market values of derivative financial instruments | 449,621                       | 449,621                     | -243,024                              | -181,449        | 25,148        |
| <b>Total assets</b>                                        | <b>449,621</b>                | <b>449,621</b>              | <b>-243,024</b>                       | <b>-181,449</b> | <b>25,148</b> |
| Negative market values of derivative financial instruments | 324,392                       | 324,392                     | -243,024                              | -74,630         | 6,738         |
| <b>Total liabilities</b>                                   | <b>324,392</b>                | <b>324,392</b>              | <b>-243,024</b>                       | <b>-74,630</b>  | <b>6,738</b>  |

## (57) IMPAIRMENT OF FINANCIAL INSTRUMENTS

### Impairment losses and provisions by category and stage

| TEUR                                                           | Stage 1       | Stage 2       | Stage 3        | POCI         | Total          |
|----------------------------------------------------------------|---------------|---------------|----------------|--------------|----------------|
| <b>31.12.2023</b>                                              |               |               |                |              |                |
| Loans and advances                                             | 18,256        | 20,334        | 114,013        | 5,113        | 157,716        |
| Debt securities                                                | 302           | 692           | 997            | 0            | 1,991          |
| Credit commitments, financial guarantees and other commitments | 2,129         | 1,846         | 7,423          | 0            | 11,398         |
| <b>Impairment losses and provisions</b>                        | <b>20,687</b> | <b>22,872</b> | <b>122,433</b> | <b>5,113</b> | <b>171,105</b> |

| TEUR                                                           | Stage 1       | Stage 2       | Stage 3       | POCI         | Total          |
|----------------------------------------------------------------|---------------|---------------|---------------|--------------|----------------|
| <b>31.12.2024</b>                                              |               |               |               |              |                |
| Loans and advances                                             | 16,835        | 27,130        | 87,180        | 5,057        | 136,202        |
| Debt securities                                                | 299           | 687           | 997           | 0            | 1,983          |
| Credit commitments, financial guarantees and other commitments | 1,470         | 1,019         | 6,349         | 0            | 8,838          |
| <b>Impairment losses and provisions</b>                        | <b>18,604</b> | <b>28,836</b> | <b>94,526</b> | <b>5,057</b> | <b>147,023</b> |

### Amount of maximum default risk for all financial instruments

| TEUR                                        | Gross carrying    | Commit- and guarantees | Maximum default risk |
|---------------------------------------------|-------------------|------------------------|----------------------|
| <b>31.12.2023</b>                           |                   |                        |                      |
| Debt securities at fair value (non-SPPI)    | 145,940           | 0                      | 145,940              |
| Debt securities at fair value (option)      | 56,240            | 0                      | 56,240               |
| Debt securities at amortised cost           | 2,345,583         | 0                      | 2,345,583            |
| <b>Debt securities</b>                      | <b>2,547,763</b>  | <b>0</b>               | <b>2,547,763</b>     |
| Loans and advances – cash reserve           | 952,091           | 0                      | 952,091              |
| Loans and advances at fair value (non-SPPI) | 435,098           | 15,506                 | 450,604              |
| Loans and advances at fair value (option)   | 157,288           | 0                      | 157,288              |
| Loans and advances at amortised cost        | 10,915,717        | 1,938,957              | 12,854,674           |
| <b>Loans and advances</b>                   | <b>12,460,194</b> | <b>1,954,463</b>       | <b>14,414,657</b>    |
| Trading assets – derivatives                | 117,610           | 0                      | 117,610              |
| Positive market values of hedges            | 377,849           | 0                      | 377,849              |
| <b>Derivatives</b>                          | <b>495,459</b>    | <b>0</b>               | <b>495,459</b>       |
| Equity instruments – trading assets         | 125               | 0                      | 125                  |
| Equity instruments at fair value (non-SPPI) | 12,371            | 0                      | 12,371               |
| <b>Equity instruments</b>                   | <b>12,496</b>     | <b>0</b>               | <b>12,496</b>        |
| <b>Sureties and guarantees</b>              | <b>0</b>          | <b>476,575</b>         | <b>476,575</b>       |
| <b>Overall exposure</b>                     | <b>15,515,912</b> | <b>2,431,038</b>       | <b>17,946,950</b>    |

| TEUR                                        | Gross carrying    | Commit- and guarantees | Maximum default risk |
|---------------------------------------------|-------------------|------------------------|----------------------|
| 31.12.2024                                  |                   |                        |                      |
| Debt securities at fair value (non-SPPI)    | 134,566           | 0                      | 134,566              |
| Debt securities at fair value (option)      | 59,069            | 0                      | 59,069               |
| Debt securities at amortised cost           | 2,494,272         | 0                      | 2,494,272            |
| <b>Debt securities</b>                      | <b>2,687,907</b>  | <b>0</b>               | <b>2,687,907</b>     |
| Loans and advances – cash reserve           | 487,552           | 0                      | 487,552              |
| Loans and advances at fair value (non-SPPI) | 432,208           | 448                    | 432,656              |
| Loans and advances at fair value (option)   | 140,139           | 0                      | 140,139              |
| Loans and advances at amortised cost        | 10,800,557        | 1,585,378              | 12,385,935           |
| <b>Loans and advances</b>                   | <b>11,860,456</b> | <b>1,585,826</b>       | <b>13,446,282</b>    |
| Trading assets – derivatives                | 103,928           | 0                      | 103,928              |
| Positive market values of hedges            | 345,693           | 0                      | 345,693              |
| <b>Derivatives</b>                          | <b>449,621</b>    | <b>0</b>               | <b>449,621</b>       |
| Equity instruments – trading assets         | 148               | 0                      | 148                  |
| Equity instruments at fair value (non-SPPI) | 17,809            | 0                      | 17,809               |
| <b>Equity instruments</b>                   | <b>17,957</b>     | <b>0</b>               | <b>17,957</b>        |
| <b>Sureties and guarantees</b>              | <b>0</b>          | <b>387,479</b>         | <b>387,479</b>       |
| <b>Overall exposure</b>                     | <b>15,015,941</b> | <b>1,973,305</b>       | <b>16,989,246</b>    |

#### Default risk of financial instruments subject to the provisions on impairment

| TEUR                                          | Rating 1         | Rating 2         | Rating 3         | Rating 4       | Rating 5       | Not rated     | Total             |
|-----------------------------------------------|------------------|------------------|------------------|----------------|----------------|---------------|-------------------|
| 31.12.2023                                    |                  |                  |                  |                |                |               |                   |
| Stage 1 – carrying amount                     | 3,112,466        | 4,184,114        | 5,374,704        | 89,611         | 0              | 17,571        | 12,778,466        |
| Stage 1 – off-balance-sheet transactions      | 274,006          | 870,345          | 956,964          | 37,345         | 0              | 3,442         | 2,142,102         |
| <b>Stage 1 – default risk</b>                 | <b>3,386,472</b> | <b>5,054,459</b> | <b>6,331,668</b> | <b>126,956</b> | <b>0</b>       | <b>21,013</b> | <b>14,920,568</b> |
| Stage 2 – carrying amount                     | 43,498           | 59,374           | 737,783          | 346,562        | 0              | 12,648        | 1,199,865         |
| Stage 2 – off-balance-sheet transactions      | 12,212           | 12,544           | 127,129          | 46,985         | 0              | 50,888        | 249,758           |
| <b>Stage 2 – default risk</b>                 | <b>55,710</b>    | <b>71,918</b>    | <b>864,912</b>   | <b>393,547</b> | <b>0</b>       | <b>63,536</b> | <b>1,449,623</b>  |
| Stage 3 – carrying amount                     | 0                | 92               | 0                | 127            | 206,037        | 968           | 207,224           |
| Stage 3 – off-balance-sheet transactions      | 0                | 0                | 27               | 0              | 37,920         | 0             | 37,947            |
| <b>Stage 3 – default risk</b>                 | <b>0</b>         | <b>92</b>        | <b>27</b>        | <b>127</b>     | <b>243,957</b> | <b>968</b>    | <b>245,171</b>    |
| POCI – carrying amount                        | 0                | 0                | 3,936            | 18,296         | 5,604          | 0             | 27,836            |
| POCI – off-balance-sheet transactions         | 0                | 0                | 0                | 0              | 0              | 0             | 0                 |
| <b>POCI – default risk</b>                    | <b>0</b>         | <b>0</b>         | <b>3,936</b>     | <b>18,296</b>  | <b>5,604</b>   | <b>0</b>      | <b>27,836</b>     |
| <b>Total – carrying amount</b>                | <b>3,155,964</b> | <b>4,243,580</b> | <b>6,116,423</b> | <b>454,596</b> | <b>211,641</b> | <b>31,187</b> | <b>14,213,391</b> |
| <b>Total – off-balance-sheet transactions</b> | <b>286,218</b>   | <b>882,889</b>   | <b>1,084,120</b> | <b>84,330</b>  | <b>37,920</b>  | <b>54,330</b> | <b>2,429,807</b>  |
| <b>Total – default risk</b>                   | <b>3,442,182</b> | <b>5,126,469</b> | <b>7,200,543</b> | <b>538,926</b> | <b>249,561</b> | <b>85,517</b> | <b>16,643,198</b> |

| TEUR                                          | Rating 1         | Rating 2         | Rating 3         | Rating 4       | Rating 5       | Not rated     | Total             |
|-----------------------------------------------|------------------|------------------|------------------|----------------|----------------|---------------|-------------------|
| 31.12.2024                                    |                  |                  |                  |                |                |               |                   |
| Stage 1 – carrying amount                     | 2,938,998        | 3,847,090        | 5,124,980        | 76,238         | 0              | 17,818        | 12,005,124        |
| Stage 1 – off-balance-sheet transactions      | 145,267          | 626,577          | 1,009,012        | 2,939          | 0              | 0             | 1,783,795         |
| <b>Stage 1 – default risk</b>                 | <b>3,084,265</b> | <b>4,473,667</b> | <b>6,133,992</b> | <b>79,177</b>  | <b>0</b>       | <b>17,818</b> | <b>13,788,919</b> |
| Stage 2 – carrying amount                     | 71,974           | 80,646           | 877,340          | 431,451        | 0              | 12,301        | 1,473,712         |
| Stage 2 – off-balance-sheet transactions      | 5,047            | 11,573           | 126,233          | 24,535         | 0              | 21,872        | 189,260           |
| <b>Stage 2 – default risk</b>                 | <b>77,021</b>    | <b>92,219</b>    | <b>1,003,573</b> | <b>455,986</b> | <b>0</b>       | <b>34,173</b> | <b>1,662,972</b>  |
| Stage 3 – carrying amount                     | 0                | 0                | 0                | 0              | 268,164        | 0             | 268,164           |
| Stage 3 – off-balance-sheet transactions      | 0                | 0                | 0                | 0              | 31,080         | 0             | 31,080            |
| <b>Stage 3 – default risk</b>                 | <b>0</b>         | <b>0</b>         | <b>0</b>         | <b>0</b>       | <b>299,244</b> | <b>0</b>      | <b>299,244</b>    |
| POCI – carrying amount                        | 0                | 0                | 20,936           | 9,874          | 4,571          | 0             | 35,381            |
| POCI – off-balance-sheet transactions         | 0                | 0                | 1                | 0              | 0              | 0             | 1                 |
| <b>POCI – default risk</b>                    | <b>0</b>         | <b>0</b>         | <b>20,937</b>    | <b>9,874</b>   | <b>4,571</b>   | <b>0</b>      | <b>35,382</b>     |
| <b>Total – carrying amount</b>                | <b>3,010,972</b> | <b>3,927,736</b> | <b>6,023,256</b> | <b>517,563</b> | <b>272,735</b> | <b>30,119</b> | <b>13,782,381</b> |
| <b>Total – off-balance-sheet transactions</b> | <b>150,314</b>   | <b>638,150</b>   | <b>1,135,246</b> | <b>27,474</b>  | <b>31,080</b>  | <b>21,872</b> | <b>2,004,136</b>  |
| <b>Total – default risk</b>                   | <b>3,161,286</b> | <b>4,565,886</b> | <b>7,158,502</b> | <b>545,037</b> | <b>303,815</b> | <b>51,991</b> | <b>15,786,517</b> |

## Disclosures on the default risk of credit-impaired financial instruments

| TEUR                              | Gross carrying | Valuation allowances | Other collateral | Guarantees received |
|-----------------------------------|----------------|----------------------|------------------|---------------------|
| <b>31.12.2023</b>                 |                |                      |                  |                     |
| Debt securities                   | 997            | 997                  | 0                | 0                   |
| Loans and advances                | 331,145        | 118,350              | 162,440          | 10,952              |
| <b>Measured at amortised cost</b> | <b>332,142</b> | <b>119,347</b>       | <b>162,440</b>   | <b>10,952</b>       |
| Loans and advances                | 100,927        | 20,436               | 72,691           | 0                   |
| <b>Measured at fair value</b>     | <b>100,927</b> | <b>20,436</b>        | <b>72,691</b>    | <b>0</b>            |

| TEUR                              | Gross carrying | Valuation allowances | Other collateral | Guarantees received |
|-----------------------------------|----------------|----------------------|------------------|---------------------|
| <b>31.12.2024</b>                 |                |                      |                  |                     |
| Debt securities                   | 997            | 997                  | 0                | 0                   |
| Loans and advances                | 365,318        | 91,664               | 175,390          | 6,944               |
| <b>Measured at amortised cost</b> | <b>366,315</b> | <b>92,661</b>        | <b>175,390</b>   | <b>6,944</b>        |
| Loans and advances                | 96,483         | 20,803               | 70,620           | 0                   |
| <b>Measured at fair value</b>     | <b>96,483</b>  | <b>20,803</b>        | <b>70,620</b>    | <b>0</b>            |

Financial receivables in the amount of TEUR 110,605 (2023: TEUR 18,473) that are still subject to enforcement measures were written off in the reporting period.

## Changes in valuation allowances by item and category

| TEUR                                                                  | Opening balance | Additions      | Utilisation    | Reversals      | Unwinding    | Stage transfer | Other changes | Closing balance |
|-----------------------------------------------------------------------|-----------------|----------------|----------------|----------------|--------------|----------------|---------------|-----------------|
| <b>2023</b>                                                           |                 |                |                |                |              |                |               |                 |
| Valuation allowances in cash reserve – stage 1                        | 3               | 2              | 0              | -2             | 0            | 0              | 0             | 3               |
| <b>Valuation allowances in cash reserve</b>                           | <b>3</b>        | <b>2</b>       | <b>0</b>       | <b>-2</b>      | <b>0</b>     | <b>0</b>       | <b>0</b>      | <b>3</b>        |
| Valuation allowances in debt securities AC – Stage 1                  | 265             | 105            | 0              | -68            | 0            | 0              | 0             | 302             |
| Valuation allowances in debt securities AC – Stage 2                  | 814             | 0              | 0              | -122           | 0            | 0              | 0             | 692             |
| Valuation allowances in debt securities AC – Stage 3                  | 997             | 0              | 0              | 0              | 0            | 0              | 0             | 997             |
| <b>Valuation allowances in debt securities AC</b>                     | <b>2,076</b>    | <b>105</b>     | <b>0</b>       | <b>-190</b>    | <b>0</b>     | <b>0</b>       | <b>0</b>      | <b>1,991</b>    |
| Valuation allowances in loans and advances AC –                       | 16,026          | 7,788          | 0              | -4,990         | 0            | -694           | 123           | 18,253          |
| Valuation allowances in loans and advances AC –                       | 19,699          | 14,469         | 0              | -11,956        | 0            | -1,939         | 61            | 20,334          |
| Valuation allowances in loans and advances AC –                       | 57,641          | 78,617         | -13,956        | -13,773        | 2,438        | 2,633          | 413           | 114,013         |
| Valuation allowances in loans and advances AC –                       | 1,353           | 3,762          | 0              | -70            | 68           | 0              | 0             | 5,113           |
| <b>Valuation allowances in loans and advances AC</b>                  | <b>94,719</b>   | <b>104,636</b> | <b>-13,956</b> | <b>-30,789</b> | <b>2,506</b> | <b>0</b>       | <b>597</b>    | <b>157,713</b>  |
| <b>Valuation allowances in debt securities and loans and advances</b> | <b>96,795</b>   | <b>104,741</b> | <b>-13,956</b> | <b>-30,979</b> | <b>2,506</b> | <b>0</b>       | <b>597</b>    | <b>159,704</b>  |
| Valuation allowances in Corporate Customers seg-                      | 54,997          | 97,187         | -11,009        | -19,012        | 1,563        | 0              | 496           | 124,222         |
| Valuation allowances in Private Customers seg-                        | 11,828          | 3,151          | -578           | -5,559         | 24           | 0              | 50            | 8,916           |
| Valuation allowances in Financial Markets segment                     | 1,232           | 207            | 0              | -275           | 0            | 0              | 0             | 1,164           |
| Valuation allowances in Corporate Centre                              | 28,738          | 4,196          | -2,369         | -6,133         | 919          | 0              | 51            | 25,402          |

| TEUR                                                                  | Opening<br>balance | Additions     | Utilisation    | Reversals      | Unwinding    | Stage<br>transfer | Other<br>changes | Closing<br>balance |
|-----------------------------------------------------------------------|--------------------|---------------|----------------|----------------|--------------|-------------------|------------------|--------------------|
| <b>2024</b>                                                           |                    |               |                |                |              |                   |                  |                    |
| Valuation allowances in cash reserve – stage 1                        | 3                  | 0             | 0              | -1             | 0            | 0                 | 0                | 2                  |
| <b>Valuation allowances in cash reserve</b>                           | <b>3</b>           | <b>0</b>      | <b>0</b>       | <b>-1</b>      | <b>0</b>     | <b>0</b>          | <b>0</b>         | <b>2</b>           |
| Valuation allowances in debt securities AC – Stage 1                  | 302                | 46            | 0              | -50            | 0            | 0                 | 1                | 299                |
| Valuation allowances in debt securities AC – Stage 2                  | 692                | 40            | 0              | -45            | 0            | 0                 | 0                | 687                |
| Valuation allowances in debt securities AC – Stage 3                  | 997                | 0             | 0              | 0              | 0            | 0                 | 0                | 997                |
| <b>Valuation allowances in debt securities AC</b>                     | <b>1,991</b>       | <b>86</b>     | <b>0</b>       | <b>-95</b>     | <b>0</b>     | <b>0</b>          | <b>1</b>         | <b>1,983</b>       |
| Valuation allowances in loans and advances AC –                       | 18,253             | 6,069         | 0              | -5,528         | 0            | -1,928            | -33              | 16,833             |
| Valuation allowances in loans and advances AC –                       | 20,334             | 16,149        | 0              | -7,722         | 0            | -1,598            | -33              | 27,130             |
| Valuation allowances in loans and advances AC –                       | 114,013            | 47,617        | -63,933        | -17,959        | 3,967        | 3,526             | -51              | 87,180             |
| Valuation allowances in loans and advances AC –                       | 5,113              | 3,062         | -2,373         | -814           | 69           | 0                 | 0                | 5,057              |
| <b>Valuation allowances in loans and advances AC</b>                  | <b>157,713</b>     | <b>72,897</b> | <b>-66,306</b> | <b>-32,023</b> | <b>4,036</b> | <b>0</b>          | <b>-117</b>      | <b>136,200</b>     |
| <b>Valuation allowances in debt securities and loans and advances</b> | <b>159,704</b>     | <b>72,983</b> | <b>-66,306</b> | <b>-32,118</b> | <b>4,036</b> | <b>0</b>          | <b>-116</b>      | <b>138,183</b>     |
| Valuation allowances in Corporate Customers seg-                      | 124,222            | 60,777        | -59,747        | -18,079        | 2,965        | 0                 | -97              | 110,041            |
| Valuation allowances in Private Customers seg-                        | 8,916              | 2,811         | -37            | -3,935         | 40           | 0                 | -31              | 7,764              |
| Valuation allowances in Financial Markets segment                     | 1,164              | 125           | 0              | -176           | 0            | 0                 | 14               | 1,127              |
| Valuation allowances in Corporate Centre                              | 25,402             | 9,270         | -6,522         | -9,928         | 1,031        | 0                 | -2               | 19,251             |

#### (58) FINANCIAL INSTRUMENTS BY CATEGORY

The presentation of financial instruments by measurement category can be found in the notes to the respective balance sheet item, as the measurement categories are already presented in detail in the balance sheet items in accordance with IFRS 9.

## G. FINANCIAL RISKS AND RISK MANAGEMENT

The full disclosure on the organisational structure, risk management and the risk capital situation according to CRR are published on the internet at [www.hypovbg.at](http://www.hypovbg.at).

### (59) OVERALL RISK MANAGEMENT

The Group is exposed to the following risks in the course of its operating activities:

- Credit risk and counterparty default risk: This includes the risk of default by counterparties as well as the risk of a deterioration in creditworthiness. Risks may also arise from the use of credit risk mitigation techniques and in the form of foreign currency or concentration risks in connection with lending business as well as counterparty default risks. Risks may also arise from securitisation activities.
- Market risks: The common feature of these risks is that they arise from price changes on the money and capital markets. Market price risks are broken down into interest rate, spread, share price, foreign currency and commodity risks.
- Liquidity risk: Liquidity risks can be broken down into forward and call risks, structural liquidity risk (follow-up financing risks) and market liquidity risk. Forward risk refers to an unscheduled extension of the capital commitment period for asset transactions. Call risk is the risk that loan commitments will be drawn down unexpectedly or that deposits will be withdrawn. This results in the risk that a bank will no longer be able to meet its payment obligations without restriction. Structural liquidity risk is the risk that necessary follow-up financing cannot be provided or can only be provided on less favourable terms. Market liquidity risk arises when positions can only be sold immediately by accepting a decline in value.
- Operational risk: Operational risk describes the risk of a direct or indirect loss caused by human error, process weaknesses, technological failure or external influences. It also includes legal risk.
- Investment risk: This risk type encompasses exposures in areas such as private equity, mezzanine financing, subordinated financing and investments in funds with these components. It also includes subordinated banking securities.
- Real estate risk: This generally refers to the risk of fluctuations in the value of real estate owned by the Group. In particular, this includes real estate that serves as loan collateral (including leased properties) and that cannot be sold to third parties in a timely manner in the course of liquidation ("bail-out purchases"). Owner-occupied real estate is not included.
- Risk of excessive debt: This refers to the risk of an equity ratio that is too low.
- Money laundering and financing of terrorism: The Group engages in all available measures to counter these risks.
- Macroeconomic risk: Macroeconomic risk describes loss potential caused by exposure to macroeconomic risk factors.
- Model risk: Model risk describes the risk of significantly underestimating the capital backing for material risks in the capital adequacy process due to incorrect input parameters, incorrect assumptions, incorrect models or incorrect application of such models.
- Other risks: In particular, other risks include risk types for which only rudimentary or no quantification methods currently exist.

The Group manages these risks with a view to limiting the risk to the Bank as a whole. The Managing Board is responsible for the overall risk management of the Group. In this capacity, it approves the principles of risk control and the risk measurement procedures. It also determines the Group's willingness to take risks and defines limits for all relevant risk types based on the risk-bearing capacity.

The Group regularly reviews the effects of economic and market developments on its income statement and net assets.

The basis for overall risk management is the strict separation of front office and back office functions. The risk management functions are

combined under the responsibility of the responsible member of the Managing Board. Risk control is developed and carried out by the Group Risk Controlling department. The Group measures risks at Group level. The independent assessment and approval of loan applications is carried out by the Credit Management Corporate Customers (KMFK) and Credit Management Private Customers (KMPK) departments.

The risk situation and the risk-bearing capacity calculation are discussed by the Asset & Liability Management (ALM) Committee. Within this committee, the Managing Board decides on the procedures for measuring market risk, the definition of the interfaces between Sales and Treasury with regard to the market interest rate method, and the level of market risk and liquidity limits. In addition to the full Managing Board and the Corporate Customers and Private Customers Sales department, the committee meetings are also attended by the Group Risk Controlling, Controlling, Strategic Bank Management and Treasury departments.

The strategies, processes and procedures for managing risks are documented in writing. The Group has a risk management manual and a credit manual which are accessible to all employees. The manuals are revised at regular intervals. Furthermore, all relevant work processes are set out in written instructions, which are also accessible to all employees.

### Sustainability risks

The Bank strives to measure and limit sustainability risks. This means that negative effects potentially resulting from the current or expected impact of sustainability factors on customers or loans must be measured and limited. This includes reputational risk. Sustainability from the "inside-out" perspective and the associated public image are therefore also indirectly relevant to risk.

The Bank is making efforts to limit risks in all three aspects (ecological, social and governance risks).

Climate risks are a subgroup of sustainability risks. They are divided into physical climate risks and transition risks, although there are also interdependencies between these two categories. In terms of risk measurement, the focus is currently on climate risks. This involves measuring and limiting both physical and transitional risks.

Global climate change is associated with significant risks that could have a negative impact on the economy and society. These risks are systematically analysed and managed at Hypo Vorarlberg. Climate change has the potential to fundamentally transform the economy and society. Many companies are being forced to reconsider their business model in view of physical risks, new regulatory requirements or changed customer behaviour, and banks are not immune to these developments.

Hypo Vorarlberg is determined to manage the physical risks and transition risks of climate change and strengthen the resilience of its business model. It is taking suitable measures to ensure that it can identify climate risks and manage them effectively. Legal regulations (e.g. EU Disclosure Regulation, EBA Guidelines on Loan Origination and Monitoring) provide the framework for this, while responsibility lies with the full Managing Board.

### Physical climate risks

The physical risks of climate change refer to risks resulting directly from changes in the climate, such as temperature changes, more frequent occurrence of extreme weather (e.g. cold spells or droughts) or natural disasters (e.g. forest fires, floods). Different economic sectors are affected by these risks to different degrees. According to the Austrian Financial Market Authority (FMA), the most vulnerable sectors include agriculture and forestry, food production, transport, tourism and energy.

### Transition risks of climate change

In contrast to the physical risks of climate change, transition risks refer to the potential consequences arising from the development towards a more environmentally friendly economic system. These include political and regulatory measures to combat climate change



(such as the introduction of a CO<sub>2</sub> tax) as well as changes in consumer behaviour (e.g. the trend towards environmentally friendly mobility solutions) and in technology (e.g. the development of a more climate-friendly alternative to the products or services offered by a company). Sectors that are heavily dependent on fossil fuels (e.g. energy production, iron and steel industry) or whose products cause high emissions (e.g. automotive manufacturers) are particularly affected by the transition risks of climate change.

While the direct physical climate risks to the Bank's infrastructure are rated as serious but generally low, it is primarily the indirect physical climate risks in its core business that are significant for the company (e.g. financing for companies that are exposed to physical risks). Transition risks of climate change also affect Hypo Vorarlberg mainly in its core business (e.g. financing for companies whose business models are being put to the test by changes in the climate).

#### DEALING WITH DIRECT CLIMATE RISKS

Direct physical risks for Hypo Vorarlberg – for example, from massive damage within the Group caused by extreme weather (e.g. the destruction of the Bank's infrastructure or IT systems) – are covered by the Bank's business continuity management. This aims to at least limit the potential damage of exceptional situations where these cannot be prevented. This also includes exceptional situations in connection with physical climate risks.

The overriding objective is to respond quickly and correctly to emergencies so that key business processes can continue. Known scenarios are outlined and recovery parameters are defined in the security and crisis manual along with the designated processes and resources. A committee – the Crisis Team – is responsible for the area of business continuity management (BCM) at Hypo Vorarlberg. It is supported by nominated security officers at all branches who have clearly defined tasks.

#### IDENTIFICATION & MEASUREMENT OF RISKS IN CORE BUSINESS

Since 2021, these risks have been subject to the same management group as other risks at the Bank. A strategy for dealing with the risks identified as material must be developed on the basis of a risk inventory. These risks are reported to the Managing Board in an annual sustainability risk report. The report was prepared for the first time in June 2023.

#### GROUP RISK CONTROLLING

The Group Risk Controlling department is responsible for risk controlling. This encompasses the annual revision of the risk strategy, including the implementation of the risk inventory and the development of risk models. One aspect of this is therefore also the identification of sustainability risks.

#### Measurement of flooding risk in Vorarlberg

With regard to physical risks, the risk of flooding and, to a lesser extent, the risk of avalanches have been identified as potentially material.

Vorarlberg was most recently affected by wide-scale flooding in 2005. According to media reports, the state-wide damage amounted to approximately EUR 180 million.

An analysis of the risk reports from the time shows low valuation allowances for real estate financing only in a few individual cases, while there are no indications of increased valuation allowances in the annual report for 2005. In other words, even wide-scale flooding in its home market had no significant impact on Hypo Vorarlberg's operations. Extensive flood control measures were subsequently taken in Vorarlberg up until 2015, with the public sector investing EUR 300 million.

The financed volume in red and yellow flood risk zones ("HQ100" = flood events with a medium probability of occurrence that statistically occur every 100 years) across Austria as a whole amounted to around EUR 569 million as at June 2024. Around EUR 409 million of this figure related to Vorarlberg. The volume in Vorarlberg is geographically diversified. It is highly unlikely that a flood event would affect the entire state. Some clusters can be identified at the level of individual customers, for example in the Rhine Valley. The water management department of the Vorarlberg state government expects the HQ100 zones to generally decrease as a result of construction measures. Flooding causes damage to property; only in a very small number of cases does the land itself lose its value. Although the loss level is reduced by government and insurance payouts, a loss event may have serious consequences for businesses.

The exposure to customers in avalanche hazard zones amounts to EUR 892 million, with the majority of this volume located in Vorarlberg. An exposure of EUR 14 million is located in both flood hazard zones and avalanche hazard zones.

In the case of Hypo Vorarlberg Leasing AG, Bolzano, the biggest exposures are manually inspected for physical risks every year. No material risks are currently identifiable.

Risks of flooding are taken into account when new loans are issued and may reduce the value of collateral, thereby requiring increased loan loss provisions to be recognised.

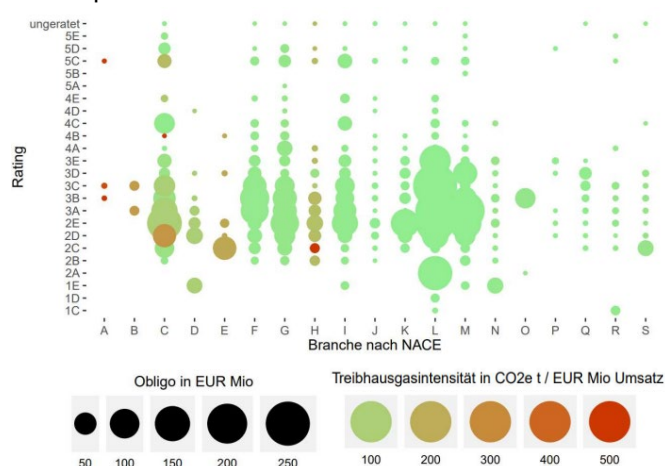
#### Measurement of greenhouse gas intensity

The pricing of greenhouse gas emissions is leading to a rise in energy costs and fuel costs, for example. The financial burden for customers is increasing as a result. To enable the Bank to manage this risk, sectors and customers with a higher greenhouse gas intensity and a lower credit rating are identified.

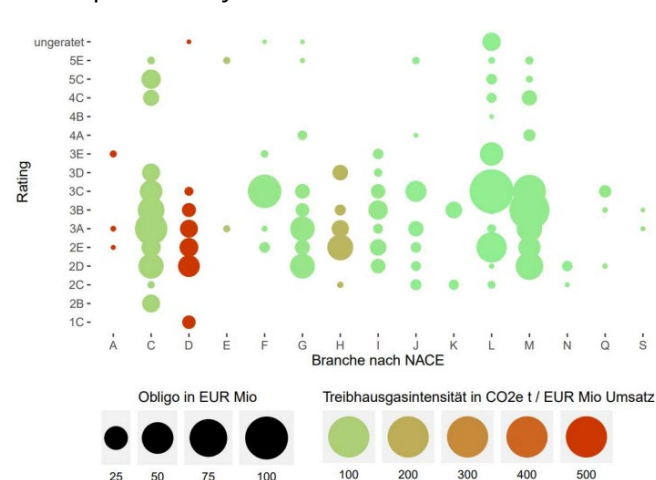
To measure the transition risk, the greenhouse gas intensities for each sector and country were transferred to the corporate portfolio (not including real estate financing or securities) of the individual bank (tons of CO<sub>2</sub> equivalents (CO<sub>2</sub>e) per EUR million of revenue; source: Eurostat).

The following heat maps show the greenhouse gas intensities for the Austrian and German corporate portfolios as at June 2024. The x axis shows NACE sectors (statistical system categorising economic sectors in the European Community), while the y axis shows customer ratings. The size of the dots represents the volume at the respective intersection.

## Heat map for Austria



## Heat map for Germany



## Table of NACE sectors

| NACE Code | Sector description                                                   |
|-----------|----------------------------------------------------------------------|
| A         | Agriculture, forestry and fishing                                    |
| B         | Mining and quarrying                                                 |
| C         | Manufacturing                                                        |
| D         | Electricity, gas, steam and air conditioning supply                  |
| E         | Water supply; sewerage; waste management and remediation activities  |
| F         | Construction                                                         |
| G         | Wholesale and retail trade; repair of motor vehicles and motorcycles |
| H         | Transporting and storage                                             |
| I         | Accommodation and food service activities                            |
| J         | Information and communication                                        |
| K         | Financial and insurance activities                                   |
| L         | Real estate activities                                               |
| M         | Professional, scientific and technical activities                    |
| N         | Administrative and support service activities                        |
| O         | Public administration and defence; compulsory social security        |
| P         | Education                                                            |
| Q         | Human health and social work activities                              |
| R         | Arts, entertainment and recreation                                   |
| S         | Other services activities                                            |
| U         | Activities of extraterritorial organisations and bodies              |

A large portion of the portfolio has a relatively low greenhouse gas intensity. In Germany, the highest intensities are seen in the energy supply sector, although an analysis of the individual customers suggests that the Eurostat data overestimates the intensities for some customers. In Austria, the manufacturing industry has comparatively high levels with significant volumes in generally good rating classes. Other portfolios with high greenhouse gas intensity and generally good ratings can be found in the transportation and storage sector and in agriculture and forestry.

On average, the greenhouse gas intensity of the entire portfolio of corporate financing amounts to approximately 38.7t of CO<sub>2</sub> per EUR million of customer revenue (June 2023: 36t CO<sub>2</sub>).

The leasing subsidiary in Bolzano has also begun analysing greenhouse gas intensity. Based on this analysis, the portfolio has an

average greenhouse gas intensity of 62.17 t CO<sub>2</sub> per EUR million of customer revenue. This calculation is based on the most recent available data from Eurostat for each NACE (as at July 2024) and the outstanding portfolio as at 31 August 2024.

In new business, greater attention is paid to sectors with comparatively higher greenhouse gas intensity. Potential future expenses are taken into account in the rating on a qualitative basis. This may lead to a less favourable rating, and hence to higher loan loss provisions.

## Energy performance certificates

Hypo Vorarlberg has been obtaining energy performance certificates for real estate financing for a number of years. The energy performance certificates include key figures that are each converted into a grade from A++ to G. The information from the energy performance certificates is required to be able to estimate the extent to which customers are exposed to a risk from higher energy costs, for example.

Customers that have a lower credit rating and occupy a property with weak energy performance are more heavily impacted by rising energy costs than other customers. Increased energy costs also impact the value of properties with high energy consumption more than that of properties with lower energy consumption. The risk of rising energy costs is currently being mitigated by extensive government subsidy programmes that are lessening the potential effects.

An analysis of loans in the Private Customers segment comparing the customer rating with the energy performance grade showed that the energy performance certificates mostly have a grade of B or better. There is only a weak correlation between the customer rating and the energy performance grade.

Hypo Vorarlberg Leasing AG, Bolzano, began obtaining energy performance certificates in 2023 and continued to do so in 2024.

Comparatively weak energy performance (and the higher heating costs this entails) tends to have an adverse effect on property prices. An increase in the unsecured portions of loans requires the recognition of higher loan loss provisions.

## Improvement in data quality

Hypo Vorarlberg has worked intensively to improve data quality in the past. Sustainability-related customer information, e.g. emissions data, is requested in the form of the OeKB-ESG questionnaire.

## Sensitivity analysis

The following section shows how the volume and the anticipated loan loss provisions in stages 1 and 2 would change if different PD curves were used. Three scenarios are applied:

- Main scenario
- Negative scenario
- Positive scenario

The climate-related scenarios described in the non-financial statement are not expected to give rise to any impacts in the period in which various forward-looking information (FLI) scenarios are applied, and hence do not affect the quantitative simulation.

## Sensitivities by stage – volume

| TEUR              | Stage 1  | Stage 2  |
|-------------------|----------|----------|
| 2024              |          |          |
| Main scenario     | 70,990   | -70,987  |
| Negative scenario | -200,990 | 200,992  |
| Positive scenario | 201,596  | -201,594 |

### Sensitivities by stage – loan loss provisions

| TEUR              | Stage 1 | Stage 2 |
|-------------------|---------|---------|
| 2024              |         |         |
| Main scenario     | -702    | -1,584  |
| Negative scenario | 771     | 3,076   |
| Positive scenario | -743    | -3,892  |

In the negative scenario, the volume in stage 2 would increase by TEUR 200,992. Loan loss provisions for stages 1 and 2 would increase by TEUR 3,847 in total. In the positive scenario, the volume in stage 2 would decrease by TEUR 201,594 and loan loss provisions for stages 1 and 2 would decrease by TEUR 4,635.

### Sensitivities by segment – volume

| TEUR              |         | Corporate Customers | Private Customers | Financial Institutions | States |
|-------------------|---------|---------------------|-------------------|------------------------|--------|
| 2024              |         |                     |                   |                        |        |
| Main scenario     | Stage 1 | 60,264              | 10,725            | 0                      | 0      |
|                   | Stage 2 | -60,264             | -10,723           | 0                      | 0      |
| Negative scenario | Stage 1 | -181,655            | -19,335           | 0                      | 0      |
|                   | Stage 2 | 181,655             | 19,337            | 0                      | 0      |
| Positive scenario | Stage 1 | 182,862             | 18,734            | 0                      | 0      |
|                   | Stage 2 | -182,862            | -18,732           | 0                      | 0      |

### Sensitivities by segment – loan loss provisions

| TEUR              |         | Corporate Customers | Private Customers | Financial Institutions | States |
|-------------------|---------|---------------------|-------------------|------------------------|--------|
| 2024              |         |                     |                   |                        |        |
| Main scenario     | Stage 1 | -277                | -425              | 0                      | 0      |
|                   | Stage 2 | -1,354              | -230              | 0                      | 0      |
| Negative scenario | Stage 1 | 149                 | 622               | 0                      | 0      |
|                   | Stage 2 | 2,689               | 387               | 0                      | 0      |
| Positive scenario | Stage 1 | 134                 | -877              | 0                      | 0      |
|                   | Stage 2 | -3,449              | -442              | 0                      | 0      |

In terms of the individual segments, the volume in stage 2 predominantly increases in the Corporate Customers segment in the negative scenario (TEUR 181,655). The increase in loan loss provisions for stage 1 and 2 in this segment amounts to TEUR 2,838.

## (60) MARKET RISK

The objective of the Group's asset and liability management is the optimal management of market risks. The strict separation of trading units and risk control ensures the objective assessment of the risks incurred and the early detection of unfavourable developments. The risks are assessed on a daily basis by Group Risk Controlling, which reports the results of its analyses to the responsible units.

Hypo Vorarlberg maintains a small trading portfolio within the meaning of Article 94 CRR in order to provide better customer service.

The balance sheet structure is managed via a uniform reference interest rate system using the market interest rate method. The setting of the reference interest rate determines the allocation of interest income and expenses to front office units or Treasury. As a key management tool, fixed interest rates are therefore set by the Managing Board and resolved anew every year.

Risk measurement with regard to market risks is based on three methods that are each calculated centrally for the individual bank:

- Value at risk (VaR)
- Change in present value of equity in stress tests (economic value)
- Change in net interest income in the next twelve months in stress scenarios (income perspective)

The value at risk describes the loss that will not be exceeded at a certain probability and over a certain holding period. The Group uses SAP software to measure value at risk. It employs a historical simulation with the following parameters:

| Historical simulation parameters |                  |
|----------------------------------|------------------|
| Historical period                | 250 trading days |
| Holding period                   | 10 trading days  |
| Confidence level                 | 99 %             |

The VaR limit defines the maximum loss the Group is prepared to absorb under normal market conditions. The Managing Board defines the global VaR limit on an annual basis in line with the ICAAP. In addition, limits are defined for various yield curves, currency pairs, credit spread risks and equity risks, for example.

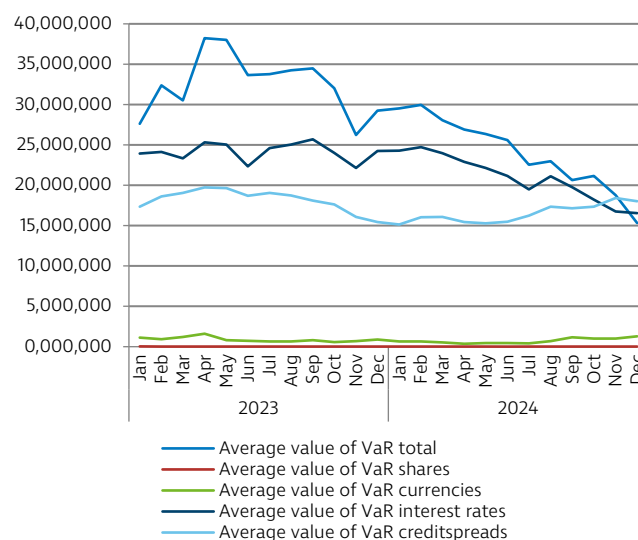
Group Risk Controlling is responsible for implementing the stress tests required by the EU's IRRBB (Interest Rate Risk in the Banking Book) Guideline. The results are reported on a monthly basis in the risk report.

In addition to present value figures, the Group regularly prepares gap analyses for managing fixed interest rates on the money market and the capital market.

Foreign currency risk is relatively limited as open positions are generally closed. The Group only has a very limited equity risk; in addition, the Group holds shares for the presentation of model portfolios in the context of asset management.

### Development of mean VaR

in EUR



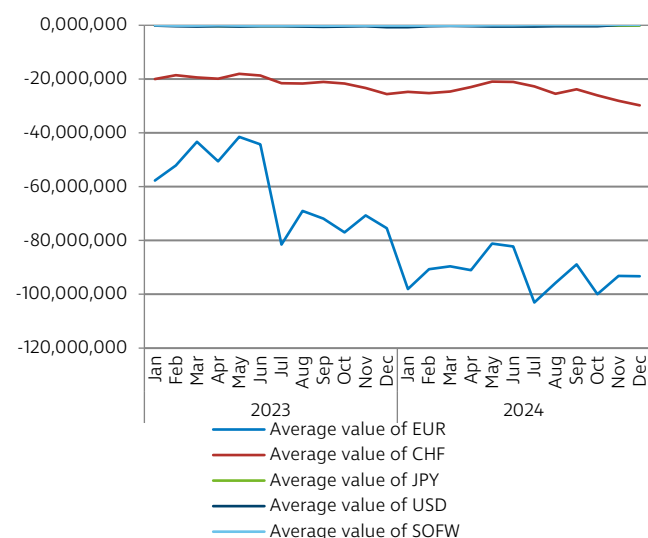
VaR for the individual risk types developed as follows over the past two years:

| TEUR      | Mean VaR (total) | Mean VaR (interest) | Mean VaR (FX) | Mean VaR (shares) | Mean VaR (credit spreads) |
|-----------|------------------|---------------------|---------------|-------------------|---------------------------|
| 2023      |                  |                     |               |                   |                           |
| January   | 27,606           | 23,929              | 1,116         | 35                | 17,339                    |
| February  | 32,380           | 24,125              | 931           | 31                | 18,606                    |
| March     | 30,535           | 23,324              | 1,223         | 22                | 19,055                    |
| April     | 38,225           | 25,301              | 1,608         | 23                | 19,735                    |
| May       | 38,000           | 25,041              | 825           | 23                | 19,653                    |
| June      | 33,645           | 22,364              | 719           | 18                | 18,686                    |
| July      | 33,762           | 24,594              | 666           | 20                | 19,065                    |
| August    | 34,250           | 25,028              | 646           | 23                | 18,730                    |
| September | 34,495           | 25,694              | 809           | 27                | 18,111                    |
| October   | 32,008           | 23,995              | 579           | 24                | 17,635                    |
| November  | 26,234           | 22,149              | 708           | 23                | 16,091                    |
| December  | 29,252           | 24,268              | 887           | 20                | 15,455                    |

| TEUR      | Mean VaR (total) | Mean VaR (interest) | Mean VaR (FX) | Mean VaR (shares) | Mean VaR (credit spreads) |
|-----------|------------------|---------------------|---------------|-------------------|---------------------------|
| 2024      |                  |                     |               |                   |                           |
| January   | 29,524           | 24,298              | 637           | 19                | 15,139                    |
| February  | 29,945           | 24,706              | 637           | 20                | 16,056                    |
| March     | 28,062           | 23,961              | 546           | 18                | 16,071                    |
| April     | 26,903           | 22,897              | 363           | 17                | 15,443                    |
| May       | 26,345           | 22,130              | 436           | 16                | 15,283                    |
| June      | 25,613           | 21,149              | 465           | 8                 | 15,475                    |
| July      | 22,554           | 19,484              | 425           | 14                | 16,245                    |
| August    | 22,962           | 21,097              | 678           | 16                | 17,365                    |
| September | 20,653           | 19,777              | 1,180         | 16                | 17,153                    |
| October   | 21,155           | 18,211              | 992           | 16                | 17,350                    |
| November  | 18,784           | 16,757              | 996           | 17                | 18,409                    |
| December  | 15,327           | 16,546              | 1,264         | 18                | 18,010                    |

The change in present values resulting from a 200-basis-point shift in the yield curves developed as follows over the past two years:

#### Development of change in present values resulting from 200-basis-point shift



#### (61) CREDIT RISK

The Group's medium-term credit risk objectives and policies are set out in writing in the risk strategy. The analysis incorporates the overall Bank strategy, business policy requirements, risk-bearing capacity and lending risks. This results in specific, medium-term objectives regarding the portfolio structure and clear limits for all relevant risks (large exposures, foreign currency components, etc.).

The principles of risk behaviour in lending business are:

- Deviations from general targets do not represent an ETP. These targets are operationalised by way of portfolio limits, for example.
- Name lending only, without meeting the usual conditions and without informative economic documentation, is not carried out.
- The Group aims to avoid cluster risks in terms of sectors, regions, foreign currencies and individual customers.
- Loans are to be priced appropriately in line with the risks.
- Higher collateral is targeted in weak rating classes.
- The goal is for loans involving foreign currency risks for the customer to decrease both in absolute terms and with regard to the total volume.
- As previously, loans in a currency other than EUR are granted only very selectively (with the exception of the St. Gallen branch).
- The goal is to achieve a reduction in foreign currency loans repayable on final maturity.
- The Group does not finance any new customers in rating class 5. Financing is permitted for existing borrowers undergoing a restructuring phase.
- For weaker rating classes, top-quality collateral must be targeted.
- Acquisitions in different sectors may involve elevated risks and must be evaluated more critically.
- New customers outside the core markets represent an elevated risk and must be examined more critically. The regulations on country limits or regional limits and other regulations in the individual sections must be observed.
- The goal is to achieve a reduction in repayment vehicle loans.
- For existing customers with repayment vehicle loans, the Group aims to achieve higher savings for the repayment vehicles or, preferably, a conversion to (partially) amortising loans.
- In the case of foreign currency loans, (partial) conversions or (partial) repayments are targeted. In EUR and in foreign currencies alike, the goal is to convert loans repayable on final maturity to amortising loans (with the exception of the "Lebenswert" and "Lebenszeit" loans at the individual bank).
- The Group aims to reduce complexity in its lending business.

The Group calculates the expected loss (EL) for the entire credit portfolio. An in-house IT tool based on the Basel IRB approach has been developed to calculate the economic capital and the unexpected loss (UL).

In countries where systemic risk or transfer risk cannot be ruled out, the Group intends to grant loans only to a limited extent. To this end, the Managing Board sets country limits that are monitored on an ongoing basis, the utilisation of which is regularly reported to the Managing Board. The banks customer group has its own defined volume limits. Banks are important business partners, e.g. in money market and derivatives trading. They are granted large-volume loans, sometimes with very short terms. These limits are also monitored on a regular basis and their utilisation is reported to the Managing Board. Limits and their utilisation are reported to the Supervisory Board once a year.

Various rating modules tailored to the respective customer group are employed in order to enable the Group to take account of the creditworthiness-relevant characteristics of its various customer segments. These systems meet the requirements of the FMA's Minimum Standards for Lending Business (FMA-MSK) for risk classification procedures. The result is the classification of borrowers into a uniform 25-level rating scale (1a to 5e), with the last five rating levels (5a to 5e) being default levels. Estimated one-year probabilities of default are associated with each rating grade. Rating grades 1a to 2e indicate excellent to very good creditworthiness, rating grades 3a to 3e stand for medium creditworthiness, and rating grades 4a to 4e denote increased default risk. External ratings are generally available in Treasury. If no external ratings are available for a counterparty, an internal rating must be prepared by the back office. External ratings are assigned to the internal rating scale. Rating class 1 is only intended for business partners with a very good external rating.

Credit decisions are made on the basis of the dual control principle. For each area, there are authorisation rules that define rating- and volume-dependent authorisations for the front and back office. As a rule, a second vote by the back office is required.

The Group identifies default events using the CRR definition of default. The recording of default ratings is mainly ensured on a technical basis, or in exceptional cases on a procedural basis. If a default event occurs, the customer in question is assigned a default rating (rating class 5). The Group uses an early warning event recovery system to clearly identify 90-day defaults. The system triggers a standardised workflow that forces the front and back office to handle exposures in default. If an exposure is not resolved within 90 days, it is normally transferred to Central Credit Management for restructuring.

The Group takes account of the particular risks of the banking business through a conservative lending policy, strict credit monitoring and the prudent recognition of specific valuation allowances. Specific valuation allowances are recognised for the credit risks inherent in loans and advances to customers and banks in accordance with uniform Group-wide standards. Risk provisions for defaulted exposures are recognised on the basis of estimates of the amount of future loan defaults and interest discounts. A specific valuation allowance is recognised for a loan if it is probable, based on observable criteria, that not all of the contractually agreed interest and principal obligations can be met. The amount of the specific valuation allowance is the difference between the carrying amount of the loan and the present value of the expected future cash flows, taking into account any discounted collateral. The total amount of the allowance for losses on loans and advances, where it relates to on-balance-sheet receivables, is deducted directly from loans and advances. By contrast, the allowance for losses on off-balance-sheet transactions (guarantees, endorsement liabilities, loan commitments) is reported as a provision for guarantees and commitments. Uncollectible receivables are written off directly. Recoveries on receivables written off are recognised in profit or loss.

The subsidiaries generally use the same rating tools as the parent company. This provides for uniform credit ratings across the Group.

The total exposure includes balance sheet receivables but also contingent liabilities such as open commitments or warranties.

#### Segments broken down by rating class (maximum default risk)

| TEUR<br>31.12.2023    | Rating<br>class 1 | Rating<br>class 2 | Rating<br>class 3 | Rating<br>class 4 | Rating<br>class 5 | Not<br>rated   | Total             |
|-----------------------|-------------------|-------------------|-------------------|-------------------|-------------------|----------------|-------------------|
| Corporate Customers   | 677,719           | 2,463,269         | 4,623,640         | 441,675           | 339,103           | 1,063          | 8,546,469         |
| Private Customers     | 290               | 1,121,162         | 1,243,630         | 31,598            | 20,672            | 21,523         | 2,438,875         |
| Financial Markets     | 3,301,004         | 655,388           | 67,100            | 52                | 0                 | 12,637         | 4,036,181         |
| Corporate Centre      | 287,215           | 714,513           | 1,515,221         | 112,394           | 66,765            | 191,831        | 2,887,939         |
| <b>Total exposure</b> | <b>4,266,228</b>  | <b>4,954,332</b>  | <b>7,449,591</b>  | <b>585,719</b>    | <b>426,540</b>    | <b>227,054</b> | <b>17,909,464</b> |

| TEUR<br>31.12.2024    | Rating<br>class 1 | Rating<br>class 2 | Rating<br>class 3 | Rating<br>class 4 | Rating<br>class 5 | Not<br>rated   | Total             |
|-----------------------|-------------------|-------------------|-------------------|-------------------|-------------------|----------------|-------------------|
| Corporate Customers   | 647,227           | 2,060,775         | 4,584,614         | 483,636           | 410,346           | 2,137          | 8,188,735         |
| Private Customers     | 0                 | 1,187,838         | 1,099,630         | 24,279            | 23,281            | 19,378         | 2,354,406         |
| Financial Markets     | 3,062,256         | 340,507           | 53,829            | 0                 | 0                 | 14,038         | 3,470,630         |
| Corporate Centre      | 318,996           | 680,475           | 1,612,438         | 125,465           | 52,054            | 217,153        | 3,006,581         |
| <b>Total exposure</b> | <b>4,028,479</b>  | <b>4,269,595</b>  | <b>7,350,511</b>  | <b>633,380</b>    | <b>485,681</b>    | <b>252,706</b> | <b>17,020,352</b> |

#### Regions broken down by rating class (maximum default risk)

| TEUR<br>31.12.2023            | Rating<br>class 1 | Rating<br>class 2 | Rating<br>class 3 | Rating<br>class 4 | Rating<br>class 5 | Not<br>rated   | Total             |
|-------------------------------|-------------------|-------------------|-------------------|-------------------|-------------------|----------------|-------------------|
| Austria                       | 2,069,282         | 3,008,574         | 4,741,599         | 380,800           | 272,318           | 3,327          | 10,475,900        |
| Italy                         | 0                 | 177,438           | 575,554           | 122,612           | 61,655            | 7,996          | 945,255           |
| Germany                       | 380,882           | 921,348           | 1,062,251         | 42,081            | 78,011            | 653            | 2,485,226         |
| Switzerland and Liechtenstein | 343,708           | 475,499           | 860,960           | 37,499            | 12,565            | 306            | 1,730,537         |
| Other foreign countries       | 1,472,356         | 371,473           | 209,227           | 2,727             | 1,991             | 214,772        | 2,272,546         |
| <b>Total exposure</b>         | <b>4,266,228</b>  | <b>4,954,332</b>  | <b>7,449,591</b>  | <b>585,719</b>    | <b>426,540</b>    | <b>227,054</b> | <b>17,909,464</b> |



| TEUR<br>31.12.2024            | Rating<br>class 1 | Rating<br>class 2 | Rating<br>class 3 | Rating<br>class 4 | Rating<br>class 5 | Not<br>rated   | Total             |
|-------------------------------|-------------------|-------------------|-------------------|-------------------|-------------------|----------------|-------------------|
| Austria                       | 1,429,265         | 2,791,778         | 4,507,542         | 398,109           | 313,330           | 5,361          | 9,445,385         |
| Italy                         | 0                 | 167,804           | 586,275           | 112,313           | 52,660            | 8,900          | 927,952           |
| Germany                       | 697,066           | 539,571           | 1,100,374         | 63,737            | 108,311           | 7              | 2,509,066         |
| Switzerland and Liechtenstein | 502,128           | 404,629           | 970,977           | 57,448            | 8,011             | 507            | 1,943,700         |
| Other foreign countries       | 1,400,020         | 365,813           | 185,343           | 1,773             | 3,369             | 237,931        | 2,194,249         |
| <b>Total exposure</b>         | <b>4,028,479</b>  | <b>4,269,595</b>  | <b>7,350,511</b>  | <b>633,380</b>    | <b>485,681</b>    | <b>252,706</b> | <b>17,020,352</b> |

The Group has a concentration risk in the poor rating classes in Italy. The real estate market in Italy has been characterised by falling prices in recent years. The Group engages in leasing activities in northern Italy, where the economic situation is relatively better than in the rest of Italy.

#### Industries (maximum default risk)

| TEUR                        | 31.12.2024        | 31.12.2023        |
|-----------------------------|-------------------|-------------------|
| Financial intermediaries    | 3,109,967         | 3,806,745         |
| Consumers/private customers | 2,521,506         | 2,727,403         |
| Public sector               | 1,487,254         | 1,412,367         |
| Real estate                 | 4,684,306         | 3,967,542         |
| Services                    | 698,837           | 1,462,924         |
| Trade                       | 965,423           | 1,013,926         |
| Metals/machinery            | 370,087           | 408,523           |
| Construction                | 802,297           | 788,448           |
| Transport/communications    | 370,802           | 327,242           |
| Tourism                     | 573,114           | 557,777           |
| Water and energy utilities  | 203,086           | 181,049           |
| Other goods                 | 171,221           | 131,851           |
| Vehicle construction        | 203,437           | 239,397           |
| Petroleum, plastics         | 80,325            | 76,437            |
| Other industries            | 778,690           | 807,833           |
| <b>Total exposure</b>       | <b>17,020,352</b> | <b>17,909,464</b> |

The definition of the real estate industry was adapted and expanded in 2024, resulting in a reclassification between the services and real estate industries.

#### Exposure in rating class 5

| TEUR                                      | 31.12.2024     | 31.12.2023     |
|-------------------------------------------|----------------|----------------|
| Corporate Customers – exposure            | 410,346        | 339,103        |
| Corporate Customers – valuation allowance | 73,759         | 90,141         |
| Private Customers – exposure              | 23,281         | 20,672         |
| Private Customers – valuation allowance   | 3,409          | 2,936          |
| Corporate Centre – obligation             | 52,054         | 66,765         |
| Corporate Centre – valuation allowance    | 14,913         | 26,113         |
| <b>Total exposure</b>                     | <b>485,681</b> | <b>426,540</b> |
| <b>Total valuation allowance</b>          | <b>92,081</b>  | <b>119,190</b> |

#### Non-performing loans

The Group defines loans and advances (including off-balance-sheet transactions, including lease receivables, not including securities) as non-performing loans if they meet at least one of the following criteria:

- asset class of loans in arrears (Article 178 CRR)
- stage 03, E3 or E4
- rating class 5

Non-performing loans amounted to TEUR 486,528 as at 31 December 2024 (2023: TEUR 425,842) and represented 3.52 % (2023: 2.90 %) of the corresponding portfolio.

#### Collateral

A uniform and transparent collateral measurement policy governs the measurement and acceptance of collateral. During the term of a loan, the collateral is monitored on a regular basis to ensure that it retains its value. Collateral is usually measured by the back office or, if above a certain size, by a body independent of the lending process.

The most important type of collateral is real estate. Valuations are reviewed regularly. The operating conditions for the eligibility of such collateral for capital backing are guaranteed. Loans above TEUR 3,000 are remeasured by independent specialists after no more than three years. Hypo Immobilien & Leasing GmbH operates as a service provider in this area to ensure uniform, independent valuations. Real estate collateral is predominantly located in the markets served by the Bank. The largest volume of real estate collateral is located in its home market of Vorarlberg, followed by Vienna. In Italy, the leased assets are located in northern Italy.

Personal guarantees can only be taken into account when the guarantor or liable party has an excellent credit rating. This typically means public bodies or banks. Discounts are applied to the current market value of financial collateral to account for unexpected fluctuations. In addition, such collateral must be sufficiently liquid to ensure that it can be realised. There is no significant concentration of guarantors.

Other collateral is only accepted if its recoverability and legal enforceability are ensured in all respects. Bad debts backed by mortgages are recovered by Hypo Immobilien & Leasing GmbH. In the reporting period, three properties were acquired by the Hypo Immobilien & Leasing Group for TEUR 8,881 (2023: one property, TEUR 2,246) and one property was sold for TEUR 2,935 (2023: seven properties, TEUR 3,213).

Depending on the market situation, it may not be easy to convert the acquired properties into cash. Following acquisition, the Group analyses whether a sale or a long-term let would be more advantageous. In the event of a sales strategy, efforts are made to implement the sale as quickly as possible, taking the proceeds into account. In the event of a letting strategy, the property is permanently classified as investment property in the Group.

Due to restructuring measures, no significant individual exposure was given a healthy rating in 2024 or in the prior-year period.

**Loans and advances past due but not impaired**

| TEUR                    | 31.12.2024        | 31.12.2023        |
|-------------------------|-------------------|-------------------|
| Number of days past due |                   |                   |
| Less than 1 day         | 16,355,171        | 17,300,217        |
| 1 to 60 days            | 148,923           | 181,883           |
| 61 to 90 days           | 30,225            | 824               |
| <b>Total exposure</b>   | <b>16,534,319</b> | <b>17,482,924</b> |

Until 31 December 2023, the above table included a row for maturities of "More than 90 days". However, this was not consistent with the definition of this table, which presents loans and advances that are not impaired. We have amended the content of the table and restated the prior-year figures accordingly.

**Loans and advances with forbearance measures**

| TEUR                                                                        | 31.12.2024     | 31.12.2023     |
|-----------------------------------------------------------------------------|----------------|----------------|
| Financial intermediaries                                                    | 10,699         | 12,500         |
| Non-financial companies                                                     | 259,593        | 140,169        |
| Private households                                                          | 9,619          | 3,803          |
| <b>Loans and advances with forbearance measures on performing loans</b>     | <b>279,911</b> | <b>156,472</b> |
| Financial intermediaries                                                    | 416            | 4,485          |
| Non-financial companies                                                     | 101,513        | 63,404         |
| Private households                                                          | 11,123         | 6,011          |
| <b>Loans and advances with forbearance measures on non-performing loans</b> | <b>113,052</b> | <b>73,900</b>  |
| <b>Total loans and advances with forbearance measures</b>                   | <b>392,963</b> | <b>230,372</b> |

In November 2020, Hypo Vorarlberg entered into its second synthetic securitisation in the form of a financial guarantee from the European Investment Fund (EIF) for the mezzanine tranche of a reference portfolio of loans, mostly to small and medium-sized enterprises (SMEs) and mid-caps in Austria and Germany. The reference portfolio had a volume of TEUR 330,000 on conclusion of the securitisation in 2020, and TEUR 136,556 of the reference portfolio was still outstanding as at 31 December 2024.

| TEUR                             | 31.12.2024     | 31.12.2023     |
|----------------------------------|----------------|----------------|
| Senior tranche                   | 110,720        | 164,298        |
| Mezzanine tranche                | 23,067         | 34,229         |
| First loss tranche               | 2,769          | 3,100          |
| <b>Total reference portfolio</b> | <b>136,556</b> | <b>201,627</b> |

In December 2023, Hypo Vorarlberg entered into another synthetic securitisation in the form of a financial guarantee from the European Investment Fund (EIF) for the mezzanine tranche of a reference portfolio of loans, mostly to small and medium-sized enterprises (SMEs) and mid-caps in Austria and Germany. The reference portfolio had a volume of TEUR 360,000 on conclusion of the securitisation in 2023. Due to an agreed replenishment period until September 2025, a reference portfolio with a volume of TEUR 360,000 was also outstanding as at 31 December 2024.

| TEUR                             | 31.12.2024     | 31.12.2023     |
|----------------------------------|----------------|----------------|
| Senior tranche                   | 293,760        | 293,760        |
| Mezzanine tranche                | 61,200         | 61,200         |
| First loss tranche               | 5,040          | 5,040          |
| <b>Total reference portfolio</b> | <b>360,000</b> | <b>360,000</b> |

The reference portfolios were not sold and remain on Hypo Vorarlberg's books. The significant risk transfer under Articles 244 and

245 CRR leads to a reduction in risk-weighted assets and thus the own funds requirement. Hypo Vorarlberg has exercised the option to deduct securitisation items with a risk weighting of 1.250 % from the capital and no longer recognises these items under risk-weighted assets.

**(62) LIQUIDITY RISK**

The goal of liquidity risk management is to ensure the Bank's ability to pay its obligations at all times (operating liquidity) while also minimising the costs associated with holding cash. The Group monitors its liquidity buffer on an ongoing basis. This includes the instruments and markets available for refinancing and assets that are convertible into cash (tactical liquidity management). As part of strategic liquidity management, the Group manages the maturities of its assets and liabilities and defines a corresponding issuance strategy. Monitoring involves gap analyses and forecasting the issue volume required for the calendar year. The Group seeks to identify potential risks by conducting regular stress tests. Contingency plans are in place to ensure the Bank's continued solvency in the event of a liquidity crisis.

The Bank employs the following control instruments to identify and contain liquidity risks:

**Operational**

- Limiting weekly liquidity gaps on the money market
- Liquidity coverage ratio

**Strategic**

- Limiting cumulative annual liquidity gaps on the capital market
- Forecasting the issue volume required for the calendar year
- Liquidity value at risk

**Stress tests**

- Composition of liquidity requirements and liquidity buffer in a crisis situation

The Group is aware of the considerable significance of the capital market for funding. Relationships with investors are established and maintained through regular road shows. The Group aims to ensure a diverse issuance policy with regard to markets, instruments and investors.

The Bank's liquidity buffer should be large enough at all times to accommodate drawdowns of loan commitments (call risk) and to ensure that expected payments not received (forward risk) do not compromise its solvency. Furthermore, the Group currently makes almost no use of the OeNB and the ECB's marginal lending facilities, the SNB repo system or the money market. The Group participated in the ECB's long-term tenders. This means it has sufficient available liquidity at all times to prevent bottlenecks in the event of a crisis.

Hypo Vorarlberg complies with the liquidity regulations set out in the Austrian Banking Act (BWG) and the CRR. There are no additional cash flow risks for the Group besides the risks described here.

The information in the tables on the money market and capital market maturity profiles relate to financial instruments. The expected cash flows are composed as follows: The disclosures in the derivatives column relate to notes (18), (23), (32) and (35). The disclosures in the assets column relate to notes (17) and (19) to (22). The disclosures in the liabilities column relate to notes (33) to (34), (36) and (39). The money market table shows maturities within the next twelve months. The capital market table shows maturities after the next twelve months.

### Money market maturity profile

| TEUR           | Assets    |             | Liabilities |             | Total     |
|----------------|-----------|-------------|-------------|-------------|-----------|
| 31.12.2023     | Assets    | Derivatives | Liabilities | Derivatives |           |
| January 2024   | 1,872,452 | 297,042     | -800,425    | -304,618    | 1,064,451 |
| February 2024  | 260,984   | 172,716     | -506,792    | -160,748    | -233,840  |
| March 2024     | 766,979   | 155,722     | -808,217    | -141,187    | -26,703   |
| April 2024     | 235,827   | 36,421      | -353,439    | -50,226     | -131,417  |
| May 2024       | 213,231   | 118,083     | -727,094    | -129,143    | -524,923  |
| June 2024      | 356,150   | 74,455      | -269,496    | -61,375     | 99,734    |
| July 2024      | 166,359   | 69,599      | -267,291    | -86,531     | -117,864  |
| August 2024    | 158,131   | 33,732      | -180,348    | -72,058     | -60,543   |
| September 2024 | 229,862   | 85,018      | -219,536    | -78,135     | 17,209    |
| October 2024   | 171,003   | 31,761      | -258,085    | -37,647     | -92,968   |
| November 2024  | 156,160   | 20,121      | -265,530    | -34,374     | -123,623  |
| December 2024  | 292,985   | 61,198      | -283,701    | -54,664     | 15,818    |

| TEUR           | Assets    |             | Liabilities |             | Total    |
|----------------|-----------|-------------|-------------|-------------|----------|
| 31.12.2024     | Assets    | Derivatives | Liabilities | Derivatives |          |
| January 2025   | 1,185,806 | 216,302     | -844,144    | -211,617    | 346,347  |
| February 2025  | 258,496   | 378,281     | -957,904    | -353,179    | -674,306 |
| March 2025     | 843,647   | 56,847      | -370,859    | -48,609     | 481,026  |
| April 2025     | 219,827   | 56,073      | -277,634    | -61,791     | -63,525  |
| May 2025       | 167,941   | 63,244      | -277,686    | -48,682     | -95,183  |
| June 2025      | 278,494   | 67,553      | -296,481    | -65,663     | -16,097  |
| July 2025      | 177,096   | 36,240      | -238,561    | -31,705     | -56,930  |
| August 2025    | 170,234   | 22,363      | -165,376    | -45,193     | -17,972  |
| September 2025 | 215,295   | 42,994      | -201,794    | -36,650     | 19,845   |
| October 2025   | 199,577   | 17,136      | -208,300    | -23,078     | -14,665  |
| November 2025  | 113,187   | 24,297      | -266,227    | -40,435     | -169,178 |
| December 2025  | 410,914   | 87,196      | -261,940    | -83,698     | 152,472  |

### Capital market maturity profile

| TEUR       | Assets    |             | Liabilities |             | Total    |
|------------|-----------|-------------|-------------|-------------|----------|
| 31.12.2023 | Assets    | Derivatives | Liabilities | Derivatives |          |
| 2024       | 4,853,811 | 1,155,838   | -4,939,920  | -1,210,664  | -140,935 |
| 2025       | 1,792,509 | 628,025     | -1,432,586  | -643,284    | 344,664  |
| 2026       | 1,827,670 | 278,346     | -1,803,041  | -281,571    | 21,404   |
| 2027       | 1,329,301 | 414,015     | -1,775,839  | -395,220    | -427,743 |
| 2028       | 1,211,917 | 154,370     | -1,536,899  | -140,237    | -310,849 |
| 2029       | 1,004,916 | 113,768     | -1,200,227  | -114,793    | -196,336 |
| 2030       | 860,116   | 96,748      | -572,182    | -82,552     | 302,130  |
| 2031       | 761,653   | 81,596      | -358,830    | -66,694     | 417,725  |
| 2032       | 742,931   | 91,845      | -258,655    | -83,819     | 492,302  |
| 2033       | 598,829   | 59,054      | -229,270    | -53,175     | 375,438  |
| 2034       | 411,063   | 72,843      | -74,232     | -67,208     | 342,466  |
| 2035       | 339,770   | 48,747      | -72,434     | -42,493     | 273,590  |



| TEUR       | Assets    |             | Liabilities |             | Total    |
|------------|-----------|-------------|-------------|-------------|----------|
| 31.12.2024 | Assets    | Derivatives | Liabilities | Derivatives |          |
| 2025       | 4,269,210 | 1,068,526   | -4,366,870  | -1,050,302  | -79,436  |
| 2026       | 1,966,704 | 399,082     | -1,904,324  | -389,691    | 71,771   |
| 2027       | 1,677,522 | 485,696     | -2,180,191  | -460,585    | -477,558 |
| 2028       | 1,318,421 | 207,821     | -1,589,565  | -183,203    | -246,526 |
| 2029       | 1,207,431 | 166,080     | -1,210,015  | -159,211    | 4,285    |
| 2030       | 949,690   | 147,041     | -1,093,979  | -119,669    | -116,917 |
| 2031       | 871,137   | 115,664     | -395,272    | -97,979     | 493,550  |
| 2032       | 825,863   | 122,347     | -269,145    | -112,766    | 566,299  |
| 2033       | 684,861   | 89,057      | -248,012    | -81,130     | 444,776  |
| 2034       | 650,802   | 97,734      | -303,386    | -91,021     | 354,129  |
| 2035       | 380,397   | 65,762      | -72,955     | -58,583     | 314,621  |
| 2036       | 323,342   | 101,712     | -112,421    | -97,381     | 215,252  |

### (63) OPERATING RISK

Operating risks (OR) are minimised in all divisions of the Bank through the clear distribution of responsibilities and written procedural instructions. The Bank has written emergency plans in place and a security and crisis management manual are made available to all employees. Employees receive regular training to prepare them for crisis events of all kinds. The Bank has engaged in a critical review of all internal processes multiple times as part of functional analyses.

Loss events at the Bank are recorded in a loss event database. In this database, operating loss events are assigned to different categories. Quality assurance is performed by operational risk managers who review each loss event. For example, the recording of loss events is guaranteed by making it a requirement for a necessary entry. The database is analysed as part of the quarterly OR report.

The Bank places great emphasis on data protection and security measures and conducts a large number of controls and monitoring processes to ensure that entrusted data remains confidential. Internal Audit conducts both regular and unannounced audits to ensure adherence to procedural instructions.

Material transactions and decisions are made exclusively in accordance with the dual control principle. Well-trained and conscientious employees are of great importance to the Bank. The internal Legal department designs contracts carefully so as to minimise legal risks, where necessary in consultation with specialist lawyers.

### (64) CONSOLIDATED CAPITAL AND REGULATORY CAPITAL REQUIREMENTS

#### Capital management

The Group's capital management objectives and requirements include:

- Compliance with the regulatory capital requirements of CRR
- Maintaining a going concern
- Servicing shareholder distributions
- Developing the capital base

Capital adequacy in accordance with CRR is monitored on an ongoing basis. This data is determined once a month and reported to the OeNB once a quarter on an individual basis and at Group level.

For 2024, the CRR stipulates that banks must achieve or exceed a common equity tier 1 (CET1) ratio of 4.50 %, a tier 1 (T1) ratio of 6.00 % and an equity ratio of 8.00 %. An additional capital preservation buffer of 2.50 % (2023: 2.50 %) and a systemic risk buffer of 0.50 % (2023: 0.50 %) also applied in 2024, among other requirements. Hypo Vorarlberg complied with the provisions of the CRR on regulatory capital both in 2024 and in the previous year.

The banking group's regulatory capital is calculated by the Reporting department and consists of three tiers. Corresponding transitional regulations for the period from 2014 to 2024 are stipulated in the CRR.

#### Common equity tier 1 capital – CET1

This includes the eligible and paid-in capital instruments, share premium accounts related to these instruments, retained earnings, eligible profit/loss for the year, accumulated other comprehensive income, and other reserves. The CRR also provides for deductions, such as for intangible assets, deferred tax assets, measurement effects due to the institution's own credit risk, deductions due to prudent valuation, and common equity tier 1 (CET1) instruments of financial sector entities that exceed certain thresholds.

#### Additional tier 1 capital – AT1

This includes the eligible and paid-in capital instruments and share premium accounts relating to these instruments. The CRR also provides for deductions in respect of these items.

Tier 1 capital (T1) is the total of common equity tier 1 capital (CET1) and additional tier 1 capital (AT1).

#### Tier 2 capital – T2

This includes eligible tier 2 bonds and subordinated loans and share premium accounts relating to these instruments. Tier 2 instruments in the last five years of their terms are only eligible to a certain extent. Tier 2 instruments of financial sector entities that exceed certain thresholds are also deductible here.

Eligible own funds are calculated by adding tier 1 (T1) and tier 2 (T2) capital. The tables below show the capital requirements pursuant to the CRR and the breakdown of the banking group's capital.

## Pillar 2 economic perspective

Pillar 2 of Basel III requires banks to prove their capital adequacy, including using internal models. In particular, they must also take account of risks for which no capital requirements are specified under Pillar 1, such as interest rate risk in the banking book. As part of this internal capital adequacy assessment process (ICAAP), the Bank identifies, quantifies, aggregates and monitors all material risks. The Bank calculates the necessary economic capital for each risk. In cases where it is not possible to calculate economic capital, the Bank provides for capital buffers. The available cover potential is allocated to organisational units and risk types as part of annual planning.

The Bank uses a risk-bearing capacity calculation to ensure that risk budgets are adhered to and the risks assumed are covered by the available coverage potential. The Bank uses a confidence level of 99.9 % for the risk-bearing capacity calculation in the liquidation view. The holding period is one year. Correlations between the individual risk types are not taken into account. The risk-bearing capacity calculation is performed monthly.

The Bank follows the IRB approach of Basel III for calculating economic capital in credit risk. The consumption of economic capital depends on the type and amount of the obligation, the collateralisation and the rating of the obligor. The ICAAP uses value at risk to manage market risk. The VaR limit defines the maximum loss that the Bank is prepared to accept under normal market conditions. The Managing Board sets the global VaR limit annually. In addition, limits are set for various interest rate curves, currency pairs or equity risks.

The Bank calculates its economic capital for operational risk using the basic indicator approach of Pillar 1. In order to quantify structural liquidity risk, Hypo Vorarlberg calculates a liquidity value at risk, the calculation of which is based on the ICAAP guidelines of the FMA/OeNB. Separate approaches are used for investment risk, real estate risk, foreign currency risk in the lending business, migration risk and counterparty default risk. An equity buffer is provided for other risks.

## Regulatory requirements according to CRR

### Total risk exposure according to CRR

| TEUR                                                                     | 31.12.2024       | 31.12.2023       |
|--------------------------------------------------------------------------|------------------|------------------|
| Risk-weighted exposure amounts                                           | 8,445,274        | 8,354,958        |
| Total exposure amount for position, foreign exchange and commodity risks | 407              | 711              |
| Total risk exposure amount for operational risk                          | 537,869          | 524,361          |
| Total risk exposure amount for credit valuation adjustment               | 29,098           | 34,020           |
| <b>Total risk exposure amount</b>                                        | <b>9,012,648</b> | <b>8,914,050</b> |

### Common equity tier 1 capital (CET1) according to CRR

| TEUR                                                          | 31.12.2024       | 31.12.2023       |
|---------------------------------------------------------------|------------------|------------------|
| Capital instruments eligible as CET1 capital                  | 206,825          | 206,825          |
| Retained earnings                                             | 1,132,610        | 1,100,260        |
| Accumulated other comprehensive income                        | 8,156            | 12,899           |
| Other reserves                                                | 139,082          | 139,082          |
| Minority interests                                            | 99               | 10               |
| Adjustments to CET1 capital due to deductions and adjustments | -18,687          | -23,514          |
| Intangible assets                                             | -2,876           | -3,285           |
| Insufficient coverage of non-performing risk positions        | -8,515           | -5,864           |
| Other transitional adjustments to CET1 capital                | 3,895            | 7,789            |
| <b>Common equity tier 1 capital (CET1)</b>                    | <b>1,460,589</b> | <b>1,434,202</b> |

### Additional tier 1 capital (AT1) according to CRR

| TEUR                                                                  | 31.12.2024    | 31.12.2023    |
|-----------------------------------------------------------------------|---------------|---------------|
| Capital instruments eligible as AT1 capital                           | 50,000        | 50,000        |
| Instruments issued by subsidiaries that are recognised in AT1 capital | 20            | 2             |
| <b>Additional core capital (AT1)</b>                                  | <b>50,020</b> | <b>50,002</b> |

### Tier 2 capital (T2)

| TEUR                                                                 | 31.12.2024     | 31.12.2023     |
|----------------------------------------------------------------------|----------------|----------------|
| Capital instruments eligible as T2 capital                           | 228,585        | 223,729        |
| Instruments issued by subsidiaries that are recognised in T2 capital | 26             | 3              |
| <b>Tier 2 capital (T2)</b>                                           | <b>228,611</b> | <b>223,732</b> |

### Composition of own funds according to CRR and capital ratios

| TEUR                                | 31.12.2024       | 31.12.2023       |
|-------------------------------------|------------------|------------------|
| Common equity tier 1 capital (CET1) | 1,460,589        | 1,434,202        |
| Additional core capital (AT1)       | 50,020           | 50,002           |
| <b>Tier 1 capital (T1)</b>          | <b>1,510,609</b> | <b>1,484,204</b> |
| Tier 2 capital (T2)                 | 228,611          | 223,732          |
| <b>Own funds</b>                    | <b>1,739,220</b> | <b>1,707,936</b> |
| CET1 capital ratio (CET1)           | 16.21 %          | 16.09 %          |
| Surplus of CET1 capital (CET1)      | 1,055,021        | 1,033,070        |
| T1 capital ratio (T1)               | 16.76 %          | 16.65 %          |
| Surplus of T1 capital (T1)          | 969,851          | 949,361          |
| Total capital ratio                 | 19.30 %          | 19.16 %          |
| Surplus of total capital            | 1,018,209        | 994,812          |

## H. DISCLOSURES PERTAINING TO AUSTRIAN LAW

### (65) AUSTRIAN LAW

The consolidated financial statements have been prepared in accordance with section 59a of the Austrian Banking Act (BWG) in conjunction with section 245a (1) of the Austrian Commercial Code (UGB) in accordance with International Financial Reporting Standards as adopted by the EU. In addition, pursuant to section 59a BWG, the information required by section 64 (1) no. 1-15 and (2) BWG and section 245a (1) and (3) UGB must be included in the notes to the consolidated financial statements.

### (66) ADDITIONAL DISCLOSURES PURSUANT TO THE AUSTRIAN BANKING ACT

The disclosure pursuant to section 64 (1) no. 1 BWG on the equity interest in the leasing business can be found in note (22).

| TEUR                                                                                 | Number     |            | Carrying amount |            |
|--------------------------------------------------------------------------------------|------------|------------|-----------------|------------|
|                                                                                      | 31.12.2024 | 31.12.2023 | 31.12.2024      | 31.12.2023 |
| Tier 2 capital according to Part Two Title I Chapter 4 (EU Reg. 575/2013) – LFVO     | 4          | 3          | 29,379          | 25,146     |
| Tier 2 capital according to Part Two Title I Chapter 4 (EU Reg. 575/2013) – LAC      | 5          | 4          | 266,043         | 238,703    |
| Additional tier 1 capital according to Part Two Title I Chapter 3 (EU-Reg. 575/2013) | 2          | 2          | 50,381          | 50,406     |

|                                                                                      | Average interest rate |            | Average remaining term to maturity (in |             |
|--------------------------------------------------------------------------------------|-----------------------|------------|----------------------------------------|-------------|
|                                                                                      | 31.12.2024            | 31.12.2023 | 31.12.2024                             | 31.12.2023  |
| Tier 2 capital according to Part Two Title I Chapter 4 (EU Reg. 575/2013) – LFVO     | 4.192 %               | 4.783 %    | 6.7                                    | 7.4         |
| Tier 2 capital according to Part Two Title I Chapter 4 (EU Reg. 575/2013) – LAC      | 3.222 %               | 3.028 %    | 4.6                                    | 5.2         |
| Additional tier 1 capital according to Part Two Title I Chapter 3 (EU Reg. 575/2013) | 6.074 %               | 6.074 %    | No maturity                            | No maturity |

The following subordinated liabilities exceed 10 % of the total amount of the subordinated liabilities shown above. The conditions of these issues in accordance with section 64 no. 5 BWG are also shown.

- Subordinated bond ISIN AT0000A1GTF4, TEUR 50,000, fixed interest rate 4.5 %, term 2015 to 2025, no termination or conversion option, will be repaid at nominal amount at end of term
- Subordinated bond ISIN AT0000A1YQ55, TEUR 50,000, fixed interest rate 3.125 %, term 2017 to 2027, no termination or conversion option, will be repaid at nominal amount at end of term
- Subordinated bond ISIN CH0461238948, TCHF 100,000, fixed interest rate 1.625 %, term 2019 to 2029, no termination or conversion options, will be repaid at nominal amount at end of term
- Subordinated bond ISIN AT0000A321S4, TEUR 44,000, fixed interest rate 4.75 %, term 2022 to 2032, no termination or conversion option, will be repaid at nominal amount at end of term

In 2016, additional tier 1 capital in the amount of TEUR 10,000 was generated through the issue of the Hypo Vorarlberg additional tier 1 bond 2016, ISIN AT0000A1LKA4. The distribution corresponds to 5.87 % p.a. for the first ten years and subsequently to the six-month Euribor plus 5.30 % p.a. (annual payment). It can be called by the issuer after ten years, and on an annual basis thereafter. In 2018, additional tier 1 capital in the amount of TEUR 40,000 was generated through the issue of the Hypo Vorarlberg additional tier 1 bond 2018, ISIN AT0000A20DC3. The distribution corresponds to 6.125 % p.a. for the first twelve years and one month and subsequently to the six-month Euribor plus 5.00 % p.a. (semi-annual payment). It is redeemable for the first time at the issuer's discretion after twelve years and one month, and on an annual basis thereafter.

The disclosure pursuant to section 64 (1) no. 2 BWG on total assets and liabilities in foreign currencies can be found in note (41).

The disclosure pursuant to section 64 (1) no. 3 BWG on forward transactions not yet settled at the reporting date can be found in notes (18) and (32).

The disclosure pursuant to section 64 (1) no. 4 BWG on the residual terms of loans and advances to banks and customers and liabilities to banks and customers can be found in note (42).

Subordinated liabilities are included in the balance sheet items "Financial liabilities at fair value (option)" and "Financial liabilities at amortised cost". The following table provides details pursuant to section 64 (1) no. 5-6 BWG.

Interest accrued as at the end of the reporting period amounts to TEUR 321 for both bonds (2023: TEUR 320). The bonds are unsecured and subordinated and have an indefinite term.

In 2025, bonds and other fixed-income securities pursuant to section 64 (1) no. 7 BWG with a nominal amount of TEUR 336,410 (2024: TEUR 424,073) and issued bonds in the amount of TEUR 780,527 (2024: TEUR 756,299) will be due for repayment.

The disclosure pursuant to section 64 (1) no. 8 BWG on assets furnished as collateral can be found in note (46).

The disclosure pursuant to section 64 (1) no. 9 BWG is not made in terms of geographical markets, as these do not differ materially from the Bank's organisational structure.

The disclosure pursuant to section 64 (1) no. 12 BWG is already made in the individual notes to the consolidated financial statements where the amounts are significant.

Interest expenses for subordinated liabilities in accordance with section 64 (1) no. 13 BWG amounted to TEUR 9,215 in 2024 (2023: TEUR 8,361).

The disclosure in accordance with section 64 (1) no. 15 BWG can be found in note (68). The Bank maintains a small trading portfolio within the meaning of Article 94 CRR in order to provide better customer service. Investment funds amounting to TEUR 148 were included in the trading book as at 31 December 2024 (2023: TEUR 125).

The disclosure in accordance with section 64 (1) no. 16 and no. 17 BWG on the breakdown of core capital, supplementary own funds and consolidated own funds can be found in notes (40) and (64).

The financial information and key figures for each country of establishment pursuant to section 64 (1) no. 18 BWG are disclosed in the following table.

| TEUR<br>2023                                            | Austria  | Switzerland | Italy  |
|---------------------------------------------------------|----------|-------------|--------|
| Net interest income                                     | 205,637  | 14,449      | 13,575 |
| Dividend income                                         | 186      | 0           | 0      |
| Net fee and commission income                           | 34,634   | 856         | -87    |
| Net result from financial instruments at amortised cost | 2,289    | 36          | 0      |
| Net result from financial instruments at fair value     | -38,750  | 628         | 0      |
| Administrative expenses                                 | -101,668 | -7,524      | -7,315 |
| Depreciation and amortisation                           | -6,599   | -494        | -1,087 |
| Earnings before taxes                                   | 42,040   | 3,491       | 7,526  |
| Taxes on income                                         | -11,102  | -499        | -1,357 |
| Number of FTEs                                          | 666      | 27          | 46     |

| TEUR<br>2024                                            | Austria  | Switzerland | Italy  |
|---------------------------------------------------------|----------|-------------|--------|
| Net interest income                                     | 206,463  | 15,395      | 11,835 |
| Dividend income                                         | 381      | 0           | 0      |
| Net fee and commission income                           | 37,957   | 1,062       | -69    |
| Net result from financial instruments at amortised cost | 94       | 0           | 0      |
| Net result from financial instruments at fair value     | -3,162   | 554         | 0      |
| Administrative expenses                                 | -115,460 | -9,392      | -7,712 |
| Depreciation and amortisation                           | -6,580   | -520        | -1,084 |
| Earnings before taxes                                   | 47,776   | 6,521       | 3,761  |
| Taxes on income                                         | -13,068  | -928        | -1,612 |
| Number of FTEs                                          | 685      | 30          | 46     |

Switzerland comprises the branch in St. Gallen. The branch in St. Gallen acts as a universal bank with a focus on lending, asset management and investment advisory services. It operates in German-speaking Switzerland, especially eastern Switzerland.

The branch in Italy comprises the subsidiaries Hypo Vorarlberg Holding (Italy) G.m.b.H, Hypo Vorarlberg Leasing AG and Hypo Vorarlberg Immo Italia srl. All of the companies are based in Bolzano. Hypo Vorarlberg Leasing AG operates in the real estate leasing business and occasionally in the movables leasing business. Hypo Vorarlberg Leasing AG also has a branch in Como. Its area of activity comprises South Tyrol and northern Italy. Hypo Vorarlberg Immo Italia srl manages and values the Group's real estate in Italy and provides real estate services for the Group. In addition, Hypo Vorarlberg Immo Italia srl manages and sells real estate in its own right. Hypo Vorarlberg Holding (Italy) G.m.b.H. holds the equity interests in the other two companies.

The return on assets in accordance with section 64 (1) no. 19 BWG amounts to 0.27 % (2023: 0.26 %).

#### (67) AUDITOR'S FEE PURSUANT TO THE AUSTRIAN COMMERCIAL CODE

The table below provides a breakdown of the fees paid to Ernst & Young, Wirtschaftsprüfungsgesellschaft m.b.H., Wagramer Str. 19 – IZD Tower, 1220 Vienna, Austria, pursuant to section 266 of the Austrian Commercial Code (UGB).

| TEUR                                                            | 2024       | 2023       |
|-----------------------------------------------------------------|------------|------------|
| Expenses for the audit of the consolidated financial statements | 250        | 207        |
| Expenses for other assurance services                           | 118        | 99         |
| Expenses for other services                                     | 40         | 29         |
| <b>Total fees</b>                                               | <b>408</b> | <b>335</b> |

## (68) DISCLOSURES ON STOCK EXCHANGE LISTING

A breakdown of securities pursuant to section 64 (1) no. 10 and no. 11 BWG is provided below.

| TEUR                                       | Unlisted       | Listed           | Unlisted       | Listed           | Total            | Total            |
|--------------------------------------------|----------------|------------------|----------------|------------------|------------------|------------------|
|                                            | 31.12.2024     | 31.12.2024       | 31.12.2023     | 31.12.2023       | 31.12.2024       | 31.12.2023       |
| Debt securities at fair value (non-SPPI)   | 83,676         | 50,890           | 87,565         | 58,375           | 134,566          | 145,940          |
| Debt securities at fair value (option)     | 7,897          | 51,172           | 4,838          | 51,402           | 59,069           | 56,240           |
| Debt securities at amortised cost          | 158,634        | 2,335,638        | 112,943        | 2,232,640        | 2,494,272        | 2,345,583        |
| Equity securities – trading assets         | 2              | 146              | 125            | 0                | 148              | 125              |
| Equity securities at fair value (non-SPPI) | 17,309         | 500              | 12,371         | 0                | 17,809           | 12,371           |
| <b>Total securities</b>                    | <b>267,518</b> | <b>2,438,346</b> | <b>217,842</b> | <b>2,342,417</b> | <b>2,705,864</b> | <b>2,560,259</b> |
| of which non-current assets                | 267,344        | 2,438,200        | 217,608        | 2,342,417        | 2,705,544        | 2,560,025        |
| of which current assets                    | 172            | 0                | 109            | 0                | 172              | 109              |
| of which trading assets                    | 2              | 146              | 125            | 0                | 148              | 125              |

Loans and advances were not taken into account in order to improve the transparency and informational value of the breakdown of securities.

The difference between the cost and the lower repayment amount in accordance with section 56 (2) BWG amounts to TEUR 56,448 (2023: TEUR 35,170). The difference between the repayment amount and the lower cost in accordance with section 56 (3) BWG amounts to TEUR 20,054 (2023: TEUR 10,491). As at 31 December 2024, the subordinated capital in the Bank's proprietary portfolio had a nominal value of TEUR 0 (2023: TEUR 0).

## (69) SUBSIDIARIES AND HOLDINGS NOT INCLUDED IN THE CONSOLIDATED FINANCIAL STATEMENTS

The following subsidiaries were not included in the consolidated financial statements as they are of minor importance to the informational value of the consolidated financial statements, both when considered individually and when taken together. In most cases, these companies are project companies which do not undertake business operations and which are instead responsible for the realisation of individual assets.

| Company name, place                                    | Equity interest | UGB share-equity | UGB net   | UGB total assets | Reporting date |
|--------------------------------------------------------|-----------------|------------------|-----------|------------------|----------------|
| TEUR                                                   |                 |                  |           |                  |                |
| HV-Finanzdienstleistungs- und Immobilien GmbH, Kempten | 100.00 %        | 239              | 25        | 246              | 31.12.2024     |
| Hotel Widderstein Besitz & Verwaltungs GmbH, Dornbirn  | 100.00 %        | 3                | -27       | 270              | 31.12.2024     |
| <b>Total</b>                                           |                 | <b>242</b>       | <b>-2</b> | <b>516</b>       |                |

The following holding over which the Group has significant influence is not included in the consolidated financial statements as its inclusion would result in a disproportionate delay in the preparation of the consolidated financial statements. Furthermore, the IFRS provisions would require a reconciliation that would involve relatively high costs without significantly increasing the information value regarding the net assets, financial position and results of operations.

| Company name, place                                                  | Equity interest | UGB share-equity | UGB net | UGB total assets | Reporting date |
|----------------------------------------------------------------------|-----------------|------------------|---------|------------------|----------------|
| TEUR                                                                 |                 |                  |         |                  |                |
| „Wirtschafts-Standort Vorarlberg“ Betriebsansiedlungs GmbH, Dornbirn | 33.33 %         | 37               | 0       | 518              | 31.12.2024     |

## I. EXECUTIVE BODIES OF HYPO VORARLBERG

### MANAGING BOARD

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**Michel Haller**

Chairman of the Managing Board, Tett nang

**Wilfried Amann**

Member of the Managing Board, Bludesch

**Philipp Hämmerle**

Member of the Managing Board, Lustenau

### SUPERVISORY BOARD

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**Jodok Simma**

Chairman, Chairman of the Managing Board (retired), Bregenz

**Alfred Geismayr**

Deputy Chairman, Chartered Accountant and Tax Advisor, Dornbirn

**Astrid Bischof**

Entrepreneur, Göfis

**Karl Fenkart**

Civil servant, Lustenau

**Eduard Fischer**

Managing Director of Offsetdruckerei Schwarzach Gesellschaft mbH (retired), Dornbirn

**Johannes Heinloth**

Member of the Board of Managing Directors of L-Bank, Karlsruhe

**Karl Manfred Lochner**

Member of the Board of Managing Directors of Landesbank Baden-Württemberg (LBBW) (retired), Burgthann

**Karlheinz Rüdiss**

Deputy State Governor of Vorarlberg (retired), Lauterach

**Birgit Sonnbichler**

Entrepreneur, Dornbirn

**Petra Winder**

Managing Director, Bregenz

**Veronika Moosbrugger**

Chairwoman of the Works Council, Works Council delegate

**Elmar Köck**

Works Council delegate

**Gerhard Köhle**

Works Council delegate

**Peter Niksic**

Works Council delegate

**Andreas Hinterauer (until 20 May 2024)**

Works Council delegate

**Judith Österle (from 20 May 2024)**

Works Council delegate

As of: April 2025

## J. SUBSIDIARIES AND HOLDINGS

### a) Fully consolidated companies:

| Company name, place                                                             | Equity interest | Reporting date |
|---------------------------------------------------------------------------------|-----------------|----------------|
| Hypo Vorarlberg Bank AG                                                         |                 | 31.12.2024     |
| "Hypo-Rent" Leasing- und Beteiligungsgesellschaft mbH, Bregenz                  | 100.00 %        | 31.12.2024     |
| LD-Leasing GmbH, Dornbirn                                                       | 100.00 %        | 31.12.2024     |
| Hypo Vorarlberg Leasing AG, Bolzano (Italy)                                     | 100.00 %        | 31.12.2024     |
| HYPO VORARLBERG HOLDING (ITALIEN) G.m.b.H, Bolzano (Italy)                      | 100.00 %        | 31.12.2024     |
| Hypo Vorarlberg Immo Italia srl, Bolzano (Italy)                                | 100.00 %        | 31.12.2024     |
| VKL VI PBZ Korneuburg Leasinggesellschaft m.b.H.                                | 100.00 %        | 31.12.2024     |
| Hypo Immobilien Besitz GmbH, Dornbirn                                           | 100.00 %        | 31.12.2024     |
| "HERA" Grundstücksverwaltungsgesellschaft m.b.H., Dornbirn                      | 100.00 %        | 31.12.2024     |
| Hypo Immobilien Bankgebäudemanagement GmbH, Dornbirn                            | 100.00 %        | 31.12.2024     |
| Hypo Immobilien Investment GmbH, Dornbirn                                       | 100.00 %        | 31.12.2024     |
| Hypo Immobilien & Leasing GmbH, Dornbirn                                        | 100.00 %        | 31.12.2024     |
| HIL Mobilienleasing GmbH & Co KG, Dornbirn                                      | 100.00 %        | 31.12.2024     |
| HIL Immobilien GmbH, Dornbirn                                                   | 100.00 %        | 31.12.2024     |
| HIL BETA Mobilienverwertung GmbH, Dornbirn                                      | 100.00 %        | 31.12.2024     |
| HIL Baumarkt Triester Straße Immobilienleasing GmbH, Dornbirn                   | 100.00 %        | 31.12.2024     |
| HIL Real Estate alpha GmbH, Dornbirn                                            | 100.00 %        | 31.12.2024     |
| HIL Kommunalleasing GmbH, Dornbirn                                              | 100.00 %        | 31.12.2024     |
| "POSEIDON" Grundstücksverwaltungsgesellschaft m.b.H., Dornbirn                  | 100.00 %        | 31.12.2024     |
| Hypo Immobilien Cinemabetriebs GmbH, Dornbirn                                   | 100.00 %        | 31.12.2024     |
| Edeltraut Lampe GmbH & Co KG, Dornbirn                                          | 100.00 %        | 31.12.2024     |
| D. TSCHERNE Gesellschaft m.b.H., Vienna                                         | 100.00 %        | 31.12.2024     |
| VKL IV Leasinggesellschaft mbH, Dornbirn                                        | 100.00 %        | 31.12.2024     |
| VKL V Immobilien Leasinggesellschaft m.b.H., Dornbirn                           | 100.00 %        | 31.12.2024     |
| HYPO EQUITY Beteiligungs GmbH, Bregenz, previously: HYPO EQUITY Beteiligungs AG | 100.00 %        | 31.12.2024     |
| KUFA GmbH, Bregenz                                                              | 100.00 %        | 31.12.2024     |
| HYPO EQUITY Unternehmensbeteiligungen AG, Bregenz*)                             | 100.00 %        | 30.09.2024     |
| METIS - Beteiligungs und Verwaltungs GmbH, Bregenz*)                            | 100.00 %        | 30.09.2024     |
| "HSL-Lindner" Traktorenleasing GmbH, Dornbirn                                   | 76.00 %         | 31.12.2024     |

\*) The single-entity financial statements of these companies were prepared as at 30 September 2024, as their financial years differ from the calendar year. The financial figures for the fourth quarter are taken into consideration.

Changes in the scope of consolidation are described in note (2). The stated equity interests in the other companies listed in the above table did not change in the 2024 financial year. The share of voting rights corresponds to the equity interest in each case.

**b) Companies consolidated using the equity method:**

The equity interests in the companies listed in the following table did not change in the 2024 financial year. The share of voting rights corresponds to the equity interest in each case.

| Company name, place<br>TEUR              | Equity<br>interest | Shareholders'<br>equity | Total<br>assets | Liabilities | Revenue |
|------------------------------------------|--------------------|-------------------------|-----------------|-------------|---------|
| comit Versicherungsmakler GmbH, Dornbirn | 40.00 %            | 5,340                   | 6,898           | 1,558       | 81      |
| MASTERINVEST Kapitalanlage GmbH, Vienna  | 37.50 %            | 5,038                   | 9,722           | 4,684       | 112     |

comit Versicherungsmakler GmbH is a financial services company that provides consulting and support for industrial, commercial and private customers on insurance matters and insurance solutions. The business activities of MASTERINVEST Kapitalanlage GmbH include the management of capital investment funds in accordance with the Austrian Investment Fund Act.

All companies included in the consolidated financial statements using the equity method are based on single-entity financial statements as at 31 December 2024. The net interest income of these companies is presented under revenue.

**c) Differing scope of consolidation according to CRR**

The regulatory scope of consolidation differs from the IFRS scope of consolidation presented above as follows. The following companies are included in the regulatory scope of consolidation using the equity method in accordance with section 6 (1) of the CRR Supplementary Regulation 2021 dated 14 December 2021 (CRR-BV 2021):

- comit Versicherungsmakler GmbH
- MASTERINVEST Kapitalanlage GmbH
- Hypo EQUITY Unternehmensbeteiligungen AG

METIS - Beteiligungs und Verwaltungs GmbH is not included in the regulatory scope of consolidation.

**(70) DISCLOSURES ON NON-CONTROLLING INTERESTS**

Non-controlling interests are held in "HSL-Lindner" Traktorenleasing GmbH, Dornbirn. The financial information for this company is presented in the table below.

**"HSL-Lindner" Traktorenleasing GmbH, Dornbirn**

| TEUR                               | 31.12.2024 | 31.12.2023 |
|------------------------------------|------------|------------|
| Assets                             | 5,629      | 846        |
| Financial assets                   | 5,626      | 798        |
| of which current                   | 902        | 419        |
| of which non-current               | 4,724      | 379        |
| Other assets                       | 3          | 48         |
| Liabilities                        | 5,432      | 718        |
| Financial liabilities              | 5,355      | 694        |
| of which non-current               | 5,355      | 569        |
| Other liabilities                  | 77         | 5          |
| Shareholders' equity               | 197        | 128        |
| of which non-controlling interests | 47         | 31         |
| TEUR                               | 2024       | 2023       |
| Net interest income                | 64         | 32         |
| Other income                       | 466        | 99         |
| Other expenses                     | -465       | -98        |
| Earnings before taxes              | 88         | 13         |
| Taxes on income                    | -20        | -3         |
| Earnings after taxes               | 68         | 10         |
| of which non-controlling interests | 16         | 2          |
| Dividends/distributions            | 0          | 100        |
| of which non-controlling interests | 0          | 24         |

**(71) DISCLOSURES ON JOINT VENTURES AND ASSOCIATES****comit Versicherungsmakler GmbH, Dornbirn**

| TEUR                    | 31.12.2024 | 31.12.2023 |
|-------------------------|------------|------------|
| Assets                  | 6,898      | 6,093      |
| Financial assets        | 4,098      | 3,222      |
| of which current        | 3,598      | 3,221      |
| of which non-current    | 500        | 1          |
| Other assets            | 2,800      | 2,871      |
| Liabilities             | 1,558      | 1,217      |
| Financial liabilities   | 394        | 24         |
| of which current        | 394        | 24         |
| Provisions              | 332        | 333        |
| Other liabilities       | 832        | 860        |
| Shareholders' equity    | 5,340      | 4,876      |
| TEUR                    | 2024       | 2023       |
| Net interest income     | 81         | 70         |
| Other income            | 19         | 20         |
| Other expenses          | -45        | -45        |
| Earnings before taxes   | 1,278      | 1,310      |
| Taxes on income         | -314       | -331       |
| Earnings after taxes    | 964        | 979        |
| Dividends/distributions | 500        | 250        |



**MASTERINVEST Kapitalanlage GmbH, Vienna**

| TEUR                  | 31.12.2024 | 31.12.2023 |
|-----------------------|------------|------------|
| Assets                | 9,722      | 10,225     |
| Financial assets      | 6,393      | 5,857      |
| of which current      | 3,778      | 3,309      |
| of which non-current  | 2,615      | 2,548      |
| Other assets          | 3,329      | 4,368      |
| Liabilities           | 4,684      | 5,320      |
| Financial liabilities | 2,868      | 3,935      |
| of which current      | 2,868      | 3,935      |
| Provisions            | 199        | 200        |
| Other liabilities     | 1,617      | 1,185      |
| Shareholders' equity  | 5,038      | 4,905      |

| TEUR                    | 2024   | 2023   |
|-------------------------|--------|--------|
| Net interest income     | 112    | 87     |
| Dividend income         | 21     | 82     |
| Other income            | 1,466  | 1,122  |
| Other expenses          | -1,277 | -1,157 |
| Earnings before taxes   | 1,188  | 829    |
| Taxes on income         | -285   | -260   |
| Earnings after taxes    | 903    | 569    |
| Dividends/distributions | 770    | 900    |

**Vorarlberger Kommunalgebäudeleasing Gesellschaft m.b.H., Dornbirn**

| TEUR                  | 31.12.2024 | 31.12.2023 |
|-----------------------|------------|------------|
| Assets                | 0          | 46         |
| Financial assets      | 0          | 46         |
| of which current      | 0          | 46         |
| Liabilities           | 0          | 0          |
| Financial liabilities | 0          | 0          |
| of which current      | 0          | 0          |
| Shareholders' equity  | 0          | 46         |

| TEUR                    | 2024 | 2023 |
|-------------------------|------|------|
| Other income            | 0    | 1    |
| Earnings before taxes   | 0    | 0    |
| Taxes on income         | 0    | -2   |
| Earnings after taxes    | 0    | -1   |
| Dividends/distributions | 0    | 0    |

The figures as at 31 December 2024 are zero because Vorarlberger Kommunalgebäudeleasing Gesellschaft m.b.H. was wound up effective 24 October 2024 and deconsolidated as at 31 December 2024 as described in note (2).

## K. DECLARATION OF THE MANAGING BOARD

We confirm that, to the best of our knowledge, the consolidated financial statements prepared in accordance with applicable accounting standards provide a true and fair view of the Group's assets and liabilities, financial position, and results of operations, and that the Group management report presents business events, business results and the Group's position so as to provide a true and fair view of the Group's assets and liabilities, financial position, and results of operations, and that the Group management report outlines the principal risks and uncertainties to which the Group is exposed.

We confirm that, to the best of our knowledge, the parent company's financial statements prepared in accordance with applicable accounting standards provide a true and fair view of the parent company's assets and liabilities, financial position, and results of operations, and that the management report presents business events, business results and the parent company's position so as to provide a true and fair view of its assets and liabilities, financial position, and results of operations, and that the management report outlines the principal risks and uncertainties to which the parent company is exposed.

Bregenz, 27 March 2025

**Hypo Vorarlberg Bank AG**

The Managing Board



Michel Haller  
Chairman of the Managing Board

Risk Management



Wilfried Amann  
Member of the Managing Board

Corporate/Private Customers Sales



Philipp Hämmerle  
Member of the Managing Board

Organisation, IT and Finance

# REPORT

## OF THE SUPERVISORY BOARD

The management by the Managing Board was continuously monitored by the Supervisory Board within the framework stipulated by the law, the Articles of Association and the Rules of Procedure for the Supervisory Board. At five regular meetings and two extraordinary meetings, the Supervisory Board discussed the Managing Board's reports on major projects and relevant events and on the position and development of the Bank and its holdings. It approved the planning and strategies for the 2024 and 2025 financial years, taking account of the Bank's strategic alignment as mutually agreed by the Supervisory Board and the Managing Board, and adopted the necessary resolutions. In addition to the annual review of the sustainability report, there were lively discussions and considerations in relation to ESG and EU taxonomy. The business and risk strategy were also adapted to reflect changes in the market environment. Risk management was thus also developed further. The findings of internal and external audits and the handling of these findings were discussed in depth. With the contract of Philipp Hämmerle set to expire in May 2025 and Wilfried Amann intending to retire, the Supervisory Board advertised their two positions in accordance with the statutory requirements. The selection process resulted in the reappointment of Philipp Hämmerle. Stephan Sausgruber will succeed Wilfried Amann with effect from 1 May 2025. He will assume responsibility for sales functions in particular.

### Supervisory Board committees

In 2024, the Audit Committee met three times and performed its control tasks of monitoring the effectiveness of the internal control system, the risk management system for the Bank as a whole, and internal auditing. The Audit Committee reviewed the financial reporting in the annual and quarterly financial statements as well as the non-financial reporting. The Supervisory Board acknowledged and approved the reports submitted.

The Risk Committee held two meetings in 2024. Among other matters, it conducted the review of the restructuring plan and advised the Managing Board with regard to the current and future risk appetite and risk strategy.

The Credit Committee held eleven meetings in 2024. It examined the loans and advances requiring its approval. In addition, the main aspects of the credit policy were coordinated with the Credit Committee. The Credit Committee also addressed organisational changes in back office and further improvements to the loan application system. Particular attention was paid to the development of inflation, interest rates, energy prices and collective salary agreements and to the effects on property markets and our customers. Adjustments to the lending policy were also carefully discussed and resolved.

The Remuneration Committee performed its tasks in accordance with section 39c of the Austrian Banking Act (BWG) and met three times in 2024.

The Nomination Committee met five times in 2024 (three regular meetings and two extraordinary meetings) and performed its tasks in accordance with section 29 BWG. The activities of the Nomination Committee focused on identifying qualified candidates to take over the expiring Managing Board mandates of Philipp Hämmerle and Wilfried Amann. The advertisement and selection process was supported by a recruitment firm. Corresponding proposals for nominations to fill the vacant positions on the Managing Board were submitted to the Supervisory Board.

### Corporate Governance Code

After reviewing them and discussing them with the Managing Board, the Supervisory Board approved the transactions presented to it that required approval in accordance with the law, the Articles of Association and the Rules of Procedure for the Managing Board. The Supervisory Board used the Corporate Governance Code as a guideline for its work.

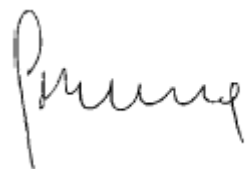
### Audit

The 2024 annual financial statements and the management report have been audited by the auditor appointed by the Annual General Meeting, Ernst & Young Wirtschaftsprüfungsgesellschaft m.b.H., Vienna. According to the unqualified audit certificate issued by this company, the annual financial statements and the management report comply with the legal regulations. The 2024 consolidated financial statements were prepared in accordance with the International Financial Reporting Standards (IFRS) as adopted by the EU. They have also been audited by Ernst & Young Wirtschaftsprüfungsgesellschaft m.b.H., Vienna, and issued with an unqualified audit certificate. Following extensive discussion, the Supervisory Board will adopt the corresponding formal resolutions.

### Thanks and appreciation

The Supervisory Board wishes to thank the Managing Board members, the managers and all employees for their hard work in the difficult 2024 financial year.

Bregenz, February 2025



Chairman of the Supervisory Board

Jodok Simma

# AUDITOR'S REPORT \*

## REPORT ON THE CONSOLIDATED FINANCIAL STATEMENTS – AUDIT OPINION

We have audited the consolidated financial statements of

### **Hypo Vorarlberg Bank AG, Bregenz,**

and of its subsidiaries (the Group) comprising the consolidated balance sheet as of December 31, 2024, the consolidated statement of comprehensive income, the consolidated statement of changes in shareholders' equity and the consolidated cash flow statement for the fiscal year then ended and the notes to the consolidated financial statements.

Based on our audit the accompanying consolidated financial statements were prepared in accordance with the legal regulations and present fairly, in all material respects, the assets and the financial position of the Group as of December 31, 2024 and its financial performance for the year then ended in accordance with the International Financial Reporting Standards as adopted by EU (IFRS), and the additional requirements under Section 245a Austrian Company Code UGB and Section 59a Austrian Banking Act BWG.

### **Basis for opinion**

We conducted our audit in accordance with the regulation (EU) no. 537/2014 (in the following "EU regulation") and in accordance with Austrian Standards on Auditing. Those standards require that we comply with International Standards on Auditing (ISA). Our responsibilities under those regulations and standards are further described in the "Auditor's Responsibilities for the Audit of the Consolidated Financial Statements" section of our report. We are independent of the Group in accordance with the Austrian General Accepted Accounting Principles and professional requirements and we have fulfilled our other ethical responsibilities in accordance with these requirements. We believe that the audit evidence we have obtained until the date of the auditor's report is sufficient and appropriate to provide a basis for our opinion by this date.

### **Key Audit Matters**

Key audit matters are those matters that, in our professional judgement, were of most significance in our audit of the consolidated financial statements of the fiscal year. These matters were addressed in the context of our audit of the consolidated financial statements as a whole, and in forming our opinion thereon, and we do not provide a separate opinion on these matters.

In the following, we describe the key audit matters from our perspective:

#### **1. Valuation allowances for financial assets at amortized cost**

#### **2. Fair Values of financial instruments, that are categorized in the fair value level 3 of the fair value hierarchy**

#### **1. VALUATION ALLOWANCES FOR FINANCIAL ASSETS AT AMORTIZED COST**

##### Description:

The company reports financial assets at amortised cost of MEUR 13,295 in its consolidated financial statements as of December 31, 2024. To account for the risk of loss in the portfolio of financial assets at amortised cost, the company recognises significant risk provisions (MEUR 138). These represent the Executive Board's best estimate of expected credit losses in the portfolio of financial assets at amortised cost as at the balance sheet date.

In accordance with the regulations of IFRS 9, financial assets are measured at amortized Cost depending on the classification of debt

securities, loan and credits on the basis of the business model and the characteristics of the contractual cash flows. In addition, the level allocation designed by the company and its key assumptions for assessing the assessment of a significant increase in the default risk (level 2) or default events (existence of objective evidence of impairment - level 3) are significant for determining the amount of valuation allowances.

Valuation allowances are calculated using the discounted cash flow method. The expected cash flows are estimated in the same way as the expected proceeds from the realisation of collateral. Estimates are made on an individual basis (significant level 3 loan receivables) or on the basis of a collective estimate (rule-based approach for level 1 and 2 loan receivables and for non-significant level 3 loan receivables).

In this regard, we refer to the information provided by the company's Managing Board in the notes to the Consolidated Financial Statements in notes (3) "Accounting Policies", (22) "Financial Assets at amortized Cost" and (61) "Credit Risk".

The determination of the amount of valuation allowances is subject to considerable discretionary scope on the basis of the assumptions and estimates used. We have therefore identified this area as a material audit issue.

##### How we addressed the matter in the context of the audit:

In order to assess the appropriateness of the valuation allowances recognized, we have assessed the significant processes and models in credit risk management, taking into account in particular the regulations of IFRS 9. In particular, we have used the processes and models for classifying debt securities, loans and credits on the basis of the business model and determining the characteristics of the contractual cash flows. In addition, we have examined the level allocation designed by the company and its key assumptions for the assessment of a significant increase in the default risk or default events in order to assess whether these processes and models are suitable for identifying a significant increase in the default risk or default events and determining the need for valuation allowances.

We have identified the internal control system, in particular the key controls for the purchase of debt securities and the granting of loans and credits, in ongoing monitoring and in the early warning process, and tested it in some areas. We have reviewed the internal control system in the area of credit management, in particular with regard to the correct handling of rating models and collateral valuation.

On the basis of a selection of already defaulted debt securities, loans and credits, we examined whether sufficient valuation allowances had been recognised. For these, we critically assessed management's estimates of future cash flows expected from repayments and collateral.

In addition to compliance with the internal rules regarding rating and collateral assignment, we examined a sample of debt securities, loans and credits that were not yet identified as defaulted to determine whether significant increases in default risk or loss events were fully identified.

When reviewing the valuation allowances on the basis of a collective estimate, we assessed the valuation models used and the parameters applied to determine whether they were suitable for determining appropriate allowances. We also examined the underlying data basis for its data quality and reconstructed the arithmetical accuracy of the valuation allowances.

In addition, we have examined whether the information provided by the company's Managing Board in the notes is complete and applicable.

## **2. FAIR VALUES OF FINANCIAL INSTRUMENTS, THAT ARE CATEGORIZED IN THE FAIR VALUE LEVEL 3 OF THE FAIR VALUE HIERARCHY**

### Description:

In its consolidated financial statements as of December 31, 2024, the company recognizes a significant amount of financial instruments measured at fair value, which are allocated to fair value level 3 of the fair value hierarchy. The carrying amounts of these financial instruments as of December 31, 2024, were assets of MEUR 866 and liabilities of MEUR 410.

The valuation of these financial instruments requires the fair value to be determined using recognised valuation models and methods, as no market or stock exchange prices are available in an active market.

In the case of valuation using recognized valuation models, the selection of these valuation models and methods, the input parameters used and the associated judgments, which are subject to estimation uncertainties, are of decisive importance for determining the fair value to be recognized.

In this context, please refer to the disclosures by the company's Managing Board in the notes to the consolidated financial statements, specifically in note (55) "Disclosures on fair values" and in note (3) "Accounting policies".

Based on the fact that the financial instruments assigned to level 3 of the fair value hierarchy account for a significant portion of the company's total assets and that estimation uncertainties may arise with regard to the relevant input parameters for their measurement, we identified this area as a key audit matter.

### How we addressed this matter in the audit:

We documented the valuation process and the design of the Group's key controls with regard to the input parameters for the measurement of financial instruments assigned to level 3 of the fair value hierarchy.

Based on a random sample, we traced their assignment by the company to level 3 of the fair value hierarchy. We also assessed the assumptions and methods used by the company's Managing Board to ascertain whether they were suitable for determining correct values. The measurement results were reproduced using our own calculations with the involvement of internal specialists at EY and their valuation was evaluated.

In addition, we examined whether the disclosures by the company's Managing Board in the notes were complete and accurate.

### **Other information**

The management is responsible for the other information. The other information comprises all information in the annual report except for the consolidated financial statements, the Group Management report and the audit certificate.

The annual report is expected to be provided to us after the date of the audit certificate.

Our audit opinion on the consolidated financial statements does not cover this other information, and we do not express any form of assurance conclusion thereon.

In connection with our audit of the consolidated financial statements, our responsibility is to read the other information, as soon as it is available, and, in doing so, to consider whether - based on our knowledge obtained in the audit - the other information is

materially inconsistent with the consolidated financial statements or otherwise appears to be materially misstated.

### **Responsibilities of the legal representatives and the Audit Committee for the consolidated financial statements**

Management is responsible for the preparation and fair presentation of these consolidated financial statements in accordance with IFRSs as adopted by the EU and the additional requirements of Section 245a UGB and Section 59a BWG. Furthermore, management is responsible for such internal control as management determines it necessary to enable the preparation of consolidated financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the consolidated financial statements, management is responsible for assessing the Group's ability to continue as a going concern, disclosing, as applicable, matters related to going concern and using the going concern basis of accounting unless management either intends to liquidate the Group or to cease operations, or has no realistic alternative but to do so.

The Audit Committee is responsible for overseeing the Group's financial reporting process.

### **Auditor's Responsibilities for the Audit of the Consolidated Financial Statements**

Our objectives are to obtain reasonable assurance about whether the consolidated financial statements as a whole are free from material misstatement, whether due to fraud or error, and to issue an auditor's report that includes our opinion. Reasonable assurance is a high level of assurance, but is not a guarantee that an audit conducted in accordance with EU Regulation and Austrian Standards on Auditing, which require the application of ISAs, will always detect a material misstatement, if any. Misstatements can arise from fraud or error and are considered material if, individually or in the aggregate, they could reasonably be expected to influence the economic decisions of users taken on the basis of these consolidated financial statements.

As part of an audit in accordance with the EU Regulation and Austrian Generally Accepted Auditing Standards, which require the application of ISAs, we exercise professional judgment and maintain a critical attitude throughout the audit.

We also:

- identify and assess the risks of material misstatement of the consolidated financial statements, whether due to fraud or error, design and perform audit procedures responsive to those risks, and obtain audit evidence that is sufficient and appropriate to provide a basis for our opinion. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations, or the override of internal control.
- obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the Group's internal control.
- evaluate the appropriateness of accounting policies used and the reasonableness of accounting estimates and related disclosures made by management.
- conclude on the appropriateness of management's use of the going concern basis of accounting and, based on the audit evidence obtained, whether a material uncertainty exists related to events or conditions that may cast significant doubt on the Group's ability to continue as a going concern. If we conclude that a material uncertainty exists, we are required to draw attention in our auditor's report to the related disclosures in the consolidated financial statements or, if such disclosures are inadequate, to modify our opinion. Our conclusions are based on the audit evidence obtained up to the date of our auditor's report. However, future events or conditions may cause the Group to cease to continue as a going concern.

- evaluate the overall presentation, structure and content of the consolidated financial statements, including the disclosures, and whether the consolidated financial statements represent the underlying transactions and events in a manner that achieves fair presentation.
- obtain sufficient appropriate audit evidence regarding the financial information of the entities or business activities within the Group to express an opinion on the consolidated financial statements. We are responsible for the direction, supervision and performance of the group audit. We remain solely responsible for our audit opinion.

We communicate with the Audit Committee regarding, among other matters, the planned scope and timing of the audit and significant audit findings, including any significant deficiencies in internal control that we identify during our audit.

We also provide the Audit Committee with a statement that we have complied with relevant ethical requirements regarding independence, and to communicate with them all relationships and other matters that may reasonably be thought to bear on our independence, and where applicable, related safeguards.

From the matters communicated with the Audit Committee, we determine those matters that were of most significance in the audit of the financial statements of the current period and are therefore the key audit matters. We describe these matters in our auditor's report unless law or regulation precludes public disclosure about the matter or when, in extremely rare circumstances, we determine that a matter should not be communicated in our report because the adverse consequences of doing so would reasonably be expected to outweigh the public interest benefits of such communication.

## REPORT ON OTHER LEGAL AND REGULATORY REQUIREMENTS

### Comments on the Group Management Report

Pursuant to Austrian Generally Accepted Accounting Principles, the management report for the Group is to be audited as to whether it is consistent with the consolidated financial statements and as to whether the management report for the Group was prepared in accordance with the applicable legal regulations.

Regarding the consolidated non-financial statement contained in the group management report, it is our responsibility to examine whether it has been prepared, to read it and to evaluate whether it is, based on our knowledge obtained in the audit, materially inconsistent with the consolidated financial statements or otherwise appears to be materially misstated.

Management is responsible for the preparation of the management report for the Group in accordance with Austrian Generally Accepted Accounting Principles and banking regulatory requirements.

We conducted our audit in accordance with Austrian Standards on Auditing for the audit of the management report for the Group.

### Opinion

In our opinion, the management report for the Group was prepared in accordance with the applicable legal requirements, contains accurate information in accordance with Section 243a UGB and is consistent with the consolidated financial statements.

### Statement

Based on the findings during the audit of the consolidated financial statements and due to the thus obtained understanding concerning the Group and its circumstances no material misstatements in the management report for the Group came to our attention.

### Additional disclosures in accordance with Article 10 of the EU Regulation

We were elected as auditor by the annual general meeting on May 31, 2023. We were engaged by the supervisory board on July 25, 2023. In addition, we were elected as auditor by the annual general meeting on 31 May 2023 for the following financial year and were engaged by the supervisory board on June 20, 2024 to audit the consolidated financial statements. We have been the auditor without interruption since 2010.

We confirm that the audit opinion in the section "Report on the consolidated financial statements" is consistent with the additional report to the audit committee referred to in article 11 of the EU regulation.

We declare that no prohibited non-audit services (article 5 par. 1 of the EU regulation) were provided by us and that we remained independent of the audited company in conducting the audit.

### Responsible Austrian Certified Public Accountant

The engagement partner is Mr. Roland Unterweger, Certified Public Accountant.

Vienna, March 28, 2025

Ernst & Young

Wirtschaftsprüfungsgesellschaft m.b.H.

Andrea Stippl mp  
Auditor

Roland Unterweger mp  
Auditor

\* This report is a translation of the original report in German, which is solely valid. Publication or sharing with third parties of the consolidated financial statements together with our auditor's opinion is only allowed if the consolidated financial statements and the management report for the Group are identical with the German audited version. This audit opinion is only applicable to the German and complete consolidated financial statements with the management report for the Group.

Section 281 paragraph 2 UGB (Austrian Company Code) applies to alternated versions.

# BRANCHES AND CONTACT

# BRANCH OFFICES

## AND SUBSIDIARIES

### HEADQUARTERS

#### Bregenz, Headquarters

Hypo-Passage 1

#### Bregenz Corporate Customers Branch Office

Simon Ruff

Branch Office Head, Bregenz Corporate Customers

#### Branch Corporate Customers Germany

Markus Schmid

Head of Corporate Customers Centre Germany

#### Bregenz Private Customers Branch Office

Stefan Schmitt

Branch Manager, Bregenz Private Customers

Stephan Spies

Head of Service and Private Customers

Stephan Bohle

Head of Private Banking

Alexander Walterskirchen

Head of Private Loans

### INTERNAL DEPARTMENTS

David Blum

Head of Strategic Bank Management

Klaus Diem

Head of Legal Department

Bernhard Egger

Head of Finance

Susanne Fünck

Head of Sustainability

Markus Felder

Head of Private Customers

Stefan Germann

Head of Credit Management Corporate Customers

Florian Gorbach

Head of Treasury

Martin Heinze

Head of Credit Management Private Customers

Bianca Dünser

Head of Human Resources

Ferdinand Gabriel

Head of IT GRC

Peter Holzer

Head of Controlling

Martha Huster

Ombudsperson

Reinhard Kaindl

Head of Compliance & Outsourcing

Johannes Lutz

Head of IT Operations

Stephan Modler

Head of Sales Support

Sabine Nigsch-Gaethke

Head of Communication and Marketing

Daniel Oberauer

Data Protection Officer

Wilhelm Oberhauser

Head of Logistics

Jörg Ruwe

Head of IT Digital Banking

Stephan Sausgruber

Head of Corporate Customers

Christoph Schwaninger

Head of Corporate and Internal Audit

Egmont Schwärzler

Head of Participation Administration

Markus Seeger

Head of Group Risk Controlling

Karl-Heinz Strube

Head of Asset Management

Johannes Tschanhenz

Head of Mid- and Backoffice Funds, Securities and Derivatives



## BRANCH OFFICES

---

**Bludenz**, Am Postplatz 2  
Martin Flachsmann, Branch Office Head and Head of Corporate Customers  
Hannes Bodenlenz, Branch Office Manager  
Christoph Gebhard, Head of Private Banking

**Dornbirn**, Rathausplatz 6  
Richard Karlinger,  
Branch Office Head and Head of Corporate Customers  
Egon Gunz, Branch Office Head Private Customers and Head of Private Banking  
Simone Küng, Head of Service and Private Customers

**Dornbirn**, Messepark, Messestraße 2  
Simone Küng, Head of Service and Private Customers

**Egg**, Wälderpark, HNr. 940  
Wolfgang Fend, Branch Office Manager

**Feldkirch**, Neustadt 23  
Martin Schieder, Branch Office Manager Private Customers  
Stefan Kreiner,  
Head of Private Loans  
**LKH Feldkirch**,  
Carinagasse 47-49  
**Rankweil**,  
Ringstraße 11

**Götzis**, Hauptstraße 4  
Franz Altstätter, Branch Office Manager

**Graz**, Joanneumring 7  
Ernst Albegger, Regional Manager Styria and Head of Corporate Customers  
Daniel Gerhold,  
Deputy Regional Manager Styria  
Gerhard Vollmann, Head of Private Customers and Private Banking

**Höchst**, Hauptstraße 25  
Klaus Meusburger, Branch Office Manager

**Hohenems**, Bahnhofstraße 19  
Andreas Fend, Branch Office Head

**Lech**, Dorf 138  
Michael Fritz, Branch Office Head and Head of Private Customers

**Lustenau**, Kaiser-Franz-Josef-Straße 4a  
Graham Fitz, Branch Office Head and Head of Corporate Customers  
Stefan Ritter, Branch Office Head Private Customers

**Riezlern**, Walserstraße 31  
Artur Klauser, Branch Office Head Kleinwalsertal  
Josef Wirth, Head of Service and Private Customers

**Salzburg**, Strubergasse 26  
Peter Gassner, Regional Manager Salzburg

**Schruns**, Jakob-Stemer-Weg 2  
Hannes Bodenlenz, Branch Office Manager

**Wels**, Kaiser-Josef-Platz 49  
Thomas Hofer, Regional Manager Upper Austria and Head of Corporate Customers  
Iris Paar, Head of Private Customers and Private Banking

**Vienna**, Brandstätte 6  
Roswitha Klein, Regional Manager Vienna  
Hans-Jürgen Spitzer, Head of Corporate Customers Vienna  
Robert Glasner, Head of Private and Commercial Customers  
Katharina Jantschgi, Head of Private Customers and Private Banking  
Christine Staber, Head of Service Customers

## REGIONAL HEAD OFFICE

---

**St. Gallen**, Switzerland, Bankgasse 1  
Walter Ernst, Regional Manager  
Thomas Reich, Head of Back Office

## SUBSIDIARIES & SHAREHOLDINGS IN AUSTRIA

---

**Hypo Immobilien & Leasing GmbH**  
Dornbirn, Poststraße 11  
Wolfgang Bösch, Managing Director  
Peter Scholz, Managing Director

**comit Versicherungsmakler GmbH**  
Dornbirn, Poststraße 11

**MASTERINVEST Kapitalanlage GmbH**  
Vienna, Landstraße 1, Top 27

## SUBSIDIARIES IN ITALY

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**Hypo Vorarlberg Leasing AG**  
Bolzano, Galileo-Galilei-Straße 10 H  
Como, Via F.lli Rosselli 14  
Michael Meyer, Delegate of the Board of Directors

**Hypo Vorarlberg Immo Italia GmbH**  
Bolzano, Galileo-Galilei-Straße 10 H  
Alexander Ploner,  
Delegate of the Board of Directors

# ALWAYS CLOSE BY

## LOCATIONS AND BRANCHES

In addition to our branches in Vorarlberg, we also have locations in the most important economic centers in Austria and in Eastern Switzerland. This way we can take care of our customers outside of Vorarlberg and, at the same time, personally convince others of the quality of our performance.



Hypo Vorarlberg – your personal advice in Vorarlberg, Vienna, Graz, Wels, Salzburg and St. Gallen (CH).

[www.hypovbg.at](http://www.hypovbg.at)

## **Imprint**

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**Photographs:** Michael Nussbaumer, Manfred Oberhauser (Titel)

## **Legal notice:**

The information and data have been compiled and reviewed with particular care. Nevertheless, some details may have changed in the meantime. Therefore, no liability can be accepted for the timeliness, completeness or accuracy of the data and information provided. Hypo Vorarlberg reserves the right to change and supplement data and information at any time. Please note that all contents of Hypo Vorarlberg's non-financial statement are protected by copyright.

## **Gendered language:**

Gender-specific terms used in this report refer equally to women and men.