



# 2

## SUSTAINABILITY REPORT

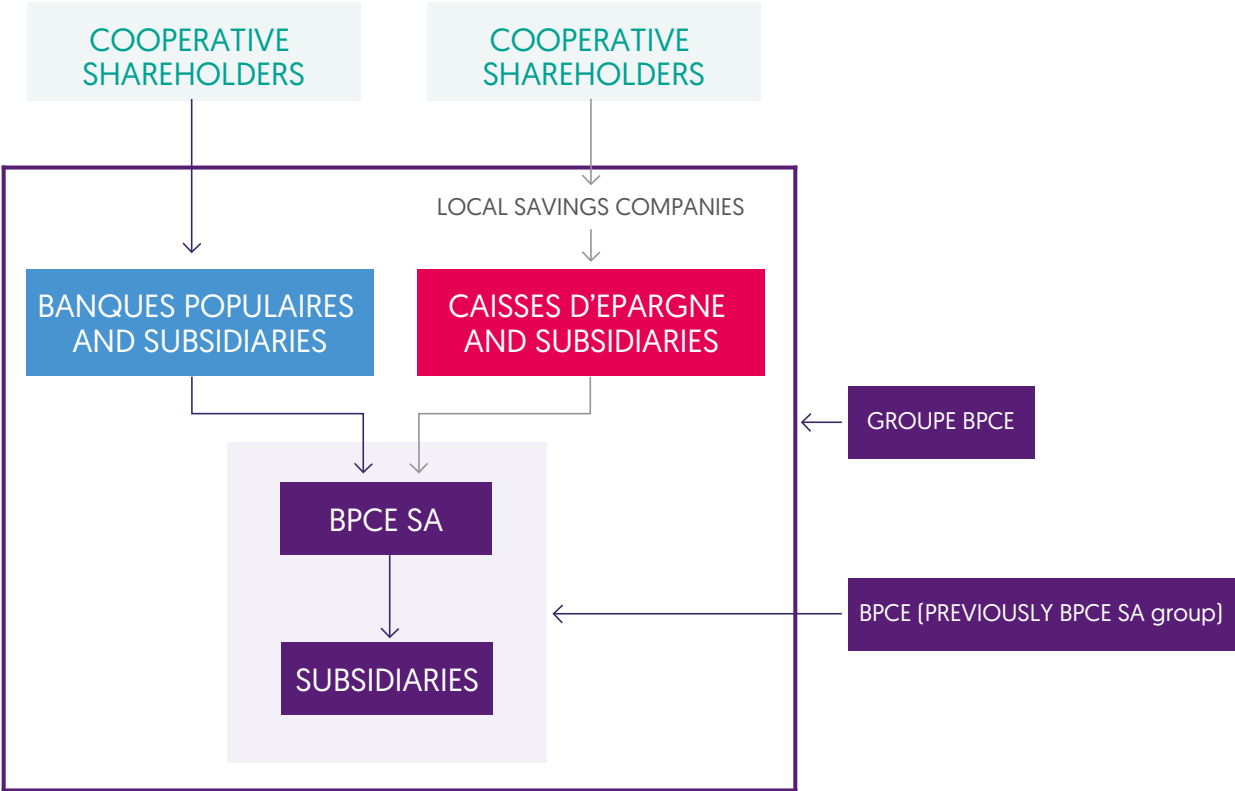
<b>2.1</b>	<b>Groupe BPCE sustainability report</b>	<b>49</b>
<b>2.2</b>	<b>Statutory Auditors' report on the Groupe BPCE Sustainability report</b>	<b>304</b>
<b>2.3</b>	<b>BPCE Sustainability report</b>	<b>308</b>
<b>2.4</b>	<b>Statutory Auditors' report on the BPCE sustainability report</b>	<b>389</b>

## Groupe BPCE and BPCE scopes of consolidation

The scope of consolidation of both groups, organized around the central institution, is presented in the diagram below.

In addition to BPCE, Groupe BPCE includes the Banques Populaires, the Caisses d'Epargne and their respective subsidiaries.

BPCE includes BPCE SA and its subsidiaries. The main difference in terms of consolidation perimeter stems from the contributions of the parent companies, which do not contribute to BPCE's net income.



## 2.1 Groupe BPCE sustainability report

<b>PART 1 - General information</b>	<b>50</b>	<b>PART 3 - Social information</b>	<b>144</b>
<b>1.1 Basis for preparation</b>	<b>50</b>	<b>3.1 S1 - Own workforce</b>	<b>144</b>
1.1.1 BP-1 — General basis for preparation of the sustainability statements	50	3.1.1 SBM-2 - Interests and views of stakeholders	144
1.1.2 BP-2 — Disclosures in relation to specific circumstances	51	3.1.2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model	144
<b>1.2 Cooperative dimension</b>	<b>53</b>	3.1.3 Impact, risk and opportunity management	145
<b>1.3 Strategy</b>	<b>55</b>	3.1.4 Targets	163
1.3.1 SBM-1 - Strategy, business model and value chain	55	3.1.5 Metrics	166
1.3.2 SBM-2 - Interests and views of stakeholders	65	<b>3.2 S2 - Workers in the value chain</b>	<b>181</b>
<b>1.4 Governance</b>	<b>67</b>	3.2.1 SBM 2 - Interests and views of stakeholders	181
1.4.1 GOV-1 - The role of the administrative, management and supervisory bodies	67	3.2.2 SBM 3 - Material incidents, risks and opportunities and their interaction with the strategy and business model	181
1.4.2 GOV-2 - Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	69	3.2.3 Incident, risk and opportunity management	182
1.4.3 GOV-3 - Integration of sustainability-related performance in incentive schemes	73	3.2.4 Metrics and targets	189
1.4.4 GOV-5 - Risk management and internal controls over sustainability reporting	73	<b>3.3 S3 - Affected communities</b>	<b>190</b>
1.4.5 GOV-4 - Statement on due diligence	77	3.3.1 SBM-2: Interests and views of stakeholders	191
<b>1.5 Impacts, risks and opportunities management</b>	<b>78</b>	3.3.2 SBM-3 - Material incidents, risks and opportunities and their interaction with the strategy and business model	191
1.5.1 Disclosures on the materiality assessment process	78	3.3.3 Incident, risk and opportunity management	192
1.5.2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model	87	3.3.4 Metrics and targets	200
1.5.3 IRO-2 - Disclosure Requirements in ESRS covered by the undertaking's sustainability report	87	<b>3.4 S4 - Consumers and end-users</b>	<b>201</b>
		3.4.1 SBM-2: Interests and views of stakeholders	201
		3.4.2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model	201
		3.4.3 Incident, risk and opportunity management	203
		3.4.4 Metrics and targets	216
<b>PART 2 - Environmental information</b>	<b>99</b>	<b>PART 4 - Governance information</b>	<b>218</b>
<b>2.1 Indicators of the European taxonomy on sustainable activities</b>	<b>99</b>	<b>4.1 G1 - Governance</b>	<b>218</b>
<b>2.2 E1 - Climate change</b>	<b>106</b>	4.1.1 Impact, risk and opportunity management	218
2.2.1 Governance	106	4.1.2 Metrics and targets	226
2.2.2 Impact, risk and opportunity management	106		
2.2.3 Strategy	111	<b>PART 5 - Indicators of the European taxonomy on sustainable activities</b>	<b>227</b>
2.2.4 Metrics and targets	134		

# PART 1 - GENERAL INFORMATION

## 1.1 Basis for preparation

### 1.1.1 BP-1 — General basis for preparation of the sustainability statements

Groupe BPCE has prepared its sustainability report in accordance with European Sustainability Reporting Standards (ESRS). These standards provide a comprehensive framework for the disclosure of non-financial information on environmental, social and governance issues.

The Group's sustainability report is based on a double materiality assessment, which takes into account both the impact of Groupe BPCE on the environment and society, and the influence of changes in the environment and society on the company's performance. This approach takes into account the expectations of stakeholders, in particular employees, investors, customers, cooperative shareholders and the communities in which the Group operates. It results in a list of impacts caused by Groupe BPCE's activity, and of risks and opportunities (IRO) related to environmental and societal changes.

To prepare this report, Groupe BPCE has collected data on a consolidated basis and across its value chain. This sustainability report is audited as required by the regulations with a limited level of assurance.

#### Scope of the sustainability report

The scope of consolidation used for this sustainability report is identical to that of Groupe BPCE's consolidated financial statements. All entities included in the IFRS (International Financial Reporting Standards) consolidation scope of Groupe BPCE are also included in this sustainability report.

The institutions included in Groupe BPCE's consolidation, permanently affiliated with BPCE in accordance with Article 10 of Regulation (EU) 575/2013 (CRR) and exempted from the individual and consolidated disclosure obligation in terms of sustainability are the following:

#### Banques Populaires

Banque Populaire Alsace Lorraine Champagne  
Banque Populaire Aquitaine Centre Atlantique  
Banque Populaire Auvergne Rhône Alpes  
Banque Populaire Bourgogne Franche-Comté  
Banque Populaire Grand Ouest  
Banque Populaire Méditerranée  
Banque Populaire du Nord  
Banque Populaire Occitane  
Banque Populaire Rives de Paris  
Banque Populaire du Sud  
Banque Populaire Val de France  
CASDEN Banque Populaire  
Crédit Coopératif

#### Caisses d'Épargne

Caisse d'Épargne Aquitaine Poitou-Charentes  
Caisse d'Épargne d'Auvergne et du Limousin  
Caisse d'Épargne de Bourgogne Franche-Comté  
Caisse d'Épargne Bretagne Pays de Loire  
Caisse d'Épargne Côte d'Azur  
Caisse d'Épargne Grand Est Europe  
Caisse d'Épargne Hauts de France  
Caisse d'Épargne Ile-de-France  
Caisse d'Épargne Languedoc-Roussillon  
Caisse d'Épargne Loire-Centre  
Caisse d'Épargne Loire Drôme Ardèche  
Caisse d'Épargne de Midi-Pyrénées  
Caisse d'Épargne Normandie  
Caisse d'Épargne Provence Alpes Corse  
Caisse d'Épargne Rhône Alpes

Exclusions from the reporting scope by family of indicators are indicated in the description of each indicator.

#### Option to omit specific disclosures

Groupe BPCE has not made use of the option that allows it to omit certain disclosures relating to intellectual property, know-how or the results of innovations. This option is provided for in Section 7.7 of ESRS 1: Classified and sensitive information, and information on intellectual property, know-how or results of innovation.

## 1.1.2 BP-2 — Disclosures in relation to specific circumstances

### 1.1.2.1 TIME HORIZONS

In most cases, the material impacts, risks and opportunities have been assessed in the short, medium and long term. To obtain forward-looking information on Groupe BPCE's material impacts, risks and opportunities in its sustainability reports, the Group has adopted the general principles as defined in Section 6.4 of the ESRS 1 section, namely:

- 1 year as short term (annual financial statement presentation period);
- between 1 year and 5 years as medium term;
- more than 5 years as long term.

### 1.1.2.2 VALUE CHAIN ESTIMATION

The indicators must cover the entire consolidated scope. However, for the calculation of greenhouse gas emissions under ESRS E1-6 (greenhouse gas emissions), the indicator is calculated over an extended scope. Scope 3, category 15 emissions relate to the value chain, in particular financed emissions.

For the calculation of Scope 3 category 15 emissions on the banking book, greenhouse gas data come from several sources:

purchase of supplier data (Carbone4, Trucost, CDP);

When the time horizons deviate from these general guidelines, this information is communicated at the same time as the relevant information concerning the specific material subject. During the preparation of this sustainability report, forward-looking estimates and assumptions were made. The results observed may differ from these estimates and assumptions.

- data collected from the Group's customers (DPE); and
- public databases (*Centre Scientifique et Technique du Bâtiment*).

When data is not available, the Group uses sectoral intensity estimates: either through extrapolation or using a proxy defined through PCAF.

### 1.1.2.3 SOURCES OF ESTIMATION AND OUTCOME UNCERTAINTY

This report, known as the Groupe BPCE sustainability report, was prepared in accordance with the legal and regulatory requirements resulting from the transposition of the European Directive on the disclosure of information on companies' sustainability (Corporate Sustainability Reporting Directive or "CSRD Directive"). This first year of application is characterized by uncertainties about the interpretation of the texts, which are generalist and cover all sectors of activity but do not specify a specific framework for banking and financial business models. There is also the absence of established practices or comparative information and certain data, in particular within the "value chain".

In this context, Groupe BPCE has endeavored to apply the normative requirements set by the ESRS, as applicable at the date of the sustainability statement, based on the information available within the timeframe for its preparation, by doing its best to reflect its role as a universal bank-insurer, as well as its various business models.

**For the double materiality analysis** and, in particular, that relating to its value chain, Groupe BPCE encountered limitations relating to the maturity of its valuation methodologies and the availability of data. As presented in Section 1.5.1.1 on the Environment (E), we considered that only the issue of mitigation and adaptation related to climate change is material within the meaning of the standard. The limitations relating to the market information and methodologies available at this stage did not make it possible to characterize the Nature ESRS's materiality within the standard's meaning, which led the Group to assess these environmental issues as non-material. This assessment was carried out based on the definitions of the standard, and the methodologies available to assess and carry out the rating exercises. This assessment can be explained, in particular, by the absence of a consensus on robust methodologies developed on the topics in question and of relevant and appropriate data which

would make it possible to establish a link between the impact or risks for Groupe BPCE regarding these topics through its value chain. In view of Groupe BPCE's continuous improvement approach to these environmental issues, the work and ongoing changes in international methodologies, the standards that are being put in place, the best market practices that are emerging and information and data from its customers, which should gradually become available, this double materiality analysis may change in the coming years. The dual materiality analysis, the results of which are presented in this report, aims to qualify the impacts, risks and opportunities as described in the CSRD standard: this analysis only meets the needs of sustainability reporting and not the analysis of factors risks presented in the chapter on risk management.

For the **data points presented** in this report, the BPCE Group used methodological options that it deemed relevant and made estimates for many data points, particularly concerning the various activities of its value chain. The data, analysis, and studies carried out do not guarantee that expectations and targets will be achieved: they are based on objectives, commitments, estimates, assumptions, standards, and methodologies under development and currently available data, which continue to evolve and develop. Some of the information contained in this document has been obtained from public sources or from sources that appear to be reliable or from market references: the BPCE Group has not independently verified them. In addition, Groupe BPCE notes that the information expected in terms of sustainability is based on so-called "agnostic" European standards (ESRS), which are generalist and do not reflect the specificities of the financial sector. As a result, certain data items deemed irrelevant or not applicable, given Groupe BPCE's business models and value chain, have not been produced. The same applies to certain data points relating to the Taxonomy Regulation.

Regarding the **climate change mitigation and adaptation transition plan**, in its transition plan, Groupe BPCE distinguishes between actions relating to its own operations and the targets and actions that it has set itself in order to contribute to the decarbonization of the economy by supporting its customers. The actions described present, in particular, the achievements and roadmap for the actions that seem to impact the downstream value chain. The Group's transition plan describes past, current and future efforts to align its financing, investment and insurance portfolios with scientifically established trajectories aimed at achieving global carbon neutrality by supporting its customers with their environmental transition. This report does not quantify the effects of decarbonization levers or future estimates of total financed emissions. Indeed, the actions undertaken by the Group cannot replace those of individual customers, companies or States that it supports with the transition, and the transition of the economy to a low-carbon economy depends on many parameters external to Groupe BPCE.

As regards the assessment of **greenhouse gas emissions**, as a service company, the Group emits a limited level of CO<sub>2</sub>e in terms of its own operations, including by integrating the upstream value chain (purchases, including those related to IT and technological investments, mobility including business trips, etc.) and the travel of its customers to its branches or business centers. Most of Groupe BPCE's GHG emissions come from financed emissions and are subject to a normative calculation for category 15 of the emissions of the downstream "investment" value chain,

otherwise known as "financed emissions", aimed at attributing to the financial institution a portion of the CO<sub>2</sub> emissions of its financed customers or securities in which it invests. This calculation takes into account the scopes 1-2-3 of customers, which therefore also include the emissions of their value chain, and leads to a maximum calculation. It is estimated that the financed emissions can be, on average, three times the same greenhouse gas emissions for portfolios of exposure to companies in the same value chain. For this sustainability statement, the Group considered the mandatory categories of financial assets provided for in the Greenhouse Gas (GHG) protocol for calculating financed emissions. The scopes, methodologies used and the main assumptions and data sources are detailed in the paragraph relating to (E1-6) "Gross Scopes 1, 2, 3 and Total GHG emissions".

**With regard to Taxonomy**, the assumptions used and limitations are detailed in Chapter 2.1 Indicators of the European taxonomy on sustainable activities.

Groupe BPCE believes that the expectations reflected in these forward-looking statements are reasonable; however, they are subject to numerous risks and uncertainties, are difficult to predict, generally outside of the control of Groupe BPCE, sometimes unknown, and may lead to results or cause events to unfold significantly differently from those expressed, implied, or anticipated by the aforementioned information and forward-looking statements.

## 1.1.2.4 CHANGES IN PREPARATION OR PRESENTATION OF SUSTAINABILITY INFORMATION

As for all French companies, the sustainability report for the 2024 fiscal year is the first such report produced by the Group. Consequently, no change in the definition or calculation of metrics, including those used to set targets and monitor progress towards their achievement, is to be reported.

## 1.1.2.5 REPORTING OF ERRORS IN PRIOR PERIODS

As indicated above, since this exercise is the first, comparative data with previous periods are not presented. The reporting of errors in previous periods does not extend to the reference periods preceding this first year of application of the sustainability standards by the company. Furthermore, no significant error related to the previous Green Asset Ratio (GAR) period was identified.

## 1.1.2.6 DISCLOSURES STEMMING FROM OTHER LEGISLATION OR GENERALLY ACCEPTED SUSTAINABILITY REPORTING PRONOUNCEMENTS

With regard to risk management, Groupe BPCE has defined sustainability risk as a risk factor. The chapter on environmental, social and governance risks under Pillar III ESG describes how the Group defines and manages these risks. This chapter also contains an overview of the impact of climate and environmental risks on other types of risks. Further details on the methodologies and management used for traditional types of risks, such as credit risk, market risk, operational risk and liquidity risk, are provided in Chapter 7 - Risk factors and management.

In addition, the elements relating to the eligibility and alignment of the Group's portfolio as defined in Regulation (EU) 2020/852 and supplemented by Delegated Regulations (EU) 2021/2178, 2021/2139 and 2023/2486 are included in Section 2.1. Indicators of the European Taxonomy on sustainable activities.



### 1.1.2.7 INCORPORATION BY REFERENCE

In order to avoid duplication, ESRS 1 allows the incorporation of parts prepared in other documents, such as the management report or the Universal Registration Document, by means of a simple mention, provided that this information has equivalent characteristics, particularly in terms of reliability. This generally concerns the parts relating to the description of the company's activities and strategy, its governance, remuneration policies, risk factors and the Duty of Care. The ESRS believe that it is imperative to ensure and explain the consistency between the

sustainability report and the financial statements, by paying particular attention to significant amounts, assumptions and projections. The amounts considered as material from the financial statements must be accompanied by a reference, although the presentation of a reconciliation in the form of a comparative table between the amounts of the sustainability report and those of the financial statements remains optional.

At Groupe BPCE level, the following information is incorporated by reference:

Name of the disclosure requirement	Data point	Registration document	Section of the Registration Document
Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	ESRS GOV-2, Para. 26 (a) & (b)	Universal Registration Document	Chapter 4 - Report on corporate governance - 4.3 Composition of the management and supervisory bodies and 4.4 Role and operating rules of governing bodies
Disclosures in relation to specific circumstances	ESRS BP-2 Para. 15	Universal Registration Document	Chapter 7 - Factors and risk management - 7.16. Environmental, social and governance risks
The role of the administrative, management and supervisory bodies	ESRS 2 GOV-1 Para. 19 & 21	Universal Registration Document	Chapter 4 - Report on corporate governance - 4.3 Composition of the management and supervisory bodies
Risk management and internal controls over sustainability reporting	ESRS 2 GOV-5 Para. 36 (a)	Universal Registration Document	Chapter 7 - Factors and risk management - 7.16. Environmental, social and governance risks

## 1.2 Cooperative dimension

Groupe BPCE is a cooperative full-service bank and insurance Group serving its customers, cooperative shareholders, territories and the economy. Its cooperative model is inseparable from the history of its two historical networks, Banque Populaire and Caisse d'Épargne. These roots, which forge its identity, also condition its performance, both financial and non-financial.

Since its origin, Groupe BPCE has been rooted in a humanist aspiration: making people a core priority, giving everyone the means to save money and finance their projects, and playing a pioneering role in regional development. This DNA, supported by century-old brands, has been embodied at every stage of its history:

- 1818: creation of the first Caisse d'Épargne et de Prévoyance to promote, collect, and manage the general public's savings;
- 1878: creation of the first Banque Populaire, founded by and for entrepreneurs to help finance their projects;
- 1919: creation of Crédit National, from which Natixis originated, to finance the reconstruction of the French economy;
- 2009: creation of Groupe BPCE through the combination of the Banque Populaire and Caisse d'Épargne groups, sharing common values of solidarity and proximity.

Thanks to its unlisted cooperative nature, which enables it to invest to meet the challenges of tomorrow, the Group's action is part of the long term and provides local and concrete responses to

the transformations of the economy and society. Its sustainable model is based on a positive financial trajectory and economic footprint contributing to both an environmental and societal impact. After fifteen years of transformation and simplification, Groupe BPCE is today a unique and solid group, 100% cooperative and bringing together 9.8 million cooperative shareholders.

### Cooperative shareholding, one of the pillars of the cooperative model

By holding the company's capital through cooperative shares, customers become cooperative shareholders and actively participate in the life, ambitions and sustainable development of their bank, with the aim of implementing a fairer and more inclusive company that is more democratic and guided by the public interest.

- **The 9.8 million cooperative shareholders of the Banque Populaire and Caisse d'Épargne networks** hold 100% of the capital of the Banques Populaires and the Caisses d'Épargne (through the intermediary of the local savings companies [LSC] for the Caisses d'Épargne). Their representatives sit on the Boards of Directors of the Banques Populaires and on the Steering and Supervisory Boards of the Caisses d'Épargne.
- **The 14 Banques Populaires and the 15 Caisses d'Épargne**, all with firm roots in their regions, hold 100% of the capital of BPCE, the Group's central institution.



## A regional cooperative model

A fundamental characteristic of its identity, the local presence of the Banques Populaires and the Caisses d'Épargne enables the Group to be attentive to everyone and understand the expectations of society. The Group transforms this proximity into a capacity for innovation to serve regional growth. By acting alongside local players (local authorities, associations, business networks, educational and university communities, etc.), Groupe BPCE brings this proximity to life:

- by making use of a short circuit of money. Local savings and results finance projects on this same scale, purchases are mainly made from local suppliers, and the Group creates jobs as close as possible to the regions;
- by promoting local ecosystems and dialog with its stakeholders such as chambers of commerce and industry, professional associations, social and solidarity-based economy players, NGOs and associations. Aware that solutions to social and environmental challenges require acting together, it stands alongside those who come together to take action.

## Cooperative performance to ensure long-term growth: VISION 2030

Strong and proud of its many faces, Groupe BPCE has built itself around solid and complementary brands: Banque Populaire, Caisse d'Épargne, Natixis ClB, Natixis IM, Oney, Banque Palatine, with full-service regional institutions with differentiating expertise. The societal project that guides their activities defines the way in which the Group conducts its business. Coupled with its regional cooperative model, these brands contribute to the Group's strengths, resources and stability.

With its VISION 2030 strategic project, the Group reaffirms the societal ambition of its activities by placing the cooperative dimension at the heart of its growth. It is now managed on the basis of a "cooperative performance"; both financial and non-financial, with an environmental and societal impact, and is part of a long-term perspective reconciling robustness, subsidiarity and impact.

### Robustness

By being unlisted the Group is protected from any speculation, reserves are indivisible and the value created is distributed fairly among stakeholders. A portion of the surpluses is reinvested in the future of the Group's companies to develop them and pass them on to future generations, and a portion is paid to the cooperative shareholders as well as used for the local development of the regions.

This model results in regular and low-volatility profitability, a moderate risk appetite and high solvency. The Group thus distinguished itself in Europe, where it maintained some of the highest solvency requirements.

### Subsidiarity

Groupe BPCE's decentralization and regional presence are real assets for supporting transitions and lasting transformation of society; they are the guarantors of rapid decision-making, as close as possible to the regions.

### Impact

With its VISION 2030 strategic project, the Group aims to "make impact accessible to all": this is the meaning of "impact for all." Its generalization is based on three main principles:

- the impact for all clients: individual clients for their energy renovation projects, corporate clients for their transition plans, local authorities in support of their policies;
- impact for all territories and the society: by enabling local players to join forces, with the help of the Group's cooperative shareholders and developing regional initiatives;

- impact for all employees and boards of directors: by deploying an Impact Inside operation and by mobilizing 100% of Groupe BPCE's employees, companies and governing bodies around ESG issues.

Groupe BPCE is convinced that it is a model in line with society's expectations, whose changes it has always supported.

## The philanthropic engagement and solidarity and sponsorship actions of the Banques Populaires and the Caisses d'Épargne

### Banque Populaire network

Since 1992, the Fondation Nationale Banque Populaire, an instrument of sponsorship for the 14 Banques Populaires and their cooperative shareholders, has promoted individual initiative and supported, over the life of their projects, talented, creative people with an entrepreneurial spirit and a taste for innovation in three areas: classical music, disability and arts and crafts.

In 2024, the Fédération nationale des Banques Populaires endowment fund continued its support for ADIE, a national and regional association that finances and supports micro-entrepreneurs. Supplemented by the action of each of the Banques Populaires in the regions, Banque Populaire (excluding CASDEN) is once again in 2023 the first financial partner of ADIE with €47.7 million, which financed 10,000 microloans and contributed to the creation or maintenance of 12,200 self-employed and salaried jobs, in addition to skills sponsorship, honor loans, and other training support or Créadie Awards.

In addition to sponsorship, they are involved in actions in favor of civil society. They are highly involved in supporting business creation, integration (through microloans in particular) and solidarity, and actively support education and research. In addition, Crédit Coopératif and its foundation are mainly focused on supporting and promoting the social and solidarity-based economy. CASDEN Banque Populaire naturally favors education and research.

The impact of the sponsorship of the 14 Banques Populaires is one of the components measured each year via the Banque Populaire Cooperative and Societal Footprint (ECS). Based on ISO 26000 (the leading international standard for CSR), this footprint identifies and values in euros the CSR and cooperative actions implemented within each bank for the benefit of society, employees and customers, cooperative shareholders and suppliers. These actions go beyond regulations, excluding commercial, and traditional banking activity. In 2023, the cooperative and societal footprint (ECS) shows that the Banques Populaires network - composed of 12 regional Banques Populaires, CASDEN Banque Populaire and Crédit Coopératif - carried out 6,434 actions for the benefit of society and the regions, for a total amount of €194.6 million. There has been a sharp increase in the number and amount of ECS actions supported.

### Caisse d'Épargne network

Created by philanthropists, the Caisses d'Épargne have been working to promote social cohesion and the fight against exclusion since their inception. They are among the leading corporate sponsors in France.

The Fédération nationale des Caisses d'Épargne has adopted CSR and Cooperative Guidelines that provide a shared framework for the actions of the Caisses d'Épargne around four ambitions: be a key player in the transformation of the regions and the local economy (local footprint), pursue the continuous improvement of ESG policies and their integration into all business lines for more impact (overall performance), encourage employees and cooperative shareholders to become cooper'actors (active cooperation) and anticipate societal needs to build solutions that contribute to progress (societal innovation).

The purpose of the endowment fund of the Caisse d'Epargne network constituted by the FNCE, is to encourage and support actions of general interest aimed at combating exclusion and poverty, particularly in banking and financial situations, and to support solidarity actions and assistance programs. It also supports the Finances et Pédagogie association, which deploys educational programs on money issues throughout the country. It also supports other large structures such as the Fondation Belem, which is recognized as a public utility, whose purpose is to

promote France's maritime past and to preserve France's last large ship of the 19<sup>th</sup> century, which has been classified as a historic monument since 1984. Lastly, it has a €200,000 fund that responds quickly to natural disasters.

The 15 Caisses d'Epargne have their own sponsorship strategy in their regions. In 2024, sponsorship represented a total of €20.8 million and 1,290 local projects were supported, mainly in the field of youth, solidarity and sport.

### **Groupe BPCE, a Premium Partner of the Paris 2024 Olympic and Paralympic Games, is building a social and environmental legacy that makes sport accessible to all**

Groupe BPCE, with all its companies - Banque Populaire, Caisse d'Epargne, Natixis, CASDEN, Crédit Coopératif, ONEY and Banque Palatine - was the leading Premium Partner of the Paris 2024 Olympic and Paralympic Games. In addition to sharing the values of one of the biggest sporting events in the world, it was an opportunity for the Group to continue to respond in a tangible way to the current challenges of society and to participate in building a social and environmental legacy which makes sport accessible to all:

- making sport a tool for regional planning;
- supporting the local economic fabric and employment;
- taking action to promote the inclusion of people with disabilities.

## **1.3 Strategy**

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

#### **1.3.1.1 SUSTAINABILITY-RELATED STRATEGY**

In 2024, Groupe BPCE rolled out its strategic project VISION 2030, a growth project at the service of its customers and their support in the face of the challenges of the environmental, demographic, technological and geopolitical changes.

The priority given to climate in its latest strategic project has been renewed and integrated into the Impact strategy, with an extra-financial trajectory that includes fifteen key impact indicators. This prioritizes the expansion of impact solutions to all clients of the group, accelerating across all ESG dimensions

Thus, sustainability, both environmental and societal, is at the heart of the Group's strategy.

##### **1.3.1.1.1 Sustainability-related strategy**

##### **A Group with "positive impact"<sup>(1)</sup>**

VISION 2030, Groupe BPCE's new strategic project outlines the major priorities it has set for itself in order to build a growth project to serve its customers, in a society marked by four major transitions: environmental, demographic, technological and geopolitical.

Faced with this situation, Groupe BPCE is mobilizing its local and regional presence, its business lines and expertise, to enable its customers, cooperative shareholders and employees to assert their power to act and to trust in the future.

The cooperative nature of the Banques Populaires and the Caisses d'Epargne, combined with the banks' strong local presence, have made Groupe BPCE a financial player which has notably committed to the decarbonization of the economy in recent years. Groupe BPCE's global business lines - Natixis Corporate & Investment Banking (Natixis CIB) and Natixis Investment

Managers (Natixis IM) - are positioned as key global players in transitions.

##### **Environmental impact**

Faced with the climate emergency, Groupe BPCE's approach sets out to ensure the rapid implementation and rollout of measures designed to mitigate and adapt to the already tangible environmental and socio-economic impacts. Making "the impact accessible to all"<sup>(2)</sup> means raising awareness and providing support to all its clients in the environmental transition by providing them with expertise, advisory services, and comprehensive solutions.

Building on the scenarios defined by science, the BPCE Group and its businesses position themselves as facilitators of transition efforts, with a clear and ambitious goal: to finance a carbon-neutral economy by 2050 by taking action today.

The Group's approach is based on its cooperative business model: a presence in local communities and a commitment to society geared to financing the economy.

##### **• Impact solutions**

**For individual clients:** providing support for energy renovations and home adaptations addressing aging and reduced autonomy by offering financing solutions and by mobilizing Groupe BPCE's role as a housing operator, trusted third party along with its network of partnerships:

- by offering an "Advice and Sustainable Solutions" tool in partnership with ADEME, making it easy for clients to calculate their carbon footprint but also to benefit from advice and assistance for energy renovation work, for decarbonized mobility or green investments;

[1] Terminology for the strategic project VISION 2030: <https://www.groupebpce.com/en/the-group/strategic-plan/>

[2] VISION 2030 strategic project terminology: <https://www.groupebpce.com/le-groupe/plan-strategique/>

- by providing support at every stage of energy renovation projects for individual homes and condominiums: energy assessment, search for grants, guarantee of successful completion of work, with financing pathways tailored to each situation;
- by increasing the volume of financing for the energy renovation of buildings.

**For BtoB customers:** supporting the transition of the business models of its clients, from SMEs to the largest international companies. The Group engages with its clients through dedicated dialogue and sector-specific expertise to integrate ESG issues according to the size of the companies and their economic sectors, particularly in energy infrastructure, transportation, waste management and treatment, etc. Sustainable solutions also exist for investor clients with a range of responsible investments and placements: sustainable development passbook accounts, funds with a sustainable investment target, theme-labeled funds, etc..

• **Support for the evolution of the energy mix:** faced with the climate emergency, the priority is to accelerate the advent of a sustainable energy system:

- by positioning itself among the world leaders in debt project financing in the renewable energy sector;
- by increasing its financing dedicated to the production and storage of green electricity;
- by providing advice about capital raising processes to its clients commanding leading positions in the infrastructure and equipment sector related to energy transition as well as innovative and high-growth companies in the same sector;
- by advising its customers on energy transformation projects in their financing or capital raising processes;
- by supporting the reindustrialization of regions and energy sovereignty;
- by setting up teams of experts dedicated to low-carbon energies (solar, wind, electrolysis, etc.) and critical metals.

• **Alignment of its financing and insurance portfolios** with trajectories compatible with the objectives of the Paris Agreement:

- by developing carbon emission measurement systems;
- by developing its system for identifying and managing physical and transitional climate risks affecting both its clients and its own activities, on the basis of a continuous improvement approach;
- by gradually withdrawing from the most-carbon emitting activities, in particular through adapted ESG policies.

In this context, the Group has joined the Net Zero Banking Alliance initiative of the United Nations Environment Program (UNEP FI), and has a decarbonization ambition for the most carbon-emitting sectors.

• **Active and innovative issuer in sustainable finance:** in its VISION 2030 strategic project the Group has set itself the target of issuing more than five green, social or health funding instruments per year, using all the debt instruments at its disposal.

## Societal impact

The Group is a leading financier in the Social and Solidarity Economy sector, local authorities and a major player in social housing, social entrepreneurship and microcredit.

• A player in the territories and regions of the world where it operates: Groupe BPCE plays a major role in local ecosystems promoting territorial cohesion, supporting numerous initiatives in favor of social inclusion and the reduction of inequalities:

- the Banques Populaires and the Caisses d'Épargne are key players in the dynamic development of our territories, notably by financing the construction or renovation of infrastructure and facilities necessary for education, health, and mobility. They are the leading providers of private funding for local authorities and the hospital sector;
- on a global scale, Natixis Investment Managers and Natixis Corporate & Investment Banking are developing their Asset & Wealth Management and Corporate & Investment banking business lines in over 40 countries, in line with international commitments in terms of investment and financing activities.

• Committed to supporting local and national initiatives:

- the impact of the sponsorship activities of the 14 Banques Populaires is measured annually through their Cooperative & Societal Footprint metric. This footprint identifies and values in euros the CSR and cooperative actions implemented within each bank;
- the 15 Caisses d'Épargne have rolled out their Utility Contract in all regions of France: 100% cooperative, 100% regional and 100% useful for the economic, social and environmental development of the territories.

## Transforming Groupe BPCE

In order to support the transitions of its clients in accordance with the best available standards, Groupe BPCE has launched an internal transformation plan entitled 'Impact Inside'. In order to expand its impact solutions to its clients and speed up its progress in all the different aspects of ESG, Groupe BPCE has undertaken a transformation of all its companies at every level. It mobilizes its governance and employees, which it trains in ESG issues, and also acts on its own activities by reducing its carbon footprint.

### 1.3.1.1.2 Sustainability-related targets

Among the strategic priorities of VISION 2030, Groupe BPCE is renewing its commitment to supporting environmental and societal transitions. It is committed to making "impact accessible to all"<sup>[1]</sup> and to reinforcing its "global positive based on the strength of local solutions accessible to all."<sup>[2]</sup>

The Group's strategy is accompanied by quantified objectives to implement and steer the Group's concrete actions by 2026. All of these objectives (depending on the major service groups, customer categories, geographic areas and relations with interested parties) are set out in the table below.

[1] Terminology for the strategic project VISION 2030 - Environmental impact, Groupe BPCE: <https://www.groupebpce.com/en/csr/actor-in-the-environmental-transition/>.

[2] Terminology for the strategic project VISION 2030 - A Group with positive impact, Groupe BPCE: <https://www.groupebpce.com/en/csr/our-csr-approach/>.

## A GROUP MOBILIZED TO DECARBONATE THE ECONOMY

Topics	Metrics	Business lines	Clients	Geographic areas	Completed in 2024	2026 target
Energy renovation with solutions designed to preserve the value of households' real estate assets	Amount of energy renovation financing for individuals	Retail Banking	Individual customers	France	€698m <sup>(1)</sup>	> €1bn
	Number of unique visits to the Sustainable Advisory and Solutions digital module	Retail Banking	Individual customers	France	5.2 million <sup>(2)</sup>	6 million
Local advisory for the transition of our corporate customers' business models via dialog devoted to this subject and by providing expertise to incorporate ESG issues according to their size and business sector	Amount of transition and decarbonization financing	Retail Banking	Corporate customers	France	€1.1bn <sup>(3)</sup>	€5bn
	Percentage of active corporate clients having participated in an ESG dialog	Retail Banking	Corporate customers	France	55% <sup>(4)</sup>	100% active corporate customers
Action plans and/or decarbonization trajectories for the highest carbon-emitting sectors	Number of sectors	Group	N/A	World	11 sectors	11 sectors
Investment offering geared to sustainable instruments, in sync with planetary limits and societal issues, thereby reducing the carbon impact of € and unit-linked portfolios	Reducing the carbon intensity of portfolios	Insurance	All clients	France	34.3%	40% reduction to reach 50 tCO <sub>2</sub> eq/€m
Supporting our clients in their allocations on sustainable investment solutions	Growth in AuM (Assets Under Management) in transitions	Asset & Wealth Management	All clients	World	+11.7%	CAGR +5%
Positioning of Corporate & Investment Banking at the heart of transitions	Green revenues	Corporate & Investment Banking	All clients	World	x2.1	1.5x the rate of CIB growth

## A GROUP WITH POSITIVE SOCIETAL IMPACT

Topics	Metrics	Business lines	Clients	Geographic areas	Completed in 2024	2026 target
A key player in territories	Financing for the social and solidarity economy, social housing and public actors	Retail Banking	SSE, social housing, public sector players	France	+3.7% <sup>(5)</sup>	+8%
	Social entrepreneurship: number of local projects supported / year	Retail Banking	Professionals	France	10,589 <sup>(6)</sup>	11,000 per year
A pioneering and ambitious approach in sustainable finance	Number of Green, Social, Healthcare bond issuances per year	Group	N/A	World	5	5 per year

## IMPACT INSIDE

Topics	Metrics	2026 target
A transformation of Groupe BPCE and its companies at all levels	Employees and board members with ESG training	100% <sup>(7)</sup>
	Reduction of the carbon footprint (own footprint 2023-2026)	(6%) <sup>(8)</sup>

[1] The scope for reporting this indicator is made up of the Banque Populaire and Caisse d'Epargne networks. This indicator sums the financing of energy renovation work for individual customers (natural persons). The calculation base for this indicator is made up of production data relating to energy renovation, ECO PTZ MPR and ECO PTZ.

[2] The scope for reporting this indicator is made up of the Banque Populaire and Caisse d'Epargne networks. This indicator is the cumulative number of unique visitors who have consulted the "Sustainable Advisory and Solutions" section of the Banque Populaire and Caisse d'Epargne networks mobile app since 2023. The basis for calculating this indicator is made up of the almost real-time reporting of digital navigation data traced by the tool Adobe Analytics.

[3] This indicator calculates, for Groupe BPCE, the percentage of corporate outstandings covered by an ESG dialog. The basis for calculating this indicator is made up of outstandings at risk covered by an ESG dialog for third-party corporate assets in the commercial sense.

[4] This indicator sums the financing of the public sector, social housing and the social and solidarity economy. It is established for the Caisses d'Epargne on the basis of the Panorama BDR CE + HeR for social housing financing. *Source FSE for the Banques Populaires.*

[5] It is established for the Caisses d'Epargne on the basis of the Panorama BDR CE + HeR for social housing financing. *Source FSE for the Banques Populaires.*

[6] The scope for reporting this indicator is made up of the Banque Populaire and Caisse d'Epargne networks. This indicator lists the annual number of professional projects financed by microloans. The calculation basis for this indicator is made up of the number of pro take-off loans carried out in the Caisses and the amount of microloans made by the CE and BPs sent by external organizations (France Active, CREA-SOL and ADIE).

[7] New system currently being rolled out.

[8] 15% reduction achieved over the 2019-2024 period.

### 1.3.1.2 BUSINESS MODEL

## Our DNA

### A FULL-SERVICE REGIONAL COOPERATIVE BANK MODEL

serving its **35 million customers**

### PARTICIPATORY GOVERNANCE

The **9.8 million cooperative shareholders** elect their representatives to sit on the boards of the regional banks

### COOPERATIVE PERFORMANCE

charting our growth over the **long term**

### AN "OVERALL POSITIVE IMPACT"\*

based on the strength of **local solutions accessible to all**

## Our strengths

### MILLIONS OF AMBASSADORS

- In the form of proud and committed cooperative shareholders and employees
- More than **100,000** employees, including nearly 90% in France

### A GROUP PROUD AND STRONG FROM ITS MANY FACES

- Combining strong **brands, regional banking houses** and **expertise**
- Banque Populaire, Caisse d'Epargne, CASDEN Banque Populaire, Crédit Coopératif, Oney, Banque Palatine, Natixis Corporate & Investment Banking, Natixis Investment Managers

### SIMPLIFIED RELATIONSHIP MODELS

- Thanks to the best of the **human** and **digital**, enhanced by **AI**
- **100%** of decisions made at a local and regional level for individual and professional clients
- **Top 10** clients' most frequent operations already available in self-service
- **10,000** employees using generative AI

### ONE OF EUROPE'S STRONGEST FINANCIAL STRUCTURES

- With a high level of capital (**CET1 ratio of 16.2%**) and significant liquidity reserves (**€302 billion**)
- Around **75% of the results** of the Banques Populaires and Caisses d'Epargne held in reserves
- A guarantee and solidarity system between the Group's institutions
- Among the best financial ratings in Europe: **A+/A1/A+/A+**

## Our challenges



### ENVIRONMENTAL TRANSITION

+1.45° in 2023 vs. pre-industrial era



### DEMOGRAPHIC TRANSITION

45% increase of the EU population aged over 80 by the end of 2030s



### GEOPOLITICAL TRANSITION

Intensified protectionism and industrial relocations



### TECHNOLOGICAL TRANSITION

100 million users of ChatGPT in just two months

## Our three strategic pillars

### 1. FORGING OUR GROWTH FOR THE LONG TERM

### 2. GIVING OUR CLIENTS TRUST IN THEIR FUTURE

### 3. EXPRESSING OUR COOPERATIVE VALUES IN ALL TERRITORIES



\* VISION 2030 strategic project terminology: <https://www.groupebpce.com/le-groupe/plan-strategique/>



## Our business lines

€23.3 billion

2024 NBI

### Retail Banking & Insurance

66% OF NBI

#### BANQUES POPULAIRES AND CAISSES D'ÉPARGNE

Supporting our customers on a daily basis, with a relationship of trust over time

54%

#### PAYMENTS

Solutions covering the entire payments and employee benefits value chain

4%

#### INSURANCE

A comprehensive insurance offer for the customers of the Group's networks

3%

#### FINANCIAL SOLUTIONS & EXPERTISE

Consulting in the financing and guarantee business lines

5%

### Groupe BPCE's global business lines

34% OF NBI

#### CORPORATE & INVESTMENT BANKING

Recognized expertise for corporate clients and investors: strategic consulting, financing, capital markets, green & sustainable

19%

#### ASSET & WEALTH MANAGEMENT

A wide range of solutions meeting the savings, responsible investment and insurance management needs of private and institutional customers

15%

## Our value creation

### A KEY PLAYER IN REGIONAL ECONOMIC DEVELOPMENT

- Financing of more than **21%** of the French economy<sup>(1)</sup>
- **No. 2** retail bank<sup>(2)</sup>
- **No. 1** bank for corporate customers<sup>(3)</sup>
- **No. 1** private financier of local authorities<sup>(4)</sup>
- **Top 5** bancassurers<sup>(5)</sup>
- Among the Top 20 asset managers worldwide<sup>(6)</sup>

### A TRANSFORMING GROUP, "IMPACT INSIDE"

- Reduction of Groupe BPCE's own footprint by **15%** since 2019

### A GROUP MOBILIZED TO DECARBONIZE THE ECONOMY BY MAKING IMPACT ACCESSIBLE TO ALL

- For individual customers:
  - Number of unique visits to the Sustainable Advisory and Solutions digital module: **5.2 million**
  - Amount of financing for energy renovation: **€698 million** in 2024
- For corporate customers:
  - ESG dialogs: **55%** of corporate clients at the end 2024
  - Amount of transition and decarbonization financing for B2B clients: **€1.1 billion** granted in 2024
- Action plans and/or decarbonization trajectories for **11** of the highest carbon-emitting sectors
- **16.2 billion** renewable energy exposures in 2024

### A GROUP WITH POSITIVE SOCIETAL IMPACT

- Leading financier of the Social and Solidarity Economy
- A long-standing partner in social housing
- **No. 1** bank for protected persons<sup>(7)</sup>
- Number of Green, Social, Healthcare bond issuances p.a.: **5**

### A RESPONSIBLE GROUP

- **47%** of managers are women
- Balance between generations: rate of junior under 30 **> 18%** and rate for seniors over 50 years old **> 29%**
- **37%** of purchases made with SMEs

[1] 21.4% market share in outstanding loans, all non-financial sector customers [Banque de France Q3 2024].

[2] Market share: 21.9% in household deposits/savings and 26.3% in home loans [Banque de France Q3 2024].

[3] 2023 Kantar SME SMI survey.

[4] *Observatoire de la dette Finance Active des Collectivités Locales* [published in 2024].

[5] Insurance Argus 2023.

[6] Cerulli Quantitative Update: Global Markets 2023 ranked Natixis Investment Managers the seventeenth largest asset management company in the world, based on the assets under management at December 31, 2022.

[7] Population of adults under professional mandate estimated at more than 810,000 [source: *Ministry of Justice*] – Caisse d'Épargne network: nearly 350,000 protected customers, including over 325,000 adults at September 30, 2024.

### 1.3.1.2.1 Description of the main groups of products and/or services offered

As a universal, cooperative and regional bank, Groupe BPCE is a major player in Retail Banking and Insurance in France, in specialized businesses lines in Europe, and in Corporate & Investment Banking and Asset Management internationally.

Groupe BPCE's business models and business lines are structured around two divisions: Retail Banking and the related business lines, mainly in France, and the global business lines of Groupe BPCE:

#### Retail Banking and Related Business Lines

- **Retail Banking:** Groupe BPCE is present in the Retail Banking field in France via its two cooperative networks, Banque Populaire and Caisse d'Epargne, along with Banque Palatine:
  - the Banques Populaires and Caisses d'Epargne provide their customers with a complete range of solutions in terms of account access, financing, savings, private management, insurance, payment and specialized financial services (such as leasing or factoring);
  - Banque Palatine provides its customers with a range of banking products (current accounts, real estate and personal loans, financial investments, financing solutions to meet environmental challenges).

The Retail Banking business line represents 54% of the Group's NBI, i.e. €12.5 billion.

- **Insurance:** BPCE Assurances is Groupe BPCE's Insurance division. A fully-fledged insurer, it designs, distributes and manages a comprehensive range of personal and non-life insurance products for customers of Groupe BPCE's banking networks:
  - personal insurance: life insurance, retirement savings, creditor insurance and individual and professional personal protection insurance;
  - non-life insurance: motor insurance, multi-risk home insurance, supplementary health insurance, personal accident insurance (GAV), multimedia equipment insurance, legal protection, parabanking insurance, professional car and multi-risk insurance, etc.

The Insurance business line represents 3% of the Group's NBI, i.e. €0.7 billion.

- **Digital & Payments:** the Digital & Payments division brings together all of Groupe BPCE's business lines and expertise in the fields of innovation, digital, data and artificial intelligence, payments, and trade finance with Oney.

The Digital & Payments business line represents 4% of the Group's NBI, i.e. €0.9 billion.

- **Financial Solutions & Expertise:** the Financial Solutions & Expertise division brings together the expertise in the financing business lines - these develop revolving credit and personal loan offers for the Group's banks, offer a complete range of rental solutions (in particular equipment and real estate leasing, long-term leasing, and leasing with option to buy) and develop factoring solutions - as well as in the business lines of insurance, custodial and advisory services.

The Financial Solutions & Expertise business line represents 5% of the Group's NBI, i.e. €1.3 billion.

#### Global business lines

- **Corporate & Investment Banking:** Natixis Corporate & Investment Banking (CIB) provides advice and designs solutions for its corporate customers, financial institutions, institutional investors, financial sponsors and public sector entities, drawing on all of its expertise in advisory, investment and financing, commercial banking and capital markets. It is organized around five main business lines: Global Markets, Investment Banking, Real Assets, Global Trade, M&A.

The Corporate & Investment Banking business line represents 19% of the Group's NBI, i.e. €4.4 billion.

- **Asset & Wealth Management:** Asset & Wealth Management develops solutions to meet the deposits and savings, investment, risk management and advisory needs of the various private banking and institutional customers of Groupe BPCE:
  - Asset Management: Natixis Investment Managers (Natixis IM) supports investors on all continents in building their portfolios by offering them a wide range of diversified and responsible solutions. Natixis IM offers a range of more than 200 strategies to enable its investor customers to achieve their investment objectives, and develops its offer around four key areas of expertise: fundamental active management, liability-driven management, real assets, and quantitative management;
  - Wealth Management: Natixis Wealth Management designs tailor-made wealth management and financial solutions to structure and manage the assets of business leaders, senior executives, large private investors and holders of family capital. Natixis Wealth Management supports its clients in their initiatives to undertake, invest and transmit by mobilizing a wide range of expertise: corporate advisory, origination, vanilla and complex financing, investment, wealth engineering, asset management and diversification solutions, in particular private equity;
  - Employee and retirement savings: Natixis Interépargne supports companies of all sizes in setting up and managing their employee savings and retirement savings (PEE, PERCO, Collective PER, Mandatory PER) as well as employee shareholding.

The Asset & Wealth Management business line represents 15% of the Group's NBI, i.e. €3.5 billion.



### 1.3.1.2.2 Description of major markets and/or customer groups

Groupe BPCE, a universal banking group, serves 35 million customers worldwide. The offers are aimed at a wide range of customers, including the main target customer groups:

- **individual customers:** Groupe BPCE is the second-largest bank for individuals<sup>(1)</sup> in France;
- **professional customers:** Groupe BPCE is the second-largest bank for professional customer and self-employed customers<sup>(2)</sup>. The professional market includes craftspeople, small retailers and liberal professions
- **corporate customers:** the Group supports companies of all sizes - SMEs, SMLs, medium-sized companies and large companies. Groupe BPCE, thanks in particular to its Banque Populaire network, is the No. 1 bank for SMEs<sup>(3)</sup>;

In addition, as part of its VISION 2030 strategic project, the Group is defining a new growth model to develop simultaneously in three major geographical circles France, Europe and the world. This ambition concerns:

- in France: insurance and individual customers, professional customers and corporate customers;
- in Europe: financial services;
- in the world: the Group's global business lines, Corporate & Investment Banking and Asset Management.

### 1.3.1.2.3 Description of the number of employees by geographical area

Groupe BPCE has over 100,000 employees, nearly 90% of whom are based in France.

### 1.3.1.2.4 Description of products and services prohibited in certain markets

ESG sector policies govern Groupe BPCE's activities in sectors deemed sensitive from an environmental, social and governance (ESG) point of view.

#### Concerning Groupe BPCE's banking activities

- **Thermal coal:** in October 2015, Natixis Corporate & Investment Banking (CIB) committed to no longer finance coal-fired power plants and thermal coal mines worldwide. This policy has gradually been strengthened. In 2021, Groupe BPCE extended its policy to all of its banking activities and committed to a strategy aimed at gradually reducing its banking activities' exposure to thermal coal to zero by 2030 (for European Union and OECD countries) and 2040 (for the rest of the world).
- **Oil and gas industry:** published for the first time in 2017, this ESG policy, initially applicable to Natixis CIB's activities, was extended in 2023 to all of Groupe BPCE's banking activities and was strengthened with new criteria.

- **local authorities:** Groupe BPCE, in particular through the Caisse d'Épargne network, is the main private financier of local authorities<sup>(4)</sup>, the hospital sector<sup>(5)</sup>, and more generally the French public sector;
- **social housing operators:** Groupe BPCE is a long-standing partner and leading private banker in social housing<sup>(6)</sup>;
- **Social and Solidarity Economy (SSE):** Groupe BPCE, thanks to the action of its Banque Populaire and Caisse d'Épargne networks, is a major player in the private financing of the Social and Solidarity Economy. They support the various SSE structures, regardless of their size and status: cooperatives, mutuals, associations and foundations, employer structures in the historical sectors of SSE activity.

#### Concerning Natixis CIB's banking activities

- **Defense industry:** Natixis CIB excludes the financing, investment and provision of services to companies involved in the production, storage and trade of anti-personnel mines and cluster munitions.
- **Tobacco industry:** Natixis CIB has undertaken to cease all dedicated financing related to tobacco activities, as well as all non-dedicated financing in favor of a company whose business is 25% or more tobacco-based.

**The European asset management companies affiliated with Natixis Investment Managers** also apply sector and/or exclusion policies:

European asset management companies have developed responsible investment policies that explain their overall ESG approach, provide detailed guidance on the integration of environmental factors, and explain their sectoral and/or exclusion policies. All European asset management companies ban controversial weapons from their investments, and have exclusion policies in the coal, non-conventional oil and gas, and tobacco sectors. Some affiliated asset management companies have developed more restrictive exclusion policies, based on recognized frameworks for fossil fuels. The majority of asset management companies offering investment products in non-listed assets completely exclude fossil fuels in favor of transition and renewable energies.

[1] Market share: 21.9% in household deposits/savings and 26.3% in home loans [Banque de France Q3 2024].

[2] 37% [rank 2] penetration rate among professional customers and self-employed customers [Pépites CSA 2023-2024 survey].

[3] 2023 Kantar SME SMI survey.

[4] *Observatoire de la dette Finance Active des Collectivités Locales* [published in 2024].

[5] *Observatoire Finance Active Établissements de Santé* [published in 2024].

[6] Repères 136 USH of August 2024 [Les HLM en chiffres].

**BPCE Assurances** has implemented the following sector policies as part of its investments:

- **Tobacco sector:** total exclusion of producers and exclusion of distributors whose tobacco-related turnover exceeds 5% of their total business.
- **Controversial weapons:** total exclusion.
- **Thermal coal:** for new investments, exclusion of producers whose turnover from thermal coal is higher than 10%, the annual coal production exceeds 10 million metric tons, or the electricity capacity generated from coal is greater than 5 GW. Distributors developing new thermal coal generation capacities of more than 300 MW are also excluded. For existing investments, divestment planned for 2030 at the latest for companies in OECD countries and for 2040 for companies in non-OECD countries.

- **Oil & Gas:** for new investments, companies developing new upstream fossil fuel (conventional or non-conventional) exploration or production projects, as well as those whose production of unconventional hydrocarbons or those with a high environmental impact exceeds 10% of their total activity are excluded. For existing investments, divestment no later than 2030 for companies that do not meet these criteria.
- **International guidelines:** for new investments, companies that violate the United Nations Global Compact (UNGC) and the OECD guidelines are excluded. For existing investments, priority divestment of companies that violate international principles.
- **Pesticides:** companies whose turnover from the production or marketing of pesticides exceeds 5% and which do not have a biodiversity strategy whose targets are aligned with target 7 of the Kunming-Montreal agreements for new investments are excluded. For existing investments, divestment set no later than 2030 for companies that do not meet the defined criteria.

### 1.3.1.3 LABELS AND COMMITMENTS

#### Public commitments that meet demanding international standards

Groupe BPCE has made several long-standing commitments to scale up its actions and accelerate the positive transformations to which it is contributing.

#### Global Compact

Since 2003, the Group has been a participating member of the Global Compact (United Nations Global Compact), which defines ten principles relating to respect for human rights, labor standards, environmental protection and the fight against corruption.

#### Principles for Responsible Investment (PRI)

Since 2008, through Natixis, the Group has adhered to the PRI, which supports institutional investors in incorporating environmental, social and corporate governance considerations into the investment decision-making process.

#### Equator Principles

Since 2010, through Natixis, the Group has been a signatory of the Equator Principles. They aim to take into account social and environmental risks in the context of project financing.

#### Principles for responsible banking, UNEP Finance Initiative

Groupe BPCE and Natixis have signed the Principles for Responsible Banking and are committed to strategically aligning their activities with the United Nations Sustainable Development Goals (SDGs) and the Paris Climate Agreement.

#### Net Zero Banking Alliance

In July 2021, Groupe BPCE joined the Net Zero Banking Alliance (NZBA), a financial initiative of the United Nations Environment Program (UNEP FI) covering more than 40% of the assets financed by banks worldwide. This alliance between banking institutions is a decisive step in the mobilization of the financial sector.

In accordance with its commitment to align the trajectory of its portfolios with the objective of carbon neutrality by 2050, Groupe BPCE has published its ambitions for the eleven sectors with the highest carbon emissions (power generation, oil and gas, automotive, steel, cement, aluminum, aviation, commercial real estate, residential real estate and agriculture).

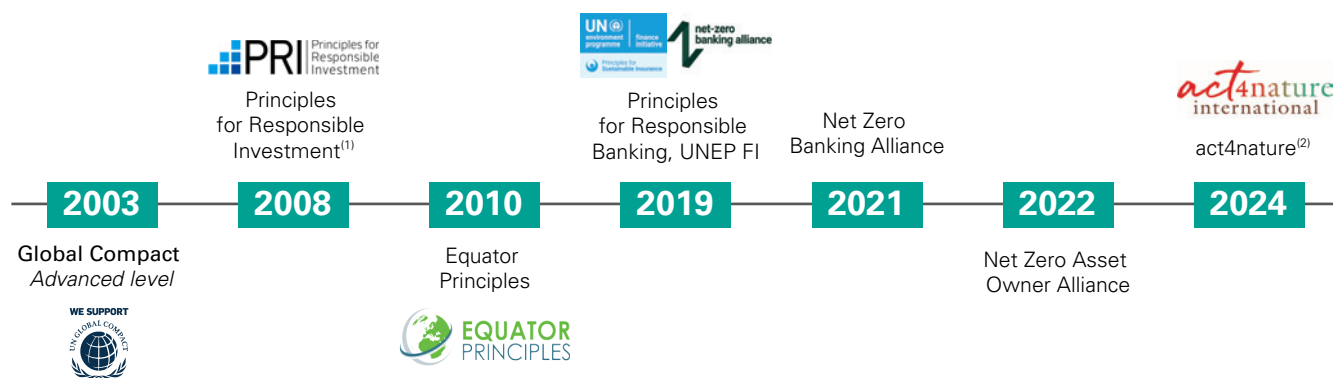
#### Net Zero Asset Owner Alliance

Since 2022, BPCE Assurances has been a member of the Net Zero Asset Owner Alliance (NZAOA), an international group of investors committed to transitioning their investment portfolios with the aim of contributing to carbon neutrality by 2050.

#### act4nature

By joining act4nature international in 2024, Groupe BPCE is strengthening its commitment to the environment by renewing the partnership supported by Natixis since 2018.

By joining act4nature international, a coalition that mobilizes companies, public authorities, scientists and environmental associations in favor of the protection, enhancement and restoration of biodiversity, the Group has set itself 24 proactive objectives as part of its banking, insurance and investing activities.



[1] Certain affiliates of Natixis Investment Managers [Natixis IM] scope, BPCE Assurances joining the PRI in 2016.

[2] Commitment made by Natixis in 2018, extended to include Groupe BPCE in 2024.

### Banque Populaire network and Caisse d'Épargne network labels

Actions carried out by Groupe BPCE are often assessed by public and private bodies who provide certificates that guarantee compliance with a particular standard or label.

Banque Populaire		Caisse d'Epargne	
CSR strategy			
Global CSR approach (ISO 26000)			
Lucie label	3		
CSR Committed Label (AFNOR)	3	CSR Committed Label (AFNOR)	2
Responsible brand	1		
CSR Label	2		
		B-Corp	2
Consumer relations			
Customer service quality: ISO 9001 and Pepp's	2		
Sustainable and solidarity-based products: Finansol	1		
Environment			
Guaranteed 100% renewable electricity	5		
ISO 50001 certification (energy management system)	1	Environmental certifications	6
Green buildings: HQE certification	8	Real estate: HPE label and BBC label	5
Green buildings: Effinergie label	4		
Green buildings: other labels	45		
Responsible purchasing			
Supplier Relations and Responsible Purchasing label		Supplier Relations and Responsible Purchasing label	7
Diversity, equal opportunities, discrimination			
Professional equality	10	Professional equality	5
Cancer@Work	7	Cancer@Work	3
Diversity label / AFNOR diversity - inclusion	1	Diversity label / AFNOR diversity - inclusion	4
Cap Handeo	1	Cap Handeo	3
Partner employer label for firefighters	9		
Responsible digital			
			1

#### 1.3.1.4 VALUE CHAIN

As a financial institution, Groupe BPCE receives funds in the form of customer deposits or purchases of financial instruments by investors and grants loans to its customers (banking transformation function).

The downstream value chain includes customers who benefit from Groupe BPCE's products or services, particularly loans.

The upstream value chain includes suppliers of products or services.

Own operations concern resources (e.g. employees, IT, premises, etc.).

## GROUPE BPCE VALUE CHAIN

### Financial value chain

#### CUSTOMER VALUE CHAIN



##### Collection

—Customers\*  
and investors

- Deposit collection
- Savings collection
- Collection on financial markets



##### Financial products and services

—Customers\*

- FINANCING**
- Financing products (bank loans, including: factoring, leasing, etc.)
  - Payment solutions
  - Savings products
  - Long-term savings products
  - Cooperative shares
  - Expertise and consulting

##### INVESTMENT

- Investment products
- Hedging products (derivatives and guarantees)
- Intermediation and market animation
- Expertise and consulting

##### INSURANCE

- Life insurance products
- Non-life insurance products
- Payment protection insurance
- Expertise and consulting

##### ASSET MANAGEMENT

- Expertise and consulting
- Portfolio management
- Intermediation and market animation
- Co-investment and seed money



##### Offer development and distribution

—Employees

- Business relationship (front, middle, back)
- Offer development, marketing, distribution
- Commercial activities and distribution
- Investor relations



##### Financial, risk and compliance management

—Employees

- Rating strategy (financial and non-financial)
- Portfolio management (assets)
- Balance sheet management (assets / liabilities)
- Risk management
- Compliance



##### Compliance with regulations

—Employees  
and regulators

- Compliance with regulations
- Audit
- Communication regulator / supervisor



### Own operations

—Employees and suppliers

- Premises and Real Estate
- IT chain (equipment, network and data centers)

- Own purchases: energy and similar, intellectual services, licenses
- Movable assets

- Fleets and mobility
- Human resources

\* Individual customers, professional customers, corporate customers, local authorities and public sector, SSE.

### 1.3.2 SBM-2 - Interests and views of stakeholders






Taking into account stakeholder expectations is an essential exercise to better identify and assess the Group's sustainability impacts. Groupe BPCE's stakeholder consultation process is based on a large number of systems that aims to involve its stakeholders in its process of identifying and assessing impacts, risks and opportunities, as well as levers for improving both environmental and societal topics. These systems are detailed in the table below.

The Group's cooperative model places dialog with stakeholders at the heart of its actions. The local presence of the Banques Populaires and the Caisses d'Epargne enables the Group to be attentive to everyone and understand society's expectations, by promoting local ecosystems and dialog with its stakeholders such as chambers of commerce, professional associations, players in the social and solidarity economy (SSE), entrepreneurial ecosystems, educational structures, associations, foundations, mutuals that the Group has historically supported, given its role as a major financier of the social and solidarity economy.

By holding the company's capital through cooperative shares, customers become cooperative shareholders and actively participate in the life, strategic and sustainable development of their bank. The members of the Board represent the cooperative shareholders, the regions and civil society within the governance of their bank.

Everywhere in the territories in France and in the regions of the world where the Group operates, stakeholder expectations are identified and taken into account through regular relations with the executives of the Group's companies, the Fédération Nationale des Banques Populaires, the Fédération Nationale des Caisses d'Epargne, the employee representative bodies, investors roadshows, meetings with rating agencies and NGOs (non-governmental organizations). Lastly, discussions with regulators, and image or forward-looking surveys are all sources of identification of changes in stakeholder expectations.

#### Summary of stakeholder dialog

Stakeholders	Dialog methods	Purpose
 Cooperative shareholders (Banques Populaires and Caisses d'Epargne)	<ul style="list-style-type: none"> <li>Participation in General Meetings</li> <li>Election of representatives</li> <li>Dedicated meetings and newsletters</li> <li>Cooperative shareholders club</li> <li>Coordination by the Fédération Nationale des Caisses d'Epargne and the Fédération Nationale des Banques Populaires</li> </ul>	<ul style="list-style-type: none"> <li>Promotion of the cooperative model</li> <li>Participation in the life of the bank</li> <li>Access to inside information on the bank's life and its impact on the region</li> <li>Measurement of satisfaction</li> </ul>
 Board members (Banques Populaires and Caisses d'Epargne)	<ul style="list-style-type: none"> <li>Participation in the Boards of Directors (Banques Populaires) or Steering and Supervisory Boards (Caisses d'Epargne)</li> <li>Participation in specialized committees</li> <li>Focus groups</li> <li>Training programs and seminars</li> <li>Dedicated directors website</li> </ul>	<ul style="list-style-type: none"> <li>Representation of the cooperative shareholders' interests in governance</li> <li>Participation in the definition of strategic orientations</li> <li>Monitoring function, in particular risk management and reliability of internal control</li> </ul>
 Employees	<ul style="list-style-type: none"> <li>Social survey (internal survey measuring the social climate in the Group's companies) and business line satisfaction survey</li> <li>Annual interviews</li> <li>Training</li> <li>Internal communication</li> <li>Non-profit networks (women, intergenerational, LGBT+)</li> <li>Employee whistleblowing rights</li> <li>Consultation of employee representatives and representative trade unions</li> </ul>	<ul style="list-style-type: none"> <li>Improving quality of life at work, health and safety at work</li> <li>Employee loyalty and commitment (career and talent management, skills and expertise development)</li> <li>Participation of employee representatives in major strategic and transformation issues and negotiation of agreements</li> </ul>
 Clients	<ul style="list-style-type: none"> <li>Interviews</li> <li>Strategic dialog to integrate ESG issues</li> <li>Customer events</li> <li>NPS satisfaction surveys<sup>[1]</sup></li> <li>Institutional and commercial partnerships</li> <li>Voting policies (available on the websites of the asset management subsidiaries)</li> </ul>	<ul style="list-style-type: none"> <li>Definition of offers and customer support</li> <li>ESG dialog: customer acculturation on ESG issues, support for transformation initiatives, risk assessment for better prevention and management by the customer and for incorporation of ESG criteria in the granting of loans</li> <li>Improving customer satisfaction</li> <li>Development of a committed shareholder base to encourage companies to transform their strategy and reduce their ESG risks</li> <li>Monitoring of the respect for compliance and ethics rules in commercial policies, procedures and sales</li> <li>Complaint management</li> <li>Mediation</li> </ul>
 Suppliers and sub-contractors	<ul style="list-style-type: none"> <li>Responsible purchasing policy</li> <li>Commitment to government initiatives (e.g. "I choose French Tech")</li> <li>Regular meetings with strategic suppliers</li> <li>"Supplier voices" survey</li> <li>Preparation of certifications</li> <li>Listening system and satisfaction surveys</li> <li>Supplier whistleblowing rights and establishment of an independent mediator</li> <li>Audit</li> </ul>	<ul style="list-style-type: none"> <li>Responsible Supplier Relations Charter, involving suppliers in the implementation of Duty of Care measures</li> <li>Compliance with ESG clauses included in contracts</li> <li>Identification of progress plans to better understand supplier expectations</li> <li>Improve the level of satisfaction and the relationship</li> <li>Consultations and calls for tenders</li> <li>Measurement of satisfaction</li> </ul>

[1] Net promoter score

Stakeholders	Dialog methods	Purpose
 Institutions, federations, regulators	<ul style="list-style-type: none"> <li>Regular meetings (public authorities, regulators, chambers of commerce and industry, etc.)</li> <li>Contribution to marketplace work (in particular within the FBF - Fédération Bancaire Française), participation in sectoral working groups</li> <li>Responses to public consultations</li> <li>Transmission of information and documents</li> <li>Board seats (EPL, LS, ESS, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>Constructively contributing to public debate and participating in collective, fair and informed decision-making</li> <li>Taking into account sector specificities</li> <li>Regulatory compliance</li> </ul>
 Rating agencies, investors and independent third parties	<ul style="list-style-type: none"> <li>Regular dialog, participation in meetings (technical meetings, roadshows, conferences, etc.)</li> <li>Transfer of information and documents for ratings/audits</li> <li>Publication of official documents: Universal Registration Document, quarterly earnings, press releases, investor website</li> </ul>	<ul style="list-style-type: none"> <li>Improving transparency</li> <li>Diversification of the Group's refinancing, in particular by promoting the issuance of Green / social / sustainable bonds</li> <li>Improving financial and non-financial ratings</li> <li>Meeting the expectations and questions of investors and rating agencies</li> <li>Reports publication (CDP, act4nature international, PRB, etc.)</li> </ul>
 NGOs and non-profits	<ul style="list-style-type: none"> <li>Calls for projects</li> <li>Sponsorship</li> <li>Employee volunteering, skills sponsorship</li> <li>Regular dialog</li> <li>Contributions to market questionnaires</li> <li>Seats on the boards of foundations or associations</li> </ul>	<ul style="list-style-type: none"> <li>Positive impacts through numerous cultural and solidarity initiatives in various fields: business creation, integration, solidarity, young people, sport, environmental protection, etc.</li> <li>Improving transparency</li> <li>Contribution of cross-expertise: banking / financial and better understanding of local players</li> </ul>
 Academic and research sector	<ul style="list-style-type: none"> <li>Relations and partnerships with business schools and universities</li> <li>Partnership with research chairs</li> <li>Participation in forums and events</li> <li>Discussions and consultations with scientific experts</li> </ul>	<ul style="list-style-type: none"> <li>Welcome and recruitment of work-study students and interns</li> <li>Improving the employer brand</li> <li>Contribution to the Group's research, working groups and strategies</li> </ul>

Certain stakeholders were consulted as part of the double materiality assessment (see 1.5.1.1 IRO-1).

## 1.4 Governance

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

#### 1.4.1.1 COMPOSITION AND DIVERSITY OF GROUPE BPCE'S MANAGEMENT AND SUPERVISORY BODIES

##### Supervisory Board and Management Board

The Supervisory Board of Groupe BPCE has 19 members<sup>(1)</sup>: 7 representatives of the Banques Populaires, 7 representatives of the Caisses d'Epargne, 3 independent members<sup>(2)</sup> and 2 employee representatives. The Supervisory Board includes 6 non-voting directors acting in an advisory capacity.

As of 31st December 2024, with eight women on its Supervisory Board out of a total of seventeen members, Groupe BPCE had a proportion of women of:

- 47.05%<sup>(3)</sup> (in accordance with Article L. 225-79 of the French Commercial Code, members representing employees are not taken into account in this calculation);
- 42.11%, in accordance with ESRS 2 (European Sustainability Reporting Standards 2) of the CSRD (Corporate Sustainability Reporting Directive).

The Management Board of Groupe BPCE is composed of four members<sup>(4)</sup>, including a Chairman. The diversity rate is 50%<sup>(5)</sup>.

The modalities and details of the composition of the Supervisory Board and Management Board (as well as the Executive Management Committee) are provided in Chapter 4.

Thus, the members of the Supervisory Board and the Management Board are appointed in accordance with the appointment and succession policy (adopted by the Supervisory Board at its meeting of February 7, 2024), which specifies the diversity policy applicable to them.

The Appointments Committee - responsible for formulating proposals concerning the choice of Board members, non-voting directors and external independent members (in compliance with legal and statutory rules and in accordance with the Supervisory Board's internal rules) - thus verifies the suitability of candidates to join the Board in view of their good reputation, skills and independence while pursuing an objective of diversity within the Board, *i.e.* a situation where the characteristics of the members of the Board differ to a degree ensuring a variety of views within the Board. The Group's cooperative nature contributes to this diversity.

The committee strives to observe the following diversity criteria:

- training,
- balanced geographical representation,
- representation of the different types of market.

When assessing a candidate for the Supervisory Board, the Appointments Committee strives to maintain or achieve a balance and have a skill set appropriate for the Group's activities and strategic project, as well as the technical responsibilities assigned to the various Supervisory Board committees.

##### Sustainability expertise and skills of the Supervisory Board

Skills are assessed collectively within the Supervisory Board, which favors their complementarity.

The Supervisory Board is mainly composed of representatives from the Banques Populaires and the Caisses d'Epargne, and in particular of the directors and Chairmen of the Boards from both networks. The board chairmen are first and foremost cooperative shareholders of their bank and have in-depth knowledge of the cooperative model, the region and regional specificities.

The skills of the members are reported in the collective skills matrix of the Supervisory Board in Chapter 4<sup>(6)</sup>. This matrix notably mentions all the regulatory skills expected by the supervisor (including banking skills such as: banking and financial markets, accounting and auditing, interpretation of a credit institution's financial information, risk management, etc.). In addition, these elements are supplemented by the information appearing in the terms of office sheet of each member<sup>(7)</sup>, which describes his or her experience in detail.

In view of the Supervisory Board's collective skills matrix, the Supervisory Board's average skill level, particularly with regard to ESG skills, is as follows:

- **Knowledge and experience of climate and environmental risks: 3.55 / 5**

This expertise covers the understanding of climate and environmental risk and its challenges for a banking group, the general regulatory context as regards the environment, the specific expectations on the banking sector, and the measurement of this risk and its main indicators. It also covers knowledge of the action plans implemented by the Group.

[1] The Supervisory Board of BPCE exercises permanent control over the management carried out by the Management Board and must include, according to the Group's articles of association, between 10 and 19 members [non-executive company directors] as well as 6 non-voting directors chosen in accordance with the procedures provided for in the diversity policy adopted on February 7, 2024.

[2] *i.e.* a proportion of 15.79% of independent members on BPCE's Supervisory Board. The proportion of independent members on the board committees is specified in Chapter 4.

[3] The Supervisory Board aims for a minimum of 40% representation of the under-represented gender, a ratio calculated by the ratio of the number of women members of the Supervisory Board to the total number of Supervisory Board members, it being specified that the members representing the employees are not included in the calculation.

[4] The Management Board has the broadest powers and must include between two and five members according to Groupe BPCE's articles of association [executive company directors].

[5] The Management Board of BPCE, which is not subject to any regulatory or statutory obligations, calculates this ratio by dividing the number of women members of the Management Board with the total number of members of the Management Board.

[6] The matrix presents the average of the collective skills of all of the members. It is based on skill levels [between 1 and 5] as declared by the members. During the assessments, the Appointments Committee checks the consistency of the declared skill levels with the CVs and training completed.

[7] See 4.3.5 "Directorships and offices held by corporate officers".



• **Social and solidarity economy: 4.47/5**

This expertise covers the understanding of the various areas of intervention of the social and solidarity economy (fair trade, responsible consumption, short supply chains, solidarity-based finance, integration through economic activity, confiscation of criminal assets for the use of social utility, social currencies and non-monetary exchange systems, etc.) and its specific challenges, knowledge of social innovations, the role of the various players, and interactions with public authorities.

• **Cooperative banking experience: 4.47 / 5**

This expertise covers the specificities of the Banque Populaire and Caisse d'Épargne networks, banks and cooperative companies, which are owned by their cooperative shareholders. As cooperative banking institutions, the operations and missions of the Banques Populaires and the Caisses d'Épargne are governed by law (as is BPCE as the central institution of these institutions): participatory governance, regional proximity, legal duties to implement the principles of solidarity and fight against exclusion, promotion and collection of savings, development of provident insurance, contribution to the protection of popular savings, financing of social housing, improvement of local and regional economic development, and fight against banking and financial exclusion of all players in economic, social and environmental life. Knowledge of these specificities, the very essence of the Group's model, is the basis of this "cooperative banking experience".

• **Regional specificities: 4.21 / 5**

This competence involves understanding and taking into account the economic and social strengths and weaknesses of the territories.

• **Economic and regional environment: 4.34 / 5**

This expertise covers knowledge of the strategies for the development, revitalization and optimization of a region as well as understanding of the role of the various players and partners and the legal and financial constraints.

**Training program**

In order to strengthen the skills available to the Supervisory Board, training provided by internal and/or external providers is offered to Board members, particularly on sustainability issues. The training program takes into account the diversity of experiences and the needs of the Board members, as well as the proposals made as part of the Board's annual assessment.

Details of the training program offered to Supervisory Board members are provided in Chapter 4.

The training offered in 2024 in terms of sustainability, both as part of the regulatory initial training and continuing training, were as follows:

- climate and environmental risks: training delivered by internal and external providers with the aim of understanding climate risk, the general regulatory context regarding the environment, and the specific expectations on the banking sector;
- the challenges of the energy transition and the management of climate and environmental risks: internal training with the aims of improving knowledge about the integration of ESG criteria in risk monitoring, presenting the main regulatory requirements related to climate and environmental risks, and describing the action plans implemented by the Group to respond to them;
- CSRD and transition plan: training delivered by internal and external providers, with the aim of ensuring a good understanding of the CSRD regulatory requirements and the challenges related to this new regulation for Groupe BPCE;
- the climate solutions fresco: external training with the aim of achieving good understanding of the impacts and challenges related to climate risks on the various sectors of the economy;
- Retail Banking operating model: internal training aimed at seeing how the Group is accelerating its transformation of the support functions and how future technologies can trigger new dynamics in Retail Banking operating models;
- governance of cooperative 'banks', overview of the governance and organization of cooperative banks in France and Europe: training delivered by internal and external providers with the aim of presenting an overview of the governance and organization of cooperative banks in France and Europe.

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

### 1.4.2.1 SUSTAINABILITY TOPICS ADDRESSED BY THE ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

#### Organization of governance relating to Groupe BPCE's sustainability issues

The Supervisory Board supervises and puts the Group's ESG strategy into perspective. The Executive Management Committee of Groupe BPCE validates the ESG strategy, ensures its implementation and oversees the Group's risk management (the composition and diversity of the management and supervisory bodies, the roles and responsibilities of the bodies are detailed in Chapter 4 of the Universal Registration Document - Report on corporate governance).



Banques Populaires and Caisses d'Epargne place ESG at the heart of their business model, and ESG issues have historically been an integral part of the governance of each institution.

#### At the level of the Supervisory Board and its committees

The Supervisory Board meets as often as the company's interests and legal and regulatory provisions require. The frequency is at least once per quarter. Several specialized committees have been set up by the Supervisory Board and carry out their activities under its responsibility. Their duties are defined in the Supervisory Board's internal rules. The Chairman of each of these committees reports on the committee's work to the Supervisory Board.

In addition to the subjects regularly addressed during Board meetings, such as the quarterly reports of the Management Board, related-party agreements, executive approvals, current events and other matters for information, sustainability subjects are also examined mainly in the context of committee minutes.

Board	Chairman	Frequency in 2024	Duties	Main ESG topics addressed in 2024
Audit and Investment Committee	Kadidja Sinz - Independent member of the Supervisory Board	9 sessions per year	<p>The Audit and Investment Committee:</p> <p>Monitors the process of preparing the sustainability information and the process implemented to determine the information to be published in accordance with the sustainability reporting standards.</p> <p>Monitors the effectiveness of the internal control and risk management systems, and where applicable the internal audit, regarding the procedures relating to the preparation and processing of accounting and financial information used for sustainability reporting.</p> <p>Monitors the performance of the statutory audit by the Statutory Auditors and certification of sustainability information and ensures compliance with the independence conditions required of the parties involved in the audit and certification of sustainability information.</p> <p>Reports regularly to the collegiate body in charge of administration or to the supervisory body on the performance of its duties. It also reports on the results of the certification of the financial statements and the sustainability information, as well as on the way in which these missions have contributed to the integrity of the financial and sustainability information. It reports on the role it has played in this process.</p>	<p>Monitoring of the construction and progress of the CSRD sustainability report:</p> <ul style="list-style-type: none"> <li>• result of the sustainability auditor's call for tenders;</li> <li>• methods for implementing the CSRD regulation (structuring and construction of the project).</li> </ul> <p>Presentation of CSRD issues for Groupe BPCE (joint meeting with the Risk Committee).</p> <p>Presentation of the double materiality assessment approach followed, results of the exercise and guidelines adopted by Groupe BPCE for the rating, overall view of the Group's materiality positions.</p> <p>Presentation by the sustainability auditor of his strategy and approach to verification of the sustainability report.</p>
Cooperative and CSR Committee	The Chairmen of Fédération Nationale des Banques Populaires and Fédération Nationale des Caisses d'Epargne alternately	4 sessions per year	<p>The Cooperative and CSR Committee:</p> <p>Develops proposals and recommendations aimed at promoting and translating the cooperative and social values of long-term engagement, as well as professional and interpersonal ethics, within the activities of the Group and networks, thereby strengthening the cooperative and CSR dimension of the Group and each of the networks.</p> <p>Develops proposals on strategy and institutional communication related to ESG issues.</p> <p>Reviews the sustainability report, as well as any other document or report relating to current or future legal obligations (taxonomy, etc.).</p> <p>Monitors the communication plan and the indicators used to measure the actions of the Group's strategic plan around the actions falling within the scope of the Cooperative and CSR Committee.</p> <p>More generally, makes any proposal it deems useful regarding CSR actions that could be carried out.</p>	<p>VISION 2030 strategic project: positions on Impact, monitoring of the ESG program, in particular assessment of the 2021-2024 ESG program, preparation and implementation of the 2024-2026 Impact program, Net Zero trajectories, biodiversity approach.</p> <p>News and key indicators of Groupe BPCE's Impact Program, monitoring of indicators.</p> <p>Management of Net Zero trajectories (NZBA).</p> <p>Sustainability reports: 2023 NFPS with focus on the carbon audit, new CSRD regulations.</p> <p>CSRD: double materiality assessment (approach followed, results of the exercise and guidelines adopted by Groupe BPCE for the rating, global view of the Group's materiality positions).</p> <p>Presentation by the sustainability auditor of his strategy and approach to verification of the sustainability report.</p> <p>Conduct and Ethics Reporting.</p> <p>News from the national federations of the Banques Populaires and the Caisses d'Epargne.</p> <p>"Protection of the local natural assets" initiative.</p>

Board	Chairman	Frequency in 2024	Duties	Main ESG topics addressed in 2024
Risk Committee	Independent member of the Supervisory Board of BPCE	10 sessions per year	<p>The Risk Committee:</p> <p>Assesses the effectiveness of the internal control and risk management systems.</p> <p>Supports risk management.</p> <p>Assesses and reviews the implementation of the operational strategy for managing BPCE's and the Group's climate and environmental risks and issues proposals, opinions or recommendations in this area to the Supervisory Board.</p> <p>Examines the overall exposure of the Group's activities to current and future climate and environmental risks (based on the work of the ESG Risk Committee)</p>	<p>Climate risks: presentation of the annual work program and monitoring.</p> <p>ESG risks: regulatory news, presentation of the action plan and monitoring.</p> <p>Validation and monitoring of the implementation of the ESG risk action plan.</p> <p>Business Environment Scan and assessment of the materiality of the risks.</p> <p>Climate risk appetite management.</p> <p>Monitoring of regulatory news and interactions with supervisors.</p> <p>Cybersecurity.</p> <p>Half-yearly reports of the compliance functions.</p> <p>Annual report on the combat against money laundering and financing of terrorism.</p>

### At the Executive Management level

Board	Chairman	Frequency	Duties	Main ESG topics addressed in 2024
ESG Risk Committee	Chief Risk Officer	6 sessions per year	<p>The ESG risk committee notably:</p> <p>Performs the consolidated monitoring of the ESG risks to which Groupe BPCE is exposed and ensures the implementation of the organization and operational strategy in terms of ESG risk management.</p> <p>Validates the main methodological choices and scenarios used within the Group in the context of ESG risk management.</p> <p>Reviews and validates the assessment of the materiality of ESG risks and expresses its opinion on the Group's ESG risk appetite.</p>	<p>ESG risk management system.</p> <p>Materiality assessment of climate and environmental risks for Groupe BPCE.</p> <p>Climate scenarios and stress test approach.</p> <p>ESG risk dashboard.</p> <p>Monitoring of regulatory news and interactions with supervisors.</p> <p>Climate and environmental risk materiality identification and assessment.</p> <p>Review and monitoring of the ESG risk action plan.</p> <p>Organizational ESG risk charter.</p> <p>Monitoring of work to strengthen the system: geo-sectoral assessments of physical and transition risks, modeling of physical risks on residential real estate, climate scenarios and stress test system, implementation and monitoring of work to integrate ESG issues in the analysis of customer business models (including the credit process).</p> <p>Climate risk appetite management.</p>
Executive Management Committee	Chairman of the Management Board	Weekly	<p>The Executive Management Committee:</p> <p>Validates strategic priorities in terms of social and environmental responsibility.</p> <p>Supervises their implementation.</p>	<p>Progress of the 2021-2024 ESG Program.</p> <p>Impact strategy in VISION 2030.</p> <p>ESG operating model.</p> <p>2023 NFPS and TCFD publications.</p> <p>Update on the work on the 2023 Duty of Care plan.</p> <p>"Protection of the local natural assets" initiative.</p> <p>Business Environment Scan and assessment of the materiality of the risks.</p> <p>Action plan to strengthen the ESG risk system.</p> <p>Monitoring of regulatory news and interactions with supervisors.</p> <p>Net Zero trajectories of the most emitting sectors.</p> <p>Impact 2024-2026 program.</p>

Board	Chairman	Frequency	Duties	Main ESG topics addressed in 2024
Environmental Transition Strategy Committee	Chairman of the Management Board	4 sessions per year	<p>The Strategic Environmental Transition Committee:</p> <p>Defines the Group's Impact strategy in terms of environmental transition and manages its implementation: action plans, indicators by business line, measurement of the Group's ambitions.</p> <p>Defines the Group's positions in terms of environmental transition.</p> <p>Manages the Group's non-financial communication plan on ESG issues and monitors its impact (non-financial ratings, etc.).</p>	<p>Net Zero trajectories of the most emitting sectors.</p> <p>ESG policies in sensitive sectors.</p> <p>CSRD project.</p> <p>Transition plan.</p> <p>Biodiversity approach.</p>
Data & Technologies ESG Committee	Chief Technology & Operations Officer Chief Digital & Payments Officer	2 sessions per year	<p>The ESG Data &amp; Technologies Committee:</p> <p>Ensures the implementation of the system for distributing the ESG data required for the various uses in all of the Group's information systems.</p>	<p>ESG data as part of VISION 2030.</p> <p>Data governance.</p>
Group Regulatory Committee	General Secretary	4 sessions per year	<p>The Group's Regulatory Monitoring Committee:</p> <p>Monitors regulatory changes, from the genesis of texts to their daily implementation.</p> <p>Carries out a regulatory watch, with a cross-functional and global vision of current/recent regulatory changes.</p> <p>Decides and monitors the implementation.</p>	<p>CSRD.</p> <p>Pillar III ESG, Green Asset Ratio</p> <p>Article 28 of the Energy and Climate act.</p> <p>ECB guide to climate and environmental risks.</p> <p>Guidance on the granting and monitoring of loans.</p> <p>Duty of Care.</p>

The double materiality assessment was presented to the Cooperative and CSR Committee in November 2024 and to the Audit and Investment Committee in December 2024. These two committees communicated their report at the Supervisory Board meeting held in December 2024.

The material impacts, risks and opportunities focus on climate change, value chain workers, affected communities, consumers and end-users and business conduct. The skills of the members of the management and supervisory bodies in connection with these IROs are available in Chapter 4<sup>(1)</sup>.

These diverse topics are the responsibility of various specialized committees and the material matters are dealt with within the ordinary framework of the existing bodies. For example, the material matters related to the climate are dealt with by the Environmental Transition Strategy Committee (CTSE), which is notably tasked with defining the Group's Impact strategy as regards the environmental transition and overseeing its implementation, through action plans, business line indicators and measurement of ambitions. It is in this body that the decarbonization action plans and/or trajectories of the eleven highest-emitting sectors published by Groupe BPCE were validated, before being presented to the Executive Management Committee (CDG).

### An "Impact Inside" approach managed by the Sustainability Office

The Sustainability Office which reports directly to the Chairman of the Management Board, proposes, validates and implements the Group's ESG strategy. It plays a cross-functional role within the Group, carrying out the following key missions:

- co-construct the VISION 2030 of the Group's Impact on the Environmental, Social and Governance (ESG) dimensions;
- develop and deploy ESG expertise and ensure the Group's representation and communication;

- conduct and interpret scientific and competitive monitoring and support regulatory monitoring, to ensure continuous improvement;
- manage the Impact 2026 program and carry out structuring projects within its scope in accordance with Group standards and regulatory expectations;
- ensure overall coordination and support each sector's "Impact Inside" operations while implementing the necessary synergies.

The "Impact Inside" approach is being rolled out:

- with the Executive Management Committee, which oversees projects related to the implementation of the Impact VISION 2030 for the Group, with a regular review of the portfolio of structuring projects;
- with the Strategic Environmental Transition Committee, which validates the main operational guidelines and monitors the deployment of environmental projects;
- via the institutions, with an Impact Committee, composed of CEOs of Banques Populaires and Chairmen of Caisses d'Epargne, which guides the Impact program and monitors the progress of projects, with the various functions of the divisions notably with the Impact/CSR function to ensure a global vision of the program, a co-construction dynamic and its implementation in the institution;
- with the Group's business lines through specific systems adapted to each business line (the global business lines of Groupe BPCE, Insurance, FSE and D&P), based on existing committees, notably including work between business line departments and a dedicated coordination to co-construct and implement the Group Impact program with the ESG managers.

[1] Matrix of the collective skills of the Supervisory Board and terms of office sheets of the members.

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

#### Concerning the members of the Supervisory Board of BPCE SA

With the exception of the Chairman, who receives a fixed annual fee, the members of the Supervisory Board receive remuneration on the basis of their activities. The Chairman and Vice-Chairman of the Supervisory Board do not receive any additional remuneration for their participation in committees.

Each remuneration payment relates to the corporate officer's attendance at Board Meetings and is calculated according to the total compensation package set by each company's General Meeting.

#### Concerning the members of the Management Board of BPCE SA

For the 2024 fiscal year, CSR and employee cooperative shareholding within BPCE are one of the five qualitative criteria influencing the variable pay of Management Board members. The variable portion of pay relating to the five qualitative criteria represents 40% of the total variable pay, with no specific weighting for each of the individual criteria. The achievement rate was assessed overall by taking into account the attention paid to the five criteria, taken as a whole, including CSR topics and employee cooperative shareholding within BPCE.

On February 6, 2025, on the proposal of the Remuneration Committee, BPCE's Supervisory Board decided to set the Management Board's variable pay targets for the 2025 fiscal year by incorporating a specific criterion related to the environment, climate and decarbonization trajectories with a weighting of 5%.

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

#### MAIN FEATURES OF THE RISK MANAGEMENT AND INTERNAL CONTROL SYSTEM LINKED TO THE SUSTAINABILITY REPORTING PROCEDURE

##### 1.4.4.1 PREPARATION AND PUBLICATION OF SUSTAINABILITY INFORMATION

#### Roles and responsibilities

Within the Group, the preparation and processing of sustainability information is mainly the responsibility of the Group Finance division which mobilizes its Architecture & Reporting (A&R) and Financial and Non-Financial Communication teams and the Sustainability Office.

#### FINANCE DIVISION

##### Architecture and Reporting

Reporting to the Finance division, the Architecture and Reporting (A&R) department is responsible for securing the key Information Systems Finance & Risks applications, ensuring the reliability of complex production processes (data transformed with the preparation of regulatory and management reports) and ensuring that these processes comply with BCBS 239 principles<sup>(1)</sup>.

In 2024, the department created a unit dedicated to managing non-financial issues closely related to the management of the financial statements. The Responsible Finance Management (RFM) structure is in line with the new "Impact Inside" model.

The new RFM department played a key role in coordinating the work to draw up Groupe BPCE's sustainability report:

- coordination of project committee and governance internally, including interaction with other Group entities that prepare their own sustainability report;
- strengthened coordination of the data strategy and the processes for producing the regulatory indicators required by the ESRS, including the conduct of a test system involving all production entities;

- active monitoring of best practices in force in the market (methodologies for producing indicators, transition plan);
- acculturation of the Finance function of the Group's companies on the new CSRD challenges, in particular via the existing National Finance Committee (NFC) bodies;
- interaction with the College of Auditors.

##### Financial and non-financial communication

Teams are involved in the CSRD set-up and responsible for the production of the Universal Registration Document. They drive the narrative production process. The drafting of the narratives is entrusted to the production business lines, who are experts in the themes. The project teams perform the following functions:

- identify, integrate and raise awareness among the ESRS-themed narrative writers of the new CSRD challenges as well as the editorial requirements required by the standard;
- provide tools to the production business lines such as an editorial guide, methods for monitoring production and completeness, and instructions for proofreading and validation with the managers of the contributing divisions;
- manage the narrative collection process with the Sustainability Office and data collection in collaboration with the Architecture & Reporting department;
- ensure the production of the sustainability report within the milestones of the URD production schedule;
- organize the mechanisms necessary to collect investors' expectations.

This approach aims to ensure a good understanding of the spirit of the EFRAG standard and guide<sup>(2)</sup>. The drafting work is carried out according to a schedule and in the collaborative tool used to draft the URD.

[1] The Basel Committee on Banking Supervision.

[2] European Financial Reporting Advisory Group.

## SUSTAINABILITY OFFICE

The Sustainability Office, which reports directly to the Chairman of the Management Board, proposes, validates and implements the Group's ESG strategy. It plays a cross-functional role within the Group and, as part of the CSRD project and is more specifically involved in the following projects:

- **CSRD acculturation:** the Sustainability Office has designed and runs acculturation sessions for employees, various business lines (Purchasing, Governance, Compliance, etc.) and the Group's management bodies, subsidiaries and institutions. The educational objective of these sessions is to put into perspective the challenges of the CSRD and the sustainability report, explain the regulatory requirements and new structuring concepts, present the organization of the project at Group level and the expected contributions;
- **double materiality assessment:** this analysis was carried out in two stages (for a detailed description, see ESRS 2 IRO-1):
  - the identification of impacts, risks and opportunities (IRO) relevant to Groupe BPCE's activity was coordinated by the Finance division (A&R) and the Sustainability Office, with the operational support of the Retail Banking & Insurance business lines, the global business lines of Groupe BPCE, as well as the ESG Risk, Operational Risk, Achats & Services, Human Resources, Compliance, Technology and Operations, and Public Affairs departments at group level. The double

materiality assessment was carried out in two phases, A and B, by the Finance department and the Sustainability Office respectively. Phase A lead to identify the topics and subtopics of the ESRS relevant to Groupe BPCE, through workshops with internal business line experts, and then to carry out an initial identification of the IROs. Phase B lead to draw up the final list of relevant IROs for Groupe BPCE, as well as to rate them,

- assessment of the materiality of the IROs: the Sustainability Office is responsible for establishing, on behalf of the Group, the IRO rating methodology and it coordinates and supervises the rating of IROs, in conjunction with the internal stakeholders mentioned above; the business lines and functional departments are responsible for rating the IROs falling within their scope;
- **communication strategy and editorial content:** the Sustainability Office ensures that the editorial content of the sustainability report is relevant and consistent with the Group's strategy on sustainability issues, for which it is responsible;
- **transition plan:** the Sustainability Office is responsible for drafting the transition plan;
- **coordination of the Banques Populaires and Caisses d'Epargne:** the Sustainability Office supports the institutions and defines a framework, guidelines and certain content for the preparation of their Impact reports (non-regulatory report produced by certain institutions).

## Methods for producing and publishing sustainability reports

In accordance with the requirements defined by the Corporate Sustainability Reporting Directive (CSRD), the central institution prepares the sustainability report.

It also ensures the proper application by the entities subject to this requirement of the rules defined by the Group and verifies compliance with these requirements. Within the Group, the entities subject to the requirement to publish a sustainability report are Natixis, BPCE Assurances, BRED Banque Populaire and Banque Palatine.

To ensure the reliability of the production process, the central institution uses:

- a project structure dedicated to the publication of sustainability reports and distributed to all Group entities;
- a process for consolidating all the information to be published in the sustainability report, including controls to ensure the consistency of the information published and the analyses;
- a complete body of documentation;
- a harmonized permanent control system, the organization of which is described in the following Section (GOV-5 1.4.4.2).

### 1.4.4.2 GENERAL ORGANIZATION OF PERMANENT CONTROL

#### General system

The internal control system defined by the Group contributes to the control of risks of all kinds and is governed by an umbrella charter—the Group Internal Control Charter—which stipulates that this system is designed, in particular, to ensure "[...] the reliability of financial and non-financial information reported both inside and outside the Group."

The Group has defined and implemented a permanent control system to ensure the quality of this information, in accordance with the requirements defined by the Ministerial Order of November 3, 2014 on internal control, or any other regulatory obligations relating to the quality of reports, and in particular for the publication of information on sustainability.

For the sustainability report, the internal control system must ensure compliance with the requirements defined by:

- the Corporate Sustainability Reporting Directive (CSRD);
- the Group, in the framework for the preparation and publication of reports and management indicators, which aims to harmonize the reporting practices within the Group.

To ensure strict independence in the implementation of controls, the permanent control system is based annually on two levels of controls with:

- a first level exercised by all those involved in the production and reporting process. The following functions produced the information used for the sustainability report: Finance, Risk, Human Resources, Impact/CSR, Purchasing, Corporate Secretary's Office and Governance;
- a second level is handled by independent units within the Risk, Compliance or Permanent Control functions. For the CSRD reporting, this work is coordinated by the Group Financial Control (Group Corporate Secretary's Office) in conjunction with the other level two control players (risk).



## Level one controls

The level one controls consist of self-checking and control procedures implemented by each unit or entity responsible for producing sustainability information.

They aim in particular to ensure compliance with the rules defined by the CSRD and by the Group in the framework for the preparation and publication of reports and management indicators.

The level one controls are carried out throughout the report production process. The definition and implementation of these controls is the responsibility of each function or entity in charge of production, throughout the chain of contributors to the CSRD sustainability report. The production processes have been documented internally.

The results of the controls are formalized by the units or entities responsible for producing the information relating to sustainability and they specify, where applicable, any anomalies identified and their remediation plans to resolve them over the long term.

With regard to the indicators, the level one controls relate in particular to:

- reconciliation with the financial statements, if applicable;
- analysis of changes;
- the quality of the data collected from external suppliers, where applicable;
- drafting of a documentary corpus describing the planned production process and first-level controls.

The level one controls are carried out either in the technical production chains or by the business lines, with particular attention paid to processes involving office automation and manual interventions.

In addition, and in accordance with the requirements of the CSRD regulations (MDR-M<sup>(1)</sup>), the methods and main assumptions underlying the indicators, as well as the associated limitations, have been documented internally and reproduced in the CSRD report to provide the reader with all the background information necessary to understand the published indicators. As this is the first year of application of the system related to the assessment of double materiality, the internal control process is under construction and will be strengthened in the coming years.

## Level two controls: independent review of the sustainability report

### GENERAL SYSTEM

To ensure that the main reports published within the Group comply with all the requirements defined by the Group or by regulations, the Group has defined a method for assessing reports called the *independent review of reports* based on the implementation of strict criteria and carried out by independent functions.

This review, organized to ensure that the regulatory requirements are met, mainly aims to obtain an opinion or reasonable assurance that the reports are produced and published in a satisfactory internal control environment and that they include reliable and clear data that is useful and auditable.

Coordinated by the Group's Corporate Secretary's Office (Group Financial Control), this system is mainly carried out in **four major phases**:

**1) a risk assessment phase** aiming to identify the indicators to be checked, to plan the controls and to include the system in an annual control plan N+1 (under PRISCO<sup>(2)</sup>) validated by the Internal Control Coordination Committee. The risk assessment is carried out on all the indicators provided for in the publication of the sustainability report, based on the double materiality assessment, to identify gross risks, and on the internal procedures to assess the risk management system related to these indicators. The results of the assessment are based on three levels of risk (low, moderate and high) in order to select those that require a targeted review;

**2) an implementation phase of the level two controls** carried out, according to the scoring method, via a grid of rated controls, in accordance with the rules set out in the permanent control framework document on a scale ranging from 1 (requirement not met) to 4 (requirement fully met):

#### Rating scale for the quality of the report

1	from 1 to 1.9	Requirement not met
2	from 2 to 2.9	Requirement very partially met
3	from 3 to 3.9	Requirement correctly met but to be improved
4	> = to 3.9	Requirement fully met

These controls are based on six areas of analysis, weighted from 1 to 3 and relating to:

- the quality of the **documentation**;
- the robustness of **the organization** relating to the production and publication of the report;
- the quality of the **audit** trail of the data and/or indicators included in the reporting;
- the effectiveness of the system of level one **controls**;
- the **accuracy** of the data and/or indicators published and their consistency with the information provided in other publications;
- the **clarity** of the information.

#### Weighting of each criterion

<b>DOCUMENTATION</b>	<b>1</b>
<b>ORGANIZATION</b>	<b>1</b>
<b>CLARITY</b>	<b>2</b>
<b>AUDITABILITY</b>	<b>2</b>
<b>CONTROL</b>	<b>2</b>
<b>ACCURACY</b>	<b>3</b>

[1] Minimum Disclosure Requirement - Metrics.

[2] Group permanent control tool.

**3) a control review phase:** the results of the controls are formalized and presented in a summary note, which presents the work carried out and the conclusions, specifying in particular the anomalies identified and, where applicable, the recommendations made (or action plans or corrective measures). The results are included, by criterion, in the Group's permanent control tool (PRISCOP) and the conclusions are shared with the audited units, the external auditors (Statutory Auditors in particular) and with the supervisory body or its specialized bodies (the Audit and Investment Committee on the one hand, and the Cooperative and CSR Committee on the other hand);

**4) a phase of monitoring corrective actions (recommendations issued) and/or areas for improvement identified:** this monitoring is carried out in conjunction with the business lines and after the publication of the Group's sustainability report in order to strengthen the system for subsequent publications. Their implementation will also be monitored for the actions reported under PRISCOP by the Group entities subject to the publication of this report.

## MAIN FEATURES OF THE ENVIRONMENTAL, SOCIAL AND GOVERNANCE RISK MANAGEMENT SYSTEM

The environmental, social and governance risk management system is described in detail in Chapter 7, section 16 of the Universal Registration Document.

## ESG risk management framework deployment program

The ESG Risk department coordinates the implementation of the ESG risk management system at Groupe BPCE level through a dedicated program. This program, initiated in 2021, was reviewed and strengthened during 2024 in line with Groupe BPCE's climate and environmental commitments within the framework of the VISION 2030 strategic project and the regulatory requirements. It defines a multi-year action plan aligned with the action plan that implements the 2024-2026 strategic project. It is directly linked to the strategy and actions implemented by the Impact program. This program is monitored quarterly by the ESG Risk Committee, Groupe BPCE's Supervisory Board and the European supervisor.

This program is structured around the following four topics:

- **ESG risk governance:** committee procedures, roles and responsibilities, remuneration;
- **strengthening risk knowledge:** monitoring systems, sector analyses and assessments, risk reference framework, risk analysis methodologies and processes, data;

## Integration of ESG risks into the risk management framework

Based on specific ESG risk assessment methodologies, Groupe BPCE is gradually integrating ESG risk factors into its operational decisions through the existing systems in the bank's main risk functions.

The process of identifying and assessing climate risks and the associated action plans are described in Chapter E1 - Climate change (in Sections 2.2.2.1 and 2.2.3.4 respectively).

Reputational and/or litigation and liability risks have been identified as material in the chapters Climate change, Workers in the value chain, Affected communities and Consumers and end-users, and are covered by the following sections:

## Definition of ESG risks

### ENVIRONMENTAL RISKS

The environmental risks fall into two main risk categories:

- physical risks arising from the impacts of extreme or chronic climate or environmental events (biodiversity, pollution, water, natural resources) related to the activities of Groupe BPCE or its counterparties;
- transition risks, arising from the impacts of the transition to a low-carbon economy, or to one with a lower environmental impact, regarding Groupe BPCE or its counterparties, including regulatory changes, technological developments, and the behavior of stakeholders (including consumers).

### SOCIAL RISKS

Social risks arise from the impacts of social factors on Groupe BPCE's counterparties, including issues related to the rights, well-being and interests of individuals and stakeholders (the company's workforce, workers in the value chain, communities concerned, consumers and end-users).

### GOVERNANCE RISKS

Governance risks arise from the impacts of governance factors on Groupe BPCE's counterparties, including in particular issues related to ethics and corporate culture (governance structure, business integrity and transparency, etc.), supplier relationship management, influence activities and business practices.

- **operational integration of work:** in coordination with the other functions of the Risk division, consideration of ESG risk factors in their respective management systems and decision-making processes;
- **consolidated risk management mechanisms:** dashboards, contributions to RAF / ICAAP / ILAAP, training and acculturation plan for directors, managers and employees, contribution to non-financial communication.

The execution of this program mobilizes the main internal stakeholders in terms of ESG risks, in particular the Sustainability Office, the teams and functions of the other departments of the Risk division, the Finance division and the Compliance department, as well as Groupe BPCE business lines, in particular the departments in charge of developing sustainable finance activities.

### REPUTATIONAL RISK

The growing awareness and sensitivity of citizens and economic players to environmental, social and governance issues is leading to increased exposure to reputational risks related to these topics.

Faced with these risks, Groupe BPCE relies on a reputational risk management system overseen by Groupe BPCE Risk division and structured around the Group Reputation Risk Committee, which is tasked with reviewing the most sensitive issues at Groupe BPCE level.

This system is based on the measures implemented in the decision-making processes in order to assess reputational risks and implement mitigation measures if necessary. This concerns in particular:

- the responsible purchasing policy, which requires knowledge and assessment of suppliers' ESG risks, and the implementation of a carbon clause in supplier contracts since 2024;
- the new products/new activities (NPNA) system concerning the characteristics and communication related to Groupe BPCE's products and activities, which includes a systematic opinion from the ESG Risk department and the Impact department;
- the application of sector CSR policies as part of the new relationship, credit and investment processes.

Given the particular sensitivity of its activities to reputational risks, a dedicated system is deployed by Natixis. This system is based in particular on an assessment of the reputational risk arising from Natixis CIB's customers, from inception and throughout the business relationship, including the management of controversies. It is carried out in the normal course of business and, to the extent possible, using the various existing governance mechanisms and committees. A reporting process also makes it possible to report all the files likely to generate a significant risk of damage to the reputation of Natixis and/or Groupe BPCE, composed of members of the entity's Executive Management.

In addition, a system for monitoring the Group's ESG reputation has been set up, conducting monthly monitoring of the main controversies related to ESG issues that have involved Groupe BPCE and their impact on its overall reputation score. This monitoring is presented quarterly to the ESG Risk Committee.

Groupe BPCE plans to continue to enhance these systems in the course of 2025, in particular by defining a framework for monitoring voluntary commitments and strengthening its reputational risk management system.

## LITIGATION RISKS

The environmental, social and governance issues are likely to lead to litigation risks for Groupe BPCE. These can be based on legal foundations specific to the ESG issues (Duty of Care, international treaties or European legislation on the climate and the environment), on broader principles applied in this context (competition law, consumer law, criminal law), or unilateral commitments made by Groupe BPCE.

Groupe BPCE has identified and integrated into its operational risk mapping three main litigation and liability risk situations specifically related to ESG issues:

- communication using the ecological/sustainable argument in a misleading manner (greenwashing);
- non-compliance with the voluntary commitments made by Groupe BPCE or voluntary commitments deemed insufficient;
- controversial activities of Groupe BPCE or its entities, customers and/or suppliers.

As for the reputational risks, the risk management relating to these three situations is based on a set of measures integrated into the Group's main decision-making processes.

In addition, Groupe BPCE's Legal department also defines and disseminates best practices in terms of communication on climate and environmental issues and supports Groupe BPCE's business lines and functions in their implementation regarding internal and external communication.

## 1.4.5 GOV-4 - Statement on due diligence

The table below maps the information concerning the due diligence procedure included in Groupe BPCE's sustainability report.

Core elements of due diligence	Sections in the statement relating to sustainability
a) Embedding due diligence in governance, strategy and business model.	1.3.1.1 / 1.3.1.2 / 1.4.2
b) Engaging with affected stakeholders in all key steps of the reasonable due diligence.	1.3.2
c) Identifying and assessing adverse impacts.	1.5.1 / 2.2.2.1
d) Taking actions to address those adverse impacts.	2.2.3.1 / 2.2.3.4 / 3.2.3.3 / 3.2.3.4 / 3.4.3.3 / 3.4.3.4
e) Tracking the effectiveness of these efforts and communicating.	2.2.3.10 / 2.2.4.1 / 3.2.4.1 / 3.4.4.1

## 1.5 Impacts, risks and opportunities management

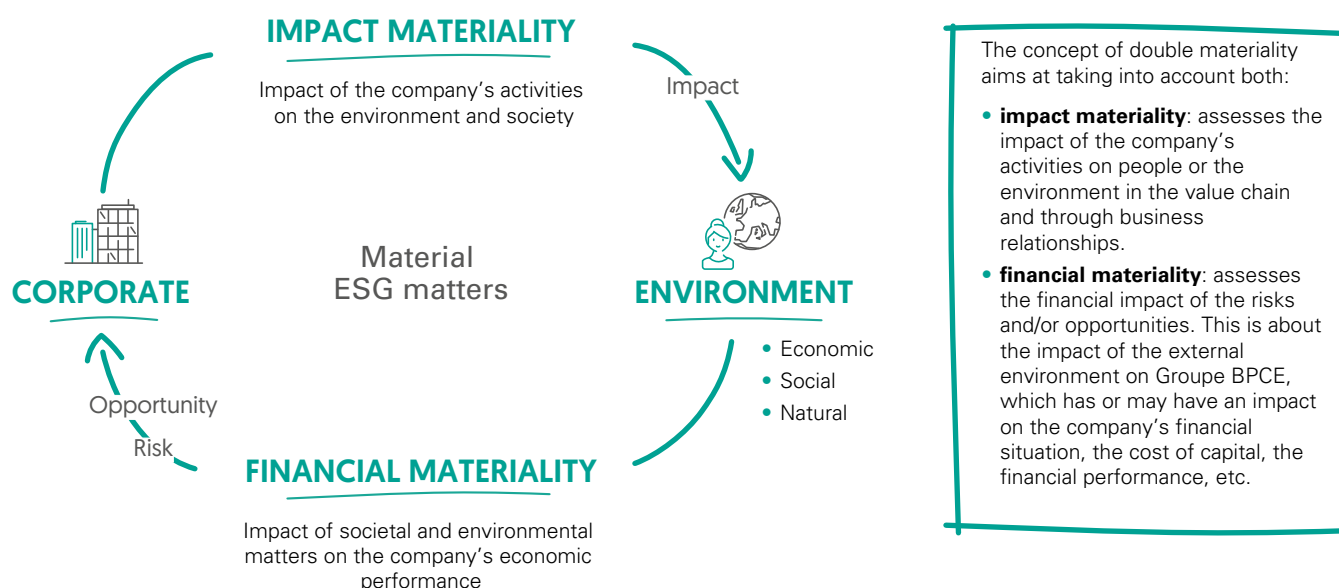
### 1.5.1 Disclosures on the materiality assessment process

#### 1.5.1.1 IRO-1 - DESCRIPTION OF THE IDENTIFICATION AND ASSESSMENT OF MATERIAL IMPACTS, RISKS AND OPPORTUNITIES PROCESS

##### 1.5.1.1.1 Double materiality definition

The double materiality exercise is the starting point for the preparation of the sustainability report.

Double materiality has two dimensions: i) materiality from an impact point of view and ii) materiality from a financial point of view.



The impacts, risks and opportunities which are identified as material represent the material matters on which the content of the sustainability report is based.

##### 1.5.1.1.2 Methodology for identifying and rating impacts, risks and opportunities

From an operational standpoint, the double materiality exercise was carried out in two stages:

- identification of impacts, risks and opportunities relevant to Groupe BPCE's business and its entire value chain;
- assessment of the materiality of these impacts, risks and opportunities.

##### Methodology for identifying impacts, risks and opportunities (IRO)

The IRO identification was carried out by topic and sub-topic according to the ESRS 1 requirements (AR 16):

- **topics and sub-topics:** the topics and sub-topics identification was carried out by mobilizing **internal sources**, such as the ESG matters identified in Groupe BPCE's 2022 and 2023 NFPS reports, the reasonable due diligence process put in place by the Group as part of the Duty of Care plan and the existing risks mapping, supplemented by **external sources**, such as the analysis of a business sectors benchmark, with a focus on the most relevant matters for banking players. Following this identification of an initial list of topics and sub-topics, additional

work was carried out to align with CSRD requirements. This alignment was carried out in two stages through workshops involving in-house business experts to (i) **validate the list** of topics and sub-topics **according to these experts**, and (ii) **reconcile** ESG issues with **ESRS themes** for the E, S and G components (AR 16 of ESRS 1). This work was carried out with the business lines in charge of the ESRS topics and sub-topics, drawing on the expertise of the employees of these teams;

- **Impacts, Risks and Opportunities (IRO):** work to identify the IRO within each theme was carried out in order to cover both **impact materiality** and **financial materiality**. Several internal and external sources were used to identify IROs;
- the **relevance of each IRO** was verified with the business lines concerned to ensure that the listed IRO effectively reflected a Risk, Opportunity or Impact for Groupe BPCE, to qualify the Impacts as positive or negative for the same sub-topic and to avoid duplication between similar IRO.

For each IRO identified, a rating was prequalified. This prequalification consisted of:

- a. positioning each IRO in Groupe BPCE's value chain, *i.e.* **upstream** of its **own activities**, or **downstream**;
- b. defining the **potential** or **actual nature of the negative and positive impacts**.

## Process for identifying and assessing impacts, risks and opportunities related to E2-Pollution, E3-Water and marine resources, E4-Biodiversity, E5-Resource use and circular economy.

The process of identifying the impacts of environmental matters, excluding climate change, at Groupe BPCE level was carried out across the entire value chain. Impacts have been identified on own operations as well as financing and asset management operations.

The rating of these impacts was conducted according to experts. As far as financing and asset management activities are concerned, the rating was carried out by experts based in particular on a business sectors analysis of Groupe BPCE's exposures by the Group ESG Risk division as part of the scale assessment. This rating was strengthened by the mobilization of the Group's stakeholders' views.

The process of identifying and assessing environmental risks, excluding climate, is part of the same system as assessing the materiality of climate and environmental risks set up by Groupe BPCE.

With regard to opportunities, the identification and assessment process was carried out by experts taking into account economic changes related to environmental issues, excluding climate change, and Groupe BPCE's outlook to adapt its banking, insurer and investor business models.

## Consideration of the value chain in the identification of the Group's IROs

The activities of Groupe BPCE and its entire upstream and downstream value chain were taken into account in the double materiality assessment. In light of Groupe BPCE's business sector specific nature, the following guidelines have been adopted:

- a. map its activities and the stakeholders in the value chain to identify which stakeholders are in risky areas;
- b. carry out an analysis by major stakeholders families: customers, suppliers, subcontractors, etc...;
- c. enlarge this analysis beyond first-level and direct business relationships: the business lines took into consideration, in addition to the major families of direct stakeholders in the value chain, the entire environment surrounding them, in particular through sectors analysis.

## Organization in terms of identifying impacts, risks and opportunities

The identification of IROs was coordinated by and under the joint responsibility of Groupe BPCE's Finance department, Financial Communication department and Impact department. The Retail Banking, Insurance, Architecture and Reporting, Risks, Purchasing, and Human Resources teams helped formalize and assess these IROs.

## Process for rating impacts, risks and opportunities

Following this first stage, among all the IROs identified as relevant, the impacts, risks and opportunities rating led to designate those that are material from an impact point of view or from a financial point of view, which are presented in this sustainability report.

## Methodology for rating impacts, risks and opportunities

### Description of the rating criteria

The ESRS impose criteria for assessing the materiality of IROs. These criteria may be different depending on whether one is related to an impact (negative or positive), a risk or an opportunity.

a) The **negative impacts** are rated according to two dimensions:

- i. **likelihood** this involves assessing the probability that Groupe BPCE will have a negative impact on the subject identified;
- ii. **severity** composed of:

1. **Scale**: the severity of the negative impact on people or the environment,
2. **Scope**: the scope of the negative impacts. In the case of an environmental impact, the extent may refer to the extent of the damage caused to the environment or a geographic area. In the case of impacts on the population, the extent may refer to the number of people affected by the impact,
3. **Irremediable character**: assessing whether, and to what extent, the negative impacts can be remediated.

Note : In the event of a potential negative impact on human rights, the severity of the impact takes precedence over its likelihood.

b) The **positive impacts** are rated according to three dimensions:

- i. **likelihood**: this involves assessing the probability that Groupe BPCE will have a positive impact on the subject identified;
- ii. **scale**: the beneficial effect of the impact on people or the environment;
- iii. **scope**: the extent of the impact (e.g. geographical or demographic).

c) The **risks** and **opportunities** are rated according to two dimensions:

- i. **likelihood of occurrence**: probability of the risk or opportunity occurring;
- ii. **scale of the financial impact**: measurement of the potential financial effects.

All IROs have been rated in gross terms, meaning without taking into account the action plans implemented by the group to prevent, mitigate, or remedy them.

## Rating scales

Rating scales are not prescribed by the ESRS. They have been defined by and for Groupe BPCE. Each rating criterion was assessed on a scale from 1 to 4.

Table with 5 main sections: NEGATIVE IMPACT, POSITIVE IMPACT, RISKS AND OPPORTUNITIES, and two criteria sections (Scale, Likelihood). Each section contains a 4-column rating scale from 1 to 4.

Score and final rating of impacts, risks and opportunities

Each impact, risk and opportunity was rated, based on the criteria and scales described above.

Determination of the materiality threshold

Materiality threshold refers to the score or rating based on which impacts, risks and opportunities are material.

Groupe BPCE's materiality threshold is defined by the CSRD Project Steering Committee.

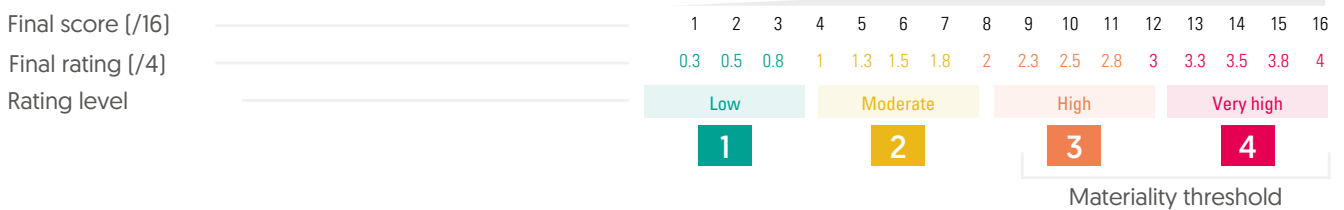
Materiality threshold

As part of the harmonization of the rating scales defined for the criteria, a rating scale has also been defined for the rating level of impacts, risks and opportunities.

This scale consists of four levels:

Table with 4 columns representing materiality levels: 1 Low, 2 Moderate, 3 High, 4 Very high.

An impact, risk or opportunity is material when the rating level is greater than or equal to 3, corresponding to a high or very high level.





## Organization in terms of rating impacts, risks and opportunities

### Role of the Sustainability Office

The Sustainability Office established the methodology for rating impacts, risks and opportunities on behalf of the Group. It also coordinated and supervised the IRO rating work on behalf of the Group.

### Operating procedure for rating IROs

Groupe BPCE's Sustainability Office proposed the methodological approach for rating IROs as part of the CSRD Project.

Workshops were held with the institutions (Banques Populaires and Caisses d'Épargne) as well as with the global business lines and BPCE Assurances to discuss structuring options for the rating of IROs and to co-construct a common approach.

A Group operating procedure was prepared and shared with the representatives of the institutions (Banques Populaires, Caisses d'Épargne, BPCE) as well as with the subsidiaries.

### Role of the functional departments

Several functional departments were called upon as part of the rating of the IROs. These notably include:

- the Purchasing department;
- the Compliance department;
- the Sustainability Office ;
- the Human Resources department;
- the ESG Risk department;
- the Operational Risk department;
- the Technology and Operations department.

### Rating of Environmental Impacts via financing and investments

The rating of the environmental impacts in connection with financing and investments was carried out, according to experts, by the Sustainability Office, Retail Banking, BPCE Assurances and Natixis based on a business sectors analysis of Groupe BPCE's exposures carried out by the Group Risk department as part of the assessment of the scale. This analysis focuses on the impact of 26 business sectors on various environmental matters (mitigation and adaptation to climate change, pollution, biodiversity, water and marine resources and the circular economy). A three-level scale is applied to each business sector depending on the criticality of its impact on each environmental matter:

- "strong" impact;
- "moderate" impact;
- "low" impact.

This information is used to score the "Scale" criterion of the negative impacts identified by Groupe BPCE:

- 1) No or very little impact when exposure to "strong impact" sectors is between 0% and 15%;
- 2) Significant: when exposure to "strong impact" sectors is between 15% and 50%;
- 3) High: when exposure to "strong impact" sectors is between 50% and 75%;
- 4) Very high: when the exposure to "strong impact" sectors exceeds 75%.

This rating was subject to additional reviews by experts in order to streamline the quantitative analysis and to cover all of the Group's exposures, taking into account:

- a) the scope of the environmental impacts of other sectors beyond the 26 business sectors analyzed by the ESG Risk department;
- b) additional exposures to those obtained by the ESG Risk Department (exposures to individual retail, the public sector and exposures to financial institutions).

The other criteria, scope, irremediable character and likelihood were assessed on an expert basis taking into account the rating scales defined for all impacts.

### Rating of environmental risks via financing and investments

The rating of environmental risks was carried out by the ESG Risk department on the basis of the materiality assessment of climate and environmental risks conducted annually by Groupe BPCE since 2021. The latter aims to qualify the materiality of climate and environmental, physical or transition, short-, medium- and long-term risks in relation to the "traditional" risks to which Groupe BPCE is exposed (according to the risk taxonomy defined within Groupe BPCE's Risk Appetite Framework, e.g. credit risk, market risk, operational risk, etc.). This rating of environmental risks was based on an analysis of the impact of 26 business sectors regarding various environmental matters (mitigation and adaptation to climate change, pollution, biodiversity, water and marine resources and the circular economy).

This annual process is based on scientific knowledge (scenarios, assessment tools) and knowledge bases (e.g. Business Environment Scan), internal measures and indicators available at the date of completion of the exercise, as well as the expertise of all internal parties involved in the risk management system (LOD1 or LOD2). The assessments are carried out on the gross risk. This annual review is part of the continuous improvement of the underlying processes and methods.

As part of the assessment of the financial materiality of the CSRD risks, the assessment of the materiality of climate and environmental risks was cross-referenced with the materiality assessment of each of the "traditional" risks. This assessment is carried out annually as part of the work on the Risk Appetite Framework in order to obtain an assessment of the intrinsic materiality for each IRO on the same criteria as the other IROs (likelihood of occurrence / scale of impact), to ensure consistency between the different exercises. An expert's overall consistency check was carried out to validate the materiality levels obtained.

To date, Groupe BPCE's rating of environmental risks (biodiversity, water, pollution and circular economy) has been applied uniformly to all these environmental topics. The work undertaken by Groupe BPCE to strengthen the climate and environmental risk management system will gradually refine this analysis.



### Process for validating the ratings of impacts, risks and opportunities

The validation of the IRO was carried out through workshops bringing together:

- representatives of the business lines concerned by each topic, subtopic and each Purchasing, Human Resources, Operational Risks IRO, etc.;
- sponsors of the institutions (4 Banques Populaires, 4 Caisses d'Épargne);
- the ESG Risk department;
- the CSR representatives of the global business lines, BPCE Assurances, Banque Palatine, BRED Banque Populaire, Crédit Coopératif, FSE and Digital & Payments;
- the Group Sustainability Office.

### Stakeholder consultation process

Although the consultation of stakeholders is not mandatory as part of the double materiality exercise, Groupe BPCE has deemed it important to specifically consult some of its stakeholders within the limits of this first exercise in addition to the existing permanent listening systems (see 1.3.2 - SBM-2). The *ad hoc* systems deployed concern customers, suppliers and cooperative shareholders and more than 300 members of the Group's company boards.

### 1.5.1.1.3 Review process

In accordance with the CSRD transposed into French law, the sustainability report is prepared annually. As a result, and as specified by EFRAG in its guidance on double materiality, Groupe BPCE must determine the list of material IROs every year. If Groupe BPCE concludes, on the basis of audit evidence, that the results of the double materiality exercise for the previous year are still relevant at the reporting date, it may use the conclusions obtained previously for the preparation of the sustainability report.

Each year, Groupe BPCE will verify the elements that may trigger a revision of the list of material IRO, for example, a major merger and acquisition transaction leading to a new activity, an entry into a new sector or a significant change in operations, a global event (pandemic, natural disaster, etc.), a change in scientific evidence that could affect the severity criteria.

## List of material IROs

### Environment

#### CLIMATE CHANGE (ESRS E1)

Subtopic	Sub-subtopic	Type of IRO	Own activity / Value chain	Time horizon	IRO definition
Climate change mitigation and adaptation	Climate change mitigation - own footprint	Negative impact	Own operations	Long term	Negative impact on the climate due to greenhouse gas emissions from the Group's own operations (IT, fixed assets, etc.).
	Climate change mitigation and adaptation - financing and investments	Negative impact	Downstream value chain	Invariable	Negative impact on the climate mainly due to the Group's financing and investments in so-called carbon-intensive sectors.
		Opportunity	Downstream value chain	Long term	Proposals for savings products invested in companies to support their transition, as well as financing solutions to support the Group's customers in their own transition and mitigate the effects of climate change.
		Risk	Downstream value chain	Long term	Risk of impairment of assets related to investments and financing exposed to physical climate risks (high-risk areas).
		Risk	Downstream value chain	Long term	Risk of financial loss related to financing/investments of counterparties exposed to climate transition risks.
		Risk	Downstream value chain	Medium term	Reputational risk related to the financing of and/or investment in companies with an activity that is carbon-intensive and/or incompatible with the net-zero alignment trajectories.

## Social

### OWN WORKFORCE (ESRS S1)

Subtopic	Sub-subtopic	Type of IRO	Own activity / Value chain	Time horizon	IRO description
<b>Attractiveness, employee loyalty and engagement</b>	Listening to employees and strengthening their commitment	Risk	Own operations	Invariable	Risk of deviation from employees' expectations due to the absence and/or inadequacy of listening systems and action plans to strengthen their commitment.
	Integration of new hires and strengthening employee loyalty	Positive impact	Own operations	Invariable	Positive impact of the employee experience contributing to a welcoming environment for the Group's employees (pre-boarding, onboarding, induction program and individualized training course).
	Recruitment strategy and employer brand	Opportunity	Own operations	Medium term	Opportunity for the Group to strengthen its employer brand and its attractiveness on the job market with a digital (communication and prospecting on social networks, use of job boards, recruitment events in the regions, co-optation, etc.) and inclusive (work-study, hiring of non-banking profiles, etc.) recruitment strategy.
<b>Working conditions</b>	Social dialog (freedom of association and collective bargaining)	Positive impact	Own operations	Invariable	Positive impact on employee commitment and performance <i>via</i> sustained and constructive dialog with employee representatives at Group, division and company level (regular meetings with the staff-representative bodies and conclusion of collective agreements).
	Privacy	Risk	Own operations	Invariable	Financial risk in the event of non-security of employee personal data or breach of privacy: <ul style="list-style-type: none"> <li>• financial sanctions;</li> <li>• damages for the loss suffered.</li> </ul>
	Quality of life at work and risk prevention and safety at work	Risk	Own operations	Invariable	Financial losses related to employee turnover, absenteeism and employee disengagement resulting from: <ul style="list-style-type: none"> <li>• recruitment and training costs for new employees, absences (replacement and financing of all or part of the absences or medical expenses);</li> <li>• lost revenue related to the decline in productivity, sales performance and customer satisfaction;</li> <li>• loss of talent.</li> </ul>
		Risk	Own operations	Invariable	Financial risks for the Group in the event of: <ul style="list-style-type: none"> <li>• occurrence of a workplace accident (incivility, assault, outside or on the premises) and/or commuting accident;</li> <li>• financial losses and operational risks related to the deterioration of the health of employees and/or the deterioration of the quality of life at work (increase in professional risks, turnover, absenteeism, loss of productivity and induced costs, etc.);</li> <li>• non-compliance with the single occupational risk assessment document regulation.</li> </ul>
		Positive impact	Own operations	Invariable	Positive impact on the quality of life at work of employees (working hours, teleworking, layout of premises, work-life balance, QLV collective agreement, etc.).
	Decent pay and social protection	Positive impact	Own operations	Invariable	Positive impact for employees thanks to clear remuneration, well understood by employees, fair remuneration exceeding legal minimums, guaranteeing adequate working conditions (basic salaries, bonuses, employee savings, benefits in kind, etc.) and solid social protection (provident insurance, health insurance, pension plan, etc.).
	Employee health and job retention	Positive impact	Own operations	Invariable	Positive impact on employee working conditions for a safe working environment adapted to the well-being of employees.

Subtopic	Sub-subtopic	Type of IRO	Own activity / Value chain	Time horizon	IRO description
<b>Equal treatment and opportunities</b>	Skills development	Positive impact	Own operations	Invariable	Positive impact on the employees' skills development.
		Positive impact	Own operations	Invariable	Positive impact on the development of employability, employee mobility within the Group and proactive career management.
		Opportunity	Own operations	Invariable	Opportunity for the Group to promote the development of internal skills and capitalize on expertise and knowledge in order to strengthen employee commitment (increase in the retention rate, reduction of operational risk, etc.).
	Diversity & inclusion (disability, discrimination & harassment)	Positive impact	Own operations	Invariable	Positive impact in terms of diversity, inclusion, professional equality and support for people with disabilities.

## WORKERS IN THE VALUE CHAIN (ESRS S2)

Subtopic	Sub-subtopic	Type of IRO	Own activity / Value chain	Time horizon	IRO description
<b>Working conditions and other work-related rights</b>	Working conditions and other work-related rights of subcontractors, service providers and suppliers	Negative impact	Upstream value chain	Invariable	Potential negative impacts in terms of human rights or working conditions (health, safety, etc.) of employees of subcontractors and service providers in the absence of proactive policies, particularly in geographic areas that are not signatories to international labor conventions.
		Risk	Upstream value chain	Invariable	Risk concerning the Group's image and reputation linked to deteriorated working conditions and non-respect of the human rights of workers in its value chain.
	Working conditions and other work-related rights of workers in financed/invested companies	Risk	Downstream value chain	Invariable	Risk of image damage due to insufficient due diligence on the social aspects of the companies that the Group finances or in which it invests.
		Negative impact	Downstream value chain	Invariable	Potential negative impact via the Group's activity of financing/investing in companies where working conditions are deteriorated.

## AFFECTED COMMUNITIES (ESRS S3)

Subtopic	Sub-subtopic	Type of IRO	Own activity / Value chain	Time horizon	IRO description
Communities' economic, social and cultural rights	Financing the economy and regional players	Positive impact	Downstream value chain	Invariable	Positive impact on society by financing and investing in projects which accessibility is governed by social or cultural rights of communities (education, health, sport, etc.).
		Positive impact	Downstream value chain	Invariable	Positive impact on local economic development and regional attractiveness by creating jobs, supporting local businesses, local collectivities and social housing operators, and by promoting economic growth, including improving the living conditions of stakeholders impacted by the Group's local presence policies.
		Risk	Downstream value chain	Invariable	Risk of image and reputation damage related to the financing/investment of projects that have a negative impact on communities or when they are not aligned with the real needs of society.
		Risk	Downstream value chain	Invariable	Legal risk related to the financing/investment of projects having a negative impact on communities, as part of the Duty of Care.

## CONSUMERS AND END-USERS (ESRS S4)

Subtopic	Sub-subtopic	Type of IRO	Own activity / Value chain	Time horizon	IRO description
Impacts related to consumer and end-user information	Access to information	Positive impact	Downstream value chain	Invariable	Positive impact on customers <i>via</i> a transparent offer to facilitate understanding of products and services by all customers and informed decision-making, as part of responsible marketing.
	Personal data protection and cybersecurity	Risk	Downstream value chain	Invariable	Risk of sanctions due to regulatory non-compliance related to: <ul style="list-style-type: none"> <li>non-compliance with customer data protection regulations (in particular: GDPR on data practices - consent, cookies, etc.);</li> <li>sanction related to the non-disclosure of cybersecurity attacks having taken place.</li> </ul>
		Risk	Downstream value chain	Invariable	Potential or proven financial losses, including related reputational risk, related to the loss of customers in the event of: <ul style="list-style-type: none"> <li>insufficient measures to prevent and combat cybercrime;</li> <li>leaks, theft or inappropriate use of personal data.</li> </ul>
		Negative impact	Downstream value chain	Invariable	Potential negative impact on human rights in case of practices related to the misuse of customers' personal data.
		Opportunity	Downstream value chain	Long term	Development of new innovative products and services, respecting responsible marketing policies, opening new markets and customer segments and partnerships with tech start-ups, stimulating innovation and creativity and increasing customer interest in products and services as part of responsible marketing.
		Positive impact	Downstream value chain	Invariable	Positive impact with access to the Group's offers and services adapted to the financial needs of each customer as well as global geographical coverage and thanks to adapted digital solutions.
		Negative impact	Downstream value chain	Invariable	Potential negative impact on customers in the event of abusive sales, unethical practices (including forced sales).

Subtopic	Sub-subtopic	Type of IRO	Own activity / Value chain	Time horizon	IRO description
		Positive impact	Downstream value chain	Invariable	Offer accessible products and services to all customers and economic players (companies, professionals, local authorities, operators of the social and solidarity economy), including those in financially vulnerable situations, thanks to accessibility and inclusion offers.
		Risk	Downstream value chain	Invariable	Risk of image and reputation damage related to the inaccessibility or lack of readability of offers, contributing to the loss of customers.
	Non-discrimination	Positive impact	Downstream value chain	Invariable	Contribution to the reduction of social inequalities by promoting access for customers with disabilities to financing and insurance offers.
		Negative impact	Downstream value chain	Invariable	Potential negative impact: undermining the equality and inclusion of people if Groupe BPCE's practices are discriminatory as regards the choice of customers (age, gender, nationality, etc.) or the access to financing or essential services provided to customers (account opening, insurance, etc.).
		Risk	Downstream value chain	Invariable	Risk of image and reputation damage related to discriminatory practices, contributing to the loss of customers.

## Governance

### BUSINESS CONDUCT (ESRS G1)

Subtopic	Sub-subtopic	Type of IRO	Own activity / Value chain	Time horizon	IRO description
<b>Ethics and corporate culture</b>	Fight against corruption and bribery	Risk	Own operations	Invariable	Financial losses due to acts of corruption or unethical behavior within the Group.
		Risk	Own operations	Invariable	Reputational risk and sanctions due to non-compliance with anti-corruption and anti-bribery laws and regulations.
	Fight against money laundering and terrorism financing	Risk	Own operations	Invariable	Risk of regulatory sanctions in the event of non-compliance with anti-money laundering and terrorist financing laws and regulations as well as reputational risk.
	Protection of whistleblowers	Risk	Own operations	Invariable	Reputational risk, deterioration of stakeholder confidence and sanctions in the event of ethically questionable practices as well as in the event of non-compliance with laws and regulations on the protection of whistleblowers.
	Compliance with sanctions measures (national, European or international), embargoes and asset freezes	Risk	Downstream value chain	Invariable	Risk of regulatory sanctions in the event of non-compliance with sanctions measures (national, European or international), embargoes and asset freezes.
<b>Management of relationships with suppliers including payment practices</b>	Management of relationships with suppliers including payment practices	Risk	Upstream value chain	Invariable	Reputational risk in the event of the Group being called into question for negative ESG impacts (unethical practices or practices that derogate from human rights) caused by its suppliers and service providers.
		Positive impact	Upstream value chain	Invariable	Positive impact on suppliers by encouraging them to adopt virtuous practices (rigorous selection of suppliers), by improving the quality of the relationships with suppliers and payment terms management.

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

The material impacts, risks and opportunities (IRO) resulting from the double materiality assessment are listed in Section 1.5.1.1 (IRO-1). This description makes it possible to identify where in its business model, its own activities or its value chain these material IRO are concentrated.

The business model, value chain and integration of sustainability matters into Groupe BPCE's strategy are detailed in Section 1.3.1.2 (SBM-1).

The interactions between these material impacts, risks and opportunities, the Group's business model and its strategy embodied by the VISION 2030 strategic project, as well as the way in which positive or negative material impacts affect the company (customers, regional players or employees) or the environment are presented within each topical ESRS.

In the absence of established practices for financial institutions, are not published in respect of the 2024 fiscal year the financial effects relating to:

- material risks and opportunities of the company on its financial position, financial performance and cash flows;
- material risks and opportunities for which there is a risk of a significant adjustment to the carrying amount of assets and liabilities included in the financial statements during the next annual period.

With respect to climate risks, Groupe BPCE analyzes the resilience of its business model across its three activities (financing, insurance, asset management) through climate stress tests as part of the self-assessment process of its capital (ICAAP) and liquidity (ILAAP) adequacy with regard to the risks it may face. This analysis is presented in Chapter E1 - Climate change (Section 2.2.3.2.1).

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

Disclosure Requirements in ESRS covered by the undertaking's sustainability report.

### ESRS 2 GOV-1

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Board's gender diversity, Section 21, point (d)	Indicator No. 13, Table 1, Annex I		Annex II of Commission Delegated Regulation (EU) 2020/1816 <sup>(5)</sup>		1.4.1.1
Percentage of board members who are independent, Section 21, point (e)			Annex II of Commission Delegated Regulation (EU) 2020/1816		1.4.1.1

### ESRS 2 GOV-4

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Statement on due diligence, Section 30	Indicator No. 10, Table 3, Annex I				1.4.5



## ESRS 2 SBM-1

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Involvement in activities related to fossil fuel activities, Section 40, point (d) (i)	Indicator No. 4, Table 1, Annex I	Article 449 <i>bis</i> of Regulation (EU) 575/2013; Commission Implementing Regulation (EU) 2022/2453 <sup>(6)</sup> , Table 1: Qualitative information on environmental risk and Table 2: Qualitative information on social risk	Annex II of Commission Delegated Regulation (EU) 2020/1816		Not applicable
Involvement in activities related to chemical production, Section 40, point (d) (ii)	Indicator No. 9, Table 2, Annex I		Annex II of Commission Delegated Regulation (EU) 2020/1816		Not applicable
Involvement in activities related to controversial weapons, Section 40 (d) (iii)	Indicator No. 14, Table 1, Annex I		Article 12 (1) of Delegated Regulation (EU) 2020/1818 <sup>(7)</sup> , Annex II of Delegated Regulation (EU) 2020/1816		Not applicable
Involvement in activities related to cultivation and production of tobacco, Section 40, point (d) (iv)			Delegated Regulation (EU) 2020/1818, Article 12 (1) of Delegated Regulation (EU) 2020/1816, Annex II.		Not applicable

## ESRS E1-1

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Transition plan to reach climate neutrality by 2050, Section 14				Article 2 (1) of Regulation (EU) 2021/1119	2.2.3.1
Undertakings excluded from Paris Agreement-aligned Benchmarks, Section 16, point (g)		Article 449 <i>bis</i> of Regulation (EU) 575/2013, Commission Implementing Regulation (EU) 2022/2453, Template 1: Banking book - Climate change transition risk: Credit quality of exposures by sector, issues and residual maturity	Article 12 (1) (d) to (g) and Article 12 (2) of Delegated Regulation (EU) 2020/1818		Not applicable

## ESRS E1-4

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
GHG emission reduction targets, Section 34	Indicator No. 4, Table 2, Annex I	Article 449 <i>bis</i>  Regulation (EU) 575/2013, Commission Implementing Regulation (EU) 2022/2453,  Template 3: Banking book - Climate change transition risk: alignment indicators	Article 6 of Delegated Regulation (EU) 2020/1818		2.2.4.1

## ESRS E1-5

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Energy consumption from fossil sources disaggregated by sources (only high climate impact sectors), Section 38	Indicator No. 5, Table 1, and Indicator No. 5, Table 2, Annex I				Not relevant
Energy consumption and mix, Section 37	Indicator No. 5, Table 1, Annex I				Not relevant
Energy intensity associated with activities in high climate impact sectors, Sections 40 to 43	Indicator No. 6, Table 1, Annex I				Not relevant

## ESRS E1-6

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Gross Scopes 1, 2, 3 and Total GHG emissions, Section 44	Indicators No. 1 and No. 2, Table 1, Annex I	Article 449 <i>bis</i> of Regulation (EU) 575/2013, Commission Implementing Regulation (EU) 2022/2453,  Template 1: Banking book - Climate change transition risk: Credit quality of exposures by sector, issues and residual maturity	Article 5 (1), Article 6 and Article 8 (1) of Delegated Regulation (EU) 2020/1818		2.2.4.2
Gross GHG emissions intensity, Sections 53 to 55	Indicator No. 3, Table 1, Annex I	Article 449 <i>bis</i> of Regulation (EU) 575/2013, Commission Implementing Regulation (EU) 2022/2453,  Template 3: Banking book - Climate change transition risk: alignment indicators	Article 8 (1) of Delegated Regulation (EU) 2020/1818		Not relevant

## ESRS E1-7

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
GHG removals and carbon credits, Section 56				Article 2 (1) of Regulation (EU) 2021/1119	Not relevant

## ESRS E1-9

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Exposure of the benchmark portfolio to climate-related physical risks, Section 66			Annex II of Delegated Regulation (EU) 2020/1818,  Annex II of Delegated Regulation (EU) 2020/1816		Phase-in
Disaggregation of monetary amounts by acute and chronic physical risk, Section 66, point (a)  Location of significant assets at material physical risk, Section 66, point (c)		Article 449 <i>bis</i> of Regulation (EU) 575/2013, Commission Implementing Regulation (EU) 2022/2453, paragraphs 46 and 47,  Template 5: Banking book - Climate-related physical risks: exposures subject to a physical risk			Phase-in
Breakdown of the carrying value of its real estate assets by energy-efficiency classes, Section 67, point (c)		Article 449 <i>bis</i> of Regulation (EU) 575/2013, Commission Implementing Regulation (EU) 2022/2453, paragraph 34, Template 2: Banking book  - Climate change transition risk: Loans secured by real estate assets  - Energy efficiency of collateral			Phase-in
Degree of exposure of the portfolio to climate-related opportunities, Section 69			Annex II of Commission Delegated Regulation (EU) 2020/1818		Phase-in

## ESRS E2-4

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Amount of each pollutant listed in Annex II of the E-PRTR Regulation (European Pollutant Release and Transfer Register) emitted to air, water and soil, Section 28	Indicator No. 8,  Table 1, Annex I; Indicator No. 2, Table 2, Annex I; Indicator No. 1, Table 2, Annex I; Indicator No. 3, Table 2, Annex I				Not material

## ESRS E3-1

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Water and marine resources, Section 9	Indicator No. 7, Table 2, Annex I				Not material
ESRS E3-1	Indicator No. 8, Table 2, Annex I				
Dedicated policy Section 13					
ESRS E3-1	Indicator No. 12, Table 2, Annex I				Not material
Sustainable oceans and seas, Section 14					

## ESRS E3-4

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Total water recycled and reused, Section 28, point (c)	Indicator No. 6.2, Table 2, Annex I				Not material
Total water consumption in m <sup>3</sup> per net revenue on own operations, Section 29	Indicator No. 6.1, Table 2, Annex I				Not material

## ESRS 2 - SBM-3 - E4

Disclosure requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Section 16, point (a) i	Indicator No. 7, Table 1, Annex I				Not material
Section 16, point (b)	Indicator No. 10, Table 2, Annex I				Not material
Section 16, point (c)	Indicator No. 14, Table 2, Annex I				Not material

## ESRS E4-2

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Sustainable land / agriculture practices or policies, Section 24, point (b)	Indicator No. 11, Table 2, Annex I				Not material
Sustainable oceans / seas practices or policies, Section 24, point (c)	Indicator No. 12, Table 2, Annex I				Not material
Policies to address deforestation, Section 24, point (d)	Indicator No. 15, Table 2, Annex I				Not material

## ESRS E5-5

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Non-recycled waste, Section 37, point (d)	Indicator No. 13, Table 2, Annex I				Not material
Hazardous waste and radioactive waste, Section 39	Indicator No. 9, Table 1, Annex I				Not material

## ESRS 2 - SBM-3 - S1

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Risk of incidents of forced labor, Section 14, point (f)	Indicator No. 13, Table 3, Annex I				3.1.3.4.1
Risk of incidents of child labor, Section 14, point (g)	Indicator No. 12, Table 3, Annex I				3.1.3.4.1

## ESRS S1-1

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Human rights policy commitments, Section 20	Indicator No. 9, Table 3, and Indicator No. 11, Table 1, Annex I				3.1.3.1.1
Due diligence policies on issues addressed by the fundamental International Labour Organization Conventions 1 to 8, Section 21			Annex II of Commission Delegated Regulation (EU) 2020/1816		3.1.3.1.1 3.1.3.1.2 3.1.3.4.1
Processes and measures for preventing trafficking in human beings, Section 22	Indicator No. 11, Table 3, Annex I				3.1.3.1.1 3.1.3.4.1
Workplace accident prevention policy or management system, Section 23	Indicator No. 1, Table 3, Annex I				3.1.3.1.2

## ESRS S1-3

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Grievance/complaints handling mechanisms, Section 32, point (c)	Indicator No. 5, Table 3, Annex I				3.1.3.3.1

## ESRS S1-14

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Number of fatalities and number and rate of work-related accidents, Section 88, points (b) and (c)	Indicator No. 2, Table 3, Annex I		Annex II of Commission Delegated Regulation (EU) 2020/1816		3.1.5.10
Number of days lost to injuries, accidents, fatalities or illness, Section 88, point (e)	Indicator No. 3, Table 3, Annex I				3.1.5.10



## ESRS S1-16

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Unadjusted gender pay gap, Section 97, point (a)	Indicator No. 12, Table 1, Annex I		Annex II of Delegated Regulation (EU) 2020/1816		3.1.5.12
Excessive CEO pay ratio, Section 97, point (b)	Indicator No. 8, Table 3, Annex I				3.1.5.12

## ESRS S1-17

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Incidents of discrimination, Section 103, point (a)	Indicator No. 7, Table 3, Annex I				Not relevant
Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines, Section 104, point (a)	Indicator No. 10, Table 1, and Indicator No. 14, Table 3, Annex I		Annex II of Delegated Regulation (EU) 2020/1816, Article 12 (1) of Delegated Regulation (EU) 2020/1818		Not relevant

## ESRS 2 - SBM-3 - S2

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Significant risk of child labor or forced labor in the value chain, Section 11, point (b)	Indicators No. 12 and No. 13, Table 3, Annex I				3.2.2

## ESRS S2-1

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Human rights policy commitments, Section 17	Indicator No. 9, Table 3, and Indicator No. 11, Table 1, Annex I				3.2.3.1
Policies related to value chain workers, Section 18	Indicators No. 11 and No. 4, Table 3, Annex I				3.2.3.1
Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines, Section 19	Indicator No. 10, Table 1, Annex I		Annex II of Delegated Regulation (EU) 2020/1816, Article 12 (1) of Delegated Regulation (EU) 2020/1818		Not relevant
Due diligence policies on issues addressed by the fundamental International Labour Organization Conventions 1 to 8, Section 19			Annex II of Delegated Regulation (EU) 2020/1816		3.2.3.4

## ESRS S2-4

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Human rights issues and incidents* connected to its upstream and downstream value chain, Section 36	Indicator No. 14, Table 3, Annex I				Not relevant

## ESRS S3-1

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Human rights policy commitments, Section 16	Indicator No. 9, Table 3, Annex I, and Indicator No. 11, Table 1, Annex I				3.3.2
Non-respect of UNGPs on Business and Human Rights, ILO principles or OECD guidelines, Section 17	Indicator No. 10, Table 1, Annex I		Annex II of Delegated Regulation (EU) 2020/1816, Article 12 (1) of Delegated Regulation (EU) 2020/1818		Not relevant

## ESRS S3-4

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Human rights issues and incidents, Section 36	Indicator No. 14, Table 3, Annex I				3.3.3.1.3

## ESRS S4-1

Disclosure Requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Policies related to consumers and end-users, Section 16	Indicator No. 9, Table 3, and Indicator No. 11, Table 1, Annex I				3.4.3.1
Non-respect of UNGPs on Business and Human Rights principles and OECD guidelines, Section 17	Indicator No. 10, Table 1, Annex I		Annex II of Delegated Regulation (EU) 2020/1816, Article 12 (1) of Delegated Regulation (EU) 2020/1818		Not relevant

## ESRS S4-4

Disclosure requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Human rights issues and incidents, Section 35	Indicator No. 14, Table 3, Annex I				3.4.3.3

## ESRS G1-1

Disclosure requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
United Nations Convention against Corruption, Section 10, point (b)	Indicator No. 15, Table 3, Annex I				4.1.1.5.1
Protection of whistle-blowers, Section 10, point (d)	Indicator No. 6, Table 3, Annex I				4.1.1.3.3

## ESRS G1-4

Disclosure requirement and related data point	SFDR reference <sup>(1)</sup>	Pillar III reference <sup>(2)</sup>	Benchmark indices regulation reference <sup>(3)</sup>	EU European law on climate <sup>(4)</sup>	Report section
Fines for violation of anti-corruption and anti-bribery laws, Section 24, point (a)	Indicator No. 17, Table 3, Annex I		Annex II of Delegated Regulation (EU) 2020/1816		4.1.2.1
Standards of anti-corruption and anti-bribery, Section 24, point (b)	Indicator No. 16, Table 3, Annex I				4.1.2.1

(1) Regulation (EU) 2019/2088 of the European Parliament and of the Council of November 27, 2019 on sustainability reporting in the financial services sector (OJ L 317, December 9, 2019, p. 1).

(2) Regulation (EU) 575/2013 of the European Parliament and of the Council of June 26, 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) 648/2012 (Capital Requirements Regulation - CRR) (OJ L 176, June 27, 2013, p. 1).

(3) Regulation (EU) 2016/1011 of the European Parliament and of the Council of June 8, 2016 on the indices used as benchmarks for financial instruments and contracts or to measure the performance of investment funds and amending Directives 2008/48/EC and 2014/17/EU and Regulation (EU) 596/2014 (OJ L 171, June 29, 2016, p. 1).

<b>ESRS</b>	<b>Disclosure Requirement</b>	<b>References in the sustainability statement</b>	<b>Page</b>
ESRS 2	BP-1 — General basis for the preparation of sustainability statements	1.1.1 BP 1 - General basis for the preparation of sustainability statements	50
	BP 2 — Disclosures in relation to specific circumstances	1.1.2 BP 2 - Disclosures in relation to specific circumstances	51
	GOV-1 — The role of the administrative, management and supervisory bodies	1.4.1 GOV-1 - The role of the administrative, management and supervisory bodies	67
	GOV 2 — Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	1.4.2 GOV 2 - Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	69
	GOV-3 — Integration of sustainability-related performance in incentive schemes	1.4.3 GOV-3 - Integration of sustainability-related performance in incentive schemes	73
	GOV 4 — Statement on due diligence	1.4.5 GOV 4 - Statement on due diligence	77
	GOV 5 — Risk management and internal controls over sustainability reporting	1.4.4 GOV 5 - Risk management and internal controls over sustainability reporting	73
	SBM-1 — Strategy, business model and value chain	1.3.1 SBM 1 - Strategy, business model and value chain	55
	SBM 2 — Interests and views of stakeholders	1.3.2 SBM 2 - Interests and views of stakeholders	65
	SBM 3 — Material impacts, risks and opportunities and their interaction with strategy and business model	1.5.2 SBM 3 - Material impacts, risks and opportunities and their interaction with strategy and business model	87
ESRS E1	IRO-1 — Description of the processes to identify and assess material impacts, risks and opportunities	1.5.1 IRO-1 - Description of the processes to identify and assess material impacts, risks and opportunities	78
	IRO-2 — Disclosure Requirements in ESRS covered by the undertaking's sustainability statements	1.5.3 IRO-2 - Disclosure Requirements in ESRS covered by the undertaking's sustainability statements	87
	ESRS 2 GOV-3 — Integration of sustainability-related performance in incentive schemes	1.4.3 GOV-3 - Integration of sustainability-related performance in incentive schemes	73
	E1-1 — Transition plan for climate change mitigation	2.2.3.1 (E1-1) Transition plan for climate change mitigation	111
	ESRS 2 SBM-3 — Material impacts, risks and opportunities and their interaction with the strategy and business model	2.2.3.2 (ESRS 2 SBM-3) Material impacts, risks and opportunities and their interaction with strategy and business model	125
	ESRS 2 IRO-1 — Description of the processes to identify and assess material climate-related impacts, risks and opportunities	2.2.2.1 (ESRS 2 - IRO-1) Description of processes to identify and assess material climate-related impacts, risks and opportunities	106
	E1-2 — Policies related to climate change mitigation and adaptation	2.2.3.3 (E1-2) Policies related to climate change mitigation and adaptation	126
	E1-3 — Actions and resources in relation to climate change policies	2.2.3.4 (E1-3) Actions and resources in relation to climate change policies	127
	E1-4 — Targets related to climate change mitigation and adaptation	2.2.4.1 (E1-4) Targets related to climate change mitigation and adaptation	134
	E1-6 — Gross Scopes 1, 2, 3 and Total GHG emissions	2.2.4.2 (E1-6) Gross Scopes 1, 2, 3 and Total GHG emissions	140
ESRS S1	ESRS 2 SBM-2 — Interests and views of stakeholders	3.1.1 SBM 2 - Interests and views of stakeholders	144
	ESRS 2 SBM-3 — Material impacts, risks and opportunities and their interaction with the strategy and business model	3.1.2 Disclosure requirement related to ESRS 2 SBM-3 - Material impacts, risks and opportunities and their interaction with the strategy and business model	144
	S1-1 — Policies related to own workforce	3.1.3.1 (S1-1) Policies related to own workforce	145
	S1-2 — Processes for engaging with own workforce and workers' representatives about impacts	3.1.3.2 (S1-2) Processes for engaging with own workforce and workers' representatives about impacts	153
	S1-3 — Processes to remediate negative impacts and channels for own workforce to raise concerns	3.1.3.3 (S1-3) Processes to remediate negative impacts and channels for own workforce to raise concerns	156
	S1-4 — Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and the effectiveness of those actions	3.1.3.4 (S1-4) Taking action on material impacts on own workforce, and approaches to managing material risks and pursuing material opportunities related to own workforce, and the effectiveness of those actions	158
	S1-5 — Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	3.1.4.1 (S1-5) Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	163
	S1-6 — Characteristics of the undertaking's employees	3.1.5.2 (S1-6) Characteristics of the undertaking's employees	167
	S1-7 — Characteristics of non-employees in the undertaking's own workforce	3.1.5.3 (S1-7) Characteristics of non-employees in the undertaking's own workforce	170
	S1-8 — Collective bargaining coverage and social dialog	3.1.5.4 (S1-8) Collective bargaining coverage and social dialog	170
	S1-9 — Diversity metrics	3.1.5.5 (S1-9) Diversity metrics	171
	S1-10 — Adequate wages	3.1.5.6 (S1-10) Adequate wages	172
	S1-11 — Social protection	3.1.5.7 (S1-11) Social protection	172
	S1-12 — Persons with disabilities	3.1.5.8 (S1-12) Persons with disabilities	173
	S1-13 — Training and skills development metrics	3.1.5.9 (S1-13) Training and skills development metrics	173
	S1-14 — Health and safety metrics	3.1.5.10 (S1-14) Health and safety metrics	174
	S1-15 — Work-life balance metrics	3.1.5.11 (S1-15) Work-life balance metrics	176
	S1-16 — Remuneration metrics (pay gap and total remuneration)	3.1.5.12 (S1-16) Remuneration metrics (pay gap and total remuneration)	177
ESRS S2	S1-17 — Incidents, complaints and severe human rights impacts	3.1.5.13 (S1-17) Incidents, complaints and severe human rights impacts	178
	ESRS 2 SBM-2 — Interests and views of stakeholders	1.3.2 SBM 2 - Interests and views of stakeholders	181
	ESRS 2 SBM-3 — Material impacts, risks and opportunities and their interaction with the strategy and business model	3.2.1.2 (ESRS 2 SBM-3) Material impacts, risks and opportunities and their interaction with strategy and business model	181
	S2-1 — Policies related to value chain workers	3.2.3.1 (S2-1) Policies related to value chain workers	182
	S2-2 — Processes for engaging with value chain workers about impacts	3.2.3.2 (S2-2) Processes for engaging with value chain workers about impacts	184
	S2-3 — Processes to remediate negative impacts and channels for value chain workers to raise concerns	3.2.3.3 (S2-3) Processes to remediate negative impacts and channels for value chain workers to raise concerns	185
	S2-4 — Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	3.2.3.4 (S2-4) Taking action on material impacts on value chain workers, and approaches to managing material risks and pursuing material opportunities related to value chain workers, and effectiveness of those actions	187
	S2-5 — Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	3.2.4.1 (S2-5) Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	189

ESRS	Disclosure Requirement	References in the sustainability statement	Page
ESRS S3	ESRS 2 SBM-2 — Interests and views of stakeholders	ESRS 2 SBM-2 — Interests and views of stakeholders	191
	ESRS 2 SBM-3 — Material impacts, risks and opportunities and their interaction with the strategy and business model	ESRS 2 SBM-3 — Material impacts, risks and opportunities and their interaction with the strategy and business model	191
	S3-1 — Policies related to affected communities	3.3.3.1.1/ 3.3.3.2.1 (S3-1) Policies related to affected communities	192/196
	S3-2 — Processes for engaging with affected communities about impacts	3.3.3.1.2/ 3.3.3.2.2 (S3-2) Processes for engaging with affected communities about impacts	192/197
	S3-3 — Processes to remediate negative impacts and channels for affected communities to raise concerns	3.3.3.1.3/ 3.3.3.2.3 (S3-3) Processes to remediate negative impacts and channels for affected communities to raise concerns	192/197
	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	3.3.3.1.4/ 3.3.3.2.4 (S3-4) Taking action on material impacts on affected communities, and approaches to managing material risks and pursuing material opportunities related to affected communities, and effectiveness of those actions	193/198
ESRS S4	S3-5 — Targets related to the management of material negative impacts, the development of positive impacts, and the management of material risks and opportunities	3.3.4.1/ 3.3.4.2 (S3-5) Targets related to the management of material negative impacts, the development of positive impacts, and the management of material risks and opportunities	200
	ESRS 2 SBM-2 — Interests and views of stakeholders	3.4.1 SBM 2 - Interests and views of stakeholders	201
	ESRS 2 SBM-3 — Material impacts, risks and opportunities and their interaction with the strategy and business model	3.4.2 (ESRS 2 SBM-3) Material impacts, risks and opportunities and their interaction with the strategy and business model	201
	S4-1 — Policies related to consumers and end-users	3.4.3.1 (S4-1) Policies related to consumers and end-users	203
	S4-2 — Processes for engaging with consumers and end-users about impacts	3.4.3.2 (S4-2) Processes for engaging with consumers and end-users about impacts	208
	S4-3 — Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	3.4.3.3 (S4-3) Processes to remediate negative impacts and channels for consumers and end-users to raise concerns	210
ESRS G1	S4-4 — Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	3.4.3.4 (S4-4) Taking action on material impacts on consumers and end-users, and approaches to managing material risks and pursuing material opportunities related to consumers and end-users, and effectiveness of those actions	212
	S4-5 — Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	3.4.4.1 (S4-5) Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities	216
	ESRS 2 GOV-1 — The role of the administrative, management and supervisory bodies	4.1.1.1 (ESRS 2 - GOV-1) The role of the administrative, management and supervisory bodies	218
	ESRS 2 IRO-1 — Description of the processes to identify and assess material impacts, risks and opportunities	4.1.1.2 (IRO-1) Description of the processes to identify and assess material impacts, risks and opportunities	218
	G1-1 — Corporate culture and business conduct policies	4.1.1.3 (G1-1) Corporate culture and business conduct policies	218
	G1-2 — Management of relationships with suppliers	4.1.1.4 (G1-2) Management of relationships with suppliers	221
	G1-3 — Prevention and detection of corruption and bribery	4.1.1.5 (G1-3) Prevention and detection of corruption and bribery	223
	G1-4 — Incidents of corruption or bribery	4.1.2.1 (G1-4) Incidents of corruption or bribery	226

## PART 2 - ENVIRONMENTAL INFORMATION

### 2.1 Indicators of the European taxonomy on sustainable activities

#### Regulatory framework

To encourage sustainable investment, EU Regulation 2020/852 of June 18, 2020 (Taxonomy Regulation) established a common EU classification system to identify economic activities considered environmentally sustainable.

The Taxonomy Regulation (Article 8) includes, for companies subject to the CSRD (Corporate Sustainability Reporting Directive published on December 16, 2022), a reporting obligation, outlined in the sustainability report, regarding how and to what extent the company's activities are associated with economic activities that can be considered environmentally sustainable.

An activity is considered as "eligible" for the Taxonomy if it is included in the European Commission's evolving list. These are activities likely to make a substantial contribution to at least one of the following six environmental objectives:

- climate change mitigation;
- climate change adaptation;
- sustainable use and protection of water and marine resources;
- the transition to a circular economy;
- pollution prevention and control;
- the protection and restoration of biodiversity and ecosystems.

To be effectively considered environmentally sustainable, an eligible activity must be "aligned" with the Taxonomy, i.e. it must meet the following three cumulative conditions:

- **demonstrate its substantial contribution** to one of the six environmental objectives in accordance with the technical review criteria defined in the delegated acts;
- **demonstrate that it does not cause significant harm** to any of the other environmental objectives (Do No Significant Harm or DNSH) in accordance with the technical review criteria defined in the delegated acts;
- be exercised in **compliance with minimum social guarantees** provided for in the regulation (i.e. in compliance with social rights guaranteed by international law).

The technical criteria for documenting the environmental sustainability of an activity are set out in delegated acts:

- the Climate Delegated Regulation of June 4, 2021 (2021/2139), including technical review criteria for economic activities that make a substantial contribution to the first two environmental objectives: climate change adaptation and mitigation of its effects. It applies from January 1, 2022.

This was amended for the first time on March 9, 2022, by Delegated Regulation 2022/1214, which included, under strict conditions, specific activities linked to nuclear energy and gas on the list of economic activities covered by the Union's taxonomy. It applies from January 1, 2023.

A second amendment was published on June 27, 2023 (Delegated Regulation 2023/2485) completing the technical examination criteria for certain activities that were initially not listed as eligible (in particular, manufacture of essential equipment for low-carbon transport or electrical equipment). It comes into force from January 1, 2024;

- the Environment Delegated Regulation of June 27, 2023 (2023/2486) sets the criteria for the technical examination of economic activities considered to make a substantial contribution to one or more of the four other environmental objectives (other than climate): 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. It comes into force from January 1, 2024.

The content of sustainability metrics (Key Performance Indicators or KPIs) and the information to be published by non-financial and financial corporations (asset managers, credit institutions, investment firms and insurance and reinsurance companies) subject to these transparency obligations, are specified, for each of these economic actors, in the Delegated Regulation Article 8 of July 6, 2021 (2021/2178). The format of publishable tables is governed by Environment Delegated Regulation 2023/2486.

Additional information is required for companies engaged in, financing or exposed to specific activities related to nuclear energy and fossil gas (Delegated Regulation 2022/1214).

In addition, European Commission communications published in the Official Journal on October 20, 2023 aim to interpret certain provisions relating to the implementation of Article 8 of the Taxonomy Regulation (C/2023/305) and the delegated act relating to the climate component of the taxonomy (C/2023/267).

On December 21, 2023, the Commission published a communication on the interpretation and implementation of Article 8 of the Taxonomy, which clarifies the information to be provided. It was published in the Official Journal of the European Union on November 8, 2024 under the reference C/2024/6691. On November 29, 2024, the Commission published a new draft communication. Given its late publication and the implementation work involved, this text is currently being analyzed, and some of its provisions will be applied in the coming period.

The Taxonomy Regulation provides for a gradual implementation of information transparency requirements according to economic players. As a company in the financial sector, Groupe BPCE is notably subject to disclosure requirements that are deferred by one year compared to non-financial corporations. This principle allows financial corporations to use the eligibility and alignment data provided by the counterparties themselves subject to these disclosure requirements (counterparties subject to the CSRD) in order to weight their investments, financing and other exposures.

Groupe BPCE publishes disclosures applicable to financial companies – credit institutions. Groupe BPCE publishes the tables required by the regulation in the tabular formats presented in Annex VI of Delegated Regulation 2023/2486.



## Taking the taxonomy into account in the Group's activities (requirement of Annex XI of Delegated Regulation 2021/2178)

The taxonomy criteria are used to identify a portion of the financial assets allocated to green bonds issued by Groupe BPCE. Groupe BPCE also takes into account the European Taxonomy in the design of some of its "green" offers and services and in its project financing (renewable energy financing).

### KPIs of material non-banking subsidiaries

The Group's material non-banking activities are insurance activities, of which BPCE Assurances is the main entity. The KPI relating to asset management activities is also published via the GAR AuM in the section "Off-balance sheet indicators: financial guarantees given and assets under management" below.

BPCE Assurances' ratios are detailed below:

#### BPCE Assurances' non-life underwriting ratio:

Non-life insurance has been defined as eligible for Objective No. 2 "Climate change adaptation". The underwriting ratio, expressed as a percentage, indicates the share of premiums that meet the technical criteria relating to climate change adaptation, in the total premiums.

	"Underwriting" KPI
Eligibility ratio	7.103%
Alignment ratio	2.8%

#### BPCE Assurances' investment ratios:

The investment eligibility and alignment ratios calculations are carried out by weighting the investments according to the share of eligible economic activities and aligned with the taxonomy, based on two financial indicators of the invested companies: turnover and capital expenditure (CAPEX).

For BPCE Assurances' euro and similar funds (excluding unit-linked funds), the proportion of eligible investments aligned with the taxonomy is presented in the table below:

	"Investments" KPI (turnover based)	"Investments" KPI (CapEx based)
Eligibility ratio	6.08%	7.54%
Alignment ratio	2.20%	3.70%

## Assumptions used and existing limitations in the preparation and collection of information

#### The various KPIs required by the regulations were published as follows:

Information on the main KPI (Green Asset Ratio) has been published.

The financial conglomerate KPI has not been published. BPCE considers that it is not subject to this indicator, which is not defined by the Delegated Regulation.

The main exempt entities are the Banques Populaires and the Caisses d'Epargne. As the activity profiles of the BPs and CEs are homogeneous with those of the Group, the summary of the GARS of the BPs and CEs is not disclosed.

The KPIs of non-financial subsidiaries have not been published because they are not material.

The flow information on the KPIs of off-balance sheet exposures has not been published due to the absence of a dedicated table in Annex 6 of the Delegated Regulation.

#### The main assumptions used to determine the alignment of eligible assets under the Green Asset Ratio (GAR) are as follows:

For real estate loans to households, the alignment is based on:

- 1) analysis of the energy performance of assets through the EPD or compliance with thermal regulations for new assets (RT2012 and RE2020) in order to measure the substantial contribution;

- 2) an analysis of the physical risks, including only the "flooding" risk in order to verify that the criteria of the DNSH adaptation are respected: any loan relating to an asset exposed to a significant physical risk is thus considered as not aligned with the taxonomy.

- 3) minimum social guarantees are deemed to be met for all assets built in France and Europe, taking into account the laws and regulations in force in these countries.

The alignment of the following eligible assets was not analyzed: loans for the renovation or financing of motor vehicles with individual customers as well as financing allocated with CSRD counterparties. These assets are therefore *de facto* considered as not taxonomy-aligned.

Given their non-material impact on the GAR ratio, the eligibility and alignment of the equity-accounted value of the insurance subsidiaries were not taken into account.

Given the non-material nature of the exposures relating to gas and nuclear energy (0.06% of the balance sheet), only the information on the Main KPI (Green Asset Ratio) was disclosed. Information on other KPIs (flows, off-balance sheet exposures) has not been disclosed.

For the breakdown of GAR exposures by sector of activity (NACE code), the Group has not published the table in CapEx view insofar as the GAR turnover and CapEx are very similar.

## MANDATORY GAR

### Main indicator – GAR (Green Asset Ratio)

Groupe BPCE's GAR at December 31, 2024 includes taxonomy alignment data. It is presented in the tabular format required by regulations. This requires presentation once on the basis of the "Turnover" KPI (key performance indicator) and once on the basis of the "CapEx" KPI (capital expenditure) of counterparties subject to the CSRD.

Groupe BPCE's GAR, established at December 31, 2024, lists for the first time information on the alignment of financial corporations with the two climate-related environmental objectives (Mitigation and Adaptation). Data on assets aligned with the Climate Change Adaptation objective are published as soon as they are available on Bloomberg.

Information on eligibility for the four non-climate objectives (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) is based on data published by non-financial corps, which publish this information for the first time on December 31, 2023. As a result, at December 31, 2024, Groupe BPCE provides this information and the columns in the regulatory tables relating to this information are presented.

The tables presenting information relating to the comparative period are presented for the first time (templates 0, 1, 3 and 5). Also, the GAR flows, whose calculation methods were specified in the European Commission communication of December 21, 2023, was published for the first time on December 31, 2024.

The GAR flows KPI shows the portion of assets aligned over the portion of assets covered by the GAR only for new outstanding loans and advances and debt securities recognized on the balance sheet since the beginning of the period (in our case, January 1, 2024). The outstandings are recorded at gross carrying amount (before impairment, provisions and amortization) and without deduction of repayments or sales of assets during the period. Given their non-material nature, the GAR flows KPI is not calculated on equity instruments (e.g. equities). The Flows KPI for financial guarantees and assets under management are not published either for operational reasons. The other calculation principles remain identical to those applied for the calculation of outstandings.

The main indicator applicable to credit institutions is the Green Asset Ratio (GAR). Expressed as a percentage, it indicates the proportion of assets that finance or are invested in economic activities aligned with the taxonomy in relation to the total assets covered.

### Scope of financial assets subject to eligibility and alignment analysis

On the basis of the prudential perimeter established in accordance with FINREP regulations (investments in insurance companies controlled by Groupe BPCE are consolidated using the equity method), assets are presented at their gross carrying amount, i.e. before depreciation, provisions and amortization.

The eligibility and alignment analysis applies to a scope of assets determined following a series of exclusions specified by the regulations:

Assets subject to eligibility analysis and taxonomy alignment analysis [A]	Assets not subject to taxonomy eligibility and alignment analysis but included in the denominator [B]	Assets excluded from the denominator and numerator [C]
<p>Exposures to:</p> <ul style="list-style-type: none"> <li>Non-financial corporations subject to the CSRD</li> <li>Financial corporations subject to the CSRD</li> <li>Retail customers – home loans, renovation loans and motor vehicle loans granted from January 1, 2022</li> <li>Local governments</li> <li>Collateral obtained by taking possession</li> </ul>	<p>Assets excluded from the numerator for the GAR calculation (but included in the denominator):</p> <ul style="list-style-type: none"> <li>Hedging derivatives</li> <li>Exposures to non-financial and financial corporations not subject to the CSRD</li> <li>On demand interbank loans</li> <li>Cash and cash equivalents</li> <li>Other assets (goodwill, property, plant and equipment, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>Exposures to central governments, central banks and supranational organizations</li> <li>Financial assets held for trading including derivatives in this portfolio</li> </ul>

**GAR NUMERATOR = [A]**

**38.88%**

of total assets

**GAR DENOMINATOR = A + B**

**66.18%**

of total assets

**TOTAL FINREP ASSETS = A + B + C**

**100%**

The above exposures subject to eligibility and alignment analysis thus include balance sheet assets in the following accounting categories:

- financial assets at amortized cost, financial assets at fair value through other comprehensive income, financial assets designated as measured at fair value through profit or loss and non-trading financial assets measured at fair value through profit or loss;

## Methodology used

In accordance with the principles of the regulations, the eligibility and alignment of the outstanding amounts of assets subject to eligibility and alignment analysis are determined:

- for financial and non-financial counterparties subject to the CSRD regulations, as identified from the database provided by Bloomberg:
  - for unallocated financing, by applying the alignment and taxonomy eligibility rates (Turnover KPI and CapEx KPI) available in Bloomberg to the gross amount outstanding. These data correspond to the indicators published by these counterparties in the previous year (determined in accordance with the criteria of the Climate and Environment Delegated Regulations). BPCE only uses Bloomberg data corresponding to the counterparty's exact data. Conversely, BPCE does not use Bloomberg estimates. Lastly, in the absence of available data distinguishing eligibility and alignment rates by environmental objective, the choice was made to allocate them to the climate change mitigation objective,
  - for financing allocated, the taxonomy criteria defined by the European Commission should be analyzed on the basis of the information provided by the counterparties. For the 2024 fiscal year, Groupe BPCE did not conduct these *ad hoc* analyses.

Eligibility and alignment were only measured using data available in Bloomberg. These data are not always exhaustive, in particular for data relating to the alignment of financial companies. The Group's alignment ratio is penalized by this lack of data.

- for retail customers (or households):
  - the exposures subject to analysis are: loans guaranteed by residential real estate (including secured loans); renovation loans and loans for motor vehicles granted from January 1, 2022.
  - the alignment of loans guaranteed by residential real estate (or secured) is determined in the light of criteria laid down by regulations and interpretations accepted by the marketplace. The substantial contribution to the first taxonomy objective of climate change mitigation is documented with regard to the following criteria:
    - financed properties with a primary energy consumption of less than 135kWh/m<sup>2</sup> per year (corresponding to properties with an Energy Performance Diagnostic - EPD - rated A, B or, in some cases, C). Groupe BPCE has adopted a methodological approach in which the collection of EPD data for loans secured by real estate is based on the EPDs collected from customers, supplemented by the EPDs supplied by the CSTB (*Centre Scientifique et Technique du Bâtiment*) and collected in the ADEME database for single-family homes for which the Group is certain of the address of the property financed. For collective housing, in the absence of customer EPDs issued after 2021, Groupe

- investments in subsidiaries, joint ventures and associates (controlled insurance companies are accounted for using the equity method for the presentation of the regulatory perimeter);
- fixed assets, with regard to collateral obtained by taking possession.

BPCE uses EPDs calculated by the CSTB, in accordance with the 2021 reform, based on the characteristics of the buildings concerned and the rating of its various lots,

- in the absence of an EPD, and for financing property to be built, Groupe BPCE determines primary energy consumption using the applicable construction standards (RT 2012 regulations applicable to constructions between January 1, 2013 and December 31, 2020) and RE 2020 regulations applicable to constructions from January 1, 2022). In the absence of information on the date on which the building permit for the property financed was filed, Groupe BPCE identifies it from the date on which the financing was granted, applying a margin of two years. For the 2021 construction year, in the absence of information, no exposure has been considered as aligned.

The analysis of alignment with the taxonomy's criteria must then be supplemented by technical criteria demonstrating that the activity does not cause significant harm to the taxonomy's other objectives (DNSH criterion):

- for retail customer real estate loans, this analysis is based on the analysis of physical risk. The acute physical "flood" risk was assessed as the most material in terms of Groupe BPCE's portfolio. Properties with the highest level of flood risk are thus excluded when determining the alignment of property loans. In the "Nomenclature of Territorial Units of Statistics", the risk of flooding related to housing has been qualified as high in accordance with the European Central Bank's classification of acute flood risks. For example, if a financed property has been identified as being at high risk of flooding, the corresponding outstanding amount will not be considered as aligned, even though it complies with the energy performance criteria described above;

The alignment analysis must also verify **compliance with minimum social guarantees**. For real estate loans to households, this criterion was not verified for each of the loans.

Groupe BPCE considers that compliance with the minimum social guarantees is implicitly verified for real estate loans when the assets financed are located in France or in the European Economic Area (EEA). This position is based on a legal framework in which European directives and national laws guarantee fundamental social rights, particularly in terms of working conditions and social protection. In France, the French Labor Code establishes clear standards that provide protection to workers and households.

The alignment analysis for renovation loans was not carried out in the absence of data available to document compliance with the taxonomy criteria.

In the absence of available data (CO<sub>2</sub> emissions/km), the analysis of alignment of motor vehicle loans has not been performed;

- for local governments:
  - housing financing is considered eligible. As this is not a real estate development activity, the alignment analysis must be carried out, where it is possible to establish a link between the financing and the property financed, in the same way as indicated above for retail real estate financing. However, due to operational constraints, the alignment could not be measured this year,
  - for other financing, in the absence of available analysis data, no outstandings were considered eligible or aligned;
- collateral obtained by taking possession has not been analyzed in terms of its non-material value.

Insurance activities are included through the equity-accounted investments in subsidiaries, presented on the “equity instruments” line. The eligibility and alignment of insurance activities is determined by applying to non-life insurance entities the underwriting ratio (share of gross written premiums received corresponding to insurance or reinsurance activities aligned with the taxonomy) and to life or combined insurance activities the investment ratio (share of investments devoted to financing economic activities aligned with the taxonomy). Given their non-material impact on the GAR ratio, the eligibility and alignment of the equity-accounted value of the insurance subsidiaries were not taken into account as of December 31, 2024.

## Summary of the MANDATORY GAR

	12/31/2024			12/31/2023			Change since 12/31/2023
	Amount in millions of euros	% of total assets	% of total GAR assets (denominator)	Amount in millions of euros	% of total assets	% of total GAR assets (denominator)	
<b>TOTAL ASSETS</b>	<b>1,489,889</b>	<b>100.00%</b>		<b>1,461,501</b>	<b>100.00%</b>		<b>0.00%</b>
Assets not covered for GAR calculation	503,906	33.82%		494,589	33.84%		(0.02%)
<b>TOTAL GAR ASSETS</b>	<b>985,983</b>	<b>66.18%</b>	<b>100%</b>	<b>966,912</b>	<b>66.16%</b>	<b>100.00%</b>	<b>0.02%</b>
Assets excluded from the numerator for GAR calculation (covered in the denominator)	406,655	27.29%	41.24%	403,009	27.57%	41.68%	(0.28%)
<b>GAR – COVERED ASSETS IN BOTH NUMERATOR AND DENOMINATOR: ASSETS SUBJECT TO ELIGIBILITY AND ALIGNMENT ANALYSIS</b>	<b>579,323</b>	<b>38.88%</b>	<b>58.76%</b>	<b>563,898</b>	<b>38.58%</b>	<b>58.32%</b>	<b>0.30%</b>
<i>(Turnover basis for CSRD counterparties)</i>							
Of which to taxonomy-relevant sectors (taxonomy-eligible)	371,631		37.69%	375,063		38.79%	(1.10%)
<b>Of which environmentally sustainable (taxonomy-aligned)</b>	<b>40,324</b>		<b>4.09%</b>	<b>38,512</b>		<b>3.98%</b>	<b>0.11%</b>
<i>(CapEx basis for CSRD counterparties)</i>							
Of which to taxonomy-relevant sectors (taxonomy-eligible)	373,489		37.88%	377,127		39.00%	(1.12%)
<b>Of which environmentally sustainable (taxonomy-aligned)</b>	<b>41,602</b>		<b>4.22%</b>	<b>39,660</b>		<b>4.10%</b>	<b>0.12%</b>

## Detail of GAR – Turnover basis

	12/31/2024					12/31/2023					Change in aligned exposures (since 12/31/2023)
	in millions of euros			As a % of total exposures		in millions of euros			As a % of total exposures		
	Exposur es	of which eligible	of which aligned	of which eligible	of which aligned	Exposur es	of which eligible	of which aligned	of which eligible	of which aligned	
GAR – COVERED ASSETS IN BOTH NUMERATOR AND DENOMINATOR: ASSETS SUBJECT TO ELIGIBILITY AND ALIGNMENT ANALYSIS	579,323	371,631	40,324	37.69%	4.09%	563,898	375,063	38,512	38.79%	3.98%	0.11%
Of wich exposures to:											
• Financial corporations subject to CSRD	39,436	170	89	0.02%	0.01%	31,696	30	4	0.00%	0.00%	0.01%
• Non-financial corporations subject to CSRD	35,983	6,416	2,113	0.65%	0.21%	30,215	4,202	1,556	0.43%	0.16%	0.05%
• Households	448,909	361,709	38,122	36.69%	3.87%	449,598	367,259	36,951	37.98%	3.82%	0.04%
• Local governments financing	54,994	3,336	0	0.34%	0.00%	52,388	3,572	0	0.37%	0.00%	0.00%
• Collateral obtained by taking possession: residential and commercial immovable properties	5	0	0	0.00%	0.00%	5	0	0	0.00%	0.00%	0.00%

## Detail of GAR – CapEx basis

	12/31/2024					12/31/2023					Change in aligned exposures (since 12/31/2023)
	in millions of euros			As a % of total exposures		in millions of euros			As a % of total exposures		
	Exposur es	of which eligible	of which aligned	of which eligible	of which aligned	Exposur es	of which eligible	of which aligned	of which eligible	of which aligned	
GAR – COVERED ASSETS IN BOTH NUMERATOR AND DENOMINATOR: ASSETS SUBJECT TO ELIGIBILITY AND ALIGNMENT ANALYSIS	579,323	373,489	41,602	37.88%	4.22%	563,898	377,127	39,660	39.00%	4.10%	0.12%
Of wich exposures to:											
• Financial corporations subject to CSRD	39,436	231	154	0.02%	0.02%	31,696	31	15	0.00%	0.00%	0.01%
• Non-financial corporations subject to CSRD	35,983	8,213	3,326	0.83%	0.34%	30,215	6,265	2,694	0.65%	0.28%	0.06%
• Households	448,909	361,709	38,122	36.69%	3.87%	449,598	367,259	36,951	37.98%	3.82%	0.04%
• Local governments financing	54,994	3,336	0	0.34%	0.00%	52,388	3,572	0	0.37%	0.00%	0.00%
• Collateral obtained by taking possession: residential and commercial immovable properties	5	0	0	0.00%	0.00%	5	0	0	0.00%	0.00%	0.00%

## Off-balance sheet indicators: financial guarantees given and assets under management

### Guidelines

From December 31, 2023, in accordance with Section 1.2.2. of Annex V of the Delegated Regulation 2021/2178, credit institutions must publish additional indicators on exposures not recognized as assets on the balance sheet relating to:

- financial guarantees granted;
- assets under management.

### Methodology used

The method used to calculate KPIs for financial guarantees and KPIs for assets under management consists in applying to exposures the eligibility and alignment rates of counterparties subject to the CSRD.

## Summary of off-balance sheet KPIs

### Detail of GAR on off-balance sheet exposures - Turnover

Detail of off-balance sheet - Turnover	12/31/2024					12/31/2023					Change in aligned exposures (since 12/31/2023)
	in millions of euros			As a % of total assets		in millions of euros			As a % of total assets		
	Exposures	of which eligible	which aligned	of which eligible	of which aligned	Exposures	of which eligible	which aligned	of which eligible	of which aligned	
Financial guarantees	56,205	8,447	2,752	15.03%	4.90%	52,097	790	260	1.52%	0.50%	4.40%
Assets under management	1,132,162	94,004	9,934	8.30%	0.88%	1,185,642	88,139	7,755	7.43%	0.65%	0.22%

### Detail of GAR on off-balance sheet exposures - CapEx

Detail of off-balance sheet - CapEx	12/31/2024					12/31/2023					Change in aligned exposures (since 12/31/2023)
	in millions of euros			As a % of total assets		in millions of euros			As a % of total assets		
	Exposur es	of which eligible	of which aligned	of which eligible	of which aligned	Exposures	of which eligible	of which aligned	of which eligible	of which aligned	
Financial guarantees	56,205	8,413	3,265	14.97%	5.81%	52,097	1,271	412	2.44%	0.79%	5.02%
Assets under management	1,132,162	26,043	8,038	2.30%	0.71%	1,185,642	18,258	7,002	1.54%	0.59%	0.12%

## Activities related to nuclear energy and fossil gas

### Guidelines

Additional information is required for companies engaged in, financing or exposed to specific activities related to nuclear energy and fossil gas (Delegated Regulation 2022/1214). The tabular format is required by regulations. This requires the publication of these tables for each applicable KPI.

At December 31, 2024, Groupe BPCE presents this information for the main KPI – the GAR established in stock, once on the counterparties' Turnover-based KPI and once on counterparties' CapEx-based KPI. Five tables must be communicated.

However, this information is not presented for the GAR in a flow view, as well as for the off-balance sheet KPIs: financial guarantees given and assets under management.

### Methodology used

The publication of template 1 is mandatory. This template is used to identify the specific activities in the gas and nuclear sectors covered by delegated act 2022/1214 of the Taxonomy Regulation.

Templates 2 to 5 are presented by weighting the exposure to the counterparties concerned by the data communicated by them in their reference document for the previous year, collected from the Bloomberg database.

All the tables required by the Taxonomy Regulation in accordance with the template tables applicable to credit institutions in Annex VI of the Regulation are presented in Part 5 "Tables to be published in accordance with Article 8 of the Taxonomy Regulation" in this sustainability report.



## 2.2 E1 - Climate change

### 2.2.1 Governance

#### 2.2.1.1 [GOV-3] INTEGRATION OF SUSTAINABILITY-RELATED PERFORMANCE IN INCENTIVE SCHEMES

This disclosure requirement is addressed in Section GOV-3 - 1.4.3.

### 2.2.2 Impact, risk and opportunity management

#### 2.2.2.1 DISCLOSURE REQUIREMENT RELATED TO ESR-2 IRO-1 - DESCRIPTION OF PROCESSES TO IDENTIFY AND ASSESS MATERIAL CLIMATE-RELATED IMPACTS, RISKS AND OPPORTUNITIES

##### PROCESS TO IDENTIFY AND ASSESS CLIMATE CHANGE IMPACTS

Groupe BPCE's climate change impacts were assessed throughout the value chain. The impacts of these activities on climate change are classified as material in the context of Groupe BPCE's sustainability report, both regarding its own operations (own footprint) and also, through the customer value chain, *via* financing operations, asset management, investment and insurance. This first year of application is characterized by uncertainties about the interpretation of the texts, which are generalist to cover all sectors of activity but do not specify a specific framework for banking and financial business models, due to the absence of established practices or comparative information as well as the absence of certain data, particularly within the "value chain".

The rating of impacts on climate change, in connection with financing and asset management activities, was carried out by experts based in particular on a sectoral analysis of Groupe BPCE's exposures carried out by the Group ESG Risk department as part of the scale assessment. This rating was supplemented by the mobilization of the views of the Group's stakeholders.

Groupe BPCE is committed to maintaining an ongoing dialog with its stakeholders based on several mechanisms that enable them to be involved in the process of identifying and assessing impacts, risks and opportunities, and identifying levers for improving its positive impact on environmental issues, in particular climate.

The expectations of stakeholders are taken into account by the teams of each Group company and regularly shared between the managers and teams of the Banques Populaires and the Caisses d'Epargne, Natixis, and more generally every Group entity, in particular through the coordination of dedicated functions (customer satisfaction, HR, purchasing, etc.), governance, the Fédération Nationale des Banques Populaires and the Fédération Nationale des Caisses d'Epargne, the employee representative bodies, investor roadshows, meetings with rating agencies, and the foundations and mutual companies that the Group has historically supported.

In particular, as part of Groupe BPCE's commitment and the ongoing dialog between the Banques Populaires and the Caisses d'Epargne and the players in the regions where they are located, the expectations of the local non-profit sector, entrepreneurial ecosystems and educational structures are identified.

Moreover, discussions with regulators, and image or forward-looking surveys are all sources of identification of changes in stakeholder expectations. Identifying customer expectations is also based on regular satisfaction surveys, conducted both immediately after a contact and after some time has passed. These surveys cover the environmental dimensions, in particular climate issues. They measure the perception of the support provided for the transitions.

Lastly, with regard to customer expectations, Groupe BPCE supports the transition of the business models of companies, ranging from SMEs to large international companies, by developing a non-financial analysis through the establishment of a dedicated dialog on environmental issues. For Natixis CIB's business lines, as well as throughout the Banque Populaire and Caisse d'Epargne networks, customer support is based on dialog around the ESG issues of each customer, depending on their size and business sector. This ESG dialog is also a tool for assessing their exposure to risks, informing them, and proposing solutions to better prevent and manage the risks. It contributes to the analysis of ESG criteria at the counterparty level as part of the integration of ESG criteria into the corporate loan granting process. This counterparty analysis complements an analysis of the financed asset and the business sector to inform the lending decision with non-financial factors. Since the beginning of 2023, more than ten thousand legal entity customers have been met by the Group's account managers to take stock of their thinking, their management of the challenges and their projects on the environmental, societal and governance dimensions.

The other criteria - scope, irremediable character and likelihood - are assessed by multidisciplinary experts, involving various teams from Groupe BPCE who have taken into account the rating scales defined for the fiscal year, as well as the use of stakeholder opinions.

## PROCESS FOR IDENTIFYING AND ASSESSING CLIMATE RISKS

The process of identifying and assessing climate risks is part of Groupe BPCE's system for assessing the materiality of climate and environmental risks and described below.

The process implemented by Groupe BPCE to identify and assess the materiality of climate and environmental risks aims to structure its understanding of the risks to which it is exposed in the short, medium and long term and to identify priority areas for strengthening the risk management system.

This process is coordinated by the ESG Risk department, under the supervision of Groupe BPCE's ESG Risk Committee and Supervisory Board. It is reviewed annually to update the underlying scientific knowledge and methodologies.

This process consists of four main steps:

- creation of the risk framework;
- documentation of the risk transmission channels;
- assessment of the materiality of climate risks in relation to the other risk categories;
- input into cross-functional risk management exercises (risk appetite system, ICAAP, ILAAP).

### Identification of risks

#### Group risk framework

Groupe BPCE has established a framework for climate and environmental risks to define the hazards covered by the climate and environmental risks. This framework is based on current scientific knowledge and reference regulatory texts (e.g. European taxonomy) and aims to provide the most comprehensive possible representation of the hazards. It must be updated annually.

With regard to physical risks, the framework distinguishes between physical risk hazards related to the climate, biodiversity and ecosystems, pollution, water and marine resources, the use of resources and the circular economy. The climate-related hazards are divided into acute or chronic hazards related to temperature, wind, water, solid mass and environmental hazards. The hazards related to environmental risks are divided between the disruption of regulation services (protection against climate hazards, support for production services, mitigation of direct impacts) and the disruption of supply services (in terms of quality or quantity).

With regard to transition risks, the framework distinguishes between risks related to regulatory changes, technological developments, and changes in stakeholder expectations and behavior.

The climate risks included in the risk framework currently defined by the Group are presented below:

## CLIMATE RISKS

### PHYSICAL CLIMATE RISKS



**Temperature**  
e.g. Heat waves, fires, temperature changes



**Wind**  
e.g. Storms, cyclones



**Water**  
e.g. Flood, drought, sea level rise



**Solid mass**  
e.g. Coastal and soil erosion, avalanches

### TRANSITION RISKS



**Regulatory and legal changes**



**Technological breakthroughs**



**Stakeholder behavior**  
e.g. Consumers, civil society, investors

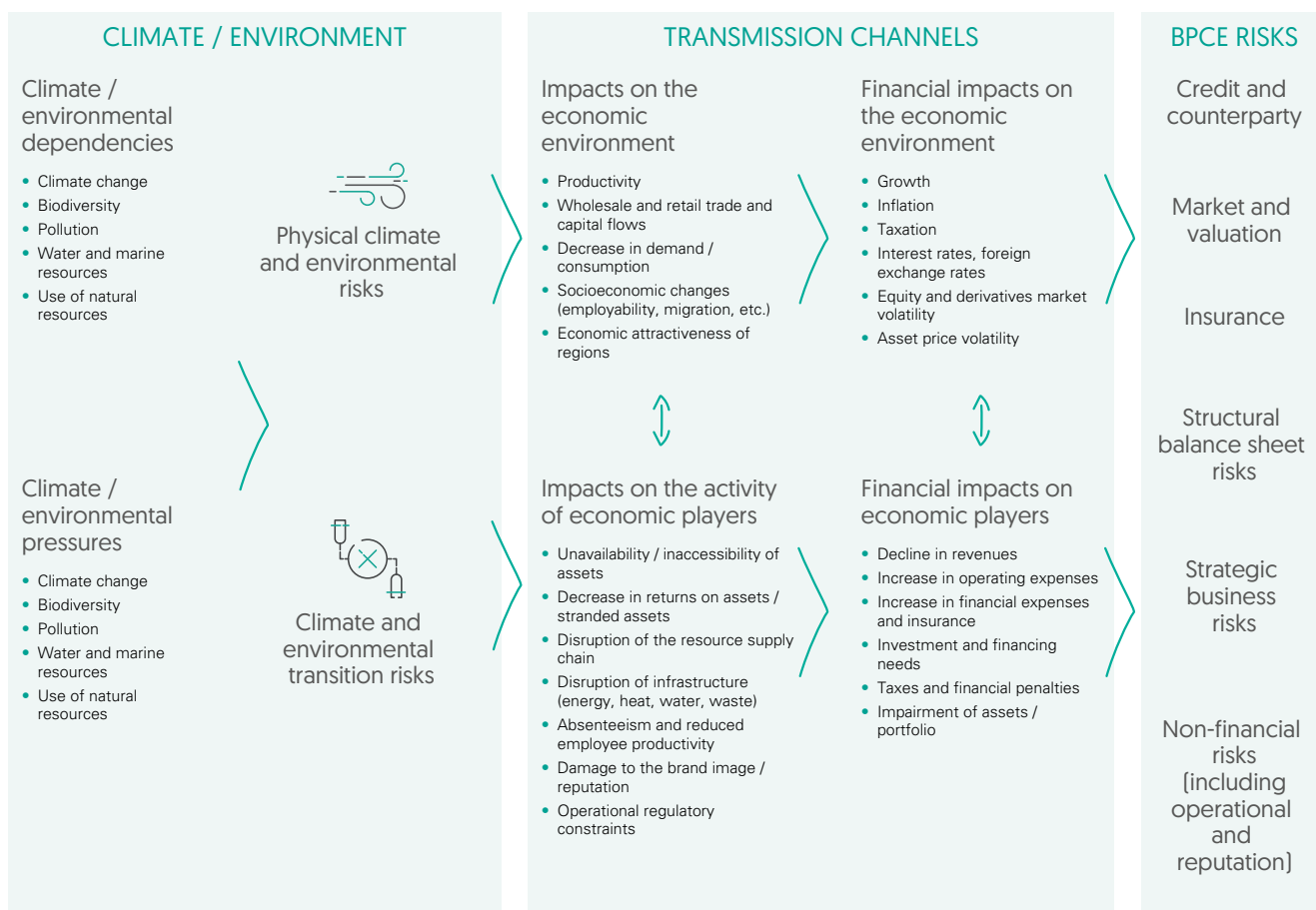
## Risk transmission channels

Climate and environmental risks are risk factors underlying the other risk categories to which Groupe BPCE is exposed, namely credit and counterparty risks, market and valuation risks, insurance risks, structural balance sheet risks, strategic and business risks and non-financial risks (operational risks, reputation risks, non-compliance risks, insurance risks, etc.), as identified in Groupe BPCE's risk taxonomy.

In 2024, Groupe BPCE conducted work to systematically identify and describe the transmission channels linking climate and environmental risk factors to the main risk categories of Groupe BPCE's risk taxonomy. For this work, Groupe BPCE relied on its internal experts as well as on the impact maps developed by leading institutions such as NGFS and SBTN or the OCARA methodology.

These transmission channels involve the impacts of climate hazards on activities and business models, which are reflected in financial variables at the macroeconomic or microeconomic level and ultimately modify Groupe BPCE's risk exposure. These risks may materialize directly, in connection with Groupe BPCE's own activities, or indirectly through the counterparties to which Groupe BPCE is exposed as part of its financing or investment activities. They are summarized in the diagram.

This work will be subject to an annual review in order to integrate changes in the knowledge on climate and environmental risks and to extend the scope of the risks covered to social and governance risks.



## Materiality assessment

Based on the transmission channels identified, Groupe BPCE assesses the materiality of the climate and environmental risks in relation to the main risk categories to which it is exposed. This assessment distinguishes between physical risks and transition risks for the climate risks on the one hand, and the environmental risks on the other. It is carried out according to three time horizons: short term (one to three years, financial planning horizon), medium term (strategic planning horizon, five to seven years) and long term (~2050).

This assessment is based on quantitative or qualitative indicators, making it possible to assess the risk exposures from a sectoral and geographical point of view, when these are available, as well as on expert assessments. The internal experts involved in these

assessments include the ESG Risk department, the other functions of the Risk division, as well as representatives from the other departments (impact, compliance, legal) and the business lines concerned.

In 2024, the assessment of the climate risks was carried out by almost all of Groupe BPCE's physical entities and aggregated at Groupe BPCE level. It was supplemented by an initial assessment of the environmental risks carried out solely at Groupe BPCE level. A convergence of the climate and environmental risk assessment processes and the extension to social and governance risks will be carried out as part of the annual update of the assessments.

As part of the assessment of the financial risk materiality, the materiality assessment of climate and environmental risks was cross-referenced with the materiality assessment of each of the “traditional” risks carried out annually as part of the work on the Risk Appetite Framework in order to obtain an assessment of the intrinsic materiality for each risk on the same criteria applied to other risks (likelihood of occurrence/scale of financial impact), making it possible to ensure consistency between the assessments. A comprehensive consistency check was carried out to validate the materiality levels obtained.

### Climate risk measurement tools and methodologies

Groupe BPCE has adopted specific methodologies to systematically and consistently address the climate, social and governance risks associated with its exposure portfolios. These methodologies are based on internal and external expertise, and reflect the state of scientific knowledge, technologies and the current regulatory environment, as well as market practices. They are regularly reviewed, supplemented and enriched with the aim of gradually improving the accuracy of the assessment of climate risks and taking into account changes in the context.

### Assessment of governance, social and environmental risks

Groupe BPCE has developed an internal methodology for assessing climate issues and risks, based on sector scores documenting the main issues and risks related to the sector, according to criteria aligned with the definitions of the European taxonomy (six environmental risk criteria: physical climate risks, climate transition risks, biodiversity, water, pollution and circular economy).

These criteria are then rated by in-house experts, according to the principles of double materiality. The scores for the climate criteria are also aggregated in order to provide a summary score enabling the sectors to be compared. The proposed scores were validated by the Non-Financial Risk Committee.

This analysis methodology was deployed in the 26 economic sectors used to manage Groupe BPCE’s financing portfolio. It is shared with all Groupe BPCE entities.

### Physical environmental risk assessment

#### GEO-SECTORAL ASSESSMENTS

In order to strengthen the sensitivity and robustness of its assessments of the physical risk associated with the outstanding financing for professional and corporate customers, in 2024 Groupe BPCE developed a methodology for analyzing the vulnerability of the outstandings to physical risks.

This internal methodology makes it possible to take into account the intrinsic vulnerability of a sector to physical risk hazards and the exposure of a given geographical area to physical risk hazards. It is currently broken down into a fine-grained sectoral grid (NACE2) and a national or regional geographic grid for countries in which Groupe BPCE has a particular concentration of outstandings (France, United States). Six physical climate risk hazards are currently covered, which are among the most representative for Groupe BPCE, and can be simulated under different scenarios and time horizons.

This methodology will be deployed in the internal risk management tools in the course of 2025.

### HOME LOAN PORTFOLIO

Given its significant exposure to home loans to individual customers, Groupe BPCE has adopted a tool to simulate the physical risks of the financed assets. This tool takes into account the exact coordinates of the asset to assess its risk exposure and certain characteristics to estimate its vulnerability to determine the estimated damages under different scenarios and time horizons. To date, this tool covers the territory of mainland France and Corsica and makes it possible to assess the exposure to the two main physical risks for this portfolio (drought - RGA and floods).

This methodology will be deployed in the internal risk management tools in the course of 2025.

### Assessment of transition environmental risks

#### SECTOR ASSESSMENTS

In order to strengthen the sensitivity and robustness of its assessments of the transition risk associated with the outstanding financing for professional and corporate customers, in 2024 Groupe BPCE developed a methodology for granular analysis of the sensitivity of the sectors to this risk.

This internal methodology makes it possible to assign a sectoral score reflecting the transition risk associated with a given NAF code, taking into account the carbon emissions and the main environmental impacts of the companies in the sector. It has been developed in line with the Green Weighting Factor methodology (described below) that applies at the level of the company or project financed. Given the predominant share of French companies in the exposure portfolio, this methodology is focused on parameters corresponding to the French economy.

This methodology will be deployed in the internal risk management tools in the course of 2025.

### HOME LOAN PORTFOLIO

To assess the transition risk on its home loan portfolio, Groupe BPCE relies on the Energy Performance Diagnostic (EPD) of the real estate assets financed. The EPD of the financed asset is collected systematically and makes it possible to capture both a risk on the repayment capacity of the loan in the event of an increase in energy expenditure or expenses related to the financing of work to improve energy performance, but also the risk of loss of value of the asset due to a deteriorated EPD, making it potentially unfit for use in the rental context given the regulations in force.

### GREEN WEIGHTING FACTOR

Groupe BPCE notably uses the Green Weighting Factor (GWF) methodology, developed by Natixis CIB, to assess the transition risk related to its counterparties and financed projects.

Using a seven-color rating scale ranging from dark brown to dark green, the GWF assesses the impact of transactions on climate change, while taking into account the risk of the most material non-climate-related environmental externalities (water, waste, biodiversity, pollution). The GWF covers all bank financing. This assessment is carried out on a granular basis for each of the financing exposures on the balance sheet for all banking products (loans, guarantees, caution letters, documentary credits) regardless of their maturity, in all geographies and for all sectors of activity except the financial sector and administration. The GWF’s methodology is also adapted to corporate and dedicated financing.

The GWF methodology offers a vision of the challenges of transition. The GWF covers:

- the issues of induced decarbonization (CO<sub>2</sub> Scopes 1, 2 and 3);
- the contribution to the transition made by certain customers or active projects, with the notion of avoided emissions;
- the exposure to the most material non-climate environmental risks;
- a forward-looking view of the customers' performance, making it possible to assess their transition potential;
- extract a set of new indicators useful for the management of the decarbonization strategy, notably for Natixis CIB and for regulatory reporting;
- the integration of the non-financial reporting needs of investor customers.

The operational management of Natixis CIB's climate trajectory is based in particular on data from the Green Weighting Factor (GWF). This management tool is used periodically and at several levels:

- for credit decisions at the transactional level;
- for the strategic dialog with customers;

## PROCESS FOR IDENTIFYING AND ASSESSING OPPORTUNITIES

Groupe BPCE takes into account economic developments related to climate change in order to adapt its business models as a banker, insurer and investor. The challenges of mitigating and adapting to climate change generate development opportunities by supporting the economic players concerned and deploying transformation levers for its business lines.

The Group's VISION 2030 strategic project is based on the consideration of four transitions, all generating opportunities: environmental - with a clear priority given to the decarbonization of the economy - demographic, technological and geopolitical. In this context, issues related to climate change are fully integrated, taking into account their interactions with the other transitions. The Group offers an approach that takes into account global limits and societal needs, offering concrete solutions to all to support the transitions towards a more sustainable and inclusive world. Combating climate change and bringing about a more low-carbon society are major challenges for which the Group has long been mobilized, in order to limit the impact related to climate change of its financing, asset management and insurance activities. In this context, the Group is becoming a player in these transitions by developing its activities and revenues while providing a real lever for the transformation of its business lines. The Group translates this opportunity into its strategic plan with ambitions to achieve them.

- for strategic planning: definition of annual color targets for each business line and sub-business line;
- for commercial planning: definition of systems for assessing the individual performance of the financing origination teams;
- for capital allocation and active portfolio management;
- for risk appetite management.

With the aim of continuously improving this analysis tool, Natixis CIB carried out a major overhaul of the GWF methodology for dedicated financing, which will be rolled out using a new tool. This overhaul makes it possible to increase the coverage of the scope of financing analyzed and to improve the relevance of the assessments of each transaction (on the basis of feedback obtained from users since 2020).

The GWF is currently deployed on Natixis CIB's financing portfolio, for which the scores assigned are updated annually as part of the review of credit files. Studies are underway to assess the relevance of rolling out the GWF to other Groupe BPCE portfolios in the future.

In order to identify, assess and implement opportunities to support the environmental transition of its customers:

- Groupe BPCE has business line teams within the Group's various entities whose mission is to study market opportunities, develop business plans and launch useful offers. The New Products and Partnerships Validation Committee approves the marketing of these products after having assessed their appropriateness;
- an ESG dialog is conducted with the local banking customers of the Banque Populaire and Caisse d'Epargne networks in order to propose comprehensive offers that bring together specialized partners to support the customers' transformation initiatives, particularly in the area of energy renovation;
- in particular, within Natixis CIB, the Green & Sustainable Hub (GSH), composed of around forty experts, contributes to the implementation of the commercial strategy in terms of green and sustainable finance. The GSH works with all of Natixis CIB's business lines to develop sustainable "cross-asset" financing and investment solutions to serve customers' transition objectives. The GSH is continually expanding its offering of sustainable finance solutions and services as well as its range of advisory and support services. Since 2023, the GSH has supported Banque Populaire and Caisse d'Epargne networks, with the creation of a "GSH network" team to meet the sustainable financing needs of large SMEs. This team is made up of five dedicated experts and bankers "incubated" full-time for six months from the Banques Populaires and the Caisses d'Epargne, who develop their own expertise and participate in the creation of a wider network of sustainable financing experts within the Group.

## 2.2.3 Strategy

### 2.2.3.1 [E1 - 1] TRANSITION PLAN FOR CLIMATE CHANGE MITIGATION

With the previous strategic project including an ambition in terms of combating climate change, Groupe BPCE initiated the adaptation of its activities in order to contribute to the decarbonization of the economy. In 2024, with the definition and launch of the VISION 2030 strategic project, Groupe BPCE is committed to long-term action.

With the aim of making impact accessible to all, the Group has defined specific areas of action:

- support for all customers in their environmental transition;
- alignment of its financing, investment and insurance portfolios with trajectories compatible with the objectives of the Paris Agreement;
- decarbonization trajectories offered by European asset management companies to their investor customers;
- extension of the sustainable refinancing strategy in order to have the resources necessary to achieve its objectives;
- accelerated reduction of its own footprint.

The Group is accelerating the transformation of its activities with the aim of extending its impact solutions to all its customers on climate issues and more broadly on sustainability issues. Groupe BPCE has undertaken a transformation of all its companies, at all levels, by launching an internal transformation plan, named "Impact Inside", to support its customers' environmental and societal transitions. The transition plan to mitigate climate change is part of this global approach.

The "Impact Inside" transformation plan is reflected in the mobilization of the full strength of the Group's regional and international economic footprint to support all players in the economy in their transitions and thus strengthen their positive impact on society and on the environment. For the largest customers, particularly at the international level, the Group is strengthening its positioning at the heart of the transitions thanks to enhanced know-how and development of the strategic dialog led by the ESG consulting activities.

The Group's cooperative model, which places customers at the heart of governance, makes it possible to take into account their expectations and needs and the aspirations of society by ensuring a fair transition for each of its customers. Its decentralized model and its regional presence are real assets for supporting transitions and contributing to a fair and sustainable transformation of society.

## Implementation of Groupe BPCE's transition plan in its contribution to climate change mitigation



### IMPACT ACCESSIBLE TO ALL

- Support for all customers in their environmental transition
- Alignment of its financing, investment and insurance portfolios with trajectories compatible with the objectives of the Paris Agreement
- Decarbonization trajectories offered by European asset management companies to their investor customers
- Extension of the sustainable refinancing strategy in order to have the resources necessary to achieve VISION 2030's targets
- Accelerated reduction of its own footprint



### ADAPTATION OF THE BUSINESS STRATEGY

#### Supporting individual customers

- In renovation
- In soft mobility
- In post-claim remediation
- Via dedicated savings products

#### Supporting legal entity customers in the evolution of business models

- Based on the analysis of transition plans (ambition, past and present performance, levers and actions, operational management)
- With a range of products and solutions adapted to corporate customers
- With a range of products adapted to investor customers
- Through the strengthening of expertise in the financing of the energy transition, the financing of renewable energies, M&A and intermediary services on the capital markets

#### Portfolio decarbonization management



### LEVERAGE

- Support for individual customers with a complete range of home energy renovation solutions to preserve the value of the real estate portfolio
- Support for individual and corporate customers in low-carbon mobility
- ESG dialog enabling consulting, in close proximity to companies, with the analysis of business models according to their size and economic sector
- Support for changes in the energy mix and support for the reduction of the use of carbon-based energies
- Management of decarbonization trajectories of the highest carbon-emitting sectors
- Continued approach to reducing the own footprint of real estate, mobility, digital and purchasing



### TARGETS AND ACTION PLANS

Quantitative, science-based decarbonization targets for...

- **Financing** of carbon-intensive sectors in financing portfolios
- **Investment** portfolios of the insurance activities
- The **portfolios and mandates** of the asset management activity

...supplemented by dedicated action plans that capitalize on the Group's local roots and its understanding of regional challenges:

- Annual financing envelope of €1 billion dedicated to energy efficiency renovation for individual customers

- Financing envelope of €5 billion by 2026, dedicated to decarbonization and the transition of companies
- Increase in renewable energy financing by 15% by 2026
- ESG dialogs with companies
- Constant development of sectoral expertise (energy infrastructure, transport, etc.)
- Development of a selective range of transition funds and services by offering products with a transition theme, or with decarbonization ambitions
- Own footprint activities



### 2.2.3.1.1 Compatibility of the company's targets with limiting climate change [E-1-1-16 (a)]

The definition of the decarbonization action plans and targets is strengthened by Groupe BPCE's local model, its expertise at the level of Natixis CIB and its regional roots. Thus, for the highest carbon-emitting sectors, the Group has defined action plans and/or decarbonization trajectories adapted to the economic sectors of its financing portfolios, as well as for the asset management and insurance activities. The Group sets its targets based on science<sup>(1)</sup> and the most ambitious objective of the Paris Agreement to limit global warming to +1.5°C by 2100 compared to pre-industrial levels.

In order to build this trajectory on its financing activities, in 2021 Groupe BPCE joined the Net Zero Banking Alliance (NZBA), an international initiative by the banking industry coordinated by the financial initiative of the United Nations Environment Program

(UNEP FI). Similarly, BPCE Assurances joined the Net Zero Asset Owner Alliance (NZAOA) in 2022 and certain Natixis IM affiliated asset management companies have joined market initiatives such as the Net Zero Asset Managers initiative (NZAMi) to strengthen their portfolio transition and alignment approach.

By co-constructing and sharing guidelines adapted to financial institutions, the Net Zero alliances allow each financial institution, depending on the composition of its loan or investment portfolio in the context of asset management, to adapt its strategy according to the business sector in which it operates. The objective is for the trajectory of each loan or investment portfolio to be aligned with the decarbonization trajectory based on science and specific to the business sector in question, thus making it possible to contribute to global carbon neutrality by 2050.

## FINANCING ACTIVITIES

Groupe BPCE has deemed it more relevant and operationally more judicious to set targets for reducing the greenhouse gas emissions from financing transactions (Scope 3 category 15) by business sector and not set one target for all financing transactions. In fact, within its financing portfolio, Groupe BPCE has identified the sectors that emit the most greenhouse gas emissions. These sectors have been assigned absolute carbon emission or intensity targets and/or are the subject of action plans. Based on the methodological framework developed at the international level within the Net Zero Banking Alliance, the Group has prioritized the following sectors: coal, oil and gas, electricity production, automotive transport, air transport, residential real estate, commercial real estate, steel, cement, aluminum, agriculture. The targets are expressed in absolute value for fossil fuel-related sectors, and in physical intensity for the GHG emissions of other sectors.

For financing activities, "financed emissions" consist in attributing a portion of the borrowers' GHG emissions to the credit exposures. In the fossil fuel sector, the target - expressed in absolute value - aims to steer a reduction in the credit exposures over the long term, as well as a reduction in the financed emissions. The intensity targets are based on GHG emissions at the level of each physical unit produced by the corporate customer (e.g. metric tons of cement, metric tons of iron, kWh, km traveled, etc.). An intensity target aims to manage the decarbonization of the most carbon-intensive financed activities and to support the Group's customers in their efforts to improve energy efficiency and transition to less carbon-intensive energies.

To define its targets by sector, Groupe BPCE generally uses as a reference scenario the Net Zero Emissions by 2050 scenario (NZE 2050 scenario) published by the International Energy Agency in 2021. This scenario plots sector trajectories compatible with limiting global warming to +1.5°C, in accordance with the most ambitious objectives of the Paris Agreement. When this scenario is not sufficiently precise and granular to be reconciled with the composition of certain sector portfolios, the Group may have to use alternative scenarios by ensuring the quality of the organizations that produce them and their compatibility with the +1.5°C target without or with limited overshoot of the global carbon budget.

The science-based decarbonization targets are used to identify the decarbonization levers relevant to each sector and to engage customers in a discussion on their transition. The Group relies on its regional presence and cooperative model to offer its customers financing adapted to their transition needs and compatible with the targets that the Group has set for itself.

The scientific scenarios are most often expressed in terms of emission intensity. They are also used by the vast majority of the customers that Groupe BPCE finances in these sectors. This shared use of the scientific reference base optimizes the dialogue between the bank and its customer.

In addition, the Group's own footprint is measured and governed by an emission reduction target.

## INSURANCE ACTIVITIES

BPCE Assurances has developed a proactive policy in terms of responsible investment. Since 2018, BPCE Assurances has set itself the goal of aligning its investment policy with a trajectory compatible with the objectives of the Paris Agreement. BPCE Assurances has stepped up this ambition by joining the NZAOA alliance in 2022. The members of this alliance commit to evolve their investment portfolios to zero net greenhouse gas emissions by 2050, in line with a maximum temperature increase of +1.5°C above pre-industrial temperatures, taking into account the best

scientific knowledge. Thus, BPCE Assurances aims for an investment portfolio temperature of +1.5°C by 2030, with a first waypoint of +2.0°C at the end of 2024.

In doing so, BPCE Assurances has changed its investment policies and the proportion of assets that contribute significantly to global warming is constantly decreasing in its investment portfolio. This action will be continued in the coming years with the aim of working towards the objective set.

[1] See Section 2.2.4.1 "Targets for aligning portfolios with the objectives of the Paris Agreement".

## ASSET MANAGEMENT ACTIVITIES

As the business model comprises different asset management companies, Natixis IM has not yet formalized a transition plan encompassing the objectives and ambitions in a consolidated manner. However, some European asset management companies are demonstrating an ambition in terms of climate transition with specific objectives adapted to their own challenges and those of their customers. Thus, the various ambitions of asset management companies in terms of transition can be reflected in decarbonization objectives or alignment with the objectives of the Paris Agreement, either at the level of funds and mandates, or at the level of the management company's portfolio.

The European asset management companies have defined decarbonization objectives or alignment with the objectives of the Paris Agreement for their portfolios, which are as follows:

- Asset management companies committed to contributing to global carbon neutrality as part of an international alliance: two asset management companies (DNCA Finance and Mirova) are committed to a Net Zero approach as part of the NZAM initiative at the end of December 2024.
- Asset management companies aiming for decarbonization or portfolio management aligned with the objectives of the Paris Agreement without joining a specific external framework: five asset management companies (Ostrum AM, Vega IM, Dorval AM, AEW and Vauban IP) manage their assets to align with the objectives of the Paris Agreement or have targets to reduce their footprint.

Other Natixis IM European asset management companies have defined approaches specific to their type of asset.

## OWN FOOTPRINT

As an extension of an approach to reducing its own footprint, already underway for several years, Groupe BPCE has determined a GHG emission reduction trajectory marked by milestones in 2026 and 2030. A detailed strategy and a pragmatic action plan have been defined. Actions after 2030 will be progressively identified to continue the efforts to reduce its footprint by 2050. The decarbonization trajectory for the own footprint, established proactively and adapted as far as possible to operational

implementation constraints, has not been compared to a scientific scenario aimed at limiting global warming to 1.5°C. The strategic KPI validated and backed by the VISION 2030 strategic project concerns the reduction of 6% of Groupe BPCE's own footprint by 2026 (on a 2023 basis). This KPI is part of a target of -20% by 2030 (on a 2023 basis), covering Scopes 1, 2 and 3 (excluding category 15).

### 2.2.3.1.2 Description of decarbonization levers and key actions [E1-16 (b)]

Groupe BPCE is mobilized to make impact accessible to all economic players in the society and in all its areas of expertise, while accelerating its own transformation. Each business line incorporates all aspects of sustainability into its business model and uses the decarbonization levers and key actions within its scope to support its customers. In this context, the Group has identified the following levers:

- the energy renovation of the residential real estate sector, with solutions to preserve the value of the real estate portfolio of its individual customers and permanently reduce the greenhouse gas emissions;
- the transition to low-carbon mobility, with solutions to support its customers on this major mitigation and adaptation issue;
- deliver local advisory for the transition of its corporate customers' business models through dialog devoted to this subject and by providing expertise to incorporate ESG issues into the analysis of business models according to their size and business sector;
- support for changes in the energy mix and support for the reduction of the use of carbon-based energies;
- managing the decarbonization trajectories of the sectors with the highest carbon emissions, both for financing activities and investment activities in the insurance sector and for asset management activities;
- reducing the carbon emissions from its own footprint.

Groupe BPCE mobilizes these levers to position itself alongside all its customers and offer them key actions *via* local and adapted solutions, in all regions, nationally and internationally. The Group pragmatically:

- supports individual customers with a complete range of home energy renovation solutions;
- supports individual and corporate customers in soft mobility;

- proposes "ESG dialogs" to its BtoB customers to support the transformation of business models by integrating climate change issues and the implementation of transition plans which contribute to achieving the objectives of the Paris Agreement;
- adapts its support to the various economic sectors thanks to cutting-edge sectoral expertise, particularly in energy and transport infrastructure;
- offers customers:
  - a range of responsible savings and investments: sustainable development savings accounts, funds with a sustainable investment objective,
  - an array of sustainable financing products such as green loans, social loans or integrating quantitative sustainability objectives (sustainability-linked) into their financial structures,
  - sustainable investment solutions;
- capitalizes on its local roots and in-depth understanding of the specificities of the regions and their challenges.

In terms of investments, BPCE Assurances uses a selective investment policy as a lever. This is reflected in a key action, which is to devote at least 16% of its investment flows to green assets each year. A significant portion of the investments (51% of flows in 2023 and 42% in 2024) is made in assets such as green bonds, Article 9 funds according to the SFDR, and divestments aligned with the European taxonomy. These investments aim to align the asset portfolio with a temperature trajectory compatible with the objectives of the Paris Agreement, with a first waypoint of +2.0°C at the end of 2024. As a result, the proportion of assets that contribute significantly to global warming is steadily decreasing in BPCE Assurances' investment portfolio. This effort will be continued in the coming years with the aim of moving towards an alignment with a scientific scenario of +1.5°C by 2030. BPCE Assurances had set itself the goal of no longer holding securities rated "Negative" by Mirova by the end of 2024 (target achieved), as the majority of the underlying issuers are related to the fossil fuel sector.

In terms of asset management on behalf of third parties and in order to support customers in their transition to a low-carbon economy, several Natixis IM asset management companies have developed products, funds and mandates dedicated to sustainable investment with decarbonization objectives. In addition to these dedicated investments, all Natixis IM European asset management companies include sustainability criteria in their investment decision-making process, using different methodologies adapted to the size, diversity of activities and asset classes. On the subject of climate change mitigation and adaptation, several commitment levers are common to several asset management companies<sup>(1)</sup> including, for example:

- encourage transparency through the publication of the company's environmental performance and its exposure to climate risks;
- encourage the implementation of a climate strategy and reduction targets in line with the objectives of the Paris Agreement;
- encourage better management of climate risks;
- encourage commitment to an energy transition.

For most of Groupe BPCE's activities, the implementation of these decarbonization levers is monitored as part of the strategic

plan by means of indicators corresponding to objectives to be achieved in 2026. These include:

- supporting the evolution of the energy mix in the territories and regions of the world where the Group operates by contributing to the reduction in the use of carbon-based energies through a 15% increase in new financing for renewable energy projects;
- management of the action plan to decarbonize the financing of the sectors that emit the most greenhouse gases via the implementation of absolute or intensity targets for 2030: oil and gas, electricity production, automotive, air transport, steel, cement, aluminum and commercial real estate.

More general indicators reflect the objectives relating to the support and awareness-raising actions deployed for its customers:

- ESG dialogs covering 100% of the active corporate customers (this dedicated exchange has been rolled out since the beginning of 2023 to already more than 10,000 corporate customers);
- a number of unique visits to the digital module<sup>(2)</sup> "Sustainable Advisory and Solutions": 5.2 million Banque Populaire and Caisse d'Epargne customers at the end of 2024.

### 2.2.3.1.3 Description and quantification of the company's investments and financing to support the implementation of the transition plan [E1-1-16 (c)]

This data point is not relevant to Groupe BPCE's financing, insurance and asset management activities. In addition, the following data point relating to the description of the way in which the transition plan is integrated into the commercial strategy, describes in detail the products implemented to support its customers in order to support the implementation of the transition plan.

With regard to its own footprint, significant investments have been made in a limited scope related to BPCE SA as part of the Real Estate Master Plan implemented between the beginning of 2020 and the end of 2023. This program has a positive and

significant impact in terms of reducing the own footprint. It required investments of €450 million notably including flexible and homogeneous workspaces, an increased range of services and services appreciated by users and the support of technology for employees or for smart management of the real estate portfolio.

In concrete terms, this program has had a major effect in terms of reducing greenhouse gas emissions and energy consumption: the estimated annual reduction of the carbon footprint is around 11,000 metric tons of CO<sub>2</sub>eq and the reduction in energy consumption is around 36%.

### 2.2.3.1.4 Qualitative assessment of the locked-in potential GHG emissions [E1-1-16 (d)]

This data point is not relevant for Groupe BPCE. There are no plans to publish qualitative information on the locked-in potential GHG emissions. In the context of a banking activities, the locked-in emissions are not significant given the nature of the assets being operated.

### 2.2.3.1.5 Explanation of any objectives or plans that the company has set to align its economic activities [E1-1-16 (e)]

This data point is not relevant to Groupe BPCE's activities.

### 2.2.3.1.6 Publication of investment amounts related to fossil fuel activities [E1-1-16 (f)]

This data point is not relevant to Groupe BPCE's activities. In addition, the objectives for reducing greenhouse gas emissions, the monitoring of these objectives as well as the action plans put in place by the Group for the financing activities are detailed in this report.

### 2.2.3.1.7 Exclusion or not of the "Paris Agreement" benchmarks [E1-1-16 (g)]

Groupe BPCE is not excluded from the "Paris Agreement" benchmarks. In addition, this data point is not applicable to financial institutions according to the Implementation Guidance [draft] Transition Plan for Climate Change Mitigation source EFRAG approved by the TEG on January 23, 2025.

[1] DNCA Finance, Dorval AM, Ecofi, Mirova, Thematics AM, Ossiam, Ostrum AM, Vega IM.

[2] The scope for reporting this indicator includes the Banque Populaire and Caisse d'Epargne networks. This indicator calculates the cumulative number of unique visitors who have consulted the "Sustainable Advisory and Solutions" section of the Banque Populaire and Caisse d'Epargne networks mobile app since 2023. The basis for calculating this indicator is made up of the almost actual data reported by the Caisse d'Epargne and Banque Populaire scopes of digital navigation traced by the tool Adobe Analytics.

### 2.2.3.1.8 Description of how the transition plan is integrated into the business strategy and financial planning

## INTEGRATION OF THE TRANSITION PLAN INTO THE COMMERCIAL STRATEGY OF THE ACTIVITIES

Faced with the climate emergency, the Group's ambition is to rapidly implement and deploy measures to mitigate and adapt to the already tangible environmental and socioeconomic impacts of climate change. The "Impact Inside" approach enables the business lines to integrate levers and actions that contribute to the transition plan into their commercial strategy. It is broken down by main customer segments, based on the Group's decentralized cooperative model.

The transition plan integrated into the commercial strategy is based on a certain number of commercial levers which make it possible, by customer segment, to develop the following actions:

### Supporting individual customers

#### In energy renovation

Groupe BPCE is a major player in the housing market: in terms of residential real estate, it finances one in four housing units in France. Supporting the reduction of greenhouse gas emissions from individual customers is closely linked to improving the energy performance of homes, an essential lever for improving quality of life and preserving the value of the portfolio.

In 2023, the residential real estate sector generated 36.4 MtCO<sub>2</sub>eq (source: *Secten 2024 report*), i.e. 9.7% of total greenhouse gas emissions in France.

To make the Impact accessible to all, a massive customer awareness campaign was organized. To promote energy efficiency renovation, Groupe BPCE offers financing solutions and mobilizes its role as an operator, trusted third party, as well as its partnerships:

- by offering its customers the use of the "Sustainable Advisory and Solutions" application on the digital applications available to customers. It enables customers to calculate their own carbon footprint, benefit from advice and support for their energy renovation and transition to low-carbon mobility, and select green savings solutions. As mentioned above, the application has recorded 5.2 million unique visitors since its launch;
- by supporting its customers with real estate projects, for individual housing and condominiums. Several services and pathways are offered:
  - energy assessment,
  - search for subsidies,
  - works performance guarantee,
  - financing adapted to each situation (dedicated eco PTZ loan, Impact loan, prefinancing of subsidies, dedicated collective loan), partnerships established or being tested with renovation specialists (Cozynergy, IzibyEDF and Leroy Merlin, etc.);
- by increasing the annual amount of financing for the energy renovation of buildings for individual customers. The action plan implemented by all of the Group's establishments will increase the annual amount of financing for energy renovation work to €1 billion per year by 2026.

In addition, as part of the multi-risk home insurance offering, in order to promote the climate transition in the housing sector by reducing greenhouse gas emissions from individual customers, BPCE Assurances provides insurance for sustainable construction and for renewable energy production equipment.

#### In soft mobility

In 2023, the light vehicle (passenger and utility) sector generated 87 MtCO<sub>2</sub>eq, representing 23.3% of the total greenhouse gas emissions in France (source: *Secten 2024 report*).

The transition to low-carbon mobility is one of the major challenges of the energy transition.

Groupe BPCE has adapted its commercial strategy and offers to support its individual customers when adapting to this new context:

- a "Clean vehicle" loan was developed to identify and meet the financing needs of "clean" vehicles, i.e., according to the regulations, electric and plug-in hybrid vehicles emitting less than 50g of CO<sub>2</sub> per km;
- a consumer loan offering called "Green Loan" for the purchase of an electric vehicle is offered by BPCE Financement;
- Banque Populaire and Caisse d'Épargne car insurance offers, dedicated to "clean" vehicles (hybrid, electric, LPG) with a specific rate advantage for electric vehicles (up to -10%) and to short-distance drivers (up to -10% if they drive less than 8,000 kilometers) have been launched;
- insurance offers have been rolled out to support the acquisition of "soft mobility" means (scooters, electric bikes, gyropods, etc.) as part of the multi-risk home insurance contract;
- lastly, the "Sustainable Advisory and Solutions" application offers comprehensive support: understanding regulatory changes, identifying Low Emission Zones, calculating the vehicle's Crit'Air sticker, estimating the carbon impact of travel using the ADEME simulator, identifying grants and subsidies to encourage the adoption of lower-emission mobility, finding a clean vehicle for purchase or lease, financing and insuring these vehicles.

#### Post-claim remediation

When managing claims, BPCE Assurances is developing an eco-responsible approach.

In the event of a car accident, this means priority implementation of repairs using re-used parts rather than new materials, thus allowing, thanks to the extension of the product life cycle, a reduction in greenhouse gas emissions. To this end, BPCE Assurances has been coordinating and involving its networks of service providers (garages and experts) for several years on the basis of detailed management indicators.

For home claims, work is being carried out to implement "low-carbon" repair processes in order to promote the use of materials from the circular economy and products made from bio-sourced raw materials.

### Via dedicated savings products

By offering savings products whose resources will be 100% allocated to financing local loans for the ecological transition, the two networks Banque Populaire and Caisse d'Épargne are enabling all their individual customers to play an effective role in this common objective. The system for earmarking "Green" bank savings products makes it possible to justify the allocation of funds collected to the CODEVair, CSL Vert, CATVair and CATVert products, as well as the 10% of funds collected on the *Livret de Développement Durable (LDD)* passbook savings accounts to financing universes contributing to the energy and environmental transition: energy renovation, low-carbon mobility, business transition, renewable energies, property construction to the latest energy performance standards.

### Supporting the needs of legal entity customers in the evolution of business models

Groupe BPCE supports the transition of the business models of companies, ranging from SMEs to large international companies, by measuring the greenhouse gas emissions footprint of its financing and by developing a non-financial analysis through the establishment of ongoing dialog with its customers on environmental issues.

In other words, and in more detail, this involves:

- establishing a link between credit and greenhouse gas emissions, by assessing the possible climate impacts of the financing activities. To this end, tools and methods used as part of the Net Zero Banking Alliance (NZBA) guidelines and relating to the analysis of climate performance *via* the colorization of sectors and counterparties (Green Weighting Factor) have been deployed;

#### Transition Potential Assessment Tool for companies and issuers

For its Corporate & Investment Banking activities, in 2024, Natixis CIB launched the development of a Transition Plan Assessment (TPA) tool to assess the transition potential of its corporate customers. This tool will notably make it possible to analyze the transition plans published by customers, in respect of regulations or proactive commitments, as well as the

- engaging in ongoing dialog with customers on these issues in order to support them on environmental transition issues and integrate the risks and opportunities related to this transition into the analysis, according to their size and business sector. This action is based on "ESG dialogs", the use of non-financial reports and data, as well as the acquisition of data, facilitated by the gradual application of the CSRD.

The transition plan provides for support for corporate and investor customers by adapting the commercial strategy of the Group's various business lines in four areas: analysis of customer transition plans, adaptation of the product offering for corporate customers, adaptation of the product offering for investor customers, and the transition to low-carbon solutions.

### A commercial strategy that builds on the analysis of transition plans

The reduction of Groupe BPCE's financed emissions is essentially based on that of its customers. The commercial strategy is enhanced by the development of detailed analysis tools for the trajectories and transition plans of the Group's customers. To date, this analysis focuses on the trajectories implemented and published by the largest customers. For all customers, specific tools are gradually being rolled out, taking into account their size and business sector.

The actions of the Group's customers are assessed as part of regular discussions to identify risks related to climate change and support opportunities in terms of financing and investment solutions. Particular attention is paid to the action plans implemented, and their achievements, to reduce the intensity and absolute emissions of greenhouse gases in relation to the specific scientific decarbonization curve of the sector in question.

governance and means actually implemented to achieve their transition objectives. The tool places particular emphasis on forward-looking factors that are not yet reflected in the GWF assessment. The assessment of customer transition plans is based on four areas: ambition, past and present performance, the levers and actions implemented, and operational management. The result of each assessment will be evidenced by a transition rating that will be used in the loan granting process, as is currently the GWF (color) rating.

With regard to asset management on behalf of third parties, several Natixis IM asset management companies assess transition potential among other sustainability criteria integrated into their investment decision-making process. This requires the review of the business model adaptation strategy through the assessment of transition plans for each issuer. Certain European asset management companies<sup>[1]</sup> already have or are in the process of implementing an internal methodology for analyzing the transition plans of portfolio companies.

### A commercial strategy based on a range of products adapted to the transition context for corporate customers

#### FOR RETAIL BANKING

To support its customers in the environmental transition, and in particular the climate transition, an organization to better embody the Green Business and lead a community of local Green Business advisors and experts has been set up within each institution of the Banque Populaire and Caisse d'Épargne networks. This organization makes it possible to concentrate expertise and thus better serve customer companies by offering them products adapted to the various domains of the transition: energy renovation, sustainable mobility, business transition and renewable energies.

[1] DNCA, Thematics AM, Mirova and Ostrum.



As part of supporting corporate customers in their transition and decarbonization approach, the Group will mobilize €5 billion in financing by 2026. The support takes the form of various actions: deployment of the ESG strategic dialog, acceleration of green financing production and ramping up of the marketing of the Impact loan dedicated to SMEs, ISEs and players in the social and solidarity economy. It also relies on the deployment of global solutions bringing together partners including [Naldéo] for energy optimization work, SAMI for the carbon assessment and the development of a decarbonization plan, Économies d'énergies to facilitate the search for subsidies and Opera for the subscription and management of energy contracts.

Organized around financing, consulting and custody at the service of the Group's networks, the Financial Solutions & Expertise division supports its customers in the realization of their projects contributing to the mitigation of global warming. This support is provided *via* a range of adapted products distributed by the networks.

In terms of mobility, several solutions enable corporate customers to reduce the environmental impact of their vehicle fleet by

promoting green alternatives. The latter can be financed through equipment leases or long-term leases (including car policy advice, eco-driving services, connected fleet management and car-sharing). In terms of energy renovation, companies are supported in the search for energy performance of their buildings and professional equipment as part of a partnership with Altérea, an energy and building engineer, and a complete range of rental solutions for movable property and real estate assets (BPCE Lease).

In addition, BPCE Solutions Immobilières offers tertiary expertise dedicated to offices based on a building's environmental performance assessment grid.

To ensure quality support for customers, the skills of the sales teams are being strengthened (training of the business lines in sustainability issues, activities). The latter maintain a regular dialog with their customers on specific sectoral issues, in particular through the organization of awareness-raising webinars and networking with partners.

### Lease Impact Program

In a context of economic and regulatory paradigm shifts and rising energy costs, leasing represents significant development potential in the service of the environmental transition. The Lease Impact program is part of this framework, covering three areas of need:

- the production of energy for self-consumption and/or sale for the electricity grid;
- energy efficiency with the aim of reducing consumption and enhancing the value of the real estate portfolio;
- green mobility to reduce the environmental impact of the vehicle fleet by promoting green alternatives.

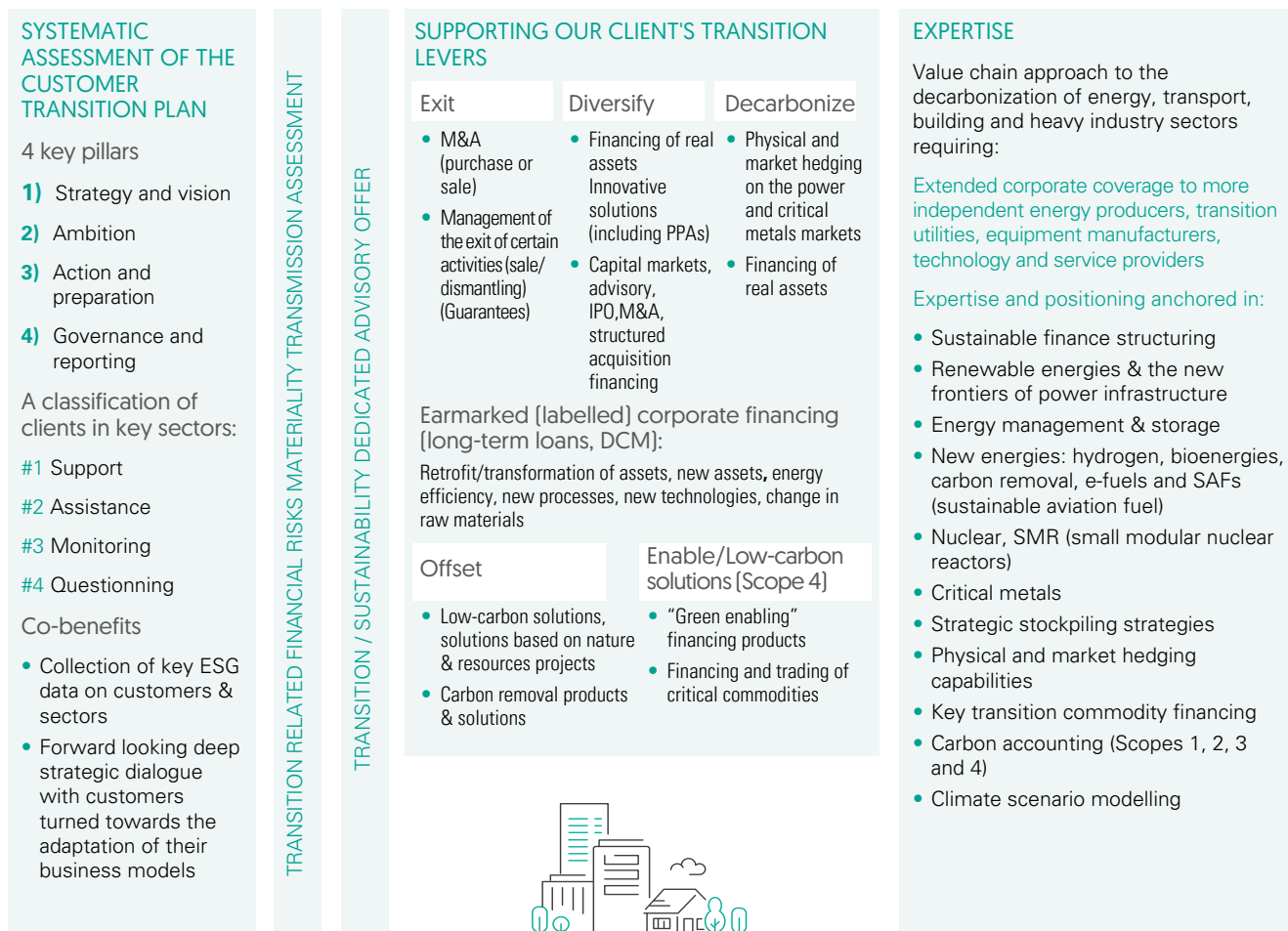
To meet these challenges and support the growing share of these three areas, this program relies on multiple financing solutions, adapted to customer needs (equipment leasing, real estate leasing, long-term leasing, IT operational leasing, project financing).

### FOR NATIXIS CIB

Natixis CIB supports its customers with financing, advisory and investment solutions in the various stages of their ecological and energy transition. It acts both as an advisor and as a preferred financial partner for:

- the withdrawal or divestment of activities that emit the most greenhouse gases;
- diversification of their activities to increase the share of those that are sustainable and/or that contribute to the transition (avoided emissions);
- intrinsic decarbonization of industrial supply and production processes;
- carbon sequestration (nature-based solutions or technological storage solutions) after prioritizing the application of the previous decarbonization levers;
- governance and consideration of transition issues in their management.

## SUPPORT CUSTOMER TRANSITION



### A commercial strategy based on a range of products adapted to the transition context for investor customers

In order to support investor customers in their objectives of contributing to the transition to a low-carbon economy, Natixis IM's management companies have developed products (funds and mandates), with decarbonization objectives or aligned with the objectives of the Paris Agreement. In addition, some of the products managed by Natixis IM's asset management companies invest in solutions that make a positive contribution to climate mitigation or adaptation, both on the listed markets, through green bonds for example, and on the private markets.

Various European asset management companies of Natixis IM have also developed analytical tools to support clients in the diagnosis of their portfolio and the calculation of climate or transition-related metrics.

### A commercial strategy based on a transition towards low-carbon solutions

With regard to Natixis CIB, the commercial strategy implemented is taking the form of a gradual reallocation of portfolios. The Green Weighting Factor shows the gradual transition of the financing

portfolio initiated since 2018. Financing exposures on the highest-emitting counterparties are reduced in favor of exposures to the lowest-emitting counterparties in each sector. This strategy is also reflected in a significant and continuous increase in the exposures related to the financing of renewable and carbon-free energies in the balance sheet compared to the weight of the financing granted to assets or counterparties in the fossil fuel sector.

As a result, Natixis CIB has sharply reduced its exposure to fossil fuels since 2017 by (i) reducing its exposure to the sub-sectors that have the greatest impact on the environment (oil and gas production/exploration, exclusively oil projects, exclusion from the financing of shale gas), (ii) reallocating part of the exposures to gas assets considered as an important driver of the transition and to short-term energy security and (iii) streamlining its energy trading financing portfolio (Commodity Trade Finance Energy) by financing fewer petroleum products and more gas and agricultural raw materials and/or transition metals. This strategy is based on a robust organization and dedicated, cross-functional teams of experts from all business lines, in particular the Green & Sustainable Hub (GSH) and the Energy Transition & Natural Resources (ETNR) team.



ETNR, symbol of the transition of Corporate & Investment Banking towards a low-carbon economy

The creation of the Energy Transition & Natural Resources activity in 2020 symbolizes the transformation of Natixis CIB's activities in favor of low-carbon energy production. This activity supports the development of companies in new sectors that are essential to the energy transition, such as hydrogen, bioenergies, sustainable fuels for aviation and carbon capture technologies. In these fast-growing but still developing segments, Energy Transition & Natural Resources, alongside Natixis CIB's business line teams (advisory, M&A, financing,

capital markets, hedging) and Retail Banking, through their support to medium-sized companies, supports its customers in their development by helping them to raise capital on the markets and finance projects to promote decarbonization. In addition, the team has deployed dedicated strategies for batteries and critical metals, essential for renewable energy production and storage, and for carbon-free transport. By way of illustration, Natixis CIB supports the development of the midstream value chain and manufacturers in the sector in Europe by financing gigafactories, the production of green hydrogen and low-carbon energy reserve infrastructures.

FINANCING OF RENEWABLE ENERGIES

Groupe BPCE finances low-carbon energy production assets through the financing of renewable energy projects of all sizes thanks to the involvement of its various entities. Groupe BPCE's renewable energy asset outstandings amounted to €16.2 billion in 2024. The portfolio is focused on solar (44%) and wind (37%).

The VISION 2030 strategic project provides for an increase in new renewable energy financing of around 15% over a three-year period by 2026.

The complementarity between the Group's entities makes it possible to support companies of different sizes and projects at both regional and national levels.

Natixis CIB positions itself as a leader in international renewable energy financing, with an arranged amount of €3.05 billion in 2024 (having enabled the development of 7,000 MW of installed capacity), an increase of +19% compared to 2020. The annual fixed amount for the financing of renewable energy projects has

doubled since 2020 and Natixis CIB is positioned as the third largest arranger in the world(1). In 2024, renewable energy accounted for 91% of new infrastructure financing by the Corporate & Investment Banking division in the power generation sector.

At the national level, for large-scale transactions, the combination of the expertise and resources of Natixis CIB, BPCE Energéco, local Caisses d'Épargne and the Caisse d'Épargne Energy Transition Debt Fund are key to arranging this type of financing.

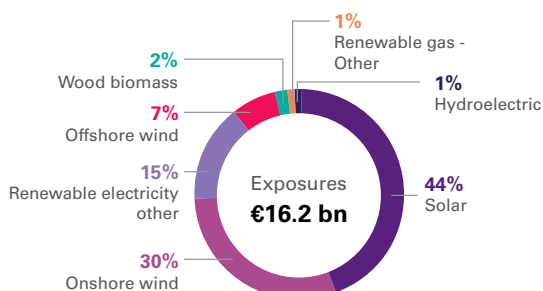
For intermediate-sized projects at the regional level, Groupe BPCE also relies on the Banques Populaires, the Caisses d'Épargne, Crédit Coopératif, Banque Palatine and the expertise of BPCE Energéco, a subsidiary of BPCE Lease, within BPCE's Financial Solutions & Expertise division. Dedicated to the financing of renewable energies since 2003, this entity supports the Group's various institutions in the financing of renewable energy projects in their region.

Renewable energy exposures(2)

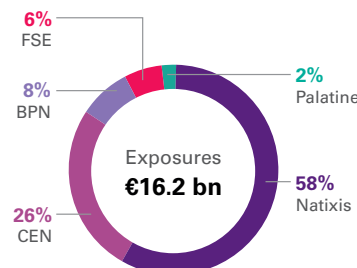
Table with 4 columns: Year, 2024, 2023, 2022. Row 1: Total Group RE exposure (in billions of euros) with values 16.2, 14.3(3), 12.2.

[1] IJGlobal 2024 - #3 RENEWABLES Project Finance MLA - in value
[2] Scope of the metric: Banque Populaire and Caisse d'Épargne networks, Natixis CIB, Banque Palatine, BPCE Energéco (subsidiary of BPCE Lease, FSE division). Metric calculated on the basis of on-balance sheet and off-balance sheet renewable energy financing outstandings.
[3] Data recalculated following quality improvement work carried out in 2024.

## Exposure of renewable energies by sub-sector



## Renewable energy exposure by Groupe BPCE entity



## FINANCIAL PLANNING OF THE TRANSITION PLAN

The implementation of the transition plan is supported by financial planning.

With regard to supporting individual customers in their energy renovation work, the action plan implemented by all of the Group's establishments will make it possible to increase the annual amount of financing for energy renovation work to reach €1 billion per year by 2026.

To support corporate customers in their transition and decarbonization approach, the Group will mobilize €5 billion in financing by 2026.

With regard to the Group's decarbonization trajectories, financial planning was based on the following two elements:

- a methodology for calculating trajectories that establishes a link between the evolution of the outstanding financing in the value chain in question and the greenhouse gas emissions of the counterparties in the sector concerned;
- a change in the nature and amounts of the outstanding financing by sector, depending on their distribution between the assets or counterparties that promote the achievement of the objectives set for 2030 and those that deviate from them.

By way of illustration, in the fossil fuel sector (oil and gas) the trajectory is based on a reduction of the outstanding financing,

whereas in the electricity production sector the trajectory is based on a planned increase of the financing for renewable energy projects. This increase is managed thanks to the implementation of a new production growth indicator (+15% by 2026).

In addition, the increase in new financing production relating to assets or counterparties that have begun their transition makes it possible to promote the structuring of bond issues dedicated to the theme of sustainable development. The refinancing program provides liquidity, necessary for the financing resources provided for in the context of financial planning.

This financial planning is periodically reviewed by steering committees by business line or by theme. The achievements of the business lines according to the levers and actions identified are then analyzed. The effectiveness of these actions in relation to the ambition is subject to a gap analysis. The results of this analysis are presented to the Environmental Transition Strategy Committee, which will decide on any actions to be implemented so that the transition plan complies with the forecast made as part of the implementation of the above-mentioned commercial strategy.

Concerning more specifically the sector decarbonization trajectories, a summary of the progress made (as set out below in the context of the disclosure requirement - Section 2.2.3.1.9) is presented to the Environmental Transition Strategy Committee.

### 2.2.3.1.9 APPROVAL OF THE TRANSITION PLAN BY THE ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES OF THE COMPANY [E1-1-16 (i)]

In accordance with the governance system described in Section 1.2.2.1, and as part of the overall process for approval of the CSRD by the administrative, management and supervisory bodies of Groupe BPCE, Groupe BPCE's transition plan was approved on March 11, 2025 by the Management Board, then by the Supervisory Board, which took note of it.

Thus, the following guidelines were presented. They are part of the transition plan:

- support for all customers in their environmental transition;
- alignment of its financing, investment and insurance portfolios with trajectories compatible with the objectives of the Paris Agreement;

- decarbonization trajectories proposed by European asset management companies to their investor customers;
- extension of the sustainable refinancing strategy in order to have the resources necessary to achieve its objectives;
- accelerated reduction of its own footprint;

Firstly, the proposed decarbonization trajectories (own footprint and financed emissions) and the methodologies used for their development are presented to the Environmental Transition Strategy committee. Chaired by the Chairman of Groupe BPCE's Management Board, this body brings together the members of the Executive Management Committee of BPCE, whose business lines will be responsible for implementing the action plans relating to the proposed trajectories, members of the Executive Committee and Group experts.

Moreover, and in the context of its cooperative model, the Impact Committee supports the work of defining and implementing the Impact strategy by liaising with the managers of Groupe BPCE's institutions. The Impact Committee manages the entire Impact dimension of the strategic plan, including the elements of the Group's transition plan. It makes it possible to focus Groupe BPCE's Impact program on all its dimensions and to share with

the executive managers of Groupe BPCE's retail banking activity an overall vision of the projects and deliverables for all business lines. It thus ensures the best chance of success for the operational integration of the program to reduce the greenhouse gases, and the success of the commercial action plans at the level of the institutions, which are part of Groupe BPCE's transition plan.

#### 2.2.3.1.10 DESCRIPTION OF THE PROGRESS MADE BY THE COMPANY IN IMPLEMENTING THE TRANSITION PLAN [E1-1-16 (j)]

### OWN FOOTPRINT

Groupe BPCE has set itself the target of reducing the GHG emissions related to its own footprint by 15% over the 2019-2024 period. This involves going from 640 ktCO<sub>2</sub>e emitted in 2019 to 544 ktCO<sub>2</sub>e emitted in 2024, calculated using the BEGES V5 method. This objective was achieved in 2024.

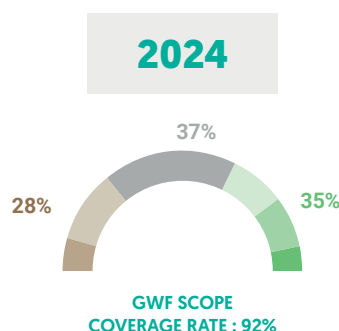
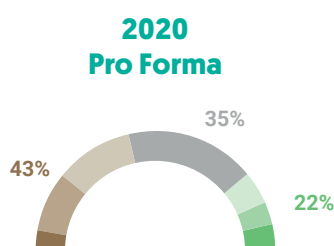
### FINANCED EMISSIONS

For more than 20 years, as part of its full-service bank model, the Group has laid the foundations for its transition planning both locally and internationally. As a long-standing player in transition support, the Group places societal ambitions and regional development at the heart of the purpose of its Retail Banking brands.

Groupe BPCE is committed to financing the energy transition and decarbonizing the most emitting sectors.

Over the 2020-2024 period, the active management of Natixis CIB's exposures shows tangible results with a significant change in the breakdown of exposures of the Green Weighting Factor.

### CHANGE IN NATIXIS CIB'S COLOR MIX BETWEEN 2020 AND 2024 (BASE 100)



The progress made thanks to the actions undertaken by Natixis CIB is based on the development of dedicated skills and expertise, as well as on continuous operational management in line with its strategic ambition thanks to key resources and tools: GWF, TPA, sustainable finance product offering and transition consulting. All the transition momentum drivers are thus activated and managed: customer mix/sector mix, pace of customer transition, sustainable finance product/service offering, active management of the financing portfolio.

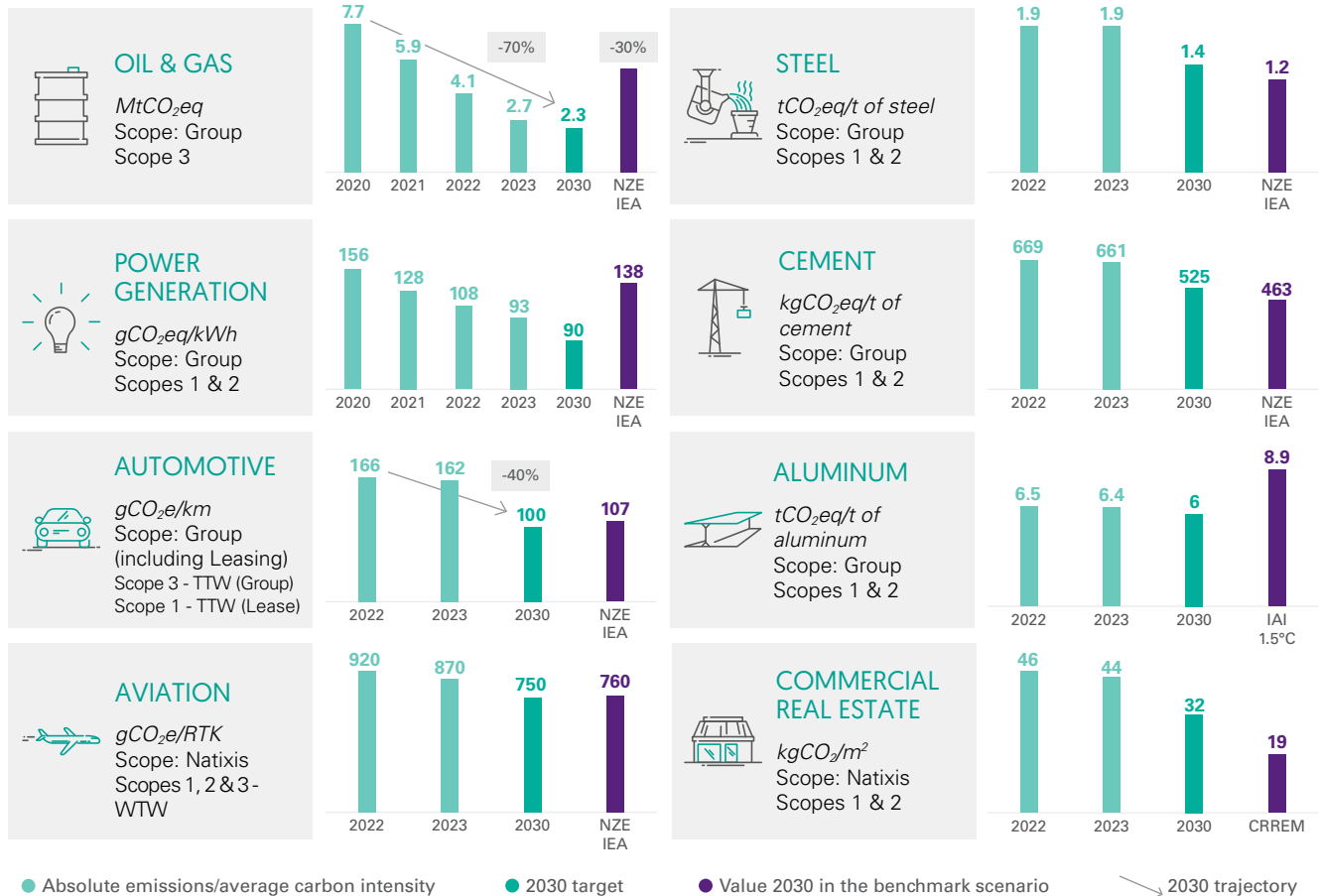
Natixis CIB's action plan is defined and measured using the proprietary Green Weighting Factor (GWF) tool, which makes it possible to implement the following operational levers:

- refinancing of existing customers rated "medium green/dark green";
- financing of customers in transition (and whose GWF rating may improve as a result);
- high selectivity for new "brown" rated financing;
- drastic reduction in financing for customers with very limited transition potential.

With regard to the progress made in the context of sector trajectories, the periodic publication of the decarbonization trajectories of the highest-emitting sectors makes it possible to note the effectiveness of the action plans and the gradual adaptation of its business model. Groupe BPCE manages the decarbonization trajectories of the economic sectors that emit the most greenhouse gases, with targets expressed in terms of emission intensities or absolute values. From one year to the next, the actual CO<sub>2</sub>eq emissions calculated in intensity or in absolute emissions make it possible to ensure the adequacy of the trajectories of the portfolios in relation to the targets and to initiate, if necessary, corrective actions. These actions can be of different kinds and include, among other things, an intensification of the dialog with customers in the sectors concerned or strengthening of the range of products and services aimed at supporting our customers' transition.

It should be noted that due to limitations concerning the availability of customer data, changes in methods, regulatory changes that may be divergent internationally, the management of sector trajectories must be interpreted with caution. In order to improve the quality of this management, at the end of 2024 Groupe BPCE launched an action plan to further industrialize the production of sector trajectory management metrics.

## • Summary of sectoral trajectories and objectives



- Note: "Value 2030 in the benchmark scenario": for the cement, steel and aluminum sectors, the value of the benchmark scenario includes a Scope 1 trajectory specific to the sector and for Scope 2, an extrapolation based on the trajectory of the electricity generation sector. For the commercial real estate sector, the value of the benchmark scenario takes into account the breakdown of the portfolio by geographical area and type of asset. For oil and gas, the level of 5.4 MtCO<sub>2</sub>e corresponds to the application of the -30% GHG rate of the scenario to the Group's 2020 reference base.

### Oil and gas sector

Groupe BPCE reduced its financed carbon emissions by nearly 65% between 2020 and 2023, from 7.7 MtCO<sub>2</sub>e to 2.4 MtCO<sub>2</sub>e on the financing recognized in the balance sheet. Also including off-balance sheet financing, this corresponds to a reduction of 13.7 MtCO<sub>2</sub>e to 6 MtCO<sub>2</sub>e, i.e. a decrease of nearly 56%.

The sharp reduction in these exposures enable Groupe BPCE to rapidly advance its trajectory in this sector by 2030. While the carbon footprint and these exposures related to fossil fuels m over time depending on market conditions, regular and precise management, favored by the Green Weighting Factor, aims to strengthen these trends and decreases over the long term.

Natixis CIB continued a selective approach in the sector, focusing its commercial efforts and exposures on players with the greatest transition potential, gradually reducing its exposure to oil and favoring positioning in the gas sector, within the limits of the sector policy in force.

### Power generation

At December 31, 2023, the carbon intensity of the electricity production financing portfolio amounted to 93 gCO<sub>2</sub>e/kWh, a decrease compared to 2022 (108 gCO<sub>2</sub>e/kWh).

The portfolio's energy mix has little exposure to fossil fuels, coal, oil and gas compared to the global energy mix for electricity production due to strategic choices in terms of financing the energy sector, but also due to the Group's geographical footprint.

The exposure to thermal coal is negligible (around €350 million), and Groupe BPCE is on track to gradually reduce its credit exposure to thermal coal to zero by 2030 for the European Union and the OECD and by 2040 for the rest of the world.

At the same time, on December 31, 2024, Groupe BPCE finances more than €16 billion in exposure to projects and companies whose main activity is in the renewable energy sector and is positioned as a leading global player<sup>(1)</sup> in terms of financing renewable energies. This closely managed positioning has gradually made it possible to make exposures to projects and companies producing electricity from a low-carbon source, which is predominant in the electricity production sector.

[1] IJGlobal 2024 - #3 RENEWABLES Project Finance MLA - in value. Natixis' Corporate & Investment Banking is a leader in the financing of renewable energy projects internationally. The annual amount arranged for the financing of renewable energy projects has doubled since 2020, and Natixis CIB is now the third largest arranger in the world. In 2024, renewable energies accounted for 91% of Natixis Corporate & Investment Banking's new financing in the power generation sector.

## Automotive sector

In 2023, the average carbon intensity of the automotive portfolio was 162 gCO<sub>2</sub>eq/km. This concerns the financing of Groupe BPCE's automotive manufacturers and the financing of BPCE Lease's leasing activity.

It should be noted that the 2022 reference value presented in the Group's previous communications, of 167 kgCO<sub>2</sub>eq/km, changes only marginally to 166 kgCO<sub>2</sub>eq/km when including the scope of BPCE Lease's leasing activities (equipment leasing contracts, leases with purchase offer, and long-term leases).

The change between 2022 and 2023 is downward. It is explained exclusively by the improvement in the carbon intensity of the leasing activities based on the evolution of the offer on light vehicles and the impact of regulations on the vehicle fleet.

In fact, as part of the French law on mobility, companies and local authorities with a fleet of large light vehicles are required to integrate an increasing share of low-emission vehicles (CO<sub>2</sub> rate ≤50 g/km) every year when all or part of their fleets are renewed. The consequence of this practice is to direct the choice of fleet managers towards electric or rechargeable hybrid models. In addition, there is a motor tax on vehicles for professional use held by companies, which is increasingly penalizing for internal combustion engines.

For the financed car manufacturers, the carbon intensities of vehicles put on the road between 2022 and 2023 are stable overall.

## Steel

In 2023, the scope of the target, initially limited to Natixis CIB, was extended to Groupe BPCE as a whole. The reference value for 2022 is maintained at 1.9 tCO<sub>2</sub>eq/t of steel on a pro forma basis due to the concentration of outstandings on customers in this sector within Natixis CIB.

At December 31, 2023, the carbon intensity of Groupe BPCE's steel producer portfolio remained stable compared to 2022 (1.9 tCO<sub>2</sub>eq/t steel).

In line with the technological transition levers, the implementation of which is expected only at the end of the decade in the reference scenario.

## Cement

In 2023, the scope of the target, initially Natixis CIB, was extended to Groupe BPCE. The reference value for 2022, previously 622 kgCO<sub>2</sub>eq/t cement, is adjusted to 669 kgCO<sub>2</sub>eq/t cement also taking into account the improvement in the quality of the data.

At December 31, 2023, the carbon intensity of Groupe BPCE's financing portfolio for cement producers was 661 kgCO<sub>2</sub>eq/t of cement.

The intensities declined very slightly between 2022 and 2023 in line with the technological transition levers whose implementation is expected only at the end of the decade in the reference scenario.

## Aluminum

At December 31, 2023, the carbon intensity of Groupe BPCE's financing portfolio for aluminum smelters was 6.4 tCO<sub>2</sub>eq/t aluminum. The average intensity is already lower than the global Net Zero 2030 target of the 1.5°C IAI scenario (9 tCO<sub>2</sub>eq/t aluminum), given the geographical location of the portfolio (mainly the Middle East).

Compared to a reference value set in 2022 at 6.5 tCO<sub>2</sub>eq/t of aluminum, the intensities declined very slightly between 2022 and 2023 based on the available information.

## Commercial real estate

The average carbon intensity of the commercial real estate financing portfolio (real estate professionals) decreased between 2022 and 2023, from 46 gCO<sub>2</sub>/m<sup>2</sup>/year to 44 gCO<sub>2</sub>/m<sup>2</sup>/year.

It should be noted that the scope of GHG emissions used for this intensity measurement concerns the use of buildings, *i.e.* mainly their energy consumption. The emissions associated with refrigerants used in buildings are not included (data not available). The measurement used is consistent with the method used to calculate market practices.

## Aviation

The average carbon intensity of the aviation financing portfolio decreased from 920 gCO<sub>2</sub>eq/RTK in 2022 to 870 gCO<sub>2</sub>eq/RTK at December 31, 2023.

The business line supports the sector's decarbonization levers which depend in particular on improving the operational efficiency of its customers (fleet renewal, optimization of the load factor, improvement of air traffic management) and is exploring initial financing projects for sustainable aviation fuel. The positive change in the carbon intensity of the aviation portfolio is mainly due to the growing share of new generation aircraft in the sector's overall financing portfolio.

It should be noted that the carbon metric used covers a scope known as Well to Wake which includes emissions from fuel production, transportation and combustion. In addition, in accordance with market practices and given the absence of scientific consensus on the consideration of an effect, contrails are not included in the emission calculation.

## Residential real estate

The reference value of this sector was established for the 2024 fiscal year according to the exposures at December 31, 2023. Due to the dependence on regulatory and governmental actions (uncertainty about the application of renovation policies and construction plans), Groupe BPCE has not set a specific carbon target for 2030. Nevertheless, action plans have been defined and implemented within the institutions.

The average carbon intensity of the home loan portfolio was around 25 kgCO<sub>2</sub>eq/m<sup>2</sup> at the end of 2023.

## Limitations on GHG measurements and associated targets

The data collected, methods and measurements carried out have not been subject to external verification. The data used regarding the customers are derived primarily from data providers or publications of companies funded by Groupe BPCE. Differences may exist in the measurements of greenhouse gases from data providers (for example, in terms of geography and scope) as well as inaccuracies or incompleteness of the activities covered by our customers in their publications. Estimates will evolve as the quality of available data improves.

Furthermore, the objectives targeted by Groupe BPCE are conditioned by the commitments of its customers and their ability to meet them over time. These objectives also depend on current government policies and the development of low-carbon technologies, which are critical for long-term horizons.

These measurements and targets are based on methodologies known to date and which may change in the future.

## INSURANCE ACTIVITIES

The actions carried out by BPCE Assurances in 2024 made it possible to achieve a significant share of green assets in inventory, standing at 16%, driven by the **significant weighting (42%) of green assets in 2024 investments**, which is well above its minimum commitment of 15%. These investments support sectors that are critical to environmental transition and limiting




climate change, such as renewable energies, building renovation, and sustainable mobility.

Since June 2024, BPCE Assurances' investment portfolio is on track to reach the +2.0°C alignment target. The significant share of green investments allocated in 2023 and 2024 has substantially contributed to the achievement of this objective.

### 2.2.3.2 DISCLOSURE REQUIREMENT RELATED TO ESRs 2 SBM-3 - MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL

Reminder of the material risks and opportunities identified by Groupe BPCE in relation to climate change

#### RISKS

Sub-theme	Sub-sub-theme	Type of IRO	Activity/Value chain	IRO definition
Climate change mitigation and adaptation	Climate change mitigation and adaptation - financing and investments	Risk	Downstream value chain	 Risk of impairment of assets related to investments and financing exposed to physical climate risks (high-risk areas)
		Risk	Downstream value chain	 Risk of financial loss related to financing / investments of counterparties exposed to climate transition risks
		Risk	Downstream value chain	 Reputational risk related to financing and/or investments in companies with a carbon-intensive activity and/or incompatible with the net-zero alignment trajectories

#### 2.2.3.2.1 RESILIENCE OF THE STRATEGY AND THE BUSINESS MODEL

##### RESILIENCE ANALYSIS AT GROUPE BPCE LEVEL

With respect to climate risks, Groupe BPCE analyzes the resilience of its business model across its three activities (financing, insurances, assets management) through climate stress tests as part of the self-assessment process of its capital (ICAAP) and liquidity (ILAAP) with regard to the risks it may face. This analysis takes place each year between October and February, on the basis of assumptions defined upstream in the cycle (between June and November). Over the last three years, the analysis has been enriched in terms of coverage of the scope (increase in the number and severity of physical hazards, increase in transition risk factors, taking into account of a reputational component) that will be the subject of continuous improvement over the coming years. From the point of view of profitability and solvency, the assessments carried out as part of the ICAAP 2023 and ICAAP 2024 processes showed low financial impacts. It should be noted that these stress tests do not cover all of the risks identified as part of the double materiality assessment.

Under ICAAP 2025, Groupe BPCE is continuing to improve its system by integrating three factors:

- a physical flood risk based on the ECB scenario proposed in 2022 extended to the whole of France and the Eurozone, applied to commercial and residential real estate, with more or less significant shocks (up to -30%) depending on the area;

- a transition risk based on the NGFS Net Zero 2050 scenario, which assumes a rapid transition to a low-carbon economy, significantly impacting the functioning of the economy (significant slowdown in growth over several years, with differentiated impacts depending on the sector, moderate increase of inflation and unemployment, sharp decline in equity indices, significant increase in sovereign rates) over the coming years;
- the occurrence of a reputational risk on the Group leading to a customer liquidity leak and a disaffection of certain investors was included, modifying the Group's financing structure and its refinancing cost at the margin.

From a liquidity point of view, the Group's resilience on its banking component (financing) for climate risks was assessed on an *ad hoc* basis regarding physical risks under the 2024 ILAAP. Thus, the impact of a major Seine flood on the financial standing of Groupe BPCE's customers and the behavior of investors was assessed. The impacts of this stress scenario were assessed as moderate with regard to Groupe BPCE's ability to cope with it.

The climate risks thus assessed do not call into question the resilience of Groupe BPCE's business model over the time horizon of its strategic plan.

In addition to the contribution of the insurance activities within Groupe BPCE as a whole, a dedicated analysis is also carried out on the impact of climate risks on this scope.



## SPECIFIC NATURE OF THE BPCE ASSURANCES SYSTEM

The financial risks arising from the exposure of the investment portfolio are assessed using several approaches. Among the work carried out, in 2023 BPCE Assurances took part in the climate stress tests set up by ACPR and which are based on two long-term trajectories: Network for Greening the Financial System on the one hand, and a short-term scenario combining physical risks and transition risks on the other. In parallel with this exercise, various types of work were carried out:

- analysis of the 40 largest exposures in the portfolio (approximately 10% of the outstandings). The objective was to measure the exposure of the companies concerned to physical risks (drought, flooding, etc.);

- analysis of the resilience of the various sectors represented in the bond portfolio held directly to various climate risks (drought, flooding, etc.), in line with the trajectories defined by the IPCC;
- analysis of the physical risk exposure of dedicated real estate vehicles and directly owned buildings;
- lastly, the measurement of the alignment of the portfolio's temperature with a scenario compatible with the objectives of the Paris Agreement makes it possible to understand the exposure of the asset portfolio to transition risk.

As part of the ORSA (Own Risk and Solvency Assessment), climate stress tests are also carried out to measure the sensitivity of the solvency ratios to the occurrence of major weather events.

## 2.2.3.3 [E1-2] POLICIES RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

### 2.2.3.3.1 Policies related to climate change mitigation and adaptation

#### ESG SECTOR POLICIES

##### General framework

The ESG sector policies govern Groupe BPCE's activities in sectors deemed sensitive from an environmental, social and governance (ESG) point of view. The definition of these policies is coordinated by the Sustainability Office within Groupe BPCE, taking into account the expectations of civil society, regulatory requirements and ESG best practices. They are regularly updated to reflect the new challenges of the sectors concerned and are validated by Groupe BPCE's Executive Management.

The Risk division is responsible for the operational integration of these policies into Groupe BPCE's processes. At the end of 2024, Groupe BPCE published sector ESG policies for the thermal coal industry as well as for the oil and gas industry, available on Groupe BPCE's website. Work is underway to strengthen the framework of sector ESG policies applicable to Groupe BPCE.

##### Scope of application of the ESG sector policies

The ESG sector policies apply to Groupe BPCE's activities worldwide. They concern the banking and financial activities of the Banque Populaire and Caisse d'Épargne networks, BPCE SA and Natixis SA, as well as their direct subsidiaries over which they exercise exclusive control.

The policies apply to credit activities, capital markets activities (in debt and capital), guarantees and advisory services (including merger & acquisition activities), as well as to investments in respect of liquidity reserves.

However, they do not apply to the management of portfolio assets on behalf of third parties and collective management. For these activities, BPCE Assurances and certain asset management companies that are subsidiaries of Natixis Investment Managers have their own ESG sector policies, which are published on their respective websites.

##### ESG sector policy - Thermal coal industry

In 2021, Groupe BPCE committed to reducing its financial exposure to thermal coal to zero by 2030 for the European Union and OECD countries, and by 2040 for the rest of the world. This commitment supports the objectives of reducing the carbon footprint financed for the electricity production sector.

The ESG sector policy applicable to the thermal coal industry covers the extraction, storage, transport, trading and processing activities of thermal coal, as well as the production and distribution of electricity produced from thermal coal.

This policy includes exclusion and assessment criteria for companies and projects in this sector. For example, Groupe BPCE does not finance a company that develops new coal capacities, or for which 25% or more of its revenues are linked to power generation from coal. Exceptions may be granted only for transactions aimed at supporting the low-carbon transition.

Similarly, Groupe BPCE does not finance coal-related projects, such as coal-fired power plants or thermal coal mines.

The policy also includes assessment criteria to assess the environmental and social performance of companies, covering in particular pollution issues, working conditions and the adoption of ESG best practices.

For more details, please consult the public document available at the following address: <https://www.groupebpce.com/en/csr/ratings-international-standards/>.

##### ESG sector policy - Oil and gas industry

Groupe BPCE has committed to reducing its financed carbon emissions related to the end-use of oil and gas extraction and production between 2020 and 2030, in accordance with the International Energy Agency's Net Zero Emissions by 2050 scenario.

The ESG sector policy applicable to the oil and gas industry covers the following activities in the industry value chain: exploration and production, transportation (pipelines), processing (refineries, liquefaction terminals, etc.), storage and other related activities. The policy covers both conventional and unconventional oil and gas resources.

This policy also includes exclusion criteria for companies and projects in this sector. For example, Groupe BPCE does not participate in any non-earmarked financing (i.e. when the funds are used for general corporate purposes) for a company whose business is 25% or more exploration - production of shale oil and gas, oil from tar sands or extra-heavy oil.



In addition, Groupe BPCE does not finance oil and gas facilities whose environmental and social risks and impacts are deemed too high, such as new shale oil and gas fields, projects dedicated solely to the commissioning of a new oil field, as well as projects located in the Arctic region.

For companies and projects, the policy details assessment criteria to assess their environmental and social performance, covering in particular pollution issues, working conditions and the adoption of ESG best practices.

For more details, please consult the public document available at the following address: <https://www.groupebpce.com/en/csr/ratings-international-standards/>.

## 2.2.3.4 [E1-3] ACTIONS AND RESOURCES IN RELATION TO CLIMATE CHANGE POLICIES

### 2.2.3.4.1 Actions and resources in relation to climate change policies

Groupe BPCE has implemented actions to: i) reduce the Group's negative impacts on the climate, both on its own operations and on financing, investment and insurance activities, and ii) strengthen the climate risk management system.

## MANAGEMENT OF NEGATIVE IMPACTS

Groupe BPCE has defined the following actions in response to the management of the negative impacts identified on climate change:

### Business lines action plans

#### Financing activities (financed emissions)

Actions on the financed emissions are implemented by business sector:

#### OIL AND GAS

To achieve the 2030 reduction target, Natixis CIB has chosen to support energy sector customers who are transitioning or having a clearly defined transition pathway, relying in particular on its Green Weighting Factor assessment tool. In this context, and during the transition period, gas is still considered an essential vector for the energy transition. Thus, for operations related to gas assets, the Group adopts a case-by-case approach, aimed at ensuring that the projects financed comply with the highest standards in the industry, particularly in terms of the environment. The relevance of these projects to local energy needs and sovereignty issues is also taken into account.

#### ► Progress to date:

The commercial actions begun in 2020 continue across the entire portfolio. Relationships with counterparties not engaged in an energy transition approach are not developed.

The Group supports the development of technological initiatives replacing fossil fuels to improve production process efficiency, such as methane capture to reduce emission intensities; and storage technologies, particularly for hydrogen. Since 2020, the outstanding financing of the oil and gas portfolio has been gradually reduced, in particular on the exposures towards the most emissive counterparties. This reduction in outstandings primarily concerns independent crude oil producers. Independent customers who demonstrate a concrete energy transition strategy (part of production more focused on gas than on oil, carbon capture solutions, etc.) are supported by the Group. This approach is also being developed with national companies and large international companies (Majors) by analyzing the projects in which they invest, in order to understand their current and future impacts on the environment, biodiversity and local populations.

#### POWER GENERATION

The determination of the target set for this sector is based on the pursuit of a strategy structured around the following areas:

- growth, diversification of corporate financing for players with the most low-carbon energy mix and/or whose trajectory and transition plan are engaging, credible and convincing;
- the concentration of structured financing on renewable energies, taking into account a growth rate in the sector in line with that forecast by the supra-national scenarios (RePower EU, IEA, IRA, etc.).

#### ► Progress to date:

In 2023, the Group ranked first in France and fifth worldwide for the arrangement and financing of renewable energy projects (*Source: Infralogic*). The number of corporate customers in the sector (developers, independent producers, utilities in transition) is growing, particularly in new regions.

This ambition is part of a value chain approach in the electricity production sector, its storage and the flexibility of distribution networks. It takes into account the investment needs in the critical metals sector needed for renewable energies and storage, carbon capture technologies (see CCUS), the strengthening of electricity grids and business models related to flexibility (interconnections, load shedding, storage, etc.), and also downstream on the electrification of uses (transport, industrial).

#### AUTOMOTIVE

For the scope selected, *i.e.* the entire Group for the financing of automotive manufacturers and BPCE Lease for leasing activities, Groupe BPCE has implemented the following action plans to achieve its target for 2030:

- Automobile manufacturers

The Group aims to maintain, or even strengthen, support for customers in the implementation of their transition plan and the electrification of their range of vehicles. The Group could, if necessary, reduce its exposure to customers with insufficient climate ambitions with regard to the provisions of the Paris Agreement, and finance customers that are new pure players or strongly committed to the electrification and decarbonization of their range.

- Leasing activity

BPCE Lease, in partnership with the European Investment Bank, offers professional, SME and mid-sized corporate customers of the Banques Populaires, the Caisses d'Épargne, Crédit Coopératif and Banque Palatine to support them in the financing of low-carbon mobility projects. This financing relates to new furniture leasing contracts and long-term leases, granted at advantageous financial terms. They promote the acquisition of light vehicles for professional use with low emissions ( $\leq 50 \text{ gCO}_2/\text{km}$ ) as well as the installation of charging stations.

This strategy for the automotive sector is part of a value chain approach, taking into account the commitment of manufacturers in terms of innovation, in particular to electrify their vehicles, as well as battery production capacities.

### STEEL

For this sector, the commercial approach is based on reinforced sectoral and technological monitoring, as well as on a strategic dialog with targeted customers on the decarbonization challenges of the sector. The strategic orientation of this sector is resolutely focused on the financing of low-carbon steel production projects (in particular the use of hydrogen in blast furnaces, electric arc furnaces, iron reduction processes), aimed at transforming and decarbonizing the sector's value chain.

In order to reach the level of emission intensity set for 2030, the action plan could result in a reduction in the exposure to the highest emitting customers (in the absence of credible transition plans); by earmarked or dedicated financing for Green steel projects; and through strengthened collaboration with the companies whose transition plans are the most aligned with Groupe BPCE's 2030 target.

### CEMENT

Groupe BPCE has little exposure to the cement sector. However, the Group places decarbonization issues, which are eminently material for this industry, at the heart of the strategic, regular and expert dialog that it conducts with its cement producers concerning their decarbonization trajectory and related technologies. However, to date it has been difficult to mobilize financial levers due to, on the one hand, the limited number of low-carbon cement production projects and, on the other hand, the often direct financing of these projects by the customers' capital, limiting the bank's financing possibilities and the traceability of the investments made.

### ALUMINUM

The action plan for this sector is to selectively develop the aluminum production activity by focusing mainly on low-carbon projects and on companies with a clear and credible decarbonization trajectory. As a result, any new customer or project is subject to strict emission intensity requirements. The business line is continuing its discussions with customers in the aluminum sector to help them identify their decarbonization levers, in particular to study the possibility of using low-carbon energy through Power Purchase Agreements (PPA), and the financing of new processing methods under development.

### COMMERCIAL REAL ESTATE

Natixis CIB's decarbonization strategy for commercial real estate is based on the following areas:

- support its customers in their transition plan at corporate level;
- manage the mix of its portfolio by type of asset and geography with regard to real estate portfolio decarbonization expectations, in particular governed by local regulations, and the expected changes in the carbon intensity of electricity mixes and the electrification of uses;
- increase the share of new/recent construction and transformative energy renovations in its portfolio.

#### ► Progress to date:

The improvement in the level of data quality undertaken with the collection of EPDs (among other carbon and environmental performance data) on Natixis CIB's outstandings made it possible to obtain a more accurate assessment of the carbon intensities of buildings. This collection exercise is now fully integrated into the operational and decision-making tools and processes for granting credit.

### AVIATION

The decarbonization objectives of the aviation financing activity are based on a commercial and capital allocation strategy based on two main areas:

- support the decarbonization levers of customers by taking into account the improvement of their operational efficiency (fleet renewal, optimization of the load factor, improvement of air traffic management);
- focus the financing mix on:
  - actors with robust decarbonization plans aligned with the Group's ambitions (these plans are more substantiated for airlines than for aircraft leasing companies),
  - the most efficient aircraft models from a carbon intensity point of view for asset financing.

It should be noted that the assumptions used in the Group's projections on the share of Sustainable Aviation Fuel (5% SAF in the fuel mix in 2030) are more conservative than those of the IEA and MPP scenarios, considered too ambitious. Nevertheless, Natixis CIB is exploring its first SAF financing projects and is co-leading an initiative on the feasibility of producing e-SAF in Europe.

### RESIDENTIAL REAL ESTATE

Groupe BPCE is implementing an action plan to reduce the greenhouse gas emissions related to its financing by:

- advising and raising awareness among its customers through the expertise of its advisors and use of the "Sustainable Advisory and Solutions" module available in the mobile banking application. This module enables customers to measure their carbon footprint and benefit from advice on how to optimize their energy consumption. Since its launch in 2023, it has recorded 5.2 million unique visitors;
- supporting energy renovation projects for individual homes and condominiums: energy assessments, search for subsidies, guaranteeing the successful completion of work and its coordination, with tailored pathways and financing (eco PTZ loan, pre-financing of subsidies, dedicated collective loans, partnerships with Cozynergy, with Papernest, etc.).

By way of illustration, Groupe BPCE is developing a partnership with the Leroy Merlin Group in order to offer its customers a turnkey solution with a complete and integrated solution. Customers will be able to benefit from a comprehensive range of financial solutions, including the interest-free eco-loan (*Eco-Prêt à Taux Zéro*). This agreement is part of a two-pronged ambition to address energy retrofitting needs and help French households manage their budget using simple solutions tailored to their needs.

The action plan implemented by all of the Group's institutions will increase the amount of financing for energy renovation work to €1 billion per year by 2026.

### AGRICULTURE

Groupe BPCE has defined an action plan reconciling climate change issues and the sustainability of agriculture and viticulture by integrating them, along with other players in the value chain, into its approach (agro-supply, processing, distribution...) into its approach.

This action plan encourages initiatives for food security in the French territories while preserving farmers' and winegrowers' incomes. Three levers are mobilized:

- adapt financing and products to new challenges;
- activate regional and sectoral synergies;
- train bank advisors to support farmers' projects in a sustainable manner.

## Portfolio decarbonization metrics

Entity	Unit	Sectors	12/31/2022	12/31/2023
Group	gCO <sub>2</sub> eq/kWh	Power generation	108	93
Group	MtCO <sub>2</sub> eq	Oil and gas extraction and production	4.1	2.4
Group	gCO <sub>2</sub> eq/km	Automotive*	166	162
Group	kgCO <sub>2</sub> /t cement	Cement production	669	661
Group	tCO <sub>2</sub> /t steel	Steel production	1.9	1.9
Group	tCO <sub>2</sub> /t aluminum	Aluminum production	6.5	6.4
Natixis CIB	gCO <sub>2</sub> eq/RTK	Air transport	920	870
Natixis CIB	kgCO <sub>2</sub> eq/m <sup>2</sup> /year	Commercial real estate	46	44

\* Consolidated figure: Car manufacturer + Lease

## INSURANCE ACTIVITIES

To achieve its 2030 target, BPCE Assurances has adopted a selective investment policy by allocating, every year, at least 15% of its investment flows to green assets (green bonds, SFDR Article 9 funds, investments aligned with the European taxonomy, etc.). By 2024 at the latest, they will represent 10% of the outstandings in the portfolio.

These investments aim to align the asset portfolio with a temperature trajectory compatible with the objectives of the Paris Agreement. A first waypoint of +2.0°C, set for the end of 2024, was reached. As a result, the proportion of assets that make a significant contribution to global warming and are liable to decline in value in the future is constantly decreasing in BPCE Assurances' portfolio. This effort will be continued in the coming years with the aim of moving towards an alignment with +1.5°C by 2030.

## ASSET MANAGEMENT ACTIVITIES

Faced with the challenges of the climate transition, its risks and opportunities for investors, most of Natixis IM's European asset management companies include climate change in their commitment process. In this respect, the commitment themes may include:

- encouraging transparency through the publication of the company's environmental performance and its exposure to climate risks. Implementing a climate strategy and greenhouse gas emission reduction targets in line with the objectives of the Paris Agreement;
- improving climate risk management and encouraging commitment to the energy transition.

In addition, Natixis IM's European asset management companies specializing in the management of unlisted assets are actively engaging with their portfolio companies.

## CHANGES IN METRICS ON THE SECTOR TRAJECTORIES OF FINANCING ACTIVITIES

In accordance with the disclosure requirements relating to actions and resources (E1-3), the table below shows the changes in emissions. Considering that Groupe BPCE measures its alignment for its financing activities through sector trajectories and in order to remain consistent with this approach (even if the calculation of the portfolio's carbon footprint is carried out), the calculation of the expected reduction of the carbon footprint and that of the reduction achieved are replaced by the calculation of the reduction achieved using the NZBA metric. The theoretical calculation scope is the one on which the targets are defined. The methodology elements (MDR-M) are published in Section 2.2.4.1 (targets).

## Own activities

In order to limit the negative impact on the climate due to the GHG emissions of the Group's own operations, it acts in the following areas:

## RESPONSIBLE PURCHASING

In 2024, BPCE Achats & Services provided training on Responsible Purchasing, based on the ISO 20400 standard, for buyers joining the function.

In order to facilitate the inclusion of CSR criteria in the specifications, the AFNOR's CSR risk mapping with CSR criteria adapted to the purchasing categories was also made available to the Purchasing function. Moreover, an action plan has been developed to increase the use of inclusive suppliers. In addition, BPCE Achats & Services has the RFAR label and is continuing to implement a simplified labeling methodology for the Group's companies. For 2025, BPCE Achats & Services has set itself the target of continuing the Group RFAR certification project with increased support for candidate companies.

Lastly, the Group is working towards acquiring CSR scorings, complementing the CSR assessment questionnaires of its suppliers. This will be a major step forward in terms of supplier data reporting and standardization.

## MOBILITY

In the last quarter of 2024, a working group dedicated to the electrification of the car fleet was initiated. This involves working on three specific projects: the HR strategy and employee change support, the vehicle catalog, and the charging business model. Contributors and sponsors of the institutions are involved in each of these three projects. The main objective is to carry out a diagnostic of uses, in order to adapt the vehicles as accurately as possible, and their charging method. The results of this study may enable every Group company to adapt its HR policy and its vehicle fleet.

## RESPONSIBLE DIGITAL

Several actions are underway to implement a more responsible digital ecosystem by relying on more efficient application development techniques, extending the lifespan of equipment, improving the energy efficiency of data centers and raising the awareness of all Group employees about eco-responsible actions. The referencing of the carbon footprint of equipment has also been implemented.

In 2023, 94% of the equipment had a carbon footprint referenced in the equipment inventory database. By controlling the growth of IT assets (removal of servers, transfer to cloud solutions...), Groupe BPCE generates carbon savings estimated at 2,235 tCO<sub>2</sub>eq per year.

## RESIDENTIAL MORTGAGES

The reduction of the carbon footprint of the premises is achieved through energy renovation work, the generalization of home

automation in offices and branches as well as the reduction of occupied space. As specified above, a major program to optimize surface areas was completed in 2023. This program has had a major effect in terms of reducing greenhouse gas emissions and energy consumption: the estimated reduction of the carbon footprint is around 11,000 metric tons of CO<sub>2</sub>eq per year and the reduction in energy consumption is around 36%.

Groupe BPCE's energy supply strategy is at the heart of the Responsible Company Program. It aims to ensure a stable supply of energy, predictability of prices and a greening of supply by taking into account a growing share of renewable energies within an essentially decarbonized supply mix, specific to France.

Through its implementation, the current electricity supply mix comprises 14% renewable energy. The ambition is to gradually increase the share of renewable electricity to a total of 56% of the Group's electricity supply by 2030.

## E1-3 Reduction of GHG emissions as a result of climate change mitigation actions

Actions and resources in relation to climate change policies	2024
Achieved reduction of Scope 1 and 2 tCO <sub>2</sub> emissions	(2,318)
Expected reduction of Scope 1 and 2 tCO <sub>2</sub> emissions	(1,365)
Achieved reduction of absolute Scope 3 tCO <sub>2</sub> emissions (categories 1 to 14 as defined by the GHG Protocol)	+7,042
Expected reduction of Scope 3 tCO <sub>2</sub> emissions (categories 1 to 14 as defined by the GHG Protocol)	(9,599)

### MDR-M E1-3

#### Definition:

Calculation of GHG emissions generated by Groupe BPCE's own activities ("office life"). As part of the production of indicators related to the "own footprint" universe, Groupe BPCE includes the following scopes:

Scope 1: direct company emissions;

Scope 2: indirect emissions related to electricity production;

Scope 3: categories 1 to 14, in accordance with the GHG Protocol classification. It should be noted that category 15 of Scope 3 is not included in the scope of the own footprint, as it is treated separately in the "financed emissions" universe.

#### Calculation method:

The emissions are calculated for each of the above scopes and each of the items that make up these scopes according to the breakdown defined by the GHG protocol.

The emission factors used for the calculations are reviewed annually. They are mainly taken from the Footprint database administered by ADEME, a reference database in France, cited by Article L. 229-25 of the French Environment code (BEGES decree). This database is managed by a governance committee bringing together various public and private players (ministries, technical bodies, associations, MEDEF, etc.). Groupe BPCE has chosen to use emission factors calculated specifically for certain indicators, in particular the four emission factors used for the "Intellectual IT services", "Consulting", "Strategy consulting" and "Software & digital services" purchasing categories. These four specific emission factors were calculated on the basis of the carbon footprints of significant players in these sectors of activity, compared to their turnover and over several successive years.

The indicators collected from entities in the consolidated scope for the calculation of the Group's carbon footprint are 54% physical indicators and 46% monetary indicators, in metric tons of CO<sub>2</sub>eq.

To reduce the uncertainties related to the collection of indicators, automated information circuits were deployed in 2024. The program to automate the collection of indicators will continue in the coming months.

Checks on any variation of +/-15% of the indicators between year N and year N-1 are systematic in the tool for collecting and calculating GHG emissions. This blocking control requires that contributors produce proof of these changes.

In 2024, Groupe BPCE improved the accuracy and granularity of the measurement of GHG emissions related to its purchases by deploying a new methodology. This new methodology is based on a segmentation of purchases into 16 categories, compared to only two previously, thus allowing the application of emission factors better suited to each of them. In addition, work has been undertaken with certain suppliers to improve the reliability of the assessment of the GHG emissions associated with the goods and services they provide. This work will eventually enable to replace monetary data with physical data, guaranteeing a more rigorous measurement, in line with best practices.

The application of the new methodology results in a significant increase in emissions for this item. It makes it possible to highlight the categories with the highest emissions, identify relevant reduction levers, and monitor their implementation in close consultation with suppliers.

In order to justify and explain the impact of this change, two calculations were carried out for Groupe BPCE's own footprint in 2024. An initial calculation was carried out using the old methodology in order to monitor the achievement of the objectives set for the 2019-2024 period. A second calculation is carried out using the new methodology, in order to follow the 2023-2026 reduction trajectory.

**Scope covered:**

Every year, the scope for calculating Groupe BPCE's consolidated own footprint is extended to new entities, particularly international entities. In 2024, the measurement was carried out on a scope of 60 entities whose employees on permanent contracts represented 88% of the Group's permanent staff (French CDI contracts). For each scope extension to a new entity, the emissions for the reference year (2019) and the emissions for subsequent years, up to the year of integration of the new entity, are recalculated. A "pro forma" is also calculated when indicators are corrected by the entities.

**Operational implementation of action plans**

In order to support its own transformation and the transition pathways of all its customers in accordance with the best available standards, Groupe BPCE has launched an internal transformation plan called "Impact Inside": an internal transformation for all Group companies at all levels.

Groupe BPCE is deploying a new pragmatic, shared and managed approach, allowing it to pursue its banking, insurance, and investment activities for the benefit of all its clients, bringing economic, societal, and environmental performance to the heart of local and regional France and in the parts of the world where the Group does business.

This "Vision 2030 focused on Impact" has been co-constructed with all Groupe BPCE companies and all its business lines. It takes the form of the Impact 2026 Program, which consists of concrete commitments in terms of offerings, financing policies, reduction of its own footprint, consideration of ESG issues in its risk management and financial processes but also within the framework of its renewed responsible employer policy. The Impact program allows each business line to fully integrate ESG issues.

By way of illustration, three areas of work have been prioritized for Retail Banking's corporate customers:

- i) make the link between credit and greenhouse gas emissions by mobilizing dedicated tools, methods and practices;
- ii) improve its knowledge of customers, in order to verify their integration of ESG issues, in particular climate issues, into their business model;
- iii) engage in dialogue with the latter to support them in their environmental transition.

Groupe BPCE's Sustainability Office is responsible for the Impact VISION 2030 on the E, S and G dimensions. It develops and deploys this expertise, and works to share and disseminate the best practices identified in all Group companies, with a view to continuous improvement. Lastly, it ensures overall coordination and supports each sector to ensure "Impact Inside" operations, while setting up the necessary synergies.

Thus, all of BPCE's business lines and all of its companies are implementing an Impact approach according to their business models and their scope in order to support the Group's transformation towards a more sustainable model that guarantees its cooperative, financial and non-financial performance.

**MANAGING IMPACT**

To implement its Impact VISION 2030, Groupe BPCE has set up a dedicated management program with the aim of increasing the positive impact of its social and environmental footprint. This management should enable:

- to extend and manage its sector decarbonization trajectories, and therefore its transition plan, to all activities and sectors with data expressing a measurement of greenhouse gas emissions;
- to support its customers by integrating their non-financial performance and the ESG issues they face in its analyses.

The Group's priority is to decarbonize the economy by supporting its customers, regardless of their size and business sector, and providing the necessary expertise to fully integrate ESG issues into the analysis of their business model.

These three areas provide a front to back vision including the risk and engagement teams. This harmonized and synchronized approach enables to integrate all ESG dimensions, as well as issues related to climate change, in the customer's annual review during the credit granting process, while securing the qualification of the transactions related to the environmental transition.



#### 2.2.3.4.2 Climate risk management

##### ESG risk management framework deployment program

This program is detailed in Section 1.2.5.2 of this sustainability report.

In summary, the ESG Risk department is coordinating the gradual strengthening of the ESG risk management system at Groupe BPCE level through a dedicated action plan, in line with the Impact Inside program and the climate and environmental commitments of Groupe BPCE as part of the VISION 2030 strategic project. The execution of this action plan is monitored by the ESG Risk Committee and the Risk Committee of the Groupe BPCE Supervisory Board.

##### Financing activities

###### Credit risk

ESG risks are taken into account in the context of credit decisions from two complementary angles, according to the issues specific to each transaction:

- the assessment of the ESG risks to which the counterparty or project is exposed and their impact on the credit risk profile of the counterparty or project;
- the assessment of the reputational risk related to the ESG issues associated with the counterparty or project's activities, in particular with regard to alignment with the voluntary commitments made by Groupe BPCE and its Impact strategy.

###### CREDIT POLICIES

Groupe BPCE's credit policies include documentation of sectoral ESG issues and points of attention to guide the analysis of financing applications on these aspects when they are relevant for the sector. These elements are compiled from the ESG sector knowledge base (see above) and reviewed and enhanced in coordination with Groupe BPCE entities and institutions as part of the regular updating of credit policies.

When relevant, Groupe BPCE's credit policies refer to Groupe BPCE's voluntary commitments (in particular, ESG policies in the coal and oil/gas sectors), requiring the exclusion criteria set in the context of credit decisions to be taken into account.

At Natixis CIB, restrictive criteria relating to ESG issues have been incorporated into certain sectoral credit policies relating to sectors that are particularly sensitive to these issues in the context of Natixis CIB's activities. Natixis CIB's credit sector policies also reflect the ESG policies specific to this scope, which also covers sensitive sectors from the point of view of social and governance issues such as defense and tobacco.

ESG sector policies are described in detail in Section 2.2.3.3.1 of this chapter.

###### ESG DIALOG WITH CORPORATE CUSTOMERS OF THE NETWORKS

Since 2023, Groupe BPCE has included the ESG dimension in its strategic dialog with the Corporate customers of its Retail Banking networks. An "ESG dialog" tool was built internally and rolled out to sales teams to address the main challenges and commitments of Corporate customers on environmental, social and governance issues. This tool enhances customer knowledge from the perspective of ESG issues and risks and identifies additional elements to the financial analysis that can be taken into account in assessing the credit file.

An overhaul of the "ESG dialog" tool was launched during 2024 to enrich the underlying questionnaire, provide additional sectoral information on the most sensitive sectors, and clarify the implications regarding the counterparty risk profile in the context of credit analyses. This work is due to be rolled out in Retail Banking networks in 2025.

###### ESG RISK RATING OF COUNTERPARTIES/TRANSACTIONS

As part of Natixis CIB's credit granting process, Corporate counterparties are systematically assigned a Green Weighting Factor score (see above) (Green Weighting Factor - General Purpose), and at the transaction level in the case of dedicated financing (Green Weighting Factor - Dedicated Purpose), and are subject to a control by the teams in charge of credit risk. This score is included in the loan origination file and is used to inform discussions regarding the transition risk associated with the counterparty or project.

Several subsidiaries of the FSE division (SOCFIM, BPCE Lease – Crédit Bail Immobilier) and CEGC also use the dedicated Green Weighting Factor score to finance real estate transactions as part of their lending process. BPCE Factor, BPCE Lease, and CEGC also include the counterparties' non-financial ratings in the credit file when available.

In addition, work has been undertaken to develop an internal ESG risk rating methodology for SME/ISEs and large Corporates, incorporating the specificities of each customer. This methodology, which is independent of the credit rating, will make it possible to systematically and consistently assess the level of ESG risk associated with a counterparty. The roll-out of this rating is planned from 2025.

###### EQUATOR PRINCIPLES

As part of the Equator Principles, Natixis CIB applies a market methodology that aims to assess the environmental and social risks of projects financed and the management of these risks by customers, regardless of their business sector. Since October 2020, Natixis CIB has applied the amended version of the Principles (EP Amendment IV), which includes more exhaustive criteria regarding respect for human rights (including the rights of indigenous communities) and requires the analysis of physical and transition climate risks.

The borrower is therefore required to: assess the physical risks associated with climate change for most projects, carry out an assessment of the climate transition risks and an analysis of less greenhouse gas intensive alternatives for projects with CO<sub>2</sub> equivalent emissions of at least 100,000 tons per year in total. Depending on the risks identified and the nature of the associated impacts, mitigation measures are requested of the customer. They are covered by specific clauses in the financial documentation ("covenants").

###### ESG CONTROVERSY ANALYSIS

As part of the due diligence carried out when entering into a relationship with its Large Corporate customers and in monitoring its portfolio clients, Natixis CIB takes into account the potential controversies that its clients may encounter, in particular concerning ESG issues. In the event of significant risks, Groupe BPCE analyzes and manages the associated risks. In certain cases, Groupe BPCE may decide of its own accord not to enter into a relationship or not to renew its commitments with the customer.

Groupe BPCE has begun work to extend this approach to all Groupe BPCE entities in a manner adapted to their operating context and their customer portfolio.

## Financial risks

### INVESTMENT RISKS RELATED TO THE LIQUIDITY RESERVE

Groupe BPCE incorporates ESG criteria into the management of the liquidity reserve in order to manage both the ESG risks associated with investments and the associated reputational risk.

These ESG criteria are defined according to two axes: a target is set on the proportion of “sustainable” securities (Green, Social or Sustainable) and an exclusion on issuers of securities with a downgraded non-financial rating.

In addition, the criteria defined in the ESG policies also apply to securities held in the liquidity reserve.

### RISKS RELATED TO PROPRIETARY INVESTMENTS

Groupe BPCE’s proprietary investments mainly concern the private equity and real estate (non-operating) investment portfolios. In 2024, Groupe BPCE used two ESG questionnaires to systematically collect information related to ESG characteristics in the creation of new investment files. The questionnaire aims to assess the ESG performance of asset management companies regarding delegated management investments, mainly in relation to the associated reputational risk. For properties managed on its own behalf, the questionnaire aims to collect elements of physical risk and transition risk associated with the invested asset.

This approach aims, at this stage, to promote the sector's acculturation to ESG issues and possibly provide information for discussion as part of the investment decision. It is planned to continue this work and enhance the system in the future.

## Operational risks

Litigation risks are dealt with in Section GOV 5 - 1.4.4.2.

### System specific to the insurance and asset management activities

#### Insurance activities

Due to the nature of its activities and its management horizons, BPCE Assurances naturally attaches importance to the integration of sustainability risks, particularly climate risks, in its risk management system.

In line with the regulations in force, BPCE Assurances incorporates climate risks at each stage of the risk management process, from their identification to their assessment and then their mitigation.

Climate risks are integrated into a risk mapping specific to insurance, distinguishing between physical and transition risks, on the one hand, and between short-, medium- and long-term risk horizons, on the other. The quantification of risks is an essential component of the approach followed by BPCE Assurances, which is gradually incorporating the concept of double materiality.

### LIFE INSURANCE BUSINESS

#### Risk identification and assessment

Various types of work were carried out to assess the financial risks induced by the exposure of the investment portfolio:

- analysis of the 40 largest exposures in the portfolio (approximately 10% of the outstandings). The objective was to measure the exposure of the companies concerned to physical risks (drought, flooding, etc.);

- analysis of the resilience of the various sectors represented in the bond portfolio held directly to various climate risks (drought, flooding, etc.), in line with the trajectories defined by the IPCC;
- analysis of the physical risk exposure of dedicated real estate vehicles and directly owned buildings.

Lastly, the measurement of the alignment of the portfolio’s temperature with a scenario compatible with the objectives of the Paris Agreement makes it possible to understand the exposure of the asset portfolio to transition risk.

#### Risk mitigation

For several years now, BPCE Assurances has defined objectives and implemented measures to limit its exposure to climate risks and its impact on climate change.

In terms of investments, this is reflected in the combination of several elements:

- implementation of sector policies: among the sector policies in force, several are directly related to the management of climate risks and concern companies related to fossil fuels;
- investments in view of the objectives of the Paris Agreement: in order to limit both its impact on the climate and its exposure to transition risk, BPCE Assurances has set itself ambitious objectives in terms of ESG criteria for its investments;
- any company rated “negative” in terms of sustainability, according to Mirova’s ESG analysis, is to be excluded from purchasing. BPCE Assurances has also developed an approach to categorize issuers according to ESG criteria and climate target criteria, which will replace the approach of issuers rated “negative” according to Mirova from January 1, 2025.

### NON-LIFE INSURANCE

Non-life insurance is particularly exposed to climate risks through the significant and regular increase in claims related to natural hazards.

With regard to non-life insurance products, climate risk management is an integral part of the underwriting, provisioning and reinsurance policies of the guarantees offered to customers.

The property & casualty insurance portfolio for individuals customers and professionals, through its guarantees for home, car and professional multi-risk, carries the risk of claims related to weather events.

Analysis of the contract portfolio is carried out on a regular basis to identify and measure risks, in particular those related to climate events, to qualify their geographical distribution and to adapt the underwriting policy.

To reduce the impact of climate-related claims on the balance sheet, BPCE Assurances transfers a portion of its risks, including climate-related risks, to global reinsurers through various reinsurance treaties.

Work is underway on the scope of banking institutions, property and casualty insurance and loan guarantees (CEGC) to integrate prospective climate change scenarios into the risk modeling.

For several years, BPCE Assurances has identified the challenges and action levers to improve the positive impact of its activities on the climate and the environment. This is reflected in its insurance offers, in the implementation of the management processes for automotive and home claims and in terms of risk prevention for policyholders.



To limit the consequences of climate events, work has been initiated to encourage policyholders to implement adaptation and prevention measures. This is reflected by:

- integration of prevention into business mail, the institutional website and the social media strategy;
- text messages in advance of climate events to alert policyholders, enable them to take shelter and protect their property.

When filing claims, BPCE Assurances accelerates customer handling by strengthening the teams dedicated to claims reporting and management and quickly mobilizes the networks of experts.

### Asset Management

In the current context of growing concern about climate issues, all<sup>(1)</sup> Natixis IM's European asset management companies have

set up a system to identify, assess and monitor risks related to climate change. However, due to the nature of its multi-boutique model, each asset management company within Natixis IM has a different level of maturity in terms of taking these risks into account and applies a system with different methods and measures, adapted to its specificities, expertise and investment strategies. At this stage, the tools and methodologies for integrating climate risks are constantly evolving.

All of Natixis IM's European companies investing in listed assets take into account physical and transition risks to assess climate risks. This consideration is strengthened through the use of one or more reference climate scenarios<sup>(2)</sup>. Some<sup>(3)</sup> asset management companies have developed proprietary tools in this area or use climate value at risk<sup>(4)</sup>.

## 2.2.4 Metrics and targets

### 2.2.4.1 (E1-4) TARGETS RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION

#### OWN FOOTPRINT

As part of the previous strategic plan, an ambitious target to be achieved by December 31, 2024 was set. Between 2019 and 2024, this consisted in reducing 15% of the Group's GHG emissions by prioritizing four priority action levers:

- Real estate: energy renovation work, generalization of home automation in offices and branches, reduction of occupied space;
- Purchasing: integration of CSR criteria in all purchasing stages, assessment of the CSR performance of suppliers during consultations;
- Mobility: reduction in employee travel, particularly remote working, transformation of the vehicle fleet;
- Digital: development of more energy-efficient applications, extension of equipment life time, improvement of the energy efficiency of data centers, training in eco-responsible practices.

The strategic KPI validated and backed by the VISION 2030 strategic project concerns the reduction of 6% of the Group's own footprint by 2026 (on a 2023 basis). This KPI is part of a target of -20% by 2030 (on a 2023 basis).

#### MDR-T Own footprint

##### Carbon emissions reduction trajectory

Groupe BPCE has set itself the target of reducing the GHG emissions related to its own footprint by 15% over the 2019-2024 period. The goal is to reduce the emissions from 640 ktCO<sub>2</sub>eq in 2019 to 544 ktCO<sub>2</sub>eq in 2024. The calculation of GHG emissions achieved and target is carried out according to the BEGES V5 method. To continue this reduction effort after 2024, this target was set at 6% between 2023 and 2026. It was calculated taking into account the annual reduction step for the previous year. The scope of the entities included in the Group's own footprint reduction target is gradually being extended to include subsidiaries and international entities.

**The GHG emission reduction trajectory between the base year 2023 and 2030 is as follows:**

- **-6% between 2023 and 2026.**

The Group proposes to smooth the reduction target annually to build annual targets:

- Year 2024: -2%
- Year 2025: -2%
- Year 2026: -2%

- **-20% between 2023 and 2030.**

The reduction intensity for 2026/2030 is therefore estimated at -14% (2030 target - 2026 target). The Group proposes to smooth the reduction target annually to build annual targets:

- Year 2027: -3.5%
- Year 2028: -3.5%
- Year 2029: -3.5%
- Year 2030: -3.5%

These reduction targets were defined using a method similar to that applied by the SBTi, broken down between Scope 1-2 and Scope 3.

The initiatives launched to refine the Scope 3 emissions will also allow to focus on sub-categories with high impact and high decarbonization potential in a pragmatic and iterative approach.

Different scenarios have been devised on the basis of the 2023 carbon assessment published in 2024 and the more or less accentuated activation of decarbonization levers such as the increase in soft mobility when commuting between home and work, the reduction of the surface areas in branches and head office, intensity of remote working.

As Scope 3 weighed more than 90% in 2023, efforts on this Scope are essential and must be brought under control.

Scope 1, 2 and 3 reduction targets are calculated according to the global annual targets and the weighting of the scopes on the total own footprint.

[1] AEW, DNCA Investments, Dorval AM, Flexstone, Mirova, MV Credit, Naxicap, NIMI Solutions, Ossiam (for funds applying ESG criteria only), Ostrum AM, Seventure, Thematics AM, Vauban, Vega IM and Ecofi.

[2] DNCA Investments, Dorval AM, Ostrum AM, Ossiam (for funds applying ESG criteria only) and Mirova.

[3] Mirova, Dorval AM and DNCA Investments.

[4] DNCA Investments and Ossiam (for funds applying ESG criteria only).

Scopes	Weighting 2023
Scopes 1 and 2	8%
Scope 3	92%

Group objectives:

2023	2024	2025	2026	2027	2028	2029	2030
Ref. year	(2%)	(2%)	(2%)	(3.5%)	(3.5%)	(3.5%)	(3.5%)
			(6%)				(14%)
							(20%)

Calculation by scope:

2023	2024	2025	2026	2027	2028	2029	2030
Scopes 1 and 2	(3.5%)	(3.5%)	(3.5%)	(5.0%)	(5.0%)	(5.0%)	(5.0%)
Scope 3	(1.9%)	(1.9%)	(1.9%)	(3.4%)	(3.4%)	(3.4%)	(3.4%)
Overall	(2%)	(2%)	(2%)	(3.5%)	(3.5%)	(3.5%)	(3.5%)

Note: It is important to understand that the reduction target is built on a cumulative basis in this calculation, since we always compare with the reference year 2023 and not with the year N-1.

Example: if we choose an annual reduction of 3.5% over three years for Scope 1:

- Scope 1 emission reduction target in 2024 = 3.5%
- Scope 1 emission reduction target in 2025 = 2 \* 3.5% = 7%
- Scope 1 emission reduction target in 2026 = 3 \* 3.5% = 10.5%

The Group's annual targets compared to the reference year are therefore as follows:

2023	2024	2025	2026	2027	2028	2029	2030
Scopes 1 and 2	(3.5%)	(7.0%)	(10.5%)	(15.5%)	(20.5%)	(25.5%)	(30.5%)
Scope 3	(1.9%)	(3.8%)	(5.7%)	(9.1%)	(12.5%)	(15.9%)	(19.3%)
Overall	(2%)	(4%)	(6%)	(9.6%)	(13.2%)	(16.7%)	(20%)

Between 2024 and 2026, the breakdown is -3.5% on Scopes 1 and 2 and -1.9% on Scope 3, which amounts to a total annual average weighting of -2% (using the respective weights of 8% and 92%). Between 2019 and 2026, the total reduction is estimated at -22%, which corresponds to the theoretical SBTi objective to achieve carbon neutrality by 2050.

For 2027 to 2030, the breakdown is -5% on Scopes 1 and 2 and -3.4% on Scope 3, which amounts to a total annual average weighting of -3.5% (using the respective weights of 8% and 92%). Between 2026 and 2030, the total annual reduction of 3.4% corresponds to the theoretical SBTi objective to achieve carbon neutrality by 2050.

Groupe BPCE has set targets for reducing the GHG emissions of the most emitting business sectors of its financing operations. It has also set reduction targets for its own operations. This enables it to reduce the identified material negative impacts on the climate.

These targets are based on the implementation of the decarbonization levers described above in the section "Actions and Resources." The quantitative contribution is observed retrospectively in the "Progress" section.

## FINANCED EMISSIONS: DECARBONIZATION TRAJECTORY TARGETS BY SECTOR

As specified in the E1-1 disclosure requirement, Groupe BPCE has defined decarbonization targets for the most carbon-intensive business sectors in its financing portfolio. Given the volume of emissions from these sectors, they require priority action to reduce emissions either in absolute terms or in intensity. The targets were determined in absolute value for the fossil fuel sector (coal, oil and gas) and in intensity for the other sectors. These sectoral trajectories demonstrate their contribution to achieving the objectives of the Paris Agreement and in particular the objective of limiting global warming to no more than 1.5°C compared to the pre-industrial era.

The reference year used to determine the trajectory is the one corresponding to the most recent year for which data were available.

Setting targets for reducing GHG emissions in absolute terms consists of setting a target date for the volumes of financing for its customers (corporate customers, individual customers, etc.) taking into account the expected volume of the emissions associated with this financing (based on a modeling of the emission trajectories of customers / financed assets), but also the

value of the customer company. Groupe BPCE considers that, for Scope 3 category 15 emissions in the customer value chain, calculated for banks according to the PCAF approach for measuring the financed emissions, it is not relevant to set a target in absolute value.

Projecting financing volumes is a complex exercise, which depends on multiple assumptions related to the macroeconomic, microeconomic and climatic environment. Groupe BPCE has included in its VISION 2030 strategic project the ambition to make impact accessible to all, including sectors in transition, which are increasingly seeking financing.

In this context, Groupe BPCE refers to the transitional provisions provided for in Paragraph 133 (a) of ESRS 1, as well as to the response given in December 2024 by EFRAG to follow up on the request for interpretation of Point 34 a). This response allows, when only intensity value targets are available, a financial institution to limit the information on the value chain targets to the information available internally during the first three years of reporting.

### Targets for aligning the banking book with the objectives of the Paris Agreement - Groupe BPCE

	Exposures			Methodology				Baseline		Update		Trajectory	
	12/31/2023	Entities	Scopes covered	Metric units	Calculation method	Scenario	Reference year	Absolute emissions	Carbon intensity	Year	Footprint	Year of publication	2030 target
Oil & Gas	4.1 (balance sheet and off-balance sheet)	Group	3	MtCO <sub>2</sub> eq	Weighted average (balance sheet and off-balance sheet exposures)	IEA NZE 2050	2020	13.7	-	2023	6	2022	(50%)
	1.5 (balance sheet)				Weighted average (balance sheet exposures)			7.7	-	2023	2.4	(70%)	
Electricity	23.1	Group	1 & 2	gCO <sub>2</sub> eq/kWh	PCAF	IEA NZE 2050	2020	-	156	2023	93	2022	<90
Residential real estate	388	Group	1 & 2	kgCO <sub>2</sub> eq/m <sup>2</sup>	PCAF	CRREM	2022	-	25	2023	25		Narrative
Commercial real estate	10.5	Natixis CIB	1 & 2	kgCO <sub>2</sub> /m <sup>2</sup>	PCAF	CRREM	2022	-	46	2023	44	2024	32
Agriculture		Group						Narrative					
Automotive	3.8	Group	3 - manufacturers 1 - use TTW	gCO <sub>2</sub> eq/km	PCAF	IEA NZE 2050	2022	-	166	2023	162	2023	(40%)
Aviation	5	Natixis CIB	1, 2, 3 - WTW	gCO <sub>2</sub> eq/RTK	Weighted average	IEA NZE 2050	2022	-	920	2023	870	2024	750
Steel	0.7	Group	1 & 2	tCO <sub>2</sub> eq/t steel	PCAF	IEA NZE 2050	2022	-	1.9	2023	1.9	2023	1.4
Cement	0.3	Group	1 & 2	kgCO <sub>2</sub> eq/t cement	PCAF	IEA NZE 2050	2022	-	669	2023	661	2023	<525
Aluminum	0.4	Group	1 & 2	tCO <sub>2</sub> eq/t aluminum	PCAF	IAI 1.5°C	2022	-	6.5	2023	6.4	2024	6

**MDR-T targets and MDR-M decarbonization metrics****Limits related to GHG measurements and associated targets**

The data collected, methods and measurements carried out have not been subject to external verification.

The data used regarding the customers are derived primarily from data providers or publications of companies funded by Groupe BPCE. Differences may exist in the measurements of greenhouse gases from data providers (for example, in terms of geography and scope) as well as inaccuracies or incompleteness of the activities covered by the clients in their publications. Estimates will evolve as the quality of available data improves. To date and for information purposes, the quality levels of the carbon data measured at December 31, 2023 are estimated, according to the PCAF score<sup>[1]</sup>, at 3.6 for oil and gas extraction and production, 2.6 for electricity production, 3.7 for residential and commercial real estate, 2.4 for the automotive sector, 2 for aviation and 3 for heavy industry (steel, cement and aluminum).

In order to have carbon data on the financed companies, consistent with the credit exposures on these same companies, for this fiscal year, Groupe BPCE has chosen to publish a financed footprint concerning the exposure at the end of 2023 and CO<sub>2</sub>e emissions of companies for 2023, some of which were calculated only in Q3-2024.

Furthermore, the objectives targeted by Groupe BPCE are conditioned by the commitments of its customers and their ability to meet them over time. These objectives also depend on current government policies and the development of low-carbon technologies, which are critical for long-term horizons.

For the residential real estate sector, due to the dependence on regulatory and governmental actions (uncertainty about the application of renovation policies and construction plans), Groupe BPCE has not set a specific carbon target for 2030.

For the agricultural sector, in the absence of precise non-financial data from clients as well as economic and social obstacles, Groupe BPCE has not published specific targets for 2030.

These measurements and targets are based on methodologies known to date and which may change in the future.

**Thermal coal**

BPCE aims to gradually reduce its exposure to thermal coal to zero by 2030 for the activities of its companies in the European Union and OECD countries and by 2040 for their activities in the rest of the world.

**Oil and gas**

Groupe BPCE's objective is to reduce, between 2020 and 2030, the absolute carbon emissions related to the end use of oil and gas by at least 70%, for the scope of financing for oil and gas extraction and production recognized in the balance sheet. When including the credit exposures recognized off-balance sheet (compared to 30% in the IEA NZE 2050 scenario published in 2021), this reduction is equivalent to -50%. The 2020 reference value, calculated on the basis of the assets in the balance sheet, is estimated at 7.7 MtCO<sub>2</sub>eq.

The carbon emissions measurements and targets cover customers' oil and gas extraction and production activities, which account for most of the emissions in this sector, all regions combined.

The financed carbon footprint is estimated using the PCAF method. This is dependent on corporate values, whose market fluctuations are essentially independent of customers' climate strategies.

**Power generation**

Groupe BPCE's target is to have an average carbon intensity related to the financing of electricity production of less than 90 gCO<sub>2</sub>eq/kWh by 2030 (compared to a target of 138 gCO<sub>2</sub>eq/kWh in the NZE 2050 scenario of the IEA published in 2021).

*Notes on methodology*

- It should be noted that the geographical breakdown of Groupe BPCE's portfolio is not directly comparable to the global scope of the IEA scenario. The IEA's NZE 2050 scenario is adapted to a global portfolio (target of less than 138 gCO<sub>2</sub>eq/kWh by 2030). Groupe BPCE's portfolio is not exposed to all geographical areas of the world. It is mainly focused on France, Europe / Middle East and the Americas.
- The carbon intensity measurements and targets cover electricity production activities.
- The calculation method used is the PACTA (average of customer intensities weighted by portfolio exposures).

**Automotive**

Groupe BPCE's carbon intensity reduction target for the automotive sector is 100 gCO<sub>2</sub>eq/km, i.e. -40% compared to 2022.

BPCE Lease's leasing activities (furniture leasing contracts, leases with purchase offer, and long-term leases) were added in 2024 in order to broaden the coverage of the sector. The 2022 reference value, initially 167 kgCO<sub>2</sub>eq/km, is 166 kgCO<sub>2</sub>eq/km pro forma.

The carbon measurements and targets cover the activities of car manufacturers and the leasing activities (furniture leasing contracts, leases with purchase offer, and long-term leases). The manufacturers' financials are excluded from the coverage. The scope of the carbon emissions corresponds to the emissions of light motor vehicles.

The IEA NZE 2050 scenario is a scenario for the global rolling stock. It does not fully correspond to the covered portfolios: the emissions are linked to the annual sales of car manufacturers' vehicles, so they are not, or only slightly, comparable to an IEA Net Zero target adapted to a (global) fleet - flows vs. stock. The ambition of the targets was calibrated on an internal calculation aiming to derive from the trajectory of the IEA car fleet (stock) an assumption of a reference point for manufacturers' vehicle sales (flow).

The financed carbon footprint is estimated using the PCAF method. This is correlated with corporate values whose market fluctuations are independent of the bank's climate strategy.

**Steel**

The scope of the target, initially Natixis CIB, was extended to Groupe BPCE. The reference value for 2022 is maintained at 1.9 tCO<sub>2</sub>eq/t of steel due to the concentration of outstandings within Natixis CIB

Groupe BPCE's steel sector objective is to reach a threshold of 1.4 tCO<sub>2</sub>eq/t of steel by 2030. It should be noted that the IEA revised the Scope 1 Net Zero target upwards in its last report published in 2023. A possible revision of this reduction target will depend on the progress of new steel production decarbonization technologies and public policies to support their deployment.

[1] As specified by the PCAF standard, the various carbon data sources used are associated with a quality level ranging from one to five depending on whether they are based on data audited and communicated by the company (corresponding to the best score: 1), or based on industry proxies/estimates (corresponding to the lowest score: 5).

The carbon measurements and targets cover steel producers, which account for most of the emissions in this sector. The production process includes the following steps: preparation of raw materials, steelmaking (including steel casting). The rolling and coating stages as well as the upstream (e.g. mining) and downstream stages (e.g. finishing) are excluded.

The financed carbon footprint is estimated using the PCAF method. This is correlated with corporate values whose market fluctuations are independent of the bank's climate strategy.

### Cement

The scope of the target, initially Natixis CIB, was extended to Groupe BPCE. The 2022 reference value, initially determined at 622 kgCO<sub>2</sub>eq/t cement, is now 669 kgCO<sub>2</sub>eq/t cement.

The cement sector's main decarbonization levers (e.g. CCUS) will not be fully operational before 2030. The reduction target set is ambitious, but is therefore higher than the 2030 target of the IEA NZE 2050 scenario published in 2021. It should be noted that the IEA revised the Scope 1 Net Zero target upwards in its last report published in 2023. The objective for the cement sector is to obtain an average carbon intensity of financing for cement producers of less than 525 kgCO<sub>2</sub>eq/t of cement by 2030. A more ambitious review of this reduction target will depend on the progress (development of sectors, economic equation, adoption by the major players in the sector) of new decarbonization technologies for cement production and public policies to support their deployment.

The carbon measurements and targets cover cement and clinker producers, which account for most of the emissions in this sector.

The financed carbon footprint is estimated using the PCAF method. This is correlated with corporate values whose market fluctuations are independent of the bank's climate strategy.

### Aluminum

Groupe BPCE aims to achieve a financed carbon intensity of 6 tCO<sub>2</sub>eq/t of aluminum by 2030. The 2022 reference value is 6.5 tCO<sub>2</sub>eq/t of aluminum. The scenario used is the International Aluminum Institute (IAI) 1.5°C scenario which is based on the IEA NZE 2050 scenario.

The carbon measurements and targets only cover the smelting activities of aluminum smelters.

The financed carbon footprint is estimated using the PCAF method. This is correlated with corporate values whose market fluctuations are independent of the bank's climate strategy.

### Commercial real estate

Groupe BPCE, through Natixis CIB, targets an average carbon intensity related to the financing of real estate professionals of less than 32 kgCO<sub>2</sub>/m<sup>2</sup>/year by 2030 (compared to the 19 kgCO<sub>2</sub>/m<sup>2</sup>/year of the CRREM Net Zero scenario), i.e. a 30% decrease in carbon intensity compared to the 2022 reference value (46 kgCO<sub>2</sub>/m<sup>2</sup>/year).

The carbon intensity measurements and targets cover dedicated financing of real estate assets and financing of commercial real estate companies (including Property Development and Foncières) worldwide. This mainly involves financing for real estate professionals.

The Carbon Risk Real Estate Monitor (CRREM) scenarios were used as a scientific reference. They are compatible with the Net Zero 2050 scenario of the International Energy Agency. They specify the Real Estate carbon budget by country and by type of asset. This allocation is made by taking as a starting point the average carbon intensity of the portfolio in each country and each type of asset, to converge towards the same final carbon intensity by type of asset by 2050.

Target setting for Groupe BPCE takes into account the current and projected breakdown of the outstanding loans in the portfolio.

### Aviation

Groupe BPCE, through Natixis CIB, targets an average carbon intensity related to aviation financing of less than 750 gCO<sub>2</sub>eq/RTK by 2030 (i.e. lower than the intensity level of 760 gCO<sub>2</sub>eq/RTK of the IEA NZE 2050 scenario). The reference value in 2022 is 920 gCO<sub>2</sub>eq/RTK.

The carbon intensity measurements and targets cover airlines, aircraft leasing companies and aircraft asset financing.

The IEA NZE 2050 scenario (or that of Mission Possible Partnership) is adapted to a global portfolio.

### Residential real estate

Groupe BPCE has not set a target and is managing changes in the emission intensity of this sector. Setting a target for reducing absolute greenhouse gas emissions would have the effect of restricting the flow of financing to energy-efficient housing and of penalizing individual customers.

Groupe BPCE, as the main player in the financing of residential housing in France, has decided to focus its actions on reducing the emission intensity of the homes it has helped to finance. The greenhouse gas emissions related to its financing are estimated on average at 25 kgCO<sub>2</sub>eq/m<sup>2</sup> at the end of 2022. Levers and actions have been put in place to meet customer needs. They aim to facilitate access to ownership of low-energy homes, help finance the renovation of so-called energy-intensive homes, and preserve the value of customers' assets. These actions will contribute to significantly lowering the average intensity of the residential real estate loan portfolio by 2030.

Given the significant need for the transition to more energy-efficient homes and the financial challenge faced by private owners, there is a strong dependence on public policies to achieve this carbon neutrality target. It is essential to take into account a private and public contribution when calculating a trajectory. While the share of the trajectory linked to private financing solutions put in place by Groupe BPCE is clearly identifiable, the public share, which is based on structural and sectoral actions, in particular to promote the marketing of new homes and the renovation of so-called energy-intensive housing needs to be adapted to the current economic context. Thus, the assumptions used to build the National Low Carbon Strategy need to be reassessed. Groupe BPCE contributed to the formulation of proposals for additional actions within the French Banking Federation (*Fédération bancaire française*) that could be implemented.

The quality of the data is correlated with the EPD coverage of all outstandings. If to date, the stock is not fully covered by the EPDs provided by the advisors. Groupe BPCE is working to systematize the recovery of the EPDs implemented since 2022.

## EMISSION REDUCTION TARGETS FOR THE INVESTMENT PORTFOLIOS OF THE INSURANCE ACTIVITIES

Following its membership of the NZAOA in 2022, in 2023 BPCE Assurances committed to two initial decarbonization targets for its asset portfolio:

- 30% reduction in the carbon footprint (Scopes 1 and 2) of the corporate bond portfolio and financial assets held directly between December 31, 2020 and December 31, 2024;
- 50% reduction in the carbon footprint (Scopes 1 and 2) of the portfolio of listed equities held through the dedicated fund *Réaumur Actions* between December 31, 2020 and December 31, 2029;

- Moreover, as part of its new strategic plan, BPCE Assurances has set the objective of continuing to reduce its carbon footprint (Scope 1 & 2), aiming for a reduction target of at least 50% by 12/31/2029 for its entire portfolio of directly held equities and corporate and financial bonds, with an interim target of at least 40% by the end of 2026.
- In addition, as part of its new strategic plan, BPCE Assurances has set itself the target of continuing to reduce its carbon footprint (Scope 1 & 2) by aiming for a -50% reduction by December 31, 2029, for its entire equity portfolio and corporate and financial bonds held directly, with a waypoint point of -40% at the end of 2026.

## EMISSIONS REDUCTION TARGETS FOR ASSET MANAGEMENT ACTIVITIES

Natixis IM's European asset management companies have set targets for decarbonizing or aligning their portfolios with the objectives of the Paris Agreement, which are as follows:

- **Asset management companies committed to achieving global carbon neutrality as part of an international alliance:** two asset management companies (DNCA Finance and Mirova) are committed to a Net Zero approach as part of the NZAM initiative at the end of December 2024.
  - Since its creation in 2014, Mirova has set itself the objective of using the lever of investment to serve environmental issues. Its portfolio is aligned with the objectives of the Paris Agreement through a demanding investment strategy for total assets of **€31.9 billion** in assets at the end of December 2024.
  - DNCA Finance has been analyzing the climate trajectory of its investments since 2020 and has made a commitment to contribute to making its investments compatible with the objectives of the Paris Agreement in December 2022. The scope covered by this commitment represents **€23.3 billion** in assets under management for DNCA Finance at the end of December 2024.
- **Asset management companies aiming for decarbonization or portfolio management aligned with the objectives of the Paris Agreement without joining a specific external framework:** five asset management companies (Ostrum AM, Vega IM, Dorval AM, AEW and Vauban IP) manage their assets to align with the objectives of the Paris Agreement or have targets to reduce their footprint.

- **Ostrum AM** had a total of **€132 billion** in assets under management with a decarbonization target at the end of 2024.
- **Vega IM** aims to reduce the greenhouse gas emissions of its investments by 45% by 2030 (excluding *Conseillère Premium* management), compared to 2021, concerning **€12.6 billion** of its outstandings at the end of 2024.
- **Dorval AM** has a target, by 2050, of having at least 80% (*i.e. almost €0.9 billion*) of open-ended fund assets aligned with a trajectory of +2°C.
- **AEW** has set itself a target of reducing the greenhouse gas emissions of its investments on **€11.4 billion** of its portfolio of at least 40% by 2030 compared to a reference year by building that cannot go beyond 2010.
- **Vauban Investment Partners (IP)**, since 2022, has formally committed to aligning its investment strategy with the goal of global carbon neutrality by 2050. This commitment covers the entire portfolio, which is aligned at the end of 2024 with a trajectory of +2°C, for a total of approximately **€9.5 billion** in assets.

Other Natixis IM European asset management companies have defined approaches specific to their type of asset.

For example, since 2023, Naxicap has included a specific sustainability clause in the shareholders' agreements signed with the companies in which its funds invest. This clause makes it possible to define targets for reducing the carbon footprint of its investments.



## 2.2.4.2 [E1-6] GROSS SCOPES 1, 2, 3 AND TOTAL GHG EMISSIONS

### Scope 1, 2 and 3 emissions for Groupe BPCE<sup>(1)</sup>

	Historical data			Milestones and target years				
	Reference year	Comparative data (N-1)	N	% N/ N-1	2026	2030	(2050)	Annual target in %/ Reference year
<b>Scope 1 GHG emissions</b>								
Gross Scope 1 GHG emissions - Emissions [tCO <sub>2</sub> e]	12/31/2024	23,154	21,330	(8%)	(10.5%)	(30.5%)	(3.5%)	(3.5%)
Percentage of Scope 1 GHG emissions resulting from regulated emission trading schemes (in %)	12/31/2024	-	-					
<b>Scope 2 GHG emissions</b>								
Gross Scope 2 GHG emissions (location-based) [tCO <sub>2</sub> e]	12/31/2024	18,152	17,658	(3%)	(10.5%)	(30.5%)	(3.5%)	(3.5%)
Gross Scope 2 GHG emissions (market-based) [tCO <sub>2</sub> e]	12/31/2024	5,158	4,922	(5%)	(10.5%)	(30.5%)	(3.5%)	(3.5%)
<b>Significant Scope 3 GHG emissions</b>								
Total gross indirect Scope 3 GHG emissions [tCO <sub>2</sub> e]	12/31/2024	498,165	505,207	1%	(5.7%)	(19.3%)	(1.9%)	(1.9%)
1 Goods and services purchased								
1 Goods and services purchased	12/31/2024	191,377	194,600	2%				
[Optional subcategory: Cloud Computing & Data Center Services]	12/31/2024	-	-					
2 Capital goods	12/31/2024	108,569	106,424	(2%)				
3 Activities in the fuel and energy sectors (not included in Scopes 1 and 2)	12/31/2024	13,512	13,169	(3%)				
4 Upstream transport and distribution	12/31/2024	-	-					
5 Waste generated during operations	12/31/2024	4,515	4,931	9%				
6 Business travel	12/31/2024	20,498	22,170	8%				
7 Employee commuting	12/31/2024	72,947	74,859	3%				
8 Upstream leased assets	12/31/2024	-	-					
9 Forwarding	12/31/2024	86,746	89,054	3%				
10 Processing of products sold	12/31/2024	-	-					
11 Use of products sold	12/31/2024	-	-					
12 End-of-life treatment of products sold	12/31/2024	-	-					
13 Downstream leased assets	12/31/2024	-	-					
14 Franchises	12/31/2024	-	-					
<b>Total Own footprint emissions</b>								
Own footprint GHG emissions (location-based) [tCO <sub>2</sub> e]	12/31/2024	539,471	544,195	1%	(6%)	(20%)	(2%)	(2%)
Own footprint GHG emissions (market-based) [tCO <sub>2</sub> e]	12/31/2024	526,477	531,459	1%				
<b>Portfolio emissions</b>								
15 Investments (Banking)	12/31/2024	113,826,510	119,095,437	5%				
15 Investments (Insurance)	12/31/2024	16,070,706	16,584,592	3%				
<b>Total GHG emissions</b>								
Total GHG emissions (location-based) [tCO <sub>2</sub> e]	12/31/2024	130,436,687	136,224,224	4%				
Total GHG emissions (market-based) [tCO <sub>2</sub> e]	12/31/2024	130,423,692	136,211,488	4%				

The data presented are based on the previous calculation methodology for CO<sub>2</sub>e emissions due to the purchased goods and services category.

The data presented are based on the previous calculation methodology for CO<sub>2</sub>e emissions due to the purchased goods and services category.

The above table is intended to represent all of Groupe BPCE's activities within the accounting scope of consolidation, with the limitations described in the MDR-M below.

The Group considers that the format of this table does not make it possible to present the milestones it has set for itself in its transition plan because this format details many categories of insignificant emissions taken one by one, and also does not detail the most important emission items relating to financing and investments, which require sectoral transparency. For this reason,

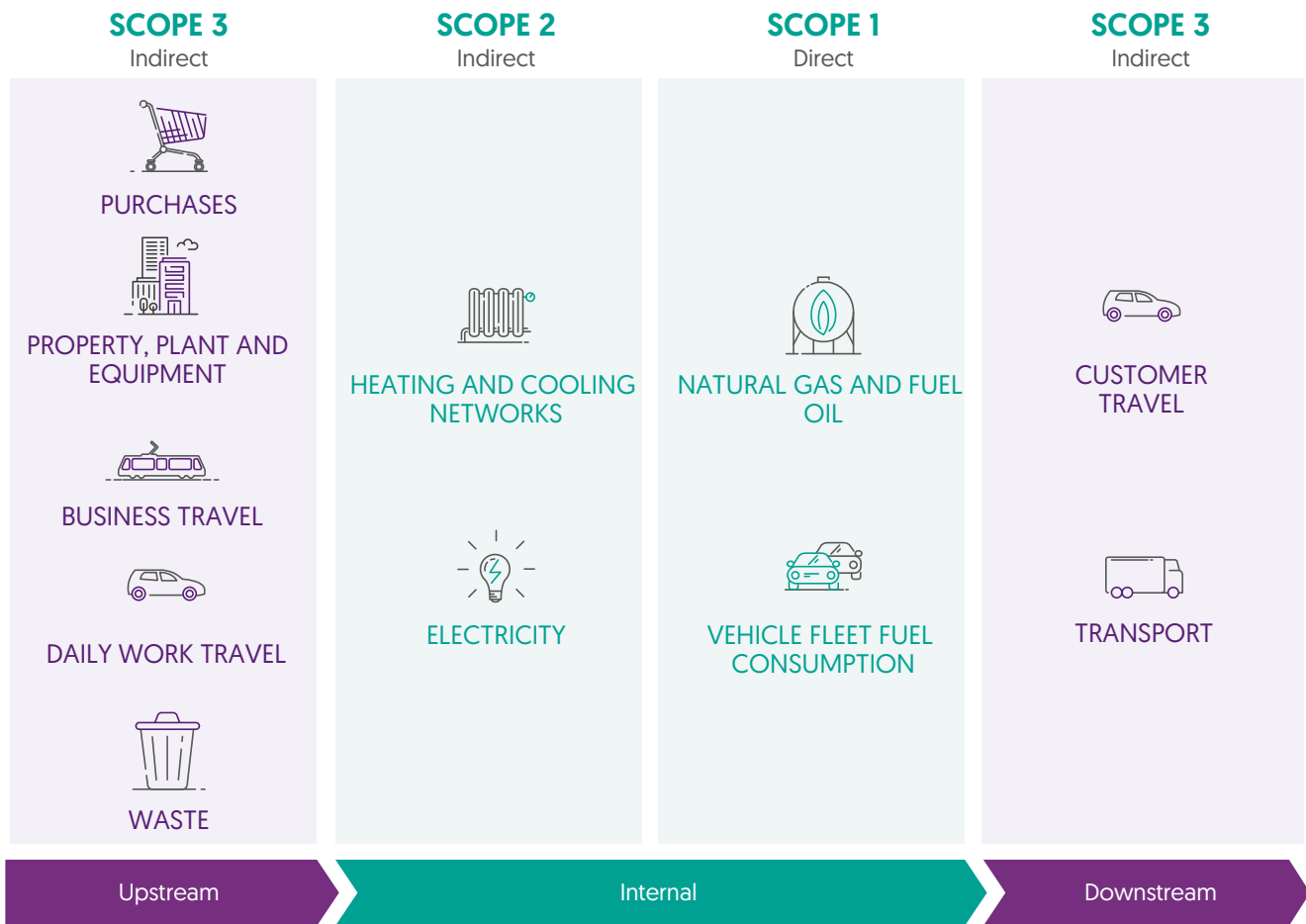
some "milestones and target years" columns are left blank in favor of a detailed presentation of these milestones and target years in Section 2.2.4.1.

The portfolio emissions presented above for the Banking exposures on one hand and Insurance on the other, aggregate scope 1, 2, and 3 emissions of the financed companies. For 2024, the financed scope 1+2 emissions total 40.5 MtCO<sub>2</sub>e for the Banking category and 1.9 MtCO<sub>2</sub>e for the Insurance category.

[1] The data presented are calculated based on the previous methodology for calculating CO<sub>2</sub>e emissions related to purchased goods and services.



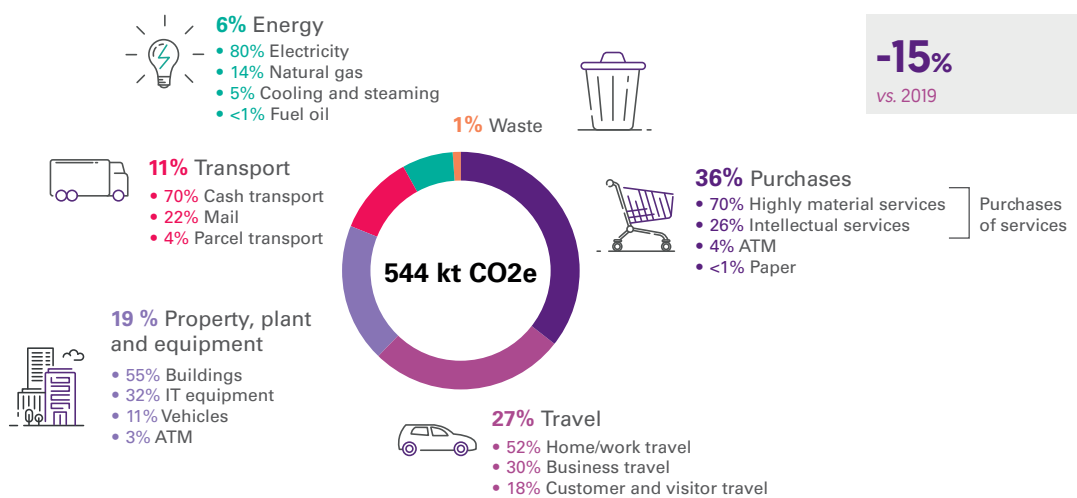
## Scope of the calculated greenhouse gas (GHG) emissions



### FOCUS ON THE OWN FOOTPRINT

#### Scope

GHG emissions related to the own footprint include all Scope 1, 2 and several Scope 3 categories.



## Calculation methodology

Two amounts are presented at the end of table AR48, which cover the specific scope of the own footprint:

- total own footprint emissions (with Scope 2 emissions calculated using the location-based method);
- total own footprint emissions (with Scope 2 emissions calculated using the market-based method).

The emissions are calculated for each of the items presented in Table AR48 according to the breakdown of the GHG Protocol items into the three emission scopes.

In this table, the data regarding the footprint has been calculated using the previous methodology for calculating CO<sub>2</sub>e emissions related to purchased goods and services, which has been applied since 2019 to facilitate market monitoring the trajectory of the strategic plan for 2019-2024.

The methodology applied to property, plant and equipment is based on the principles of French regulations concerning the preparation of a greenhouse gas report (BEGES V5), which meets the regulatory requirements set out in Article L. 229-25 of the French Environment Code. This methodology is also consistent with ISO 14064-1:2018. More specifically, the calculation of emissions associated with fixed assets is based on the collection of data from the inventories of the various fleets (IT equipment, real estate, vehicles, etc.) and on the application of amortization coefficients making it possible to distribute the emissions over the useful life of the assets concerned.

Work will be carried out in the coming months to enable Groupe BPCE to also calculate its carbon footprint according to the methodological principles of the GHG Protocol, *i.e.* by accounting for all emissions associated with the manufacture of capitalized assets during the year of acquisition.

As specified in the paragraph "Actions and resources" (E1-3), Groupe BPCE has refined the measurement of its purchases in 2024, by detailing the measurement on 16 categories of purchases instead of two previously and by allocating more precise emission factors to each category. This greater degree of precision shows a significant increase in emissions for this item. As a result, two calculations were carried out in 2024: a calculation of the carbon footprint using the old methodology, in order to measure the achievement of the objectives set over the 2019-2024 period, and a second calculation with the new methodology, in order to follow the 2023-2026 reduction trajectory. According to this new methodology, in 2024, the CO<sub>2</sub> emissions related to purchased goods and services amount to 226 ktCO<sub>2</sub>e, bringing the Group's own footprint based on location to 576 ktCO<sub>2</sub>e, and 563 ktCO<sub>2</sub>e based on market.

See details of changes in the measurement of purchases in E1-3 - 2.2.3.4.1.

## Limitation of scope

The scope of calculation of the own footprint covers 60 entities whose permanent contracts (CDI) represent 88% of the Group's employees with permanent contracts. This scope is gradually extended each year.

**In response to the E1-6 disclosure requirement [AR 43], the Group publishes the following mandatory information:**

Gross Scopes 1, 2, 3 and Total GHG emissions	2024
Biogenic CO <sub>2</sub> emissions resulting from the combustion or biodegradation of biomass separately from Scope 1 GHG emissions, but includes emissions of other types of GHG (in particular CH <sub>4</sub> and N <sub>2</sub> O)	-
Breakdown of information by indicating separately the Scope 1 emissions from:	
- the consolidated accounting group (parent company and subsidiaries); and	
- companies benefiting from investments, such as associates, joint ventures, or unconsolidated subsidiaries that are not fully consolidated in the financial statements of the accounting group, as well as contractual agreements that are joint agreements not structured through an entity ( <i>i.e.</i> jointly controlled operations and assets) over which the company exercises operational control.	-
Breakdown of information by indicating separately the Scope 2 emissions from:	
- the consolidated accounting group (parent company and subsidiaries); and	
- companies benefiting from investments, such as associates, joint ventures, or unconsolidated subsidiaries that are not fully consolidated in the financial statements of the accounting group, as well as contractual agreements that are joint agreements not structured through an entity ( <i>i.e.</i> jointly controlled operations and assets) over which the company exercises operational control.	-

**MDR-M - EMISSIONS FINANCED BY GROUPE BPCE - BANKING ACTIVITIES****Scope**

The scope of greenhouse gases related to financing activities (Scope 3 category 15 Investments [Banking]) corresponds to the scope of corporate financing and dedicated financing (Natixis) of the banking book and also includes home loan financing. Home loan financing corresponds to home loans granted to individual customers and to self-employed customers.

**Calculation methodology**

The calculation of the carbon measures financed follows the Partnership for Carbon Accounting Financials (PCAF) methodology in accordance with the recommendations of the GHG Protocol for corporate credit financing (in its guide *"The Global GHG Accounting and Reporting Standard Part A: Financed Emissions"* published in 2022). These measures are based on methodologies known to date and which may change in the future.

The calculation is carried out on the Scope 1, Scope 2 and Scope 3 emissions of financed customers, aligned with the regulatory requirements and scope materiality issues. The sources of carbon data used for corporate financing are mainly based on data suppliers (Carbone 4, CDP, Trucost, MSCI): when the data is not available at the company level, their group's carbon data is used. In the absence of information, sectoral proxies are used:

- For companies or dedicated financing belonging to sectors with good supplier data coverage, the sectoral carbon data are extrapolated.
- For companies related to other sectors, the sectoral proxies provided by PCAF are applied (by NACE code and geographical area). As the coverage by the PCAF proxy is significant (applied to more than [75]% of outstandings) related in particular to exposures to small- and medium-sized companies, the estimated nature of the measures should be highlighted for this segment.
- The carbon measurements used for home loan financing correspond to the carbon emissions related to the use of the building. The data sources are based on Energy Performance Diagnostics (EPDs) when these are available. Otherwise, proxies are used, relying in particular on data from the French Scientific and Technical Center for Building (*Centre Scientifique et Technique du Bâtiment - CSTB*).

It should be noted that the carbon data used may be one year behind the closing date of the outstandings. The data collected, methods and measurements carried out have not been subject to external verification.

To date and for information purposes, the quality levels of the carbon data used to measure financed emissions at December 31, 2023 and December 31, 2024 are estimated at around four according to the PCAF score. As specified by the PCAF standard, the various carbon data sources used are associated with a quality level ranging from one to five depending on whether they are based on data audited and communicated by the company (corresponding to the best score: 1), or based on industry proxies/ estimates (corresponding to the lowest score: 5).

**MDR-M - EMISSIONS FINANCED BY GROUPE BPCE - INSURANCE ACTIVITIES****Scope**

The scope of greenhouse gases related to insurance activities (Scope 3 category 15 Investments [Insurance]) includes the activities of BPCE Assurances and PREPAR-VIE.

**Calculation methodology**

The methodology used to calculate greenhouse gas emissions is aligned with that of the Principal Adverse Impacts indicator (PAI) 1.1 defined by the SFDR regulation. Thus, the gross GHG emissions attributed to investments take into account the Scope 1, 2 and 3 emissions of the companies comprising the portfolios of assets held. The attribution coefficient for a given company corresponds to the value of the investment divided by the total value of this company (Enterprise Value Including Cash [EVIC]).

BPCE Assurances relies on Carbone 4 Finance for the collection of GHG emissions as well as the EVICs of companies in which it invests. In the absence of available information, sectoral proxies are used.

PREPAR-VIE relies on ISS, using the Sequantix STM tool for all its calculations. The coverage rate of the ISS data used to measure the Scope 1 + 2 + 3 CO<sub>2</sub> emissions of directly managed bonds is 72%. To date, the calculation does not use proxies.

To be consistent with the scope of emissions financed by the banking activity, emissions relating to insurance activities relate exclusively to corporate investments.

In addition, asset management companies are subject to SFDR reporting obligations and/or Article 29 of the Energy Climate Act and disclose information on the financed emissions that they incur through the investments.

As an illustration, Natixis IM has consolidated the GHG emissions calculated according to the PCAF standard for European portfolios of listed assets (excluding sovereigns)<sup>(1)</sup> and relying on a single data source (MSCI). These emissions amounted to €81 million tCO<sub>2</sub>e at December 31, 2024.

[1] This carbon footprint is consolidated by summing the GHG emissions "attributed" to each position in the portfolio, on companies. The emission allocated corresponds to the carbon emissions (Scope 1, 2 & 3) of the company multiplied by the actual outstanding amount of listed shares or corporate bonds held in the portfolio divided by the value of the company including cash [EVIC].

## PART 3 - Social information

### 3.1 S1 - Own workforce

#### 3.1.1 SBM-2 - Interests and views of stakeholders

The Group has an ongoing dialog with its stakeholders. This process makes it possible to identify levers for improvement to maximize the positive impact of its activities, on both environmental and societal level, and to adapt its strategy and business model accordingly. Through its business lines, Groupe BPCE interacts with various stakeholders. The methods of dialog, adapted to the points of view and rights of the stakeholders, are presented accordingly.

##### • Career management and support

The Human Resources division is committed to providing individualized support for employees' career paths. This involves close collaboration between managers and employees, in particular through annual interviews that should allow identification of employee's skills development needs and career development aspirations.

##### • Skills development to retain and engage employees

The Human Resources department develops skills development as an essential lever for retaining and engaging employees. The Human Resources Managers, as well as the Training and Career management teams, are attentive to the needs of employees and suggest training courses tailored to their business line needs. These internal and external training courses are designed to meet the company's strategic challenges while promoting the personal and professional development of employees.

##### • Recruitment and employer brand

To strengthen the employer brand and attract the best talents, the Human Resources department relies on HR Development Managers, employee ambassadors and managers who contribute to promoting a positive image of the company by highlighting its values, its culture and development opportunities. This includes the dissemination of communications on social networks and participation in recruitment events.

##### • Communities of HR officers

The Human Resources department coordinates communities of HR officers around issues of diversity, gender equality, disability and well-being at work. Diversity and gender equality officers, disability officers, quality of life at work (QLWC) officers and harassment officers share and implement initiatives in line with group or branch policies and agreements in their field, in order to promote an inclusive and respectful work environment.

##### • Non-profit and influence networks to promote an inclusive policy

The Human Resources department relies on and showcases Employees Resource Groups (non-profit and influence networks) to promote the Group's inclusive policy. Employees Resource Groups such as "Les Elles de BPCE", "WIIN", "All Equals" and "GenConnect" are promoted in their implementation of tangible actions to encourage intergenerational exchanges, diversity and equal opportunities.

##### • Dialog with employee representatives to guarantee quality of life at work, health and safety

Dialog with employees is a fundamental element of the HR policy to guarantee quality of life at work. The Human Resources department works in collaboration with, HR representatives, employee representatives and labor relations managers to establish an open and constructive communication framework. This includes the implementation of information and consultation mechanisms on employee working conditions and health & safety. Its objective is to create a healthy and safe working environment, where each employee feels listened to and valued.

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

Among the three themes related to the own workforce "Attractiveness, employee loyalty and commitment", "Working conditions" and "Equal treatment and opportunities" ten issues have been identified as material.

##### • Attractiveness, employee loyalty and commitment

With regard to "Attractiveness, employee loyalty and commitment", two material issues in terms of opportunity or positive impact have been identified:

- a phygital and inclusive recruitment strategy is an opportunity for the Group to strengthen its employer image;

- the various support systems, integration of new employees and talent retention have positive impacts on the Group's employees.

Conversely, an insufficient system for listening to employees, which does not capture their needs and level of satisfaction, is considered as a risk for the Group, insofar as this could have a harmful effect on employee commitment.

### • Working conditions

In terms of “Working conditions”:

- the theme of quality of life at work, risk prevention and health and safety at work is crucial because of its direct impact on employees, directly affecting their well-being. This theme is also material in the event of inadequate measures, in terms of employee retention, absenteeism, or disengagement of teams leading to an increase in recruitment, training or replacement costs. Insufficient commitment to risk prevention and occupational health and safety could also generate operational risks and have financial consequences for the Group;
- sustained and constructive dialog with employee representatives at the level of the Group and its various entities is a guarantee for the improvement of employees’ working conditions;
- a transparent remuneration policy understood by employees, decent remuneration beyond the legal minimums and protective social security coverage enable a significant improvement in employee well-being;
- the protection of personal data and the privacy of employees’ personal life was assessed as a material risk which in the event of non-compliance, could have financial consequences, such as financial penalties in the context of damages suffered.

### • Equal treatment and opportunities

With regard to the theme of “Equal treatment and opportunities”, the Group considers positive material impacts or opportunities through the various initiatives implemented: adapted skills development systems, policies supporting career paths and development of employability, policies promoting gender balance, professional equality, diversity, inclusion, support for people with disabilities or through measures to fight discrimination of any kind.

Groupe BPCE’s commitments to its employees are expressed as follows:

- in its Human Rights Charter, through its committed and responsible human resources policy, which respects the rights and dignity of its employees and social partners<sup>(1)</sup>;
- in its Code of Conduct and Ethical Standards<sup>(2)</sup>, which notably promotes exemplarity, high standards and benevolence (Principle 5) and respect for employees and their personal development (Principle 6).

The management of material impacts, risks and opportunities are described in the following paragraphs.

## 3.1.3 Impact, risk and opportunity management

### 3.1.3.1 (S1-1) POLICIES RELATED TO OWN WORKFORCE

#### 3.1.3.1.1 Human rights

Groupe BPCE is committed to respecting and promoting human rights, which is one of the cornerstones of its corporate social responsibility.

Groupe BPCE is a signatory of the United Nations Global Compact and endorses its “Ten Principles”, of which two relate to Human Rights:

- promote and respect the protection of international human rights law in its areas of activity and sphere of influence. This responsibility relates to the internationally recognized human rights set out in the International Bill of Human Rights and the principles set out in the ILO’s<sup>(3)</sup> Declaration on Fundamental Principles and Rights at Work;
- make sure they are not complicit in human rights violations.

The Group’s convictions and commitments have been set out in the form of “Principles” in the Groupe BPCE Code of Conduct and Ethical Standards. “Promoting respect for human rights in all our activities” is thus anchored in the Group’s values framework.

Groupe BPCE is also committed to applying the guiding principles on business and human rights set out in the United Nations’ “Protect, Respect and Remedy” framework.

Groupe BPCE recognizes the fundamental role of States and governments in defining legal frameworks for the protection and full exercise of human rights. The Group thus complies with the legal and regulatory provisions of the regions in which its activities are carried out. Groupe BPCE is also convinced of its role in preventing serious violations of human rights, both in the context of its internal operations and for the risks directly related to its purchases and its products and services.

Through its committed and responsible human resources policy, Groupe BPCE respects the rights and dignity of its employees and social partners. In particular, the Group:

- strives to create an inclusive and respectful environment, without distinction or discrimination, which promotes the well-being of its employees and offers remuneration that values employee commitment;
- ensures the implementation of an adequate prevention and protection system to guarantee health and safety at work and undertakes to protect the privacy of its employees and the confidentiality of their data in accordance with the applicable regulations;
- respects the rights of its employees to freedom of association and collective bargaining.

The Group’s employees must, in the context of their professional activity, apply and respect Human Rights, this rule is contained in the Code of Conduct and Ethical Standards that applies to all employees.

[1] [241007-dles-group-human-rights-charter.pdf \[groupebpce.com\]](#).

[2] [Code-of-conduct-ethics-FR-2.pdf \[groupebpce.com\]](#).

[3] International Labor Organization.

### 3.1.3.1.2 Dialog with employee representatives & working conditions

#### GROUP SOCIAL POLICY

Groupe BPCE's social dialog complies with local regulations and takes the form of organized dialog with employee representatives in France. Internationally, there are no laws or regulations on employee bodies in the countries where the Group is most represented.

Groupe BPCE's employment policy is based on an ongoing dialog led by the legal bodies and endeavors to respect the fundamental rights and freedoms of employees. Social dialog is based on regular exchanges with employee representatives and representative trade unions, which are key players in the proper functioning of the Group's various companies. Dialog with employee representatives thus contributes to the Group's economic and social performance.

Groupe BPCE's social dialog and negotiations with social partners are structured around three levels: the Group, the branches, and the companies.

At Group level, regular discussions with the representative trade unions take place in three main bodies:

- the Group committee, a body for information, discussion and dialog on subjects such as the general market, the economic and financial situation, and the Group's social policy;
- the Strategy Committee, a body for sharing the Group's strategic plan and overall vision;
- the negotiation body with the three representative trade unions at Group level.

In this context, dialog with employee representatives is reflected in group agreements applicable to the various entities, such as:

- the 2022 Workforce and Career Management agreement on Employment and Skills Forecasting (which addresses the themes of intergenerational balance, end-of-career arrangements, skills development, professional and geographical mobility and mobility leave);
- the 2022 agreement on the career paths for appointed employees (which deals with support for employee representatives when taking office, during their term of office and at the end of their terms of office).

At the level of the Banque Populaire and Caisse d'Épargne branches, social dialog takes the form of regular exchanges with trade unions within the framework of the Banque Populaire Joint Commission (CPBP) and *Commission Paritaire Nationale* (CPN), leading to the conclusion several collective agreements, such as : in 2024 the Banque Populaire and Caisse d'Épargne collective agreements on the prevention of incivility and professional equality between women and men. An NAO agreement was also signed in each of the two branches. In addition, social dialog in the Banque Populaire and Caisse d'Épargne branches is mobilized in the field of human resources development and business lines through the *Commissions paritaires nationale pour l'emploi* (National Employment Committees (CPNE)) and the *Observatoires prospectifs des métiers, qualifications et compétences* (Prospective observatories of business lines, qualifications and skills (OPMQC)).

Lastly, each Group company leads its own social dialog, thus guaranteeing an approach adapted to each entity's specificities while respecting the fundamental rights of employees.

This three-tiered organization ensures fluid communication and a strong commitment to collective bargaining.

The Group is committed to maintaining an open, transparent and constructive dialog that contributes to the implementation of its strategy and the performance of its activities. This dialog with employee representatives promotes the support of social partners and employees in the deployment of the Group's social policies.

In this context, the Group is very keen to involve employee representatives as early as possible on the major strategic issues and transformations to be carried out within its organization. These discussions prior to the deployment of projects facilitate understanding both in terms of the Group's challenges and development prospects, thus avoiding possible situations of blockage or potential infringement that could not only harm the Group's operations but also lead to a decrease in employee commitment.

## REMUNERATION & PERSONAL DATA PROTECTION

### Remuneration policy

The Group's remuneration policy is structured to promote long-term employee commitment and strengthen the company's attractiveness. It reflects the individual and collective performance of the business lines and employees, while ensuring that it is not a vector of conflicts of interest between employees and promoting behavior in accordance with Groupe BPCE's culture and the rules of good conduct.

The remuneration policy also aims to offer competitive remuneration levels in its reference markets. The Group regularly compares its practices with those of other similar players in France and internationally, to ensure that its remuneration policy remains competitive and appropriate for each of its business lines and entities.

The remuneration policy also incorporates the fundamental objectives of professional equality and non-discrimination. In this respect, the Group ensures, in particular, the equal treatment of women and men in terms of remuneration (details of the action plan in the Section 3.1.3.4.3 *Discrimination and equal*

*opportunities*). The Group also pays particular attention to the remuneration of its junior and senior employees.

Finally, the Social and Environmental Responsibility (CSR) dimension is integrated into the remuneration policy at several levels, for example:

- by taking into account the Group's CSR strategy in determining the variable pay of the Executive Management Committee of BPCE (see 1.4.3 - GOV 3 for more details),
- for certain subsidiaries:
  - the inclusion of CSR indicators in profit-sharing agreements,
  - the systematic choice of SRI-certified funds<sup>[1]</sup> or those incorporating ESG criteria for the free management of employee savings plans (PES) and collective retirement savings plan (PERCO),
  - the profit-sharing agreement, which provides the inclusion of CSR indicators to calculate the special profit-sharing reserve (sustainable and impact assets under management for asset management activities and the amount of green income for corporate banking and investment activities).

[1] Socially Responsible Investment.



The remuneration of Group employees is structured around the following three components:

- fixed pay that reflects the skills, responsibilities and expertise expected in the performance of a position, as well as the role and weight of the function in the organization. It is determined according to the specificities of each business line within its local market. It includes the basic wage, which compensates for the skills and responsibilities corresponding to the position held, and, where applicable, additional fixed pay related to geographical mobility and/or the specific nature of certain functions and responsibilities, allocated in accordance with regulations;
- individual variable pay, awarded annually according to the results of the activity and/or the achievement of predetermined individual objectives, including the contribution to risk management taking into account market practices (business line/geography). It may be paid in full in cash in the year of the grant. For certain employees (depending on their regulatory status, their profession and/or their level of variable pay), the payment may also be partly deferred, indexed to a financial instrument and subject to conditions, in a logic of loyalty and alignment of employees' interests within the long-term interests of Groupe BPCE;
- collective variable pay associated with employee savings schemes, particularly in France (profit-sharing and incentive schemes), as well as other local savings and/or social protection schemes offered in each jurisdiction.

Each employee benefits from all or some of these various components, depending on their job, their responsibilities, their skills and their performance.

The objectives and main principles of the Group's remuneration policy apply to all its employees in France and internationally. This policy is applied in all business lines, functional departments and Group entities according to their specificities and market practices, and in compliance with local laws and regulations that apply to them. The foreign subsidiaries, which are subject to specific regulations, have their own remuneration policy, which is in line with that of the Group.

The Supervisory Board for BPCE or the Board of Directors for Natixis - is the body for approving the remuneration policy and its implementation, guaranteeing independent decision-making through its composition and prerogatives.

More specifically, the decision-making process is structured around several successive levels of validation:

- business lines, functional departments and entities;
- Executive Management in coordination with the Human Resources division;
- Board of Directors after consulting the Remuneration Committee, itself composed of directors, half of whom are independent

The Compliance and Risk divisions, as control functions, are involved in the implementation of the remuneration policy, in particular to ensure that risk management and behavior in terms of conduct and compliance are properly taken into account when determining the amounts of individual variable pay.

The remuneration policy is in strict compliance with the legal obligations that apply to the company at the national, international, European and/or local level in terms of labor law and social and tax legislation.

In France and in the countries where the legislation provides for it, the social partners are involved in determining the remuneration policy. Each year in France, mandatory annual negotiations (NAO) are held with representatives of representative trade unions on the main components of remuneration. Employee savings schemes (including profit-sharing and profit-sharing), as well as social protection schemes (healthcare costs, personal risk insurance) are also governed by collective agreements negotiated with social partners. Lastly, the theme of equal pay is included in the agreements signed on gender equality.

### Internal communication

Policies and practices in terms of remuneration and social benefits are disseminated and applied internally in the form of procedures, guides, notices and guidelines to the various stakeholders involved in their definition and implementation, particularly within the Human Resources, Risk and Compliance divisions. Managers involved in the annual review of their employees' remuneration are also supported within the same exercise.

At the end of the annual remuneration review, the components of remuneration specific to each employee (individual fixed and variable pay) and their evolution are communicated by their manager.

An Individual Social Report is sent to employees each year to explain the components of annual remuneration. It presents both quantitative and qualitative elements related to:

- direct remuneration and its composition;
- employee savings schemes;
- social protection (protection, health, retirement, etc.);
- the various benefits.

### External communication

In addition, as part of its compliance with its regulatory obligations, the Group is required to publish an annual report on its remuneration policies and practices on its website, with a focus on employees identified as having a material impact on the company's risk profile under the CRD regulation<sup>[1]</sup>.

The Group also complies with transparency requirements with regard to supervisory bodies in France, at the European level and in the various countries where it operates, such as the *Autorité de contrôle prudentiel et de résolution* (ACPR), the French prudential supervisory authority for the banking and insurance sector, the European Central Bank (ECB) and the *Autorité des Marchés Financiers* (AMF), the French financial markets authority.

### Employee data protection

Groupe BPCE has defined a Group data protection policy that reflects the organization of the Group's Privacy function.

In line with this general policy, the Group has drawn up an information notice on personal data for employees, relating to the processing of their personal data. It meets the obligation of transparency due to the holders of personal data in the context of the use of their data.

This Group information notice has been applied to each entity within the scope of supervision of Groupe BPCE as its central institution.

[1] Capital Requirements Directive.



This policy also sets the requirements for employee training on GDPR compliance<sup>[1]</sup>.

This applies to all Group employees, insofar as they are located in a country subject to GDPR regulations. It should be noted that the SECs, as independent legal entities, are not subject to this policy, as they are outside the scope of BPCE's supervision as a central institution.

The draft policy is prepared by the Group DPO (data protection officer), belonging to the Group Security division, and submitted to the GDPR umbrella committee, named the Executive Privacy Committee, four members of BPCE's Executive Management Committee are present or represented, for approval by Groupe BPCE's Standards and Methods Committee.

## QUALITY OF LIFE AT WORK

Quality of Life and Working Conditions (QLWC) is a major area for Groupe BPCE that concerns each company and each employee individually. The QLWC policy aims to strengthen collective commitment and effectiveness and have a positive impact on the development and health of employees to serve the overall performance of the Group and its companies. The QLWC includes a set of issues such as: the work environment, work-life balance, support for transformations, career support, recognition and the right of expression, etc.

The QLWC approach is co-constructed with the coordination of a group-level function and the deployment of actions within the entities by local representatives. These actions, resulting in concrete measures to improve the working conditions of employees, directly contribute to the well-being and satisfaction of employees as well as to the reduction of psychosocial risks (workload, stress, burn-out, etc.).

Since 2009, several QLW agreements have been signed within the Group:

- agreements on stress measurement and prevention;
- agreements on working conditions;
- agreements to expand the possible fields of intervention by articulating all QLWC topics to facilitate the implementation at the local level of each company;
- agreements including new provisions on occupational health, workload regulation and support for managers.

## RISK PREVENTION AND SAFETY AT WORK

Groupe BPCE deploys its Personal and Property Security policy on the basis of branch agreements and the legal provisions in force (Banque Populaire and Caisse d'Epargne). It issues safety and occupational risk prevention rules.

The documents apply to all employee activities as well as outsourced services and concerns all Groupe BPCE companies subject to French regulations (4121-1 to 8 of the French Labor Code).

The safety and incivility branch agreements or the legal provisions in force, shared with employee representatives, organize prevention and safety and adapt the systems, equipment and human resources in order to achieve the overall safety objectives.

The policy is an extension of the European regulation (GDPR) and its implementation in French law. It also incorporates the guidelines of the EDPB and the French regulatory authority, the CNIL.

The policy transparently defines the rights of employees and the procedures for exercising them. Employees therefore have access to information on the processing of their personal data through the Data Protection Policy and the Data Protection Notice.

The policy and its operational implementation (the Personal Data Information Notice) are accessible on the intranet page containing the standards applicable within the Group:

- the employee intranet space - NORMA;
- the Data Protection area - the Kiosk;
- the intranet space opened in each Group entity for the benefit of employees - intranet portal.

For the Group, QLWC adapted by each company, is a catalyst for sustainable performance, making it possible to reconcile efficiency and employee well-being. Four aspects are taken into account:

- attention to **well-being** at work: "**Care**": systems for well-being and work-life balance (*Right to disconnect, Concierge services/ Well-being areas, Parenthood, Health Plan/Fight against sedentary lifestyle, etc.*);
- the **quality of relationships** and **leadership**: trust-based management that empowers teams and helps them grow (*Leadership model - Leadership Development Programs - Simplicity of Organizations*);
- **working environment**: a framework that facilitates efficiency and collaboration (*Support for hybrid work, Workspaces, Collaborative tools, integration of the human dimension in the management of transformations*);
- **transformation**: a constantly evolving company, which ensures that employees are committed to change (*Change management methodology, Increased attention to psychosocial risks*).

All of these actions, supported by constant dialog with employee representatives, make it possible to limit the high risk of financial losses related to turnover, absenteeism and employee disengagement, risk arising from:

- the loss of talent, recruitment costs, the training of new employees, and the replacement and financing of all or part of the absences;
- lost revenue related to the decline in productivity, performance and internal or external customer satisfaction.

French regulations are thus made operational and applied to banking activities, which also comply with the regulations of the host countries for international subsidiaries with local legislation.

Through the prevention of occupational risks, major risks and the safety of banking activities, companies aim for:

- a positive impact on the feeling of safety and the improvement of working conditions;
- the reduction of the financial impact on the amount of the social security contributions, in addition to the reduction in the number of days lost in the event of a workplace accident.

[1] The General Data Protection Regulation.

Management committees and safety reviews are within each company. They ensure that the process is adapted and updated on a regular basis. The steps are shared with the staff involved in the implementation.

Management, with the help of community tools, provides a global, consistent and structured vision for the entire group. Procedures for preparing and responding to emergencies or major situations are also implemented by companies. A monitoring and management unit can be activated at Group level.

Permanent control plans guarantee risk control and compliance of measures.

### 3.1.3.1.3 Promoting equal opportunities and combating discrimination

The Diversity, Equity & Inclusion policies deployed within Groupe BPCE reflect the conviction of its executives that there is no performance without collective intelligence and therefore without diversity. To make room for all singularities and therefore all diversities, means:

- being faithful to the Group's values, because collective intelligence and cooperation are at the foundation of the creation of Groupe BPCE;
- meeting the expectations of customers, regulators and civil society more broadly.

## DIVERSITY AND GENDER EQUALITY

For several years now, the Group's policy on diversity and gender equality has been structured around three areas: the representation of women in all the business lines at all levels of responsibility, equal pay and the fight against sexism and sexual harassment.

Since 2009 in France, with the signing of "Workforce and Career Management" (GEPP) agreements, the Group has defined a common base of actions in favor of gender equality. The majority of the Group's companies have then supplemented these GEPP agreements with signing additional specific agreements on the subject of professional equality.

All of these agreements make it possible to define the means implemented in terms of recruitment, equal pay, professional promotion, parenthood, the fight against sexual harassment, sexist acts and other violence.

They are the subject of annual monitoring meetings with employee representatives, which present the actions deployed and monitor the progress of diversity and gender equality indicators.

## DISABILITY

Groupe BPCE has long been involved in the inclusion of people with disabilities and the retention in employment of employees faced with fragile health or personal accidents. Since 2006, the Group's companies have implemented a proactive inclusion policy aimed at promoting the integration and retention in employment of people with disabilities.

This policy is based on clear commitments, enshrined in Groupe BPCE agreements, branch or company agreements, approved by the French State in accordance with the legal provisions set out in the framework of the French Obligation to Employ Disabled Employees (OETH)<sup>[1]</sup>.

Proactive HR policies have been in place for several years in order to build an even more respectful and inclusive working environment, which capitalizes on the diversity of its employees and allows everyone to be heard, valued and have an impact. Our HR policies offer the same opportunities to talents from all backgrounds, regardless of age, background, gender, orientation or gender identity or disability.

Supported by the managers, this Diversity, Equity & Inclusion policy is an opportunity and a positive impact on several levels:

- in terms of innovation and transformation thanks to the comparison and cross-examination of the diversity of its employees, customers, cooperative shareholders and service providers;
- performance, thanks to a better understanding of the needs of all customers in all markets;
- commitment and employer brand, in response to the expectations of candidates, employees and civil society, who are increasingly attentive to these issues.

Driven at Group level, the Diversity, Equity & Inclusion policy is then rolled out at the level of each company, taking into account local specificities and adapting to the regulations of the host countries for international structures.

Beyond the signing of these agreements, all executives are mobilized in favor of diversity and gender equality. In 2021, they publicly reaffirmed their commitment by signing a "diversity charter" ratified by all Group executives. To strengthen these actions and offer an increasingly respectful working environment for women and men by applying zero tolerance to sexism, Groupe BPCE is also a member of the collective initiative **#StOpE** composed of around a hundred companies, associations and schools, which is committed to the long-term fight against so-called "ordinary sexism in the workplace".

The composition of the own workers is a concrete illustration of the Group's commitment and results:

- the workforce is composed of 55.5% women and 44.5% men (figures available in 3.1.5.2 S1-6 Breakdown of own workers by gender);
- the representation of women within senior executives is 37.4% (MDR-M available in Section 3.1.5.5 S1-9 Diversity metrics).

Lastly, the Group ensures that women and men have identical access to training.

Through these agreements, the Disability policy covers the following main areas:

- **job retention:** thanks to the implementation of actions to detect disabling situations as early as possible, the Group's companies can adapt working conditions and tools to the disability, in order to keep the employees concerned in their jobs. They also ensure that employees with disabilities can benefit from the same development prospects as other employees, in line with their ambitions, their skills and the opportunities offered, without the disability being an obstacle;
- **recruitment and integration:** there is a major gap in integration into the labor market between people with disabilities and the rest of the population. Thus, the Group's Disability policy aims to promote: the professionalization of people with disabilities, sourcing and support for the integration of candidates with disabilities;

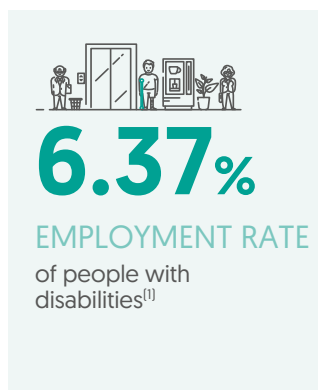
[1] Article L. 5212-13 of the French Labor Code.

- **changing outlook for better inclusion:** the Group's companies are committed to promoting disability awareness and inclusion, notably through the Mission Handicap Nationale and by the community of diversity & inclusion and disability officers;
- **support for the Sheltered and Adapted Work Sector:** Groupe BPCE's companies have a proactive purchasing policy and are committed to using the services of structures (*Entreprises Adaptées*, ESAT and Independent Workers with Disabilities) in the Sheltered and Adapted Work Sector (STPA) to support the external employment of people with disabilities who cannot work in the ordinary environment.

In France, in each Groupe BPCE company, a disability officer supports people with disabilities throughout their career in the company.

Within the Group, the Mission Handicap Nationale ensures the commitment of all companies and the continued momentum of sharing and pooling means and resources in each scope in order to maximize its impact.

Thanks to the implementation of this policy, the employment rate of people with disabilities within the Group reached 6.37%<sup>(1)</sup> in 2023, above the legal obligation of 6%.



[1] Legal obligation: 6%.

[2] Amount excluding tax of supplies, works or services, less the cost of raw materials, products, materials and selling expenses.

## FIGHT AGAINST DISCRIMINATION & HARASSMENT

In order to offer a respectful and safe working environment, in which each and every employee can express their skills and potential, the Diversity, Equity & Inclusion policies are supported by robust HR systems to combat discrimination and harassment. They make it possible to reduce the underlying risks: the risk of deterioration in working conditions, the reputational risk and the associated financial risks.

Several types of systems are available to the Group's employees:

- guides and communication campaigns that raise employee awareness against all forms of discrimination, such as sexism and racism;
- training to understand what inclusion consists of and how, in addition to the policies put in place, all employees are involved in inclusion;
- specific training to enable employees to recognize and fight against the different types of discrimination and harassment (see Chapter 4 Actions);
- with regard to the fight against sexual harassment and sexist behavior, a network of harassment officers trained and led by Group HR teams and company HR divisions.

### 3.1.3.1.4 Attractiveness, employee loyalty and commitment

#### ATTRACTIVENESS

The Group Human Resources department is responsible for the main guidelines applied by each entity for the implementation of the attractiveness policy. The latter is co-constructed with the various stakeholders, divisions concerned, employees and candidates, all involved at different times. The Group's policy is disseminated through all internal HR (HR divisions, recruitment managers, career managers, etc.) and external (social networks, trade shows, etc.) channels.

Groupe BPCE stands out for its social DNA that is fueled by cooperative values, strong local roots and a desire to act as a responsible employer. The Group's strategy, consisting of recognized and powerful brands, is based on four key dimensions that guide its approach to recruitment, retention and commitment.

- **Skills:** a group that gives all its employees the means to succeed and thrive at every moment of their professional life

The Group Human Resources department, with the HR officers in each entity, mobilizes the recruitment system to detect and attract talent, by focusing in particular on the apprenticeship of young people. Its loyalty policy takes the form of individualized support for employees in their professional development and proactive career management, thus promoting their employability. Groupe BPCE's HR policy aims to grow each employee by giving them the time and resources to continuously train to maintain and develop their skills, or to reinvent themselves within the Group by implementing their professional development or retraining projects. (see 3.1.3.1 S1-1 Skills development section).

[1] **Scope:** Groupe BPCE for French companies only // **Calculation:** Beneficiary of the obligation to employ workers with disabilities [BOETH] workforce employed by the company for the obligation to employ workers with disabilities [OETH] for the year/workforce subject to the OETH [D. 5212-1 of the French Labor Code]. Figure communicated to URSSAF each year.

- **Equality and inclusion:** a respectful group that offers a protective working environment

Groupe BPCE considers diversity to be an asset: it trusts everyone, regardless of their career path, by tangibly realizing the promise of equal opportunities, universal accessibility, diversity, inclusion and professional equality. Initiatives in favor of gender equality, the employment of people with disabilities and pay equity, as well as awareness-raising and educational support programs illustrate this commitment to creating an environment in which every employee feels respected. Groupe BPCE's HR policy strives to offer a real comfort of work, making it possible for each employee to give their best, through a culture of listening and dialog that takes into account all voices.

- **Well-being at work:** a group attentive to the needs of its employees

Groupe BPCE implements a work environment that meets the highest standards of well-being and health and safety at work, in terms of quality of life and work organization, work-life balance, health and personal risk insurance. It implements listening and support systems, promotes initiatives such as occupational health programs and spaces for dialog with employee representatives to improve the experience for everyone.

- **Sense and pride in belonging:** towards a positive and powerful impact

As a cooperative full-service banking group, Groupe BPCE wants each employee to feel proud of being part of a collective adventure and unifying moments with a strong positive impact on societal challenges, such as major transitions, sustainable finance, social innovation or the Olympic and Paralympic Games. It implements a tangible and pragmatic HR policy to support its employees towards responsibility, autonomy and initiative, by spreading an entrepreneurial culture in each business line, at each level and in each Group entity. It encourages employees to get involved outside the company and recognizes the place of this commitment in their lives, whether in terms of sports, civic or educational commitments, or with their families.

## RECRUITMENT AND EMPLOYER BRAND

### The strength of a decentralized, multi-brand group

The Group's companies attract, recruit and develop talent in line with the components of the markets and companies in which they operate, both in France and internationally, while capitalizing on centralized resources. The values of cooperation, trust and commitment are conveyed through the Group's website and disseminated through various internal and external communication channels.

Recruitment processes are adapted to local organizations to enable candidates to join a company that will provide them with the right level of professional support, with the possibility of moving on within the Group. Each company has the opportunity to adapt its human resources management methods to its market and its needs.

### Attractiveness of Groupe BPCE brands

Groupe BPCE has been able to develop a consistent communication strategy between its brands based on three pillars:

- placing the employee at the center by including employee testimonials in its publications;
- conducting communication campaigns to promote the business lines and support recruitment operations;
- promoting all its commitments in terms of inclusion (gender equality, disability, diversity) with dedicated communication plans (pride month, European Week for the Employment of People with Disabilities (SEEPH), diversity week, etc.).

The Group has strengthened its presence and visibility on two social networks:

- LinkedIn to promote the Group's culture and professional commitments by embodying its DNA through its employees as much as possible;
- Instagram to develop proximity and conversation with the audience, in particular through stories.

In 2024, the Group obtained the following results on LinkedIn<sup>[1]</sup>:

- number of subscribers: +21% between January - August 2023 and 2024:
  - over the period January - August 2024, 223,206 subscribers were registered on the platform,
  - for the period January - August 2023, the figure was 176,332 subscribers;
- number of appearances of a publication:
  - more than 4 million in the first half of 2024 compared to 1 million in the first half of 2023;
- number of visits to the Group's page:
  - 256,968 visits in the first half of 2024 compared to 55,535 visits in the first half of 2023.

Groupe BPCE and its entities are featured on several job boards and specialized media. The objective is to significantly develop the reputation and image of the various brands through increased communication on the culture, business lines and employment opportunities within the Group. The challenges are as follows:

- increase the visibility of messages to generate media impact and recruit qualified candidates;
- develop a multi-channel and mixed content strategy to address targeted messages on the platforms mentioned above.

### Strong markers around Sport, Health and Collective engagement

The Group's policy of attractiveness is based on its strong societal engagement:

- in 2023: launch of the Sport, Health & Collective engagement program, which includes measures to promote sports and physical activity within companies, actions aimed at having a positive impact on health (soft mobility, nutrition, etc.) and commitments to associations;
- in 2024: the development of sports practices by as many people as possible, notably through the partnership with Paris 2024, the sponsorship of the *Relais de la Flamme* (torch relay), and the organization of recruitment operations: 56 recruitment operations (*source Indeed*) from May to July 2024 in all French regions.

[1] The figures are taken from the LinkedIn tracking platform.

### Strengthening the employer brand and Groupe BPCE's commitments to young people

Groupe BPCE is resolutely committed to strengthening its employer brand among young talent. Aware of the importance of this new generation for the future of the company, the Group has a dedicated strategy aimed at attracting, developing and recruiting young professionals. At the end of 2024, the Group had 5,172 work-study students<sup>[1]</sup> (metric monitored at Group level) within its companies.

#### Diversify recruitment: OPIE and retraining of athletes

Several Group companies have set up the Operational Preparation for Individual Employment (OPIE) system offered by *France Travail*, which makes it possible to train and recruit job seekers.

The Group also invests in the field of sports to open up its recruitment to diversity and profiles with atypical career paths. A partnership developed with the *Association Française des Banques* (French Banking Association - AFB) enables the group to recruit young people, some of whom are far from the job market, as work-study trainees for customer service positions.

In 2024, a partnership was also signed with a specialized service provider to hire high-level sportspeople undergoing career changes. Groupe BPCE accompanies the athletes supported during Paris 2024 who wish to join the corporate world after the competition.

#### Supporting employees as soon as they join the company

Significant benefits for the Group's employees thanks to measures such as:

- integration and support for new employees: the Group's companies have undertaken to offer a reinforced onboarding program over three years, within a common framework by a GEPP (Workforce and Career Management) agreement renegotiated every three years. The current agreement signed on July 12, 2022 covers the 2022-2025 period;
- talent retention (systems for promoting success in positions, internal promotion culture, empowerment, corporate and Group talent pools and building individual career paths) (see 3.1.3.4.4 Skills Development).

#### Enhanced support and monitoring for a positive newcomer experience

Each Groupe BPCE company undertakes to implement an onboarding process and carries out tangible actions that anticipate and support the arrival of all new employees. This approach is structured around several major stages:

A pre-boarding program to prepare for the arrival of the new employee, maintain a link and distribute information about their future environment (group history, HR policies, etc.) in several smooth and fun formats.

- on arrival, an onboarding process organized around welcome sessions, meetings with the team and key stakeholders, the stages of which are structured;
- reinforced monitoring during the first months, with regular interviews with the manager and the HR manager;
- "mentoring" is encouraged so that the new employee can be accompanied by an employee on an informal basis.

Some Group companies are equipped with dedicated platforms to facilitate the support of employees in pre- and on-boarding. These tools offer an innovative, game-based employee experience and facilitate the onboarding of new employees.

#### Offer rewarding professional development through internal mobility and support for employee projects and career paths

Groupe BPCE has made internal mobility one of its priorities, in order to strengthen the sense of belonging and commitment and retain talent. Mechanisms are made available to employees to boost internal mobility:

- a Job Exchange for each company and a Group job exchange, rolled out in all Group companies to facilitate access to available opportunities for all employees of the Group's companies;
- a Group platform that summarizes career paths by mapping the bridges between jobs and associated skills, is accessible on the intranet of all Group companies to enable employees to understand the many business lines and employment channels of the Group's companies and project themselves into possible developments and paths;
- a Group platform dedicated to supporting employees in their mobility projects, Mobiliway deployed in all Group companies and accessible to all employees *via* their job exchange;
- innovative platforms for self-declaration of skills in certain Group companies, which enable employees to view and receive job offers that best match their skills and aspirations.

#### Training employees

Groupe BPCE implements an active training policy, promoting continuous learning through its "BPCE Campus" (see 3.1.3.4.4. Skills development)

#### Supporting high-potential employees

Since 2022, the Group has deployed a long-term system that has led to the identification and support of high-potential employees at Group level. Two pools have been created: potential senior executives and core business lines to fill management positions with experts. Employees have a shared development plan and are regularly monitored by an assigned individual manager. They benefit from personal development support actions.

[1] **Definition** of the scope of work-study students in the metrics calculated: the total number of work-study students was calculated on the basis of the scope of entities subject to the CSRD // **Calculation methodology** of the total number of work-study students based on: counting the own workers on a contractual basis in number of work-study contracts / workforce present at the end of the reference period / closing date: December 31 of the reference year. // The metrics are produced on the basis of the France and international **scope**. The metrics are produced in France and internationally.



## SKILLS DEVELOPMENT

### Skills at the heart of the HR policies

Groupe BPCE is committed to the long-term employability of its employees by offering them the possibility of broadening their experiences through rewarding career opportunities and the continuous development of new skills. In a constantly changing environment, Groupe BPCE is also committed to developing its high-potentials and its leaders to ensure succession in the company's key positions and manage the achievement of its commitments, particularly in terms of diversity and inclusion.

Groupe BPCE's skills development policy is part of an evolving context of its business lines and strong competition. Groupe BPCE is convinced that the development of technical and relational skills is an essential driver for individual and collective success and is determined to put skills at the heart of HR policies.

In France, this policy is expressed through the signing of an agreement for all Group entities on Workforce and Career Management agreement (GEPP) in July 2022 which defines a common set of policies and practices for all Group entities. This agreement is supervised by the Group HR department.

It is consistent with the branch and company agreements signed within the Group in the areas of professional training, gender equality and quality of life at work, in accordance with current legislation on professional training in France.

The main objectives of the skills development policy are therefore broken down into four major areas:

- promoting the integration of young people into the business lines;
- encouraging professional mobility & supporting business line transformation;
- raising awareness on CSR;
- developing a positive AI culture.

### 3.1.3.2 (S1-2) PROCESSES FOR ENGAGING WITH OWN WORKFORCE AND WORKERS' REPRESENTATIVES ABOUT IMPACTS

#### 3.1.3.2.1 Dialog with employee representatives and working conditions

#### DYNAMIC DIALOG WITH EMPLOYEE REPRESENTATIVES

Dialog with employee representatives is based on a series of interactions both within the Group's Human Resources/Labor Relations function, with the Employee Representatives as well as with employees *via* the Human Resources departments in particular.

With regard to the Human Resources/Labor Relations function, the Group HR department coordinates its policy on dialog with employee representatives through - and in agreement - with the entire community of directors, Human Resources Directors and Labor Relations in order to allow harmonization of practices, global monitoring of issues affecting the entire working community and shared expertise. This activity takes the form of regular *ad-hoc*

exchanges, working groups dedicated to specific topics as needed, as well as two seminars per year.

With regard to interactions with Employee Representatives, as discussed in Section S1-1 - 3.1.3.1 on policies related to the own workforce, regular meetings are organized within each entity concerned, with the joint committees of the branches or with the social and economic committees (CSE) as well as with the specialized committees within them (health, safety and working conditions committee, etc.). In addition, Employee Representatives are the local contacts for employees within the Group's companies to raise their concerns and questions and obtain answers.

Collective agreements are negotiated with union representatives. When agreements are signed, all employees concerned are informed of the measures negotiated applicable to them.

## REMUNERATION & DATA PROTECTION

### REMUNERATION

Payroll is subject to a regular individual review *via* annual interviews conducted by management under the supervision of the HR Department. In addition, employees can contact their line managers or the HR department at any time to discuss the subject of pay. At the collective level, pay is subject to mandatory annual negotiations with the social partners (details available in Section 3.1.3.1 S1-1 Remuneration policy).

### Data protection

The DPO (data protection officer) of the employee's parent entity is competent for the exercise of rights or requests for information on the processing of personal data. For this purpose, a generic mailbox makes it possible to collect requests made by employees.

The responses are sent directly by the DPO to the requester, using the same communication channel as the referral. In accordance with the GDPR, feedback made following a right of access are in a clear and accessible format.

## QUALITY OF LIFE AT WORK

In terms of Quality of Life at Work, Groupe BPCE's Human Resources department has set up a dedicated organization with a national contact who drives, develops and implements QLV actions alongside companies. This shared approach specific to the cooperative organization has gradually made it possible to develop a harmonized QLV policy (clarification available in Section 3.1.3.1 S1-1 Quality of life at work).

The quality of life and working conditions is a collective and concerted momentum of action by employees, managers, executives, occupational health and social assistance players, and social partners.

Employee listening systems are regularly deployed within the Group's various entities, with a view to dialog and continuous improvement (see paragraph "Listening systems" in Section 3.1.3.2.3 "Attractiveness").

At the local level, the creation of a QLW officer, who is the coordinator and bearer of the local policy, makes it possible to define and carry out actions as close as possible to the ground according to the specific context of the companies.

At the national level, the QLW players' function benefits from specific activities through discussions, co-construction, experience sharing and studies. Web conferences and meetings

are regularly organized. The QLW officers have a QLW website, which is a memory of the function's work, and a social network platform specific to their community. A professionalization system that can be adapted to the needs and constraints of participants is available to new officers. It enables them to acquire the skills necessary to implement appropriate systems and thus avoid negative impacts of an insufficient quality of life at work.

## RISK PREVENTION AND SAFETY AT WORK

The Group Security department is the reference documentation for the Safety and Security of People and Property, and oversees its implementation and updating. In addition, it is the responsibility of each company to implement the rules and recommendations set out in the reference documentation within their respective contexts in accordance with the validation processes and the responsibilities of the institutions representing the company's employees.

Agreements are shared at the national level with employee representatives at the level of the *Association Française de Banque* (AFB), Caisse d'Epargne and Banque Populaire branches. They are distributed to member companies with the aim of informing their departments responsible for implementing the agreement (real estate, sales, security departments, etc.), the employee representatives and the employees concerned.

Dedicated information and follow-up moments are shared with employees and their representatives at several levels:

- a national joint committee takes stock of the past year by reviewing:

- statistical balance sheets of accidents,
- analyzing work situations according to business line transformations,
- security devices and equipment inventory taking into account technological developments,
- study of safety rules and procedures;
- Within companies, a health, safety and working conditions committee (CSSCT) meets quarterly. It is made up of Management and employee representatives who interact quarterly on prevention and safety issues. Annually, an accident report and an action plan is presented to the Social and Economic Committee (SEC). The latter is regularly consulted to issue an opinion on the various projects or when calling on an expert.

In parallel, companies also adopt the Group's Personal and Property Security Policy. They define the procedures for operational application within them (organization, management, bodies, etc.) by regularly interacting and informing employees and their representatives.

### 3.1.3.2.2 Promoting equal opportunities and combating discrimination

The Group's HR teams are the entry point for the Diversity, Equity & Inclusion policy with all stakeholders, employees and their representatives.

As indicated above, the agreements monitoring committees (Professional Equality, Disability, GEPP) draw up the quantitative and qualitative assessment of the actions deployed and are part of a constructive dialog with employee representatives.

In terms of interaction, Groupe BPCE relies on a number of key HR players. They cover several distinct scopes and are spread across all companies in France:

- the diversity & gender equality officers: their role consists in promoting, leading and coordinating the implementation of the Diversity & Gender Equality policy within the company. They deploy training systems, manage key indicators and relay the tools and highlights made available to employees;
- the HR harassment officers: in accordance with the law in force, their role is to guide, inform and support employees in the fight against sexual harassment and sexist behavior;
- the SEC officers are appointed within each SEC to fight against sexual harassment and sexist behavior. They are trained *via* the Group system made available to them or *via* another training program of their choice;
- the disability officers: in each company of Groupe BPCE, a disability officer supports people with disabilities throughout their career in the company (recruitment, integration, training, job retention, support in the process of recognizing their disability, etc.) in conjunction with Human Resources managers, managers, occupational health services and disability missions.

These groups of officers are key contacts for employees, who can call on them as needed.

To carry out their duties, the officers are trained and coordinated through regular meetings and exchanges of best practices.

Another key relay for employees is the associative networks as a space for discussion and action plan proposals for ever greater inclusion of all types of diversity. Groupe BPCE currently has:

- female or mixed-use networks which exist in almost all of the Group's companies and bring together a large group of committed employees;
- Groupe BPCE's *Les Elles* network of women in banking contributes through its actions to gender diversity in positions of responsibility, as a career facilitator that defends and promotes diversity, and offers advice on how to dare to pursue a career as a woman. ([lesellesdebpc.fr](http://lesellesdebpc.fr));
- the WINN network (We in Natixis Network), is an association open to all employees, which aims to promote diversity in management in France and internationally through conferences, mentoring and networking events;
- the All Equals network, created in 2020, which aims to promote equality and inclusion of LGBT+ people. All Equals is open to all Group employees, regardless of their workplace, sexual orientation or gender identity;

Lastly, to promote and disseminate all of the Group's Diversity, Equity & Inclusion commitments, dedicated online spaces are accessible to all employees in France and abroad. They can find all the key resources there (charters, agreements, key figures, news, etc.).



### 3.1.3.2.3 Attractiveness, employee loyalty and commitment

#### ATTRACTIVENESS

The HR functions of the Group's entities are regularly coordinated around the themes of Recruitment & employer brand, integration & loyalty, listening systems, enabling employees and their representatives to be informed of all projects and news.

In France, a Group GEPP agreement (signed on July 12, 2022 and covering the period from 2022 to 2025) gives rise to an Annual Monitoring Committee bringing together staff representatives as well as corporate HR managers and the Group's HR department. This agreement lays down key principles on the integration and retention of employees over three years, on the development of skills and career development.

Groupe BPCE's HR department offers a range of attractive programs for the Group's candidates and employees.

#### DIAPASON barometer

The Group diapason barometer, developed with IPSOS, has become a key tool for interaction with employees and for measuring the transformation of the Group and our companies. It is a measure of trust and commitment. Rolled out to all Group employees, the purpose of this engagement survey<sup>(1)</sup> is to collect employees' opinions on their professional situation and their perception of the company at local and Group level.

In 2023, the results of the Diapason barometer at Group level:

- 60,698 respondents;
- 77% participation rate;
- 72% engagement rate;
- 76% of employees confident in the future of their company<sup>(2)</sup>.

#### Specific listening systems

Depending on their challenges and the context, different systems are made available to the Group's entities to carry out *ad hoc* surveys. They are based on tools referenced at Group level:

- *Key employee moments*: this system makes it possible to question employees during the main events of their professional career, generating the implementation of specific action plans;
- *Your Pulse program*: deployed since 2020, this program aims to regularly take the pulse of the teams *via* short surveys and thus be as close as possible to employee expectations;
- *other mechanism*: in all the Group's systems, the integration of several open questions makes it possible to listen to employees' concerns and to encourage more spontaneous proposals in order to identify the acceleration drivers for necessary transformations.

#### SKILLS DEVELOPMENT

In France and abroad, interactions between managers and their employees are at the heart of the skills development policy. These discussions make it possible to maintain the motivation of each employee, to identify their support and/or training needs, and to involve them in the construction and management of their career path.

These systems are made available to the Group's entities, which mobilize them as needed. They make it possible to prevent potential risks or identify improvements. They ensure that the processes concerned are adapted and regularly updated.

The Group is very keen and committed to maintaining a constructive and permanent dialog by involving employee representatives, along with all or some of the employees, depending on the themes addressed during the listening sessions in order to avoid any decline in employees' engagement.

#### Developing interactions between Groupe BPCE companies

The HR Managers of the companies regularly discuss all topics related to recruitment at thematic meetings. The practices and tools used by companies are compared in order to optimize them.

Centralized management of the main recruitment tools (application management software, recruitment processes, interviews, tests) are referenced and integrated for a majority of solutions.

Lastly, the service providers also solicited and used to complete this offer are subject to agreements and partnerships widely communicated within the companies and they give rise to benchmarks, best practices and experience sharing that boost Groupe BPCE's recruitment management.

#### Group employee ambassadors

Groupe BPCE employees are regularly asked to have their say on social media: promoting their business lines, sharing behind-the-scenes information on their business lines, promoting a commitment. Employees are also encouraged to post a review on recruitment platforms such as Glassdoor and Indeed.

The Group's employees can also be stakeholders in the recruitment activity, by:

- participating in actions to promote the Group's business lines to target schools;
- co-opting candidates for job offers within the Group.

Allowing employees to be ambassadors or co-opters is also a strong commitment driver.

#### Support for employee development

Employees can share their training needs throughout the year and also during their annual development interviews. Staff reviews organized between managers and Human Resources Managers make it possible to prepare for employee promotion and support their professional development.

In France, on the basis of these various exchanges, the Group designs skills development plans that are shared and monitored with employee representatives in dedicated bodies of the Social and Economic Committee.

[1] Annual survey or every two years.

[2] **Scope**: All Group companies // **Methodology**: questionnaire submitted to all employees on permanent (CDI) and active contracts on the roll-out dates.

### A learning experience to encourage employees to train

The Group's entities offer their employees a portal for accessing training in response for the need for greater visibility on training opportunities.

### 3.1.3.3 (S1-3) PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR OWN WORKFORCE TO RAISE CONCERNS

#### 3.1.3.3.1 Dialog with employee representatives and working conditions

There are different channels for raising employee concerns. In particular, they can contact their manager and their Human Resources Manager. Complaints can also be made *via* employee representatives or trade unions. Employee representatives can be contacted at any time to collect employee concerns.

The labor inspectorate may also be solicited directly by employees.

In addition, dialog with employee representatives at the level of the Group, the Banques Populaires & Caisses d'Epargne branches and BPCE allows for rapid meetings when the social partners solicit management on a particular and extraordinary topic, outside of the monthly meetings of employee representative bodies. The regularity of these meetings as well as the social highlights at Group level, such as the Group Works Council (at least two per year) and the Strategy Committee (also at least two per year), make it possible to report all complaints and demands made by the working community through the trade unions.

### RISK PREVENTION AND SAFETY AT WORK

The processing and identification of employee exposure and accidents in Groupe BPCE companies are organized according to severity or organizational scope criteria.

All employees who are victims of an accident related to a professional activity or while commuting, inform their employer of the occurrence of a workplace accident by any means (email, telephone, SMS, etc.). This procedure is carried out on the day of the accident or within 24 hours at the latest.

The components of an accident or occupational illness are listed on the basis of the victim's declarations and declared to the corresponding Primary Health Insurance Fund according to national procedures.

Cases of serious accidents are analyzed and investigated by the Health, safety and security departments, and the results are shared in extraordinary meetings with employee representatives.

Faced with the constant increase in crime figures across the country, as a preventive measure, in 2023, Groupe BPCE's HR department decided to strengthen measures to report incivilities. The system includes a reporting tool to identify incidents, a management and processing workflow, an innovative training program based on virtual reality, awareness-raising guides adapted to managers and employees, and support measures for victims (psychological assistance, legal assistance, etc.).

The Group tool centralizes notifications of near-misses, work-related accidents and occupational illnesses.

Employees can thus find the main offers by theme (communication, project management, impact, etc.) and, for some of them, direct access to skills diagnostics that allow them to create personalized courses or content platforms.

Each employee can ask their line manager and/or the HR department to express a concern about their own pay. A dedicated chat platform has been implemented to facilitate and accelerate the processing of individual questions. In addition, the social partners relay complaints and demands in terms of remuneration to company, branch and group bodies.

Generic addresses (delegate-protection-donnees@, etc.) are available in each Group company, and enable the DPO to be contacted in the event of a personal data breach. A response is provided within the legal deadlines, where applicable.

The Human Resources department of each company define their remedy procedures, manage and support the collective and individual situations identified (whistleblowing process available in the Section 4.1.1.3.3 *G1-1 Whistleblowing procedure*).

Group companies offer employees specialized psychological support to prevent psychosocial risks. Employees have free access to a telephone listening platform in complete confidentiality. Listed service providers also intervene occasionally at the request of companies to support crisis situations.

Finally, procedures for preparing and responding to emergency or major situations are implemented by companies through business continuity. A monitoring and management unit can be activated at Group level.

Infrastructure improvement and business transformation projects are regularly subject to specific assessments proposing measures to improve working conditions, risk prevention and protection.

In addition, safety visits (safety and security of people and property) and actions in the workplace (health at work) are regularly scheduled. The whole contributes to the regular updating of the Single Occupational Risk Assessment Document (DUERP).

A Health, Safety and Security passport is available to all employees, particularly new employees, with a specific focus on the risks associated with their activity (fire, evacuation, coping with incivility, fraud).

Prevention, management and safety training programs cover all known risks and are adapted to safety experts, managers and employees. An annual assessment measures the skills acquired and available.

Actions to prevent occupational risks are undertaken in the Group's companies. They are reinforced by national management.

Permanent control plans ensure risk management and the compliance of measures.

Best practices are collected by the central institution. They formalize the effective measures deployed in companies. They are regularly shared at safety reports (changes in the temperature of heat waves, extreme cold, road risks, international missions,

remote working, etc.). Managers, HR departments, Security Managers and business line managers are collectively involved in deploying prevention and protection measures from start to finish.

### 3.1.3.3.2 Discrimination and equal opportunities

In 2024, the Group rolled out a “Whistleblower” system to all employees (See 4.1.1.3.3 G1-1 Whistleblowing procedure) in which it is now possible to report information related to crime, offense, threat or prejudice to the general interest. In particular:

- a breach of the Groupe BPCE Code of Conduct and Ethical Standards;
- a violation, or an attempted violation, of the law or regulations in force;
- any action that has a negative impact on the environment;
- any behavior that is inappropriate in the workplace or that could harm everyone’s safety.

Employees who are victims or witnesses of discrimination or harassment can contact the aforementioned officers. Their contact details are available on the company intranet. Some companies have also set up dedicated pages to remind people of the best practices to adopt and facilitate access to the whistleblowing system.

Several contacts are in position to answer employees’ questions on diversity, inclusion and disability in complete confidentiality in order to inform them and support them in their approach depending on the situation and the subject.

**Disability officers** are available to take into account disability compensation needs. They receive, inform and provide guidance in complete confidentiality on issues relating to each individual disability situation and its impact on professional life.

**The occupational physician** is the essential contact person who can help to take stock of the impact of a health problem on professional activity and to formulate a request for adaptation of the position. He/she is bound by medical confidentiality.

**The Social Worker** manages all legal and internal procedures to support employees in administrative procedures, including in their private lives, and ensures a listening, information and guidance role.

**The Human Resources Manager** is also a privileged contact at all times of professional life.

**Employee representatives of each company** can be solicited as part of the diversity, inclusion and disability policy. They contribute to the protection of the physical and mental health and safety of employees within the company.

So that employees can benefit from a listening, information or advice space, the Group also provides all its employees with dedicated and anonymous listening centers.

### 3.1.3.3.3 Attractiveness, employee loyalty and commitment

#### ATTRACTIVENESS

##### Listening systems and continuous process improvement plans

The Diapason survey and additional listening systems are opportunities for employees to express their irritants and dissatisfaction. Groupe BPCE endeavors to report on results by entity, involving HR representatives. This makes it possible to identify operational action plans to be put in place to better support employees and initiate a continuous improvement process.

##### Monitoring jobs and working methods

In order to anticipate the impacts on working conditions, monitoring and tangible actions are implemented at Group level:

- a job observatory which provides a monitoring and alert system for quantitative and qualitative changes in the Group’s jobs, and enables to fine-tune training, mobility and retraining programs.
- the implementation and support of new ways of working: work organization, hybrid work, management methods, etc.

##### An open and transparent application process

All candidates may request directly via the recruitment site to delete their applications and associated data in compliance with the laws and regulations in force.

In addition, to allow candidates more proactivity and simplified interaction, Groupe BPCE has also set up - with its partner who manages the application management software - a link system sent directly by email when the application is submitted to manage and even withdraw their applications and associated data.

Finally, all data is automatically archived and destroyed at the end of the legal period, and all data exchanged as part of the monitoring and reporting necessary for the proper functioning of these tools are coded to make anonymous all statistical processing necessary for the performance and evaluation of the effectiveness of the systems used.

##### Moderation

Groupe BPCE may be subject to unfounded complaints relating to “greenwashing” (excessive advertising in terms of eco-responsibility), “pinkwashing” (abusive advertising in terms of inclusion), opinions and/or comments on the social networks and rating platforms from candidates or employees, which could tarnish its employer reputation.

In response, Groupe BPCE has set up a moderation guide<sup>[1]</sup> which is managed by the Communication department with the help of a social media agency that supports it.

[1] [https://groupebpce.sharepoint.com/sites/tous\\_acteurs\\_sur\\_les\\_reseaux\\_sociaux/](https://groupebpce.sharepoint.com/sites/tous_acteurs_sur_les_reseaux_sociaux/)

## SKILLS DEVELOPMENT

The risk for Groupe BPCE companies could be that they may not identify the right skills for future needs. To update and take into account future skills needs, the Group has a certain number of tools and systems.

### Business line observatories

Among these resources, the studies carried out annually by the Business Line Qualification Observatories (OPMQ) exist in each branch. Through these studies, the observatories offer an enlightened vision of current or future changes and the impacts of these changes on organizations, employment and skills.

The Group thus relies on those of the Banque Populaire, Caisse d'Epargne, *Association Française des Banques* (AFB) and Insurance branches with, in particular,

- specific studies on the Banque Populaire and Caisse d'Epargne scope (example in 2023 "*What levers to attract and retain employees in the banking sector, in a changing environment?*");
- inter-branch studies between the banking and mutualist departments (example: on the challenges of generative AI in the banking sector, ongoing in 2024).

In addition, studies are also carried out by OPCO ATLAS. They are accessible, as well as those carried out by the branches of the scopes, from the Prospective Atlas platform set up in 2024.

At Group level:

- a job development trend booklet, updated each year, including sensitive job sheets (identified according to the findings of observatory studies, particular context, recruitment difficulties, etc.) is accessible to all employees (example in 2023: professional customer advisor, branch manager and remote banking advisor);
- dynamic personalized mobility platforms bring together information on the Group's business lines, training courses and mobility bridges;
- ongoing updating of skills and employment standards in line with the business lines and on a regular basis.

### Continuous updating of business line frameworks

The Group HR division regularly updates the business line and skills frameworks in line with changes in the business lines and under construction with the business line divisions of the Group and its entities. As indicated in the Group GEPP agreement of 2022, these operational and dynamic business benchmarks must enable managers, employees and the HR division to build individual policies and trajectories for the development of skills and performance on a daily basis and over the long term. These business line frameworks provide useful material for discussion when assessing the employee's work, particularly during the assessment interview and/or a skills assessment.

## 3.1.3.4 [S1-4] ACTIONS ON MATERIAL IMPACTS ON OWN WORKFORCE, APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL SIGNIFICANT OPPORTUNITIES RELATED TO OWN WORKFORCE, AND EFFECTIVENESS OF THOSE ACTIONS AND APPROACHES

### 3.1.3.4.1 Human rights

In France and internationally, HR divisions implement measures to guarantee benchmark standards for HR policies. In 2023, a map was drawn up as part of the Duty of Care to identify more specifically the risks relating to working conditions, discrimination and personal safety in the various Natixis sites. These assessments are based on recognized external databases, such as ILO (International Labour Organization) statistics or the ITUC (International Trade Union Confederation) Global Rate Index. On the basis of these analyses, the sites with more than 50 employees that present a risk in terms of human rights, health and safety are as follows: China, United Arab Emirates, Hong Kong, India and Algeria. In all countries, including these five countries, the working conditions of employees comply with local regulations or improve them:

- child labor and forced labor are strictly prohibited; Group entities are required to check the age of all new employees when they are hired;
- working hours comply with local standards or are more favorable, sometimes with the possibility of remote working and additional days off;
- remuneration surveys are regularly carried out to verify their competitiveness in their reference market;
- maternity leave complies with or improves local regulations;

### 3.1.3.4.2 Dialog with employee representatives and working conditions

## RISK PREVENTION AND SAFETY AT WORK

Groupe BPCE has implemented a strategy to identify any material impact on the work situation, such as significant fluctuations in the number of employees, problems with work or commuting accidents, the identification of serious accidents, specific risks, or material changes in the organizational structure.

The "Prevention of occupational risks" rule (N2) is a set of principles formulated in the form of commitments in which Groupe BPCE defines the organization's long-term orientation for the support and continuous improvement of its performance in preventing occupational risks. It gives a general direction and

provides a framework enabling the organization to define its objectives and carry out actions in order to obtain the expected results of the prevention management system and, more specifically, the accident ratio.

These commitments are then reflected in the processes established by the companies to guarantee a reliable, credible and robust system.

Community tools support companies in mastering techniques and harmonize practices between companies.

The tools offer modules around the following prevention objectives:

- assessment of physical and psychosocial risks;
- action plan;
- accident reporting;
- monitoring of near-misses;
- indicator for managing accidents and absenteeism.

Whenever necessary, they adapt to the regulations of the host countries for international subsidiaries with local legislation.

Some actions undertaken by the Group since 2023:

- an occupational risk prevention rule applicable to all Groupe BPCE companies reinforces the personal and property safety policy and specifies the applicable rules and best practices for preventing the risk of accidents. Without an end limit and revised regularly, the rule specifies the legal provisions and the Group's recommendations in terms of organization, planning, performance of operational activities, evaluation and continuous improvement;
- a three-year Security branch agreement, the objectives of which are to maintain the vigilance of companies and reaffirm their desire to ensure the safety of employees in the face of assaults, on the one hand, and on the other hand, for emerging health and climate risks, related to new working methods or high-risk gatherings, is signed between the Management and employee representatives of the Banque Populaire branch. The scope

## QUALITY OF LIFE AT WORK

The Group's QLW system pays particular attention to individual and collective situations. The measurement of the impact of the actions is the responsibility of each company. Indeed, the quality of life and working conditions is an approach that is materialized and experienced on the ground in the working environment. However, the Group promotes and monitors actions:

- **the Prev&Care system:** a partnership was signed in 2023 with a Care Management company. This partnership offers Group companies a personalized response to the support needs of their employees who are caregivers, including information and training, and the implementation of care solutions for the person being cared for. This system is currently operating in 18 companies. In addition, some companies offer specific measures, for example, additional remote working days for caregiver employees. The global approach to inclusion and support for caregiver employees was recognized by the award in 2021 of the First Prize Company and Caregiver Employees.

The system is set to continue and be extended to the Group's various institutions. An annual review is scheduled for April 2025 and aims to take stock of the use of Prev&Care and the new services offered by Prev&Care.

- **Support for transformations:** in a context of accelerated change in the banking sector characterized by new work organizations, Groupe BPCE also pays close attention to the management of transformations, hence the implementation of dedicated initiatives and teams to support change such as:
  - Human Impact Measurement;
  - Establishment of the Change function.

These initiatives include giving employees a voice to identify the major consequences of a transformation shared by the work team, identify corrective measures and strengthen support measures. Internal training courses enable employees to be trained in the implementation of these approaches.

covers all Banque Populaire companies. The agreement specifies the prevention and safety policy, the means of protection and prevention implemented as well as the planned crisis management systems;

- two branch agreements for the Banque Populaire and Caisse d'Epargne companies are negotiated with employee representative bodies on the phenomenon of incivility and assaults committed by customers, in the workplace, in situations of mobility, or through communication tools, whether digital or not. The agreements are signed for an indefinite period. A review of incivilities and assaults is organized annually for the branch and a review scheduled every three years.

Their action plans include strong measures to fight incivility in companies, in particular:

- a campaign to raise employee awareness of the risk of incivility;
- a training program to deal with incivilities including new hires, team members and dedicated training for managers. The program includes virtual reality immersions;
- the creation of a specific, innovative system available on the employee's computer workstation. It is intended to support employees in situations of isolation and lack of motivation;
- a manager's guide to dealing with incivilities in the form of a toolbox to respond to emergency situations;
- a tool for reporting and processing incivilities.

The Human Impact Measurement will continue in 2025 depending on the transformation projects chosen by the companies to benefit from this system.

### • Sport & Health

The Group's various companies deploy awareness and prevention actions in the areas of physical health, mental health and serious or chronic diseases.

The partnership with Paris 2024 was an opportunity to reinforce the Group's efforts and commitments in the fight against sedentary lifestyles, and to contribute to the well-being of its employees.

A Sport, Health & Collective Engagement program, launched in 2023, focused on five areas:

- **Sport & Business:** promotion of physical activity in companies, with more than a hundred programs identified and contracts in progress with sports platforms;
- **Sport & Inclusion:** promotion of diversity and inclusive recruitment, in particular for the retraining of athletes;
- **Sport & CSR:** initiatives promoting a positive impact on health and associative commitment;
- **Sport & Attractiveness:** promotion of the partnership with Paris 2024 to improve the employer image;
- **Sport & Pride in belonging:** employee loyalty initiatives during and after the 2024 Olympic and Paralympic Games.

The Group continues its commitment to the dynamics of the Olympic Games, through initiatives aimed at improving employee's well-being and promoting Groupe BPCE as a Sports Bank.



### 3.1.3.4.3 Discrimination and equal opportunities

In accordance with the policy on professional equality, the action plans undertaken by Groupe BPCE are broken down into three themes:

- actions in terms of professional equality;
- disability actions;
- actions to combat discrimination and harassment.

All action plans are included in company agreements for a period of three years. They are monitored annually and reviewed at maturity.

## ACTIONS ON PROFESSIONAL EQUALITY

In terms of professional equality, several corrective actions are applied to prevent the risk of discrimination and promote equality.

**In terms of remuneration:** these are monitored annually, in particular as part of the production of gender equality indices and mandatory annual negotiations with employee representatives. In this respect, pay gaps are closely monitored. Dedicated budgets are thus reserved to reduce the discrepancies observed and not justified by the nature and/or positioning of the job.

**In terms of recruitment:** job offers are formulated in a neutral and objective manner. In addition, the Group strives to promote gender diversity in the business lines and to guarantee, as much as possible, a mixed final recruitment phase for management functions and certain business lines.

Other initiatives focus on highlighting the testimonials of employees in jobs where they are less represented in order to fight stereotypes.

### In terms of parenthood:

The Group ensures that maternity leave does not hinder the professional development and remuneration of women.

## ACTIONS RELATED TO DISABILITY

In terms of actions related to disability, several corrective measures are applied to prevent risks in terms of job retention, recruitment, integration and change of perspective.

**Job retention action plan** defined in the 2023-2025 disability agreements:

- information for employees experiencing health difficulties about the specific support measures from which they could benefit by having their disability recognized;
- support for employees wishing to apply for recognition of the status as a disabled worker (RQTH);
- multidisciplinary management of individual situations and search for solutions;
- assistance in financing disability compensation needs in a professional and personal field;
- organization of training (internal or external) according to the constraints related to the person's disability.

**Action plan for the recruitment and integration of people with disabilities** defined in the 2023-2025 disability agreements:

- welcome and training of people with disabilities *via* internships or work-study contracts;

Thus, in France, women returning from maternity leave benefit from the average increase granted to employees in accordance with the legal provisions applicable in France. In application of this principle, it is agreed that after one year of seniority, any employee on paternity leave covered by social security benefits from remuneration equal to 100% of the difference between the amount paid by social security and the amount of their gross pay.

**Awareness-raising actions:** highlights throughout the year, such as gender diversity week, parenthood week and the fight against sexism day, raise employee awareness of these themes and promote behavioral change.

In 2024, 15 companies in the Group were involved in obtaining the Professional Equality label<sup>[1]</sup>. This label, created in 2004 by the State, in association with social partners and experts, is a true methodological guide, which certifies respect for equal rights between male and female employees.

In addition, some of the Group's companies have carried out their Diversity footprint: a digital footprint that measures the level of maturity on five dimensions: gender equality, disability, cultural and social origins, ages and sexual orientation/gender identity.

- participation in sourcing actions dedicated to disabled candidates (virtual forum, trade fair, specialized firm, etc.);
- external communication to attract new employees with disabilities;
- adaptation of the recruitment process according to the individual compensation needs of candidates;
- awareness-raising/training of HR teams, recruiters and managers on the principles of non-discrimination applied to disability.

**Action plan: change of perspective** defined in the 2023-2025 disability agreements:

In 2024, the Group focused on actions to improve awareness of visible and non-visible disabilities and improve the inclusion of employees with disabilities.

**Support Action plan for the Sheltered and Adapted Work Sector** defined in the 2023-2025 disability agreements:

- implementation of an annual action plan by each company purchasing function;
- raising awareness among local buyers and specifiers;
- national partnership with the Gésat Network.

Each of the provisions of the action plans are rolled out and implemented within each Group company according to their own policy and commitments on this subject.

[1] <https://www.groupebpce.com/rse/employeur-inclusif/>

## ACTIONS TO FIGHT DISCRIMINATION AND HARASSMENT

Systems to raise awareness and to train employees with several levels of granularity according to the themes and challenges:

- non-discrimination training for recruiters;
- e-learning programs have been widely rolled out to employees, enabling them to:
  - distinguish non-discrimination, diversity and inclusion,
  - understand the challenges of inclusion,
  - identify the impact of stereotypes on daily working life,
  - identify and know how to react to micro-attacks,
  - adopt inclusive practices and behaviors.

In addition, the Group has made available a guide “all mobilized against sexism”, a self-assessment as well as a dedicated e-learning program to prevent sexism and sexist behavior.

Commitments were also made to several dedicated populations:

### Soutien aux jeunes (Support for young people) from priority urban areas

- welcoming many young interns from third and second grade from the priority urban areas across the whole group in order to introduce them to the Group's business lines;
- partnership for three years with the *Capital Filles* association to help young girls in their career paths. For the association, Groupe BPCE represents the largest number of female sponsors who once again support young people from rural areas or priority urban areas;
- support for the “Nos Quartiers ont des Talents” (NQT) (our neighborhoods have talent) program with mentors who help young people in their job search: help with CV writing, advice for interviews, mentoring, etc.;

- welcome of work-study students from priority urban areas in 2024 within Groupe BPCE.

### Inclusion des personnes LGBT+ (inclusion of LGBT+ people)

- signature of the *Autre Cercle* commitment charter, encouraging companies to promote and LGBT+ diversity respect in their workforce;
- organization of several conferences and round tables in the Group's various companies to address the consideration of LGBT+ diversity in society and in business;
- distribution of a guide to clarify certain definitions or misconceptions and share some best practices;
- a quiz/Sensi'Diag of around ten questions enabling employees to assess themselves in just a few minutes and test their knowledge and awareness on LGBT+ inclusion.

### L'intergénérationnel, source de richesse pour tous (intergenerational, a source of wealth for all)

- signature of the 50 years plus charter, managed by a collective of companies under the aegis of the Bayard Group<sup>(1)</sup>;
- deployment of a policy structured around company agreements which notably covers the recruitment of young people under the age of 30 years and the retention of employees over the age of 50, in accordance with French law. In this context, measures have been deployed to enable young people to integrate the Group's business lines, as well as older people to evolve under the same conditions as other employees, to change jobs and to be supported in a pragmatic manner in retirement.

### 3.1.3.4.4 Attractiveness, employee loyalty and commitment

## SKILLS DEVELOPMENT

All of the skills development action plans described below fall within rolling time horizons. Indeed, action plans are to continue over the coming years with no scheduled end date.

The total amount committed in terms of training is<sup>(2)</sup>:

- €275 million for 2022;
- €301 million for 2023.

100,369 employees benefited from training in 2023.

### Integrating young people into the Group's business lines with the Apprenticeship Training Center (CFA) of the BPCE Campus

- In order to support the Group's proactive and ambitious skills development policy, the BPCE Campus CFA was created in 2020 to support, train and retain students by offering them adapted courses. The BPCE Campus CFA, in partnership with the *École Supérieure de la Banque* (ESB), offers two Bac+3 graduate level certifications: the Professional Banking Degree

(LPB) and the Bachelor in Banking Insurance (BBA), which prepare students for the profession of Individual Customer Advisor.

In 2024, the Campus CFA welcomed more than 300 work-study students (*i.e.* four cohorts in the Professional Banking Degree and 17 in the Bachelor in Banking Insurance) in more than 10 locations in mainland France (Paris, Marseille, Lyon, Toulon, Bordeaux, Toulouse, Montpellier, Nantes, Lille, Tours, Rouen, Caen, Strasbourg, etc.). Nearly 8 out of 10 work-study students passed their exam<sup>(3)</sup>.

In June 2024, the Campus CFA passed an external audit to renew its Qualiopi certification, enabling it to maintain it for the next three years. This audit revealed any non-conformities and identified twelve strong points, notably:

- strengthening of the supervision of young people;
- support for the success of work-study students.

[1] <https://www.clublandoy.com/la-charte-50/>

[2] Figures taken from the Group's social report in 2023. The scope studied below represents more than 96% of Groupe BPCE's total workforce in France. It includes the Banques Populaires, the Caisses d'Épargne branch, Banque de Savoie, BCP Banque, Banque Palatine, Natixis SA, Natixis Interépargne, UES Natixis Investment Managers International, Natixis Wealth Management, AEW CIOGER, Fédération Nationale des Banques Populaires, as well as BPCE companies [1]. It concerns 100,369 employees.

[3] For the Bachelor in Banking Insurance, one month after taking the exam, the exam certifier (in this case ES Banque) sends the results file. For the Professional Banking Degree, the certifier (in this case the partner universities) sends the results to its educational partner (ES Banque), which issues them to the Group during the quarter.



## Professional mobility & job transformation

Groupe BPCE encourages the mobility of its employees and develops tools to facilitate their professional development:

- digital platforms and job exchanges to discover jobs and identify opportunities;
- workshops or individualized support to build professional projects and prepare for interviews;
- continuous training programs to develop employees' skills and thus strengthen their employability.

### Support for professional mobility through targeted pathways

Groupe BPCE supports the preparation of future professional mobility through several key pathways available:

- the Career Boost program enables employees to build their mobility project, consolidate their future applications and develop their personal marketing;
- the "Up by BPCE" program enables the development of high-potential young talents who are likely to advance across the Group's major business lines;
- high-potential development paths are also offered within each major business line.

At Group level, dedicated pathways are offered to high-potential female employees to accelerate their development with, in 2024:

- the "Declic" program enables high-potential female employees to accelerate their careers by developing a clear and ambitious career plan;
- the "Inspiring Women Program" with an international dimension and the "Women Sponsorship Program" to enable women with strong potential to develop their careers and their visibility.

### Support for professional mobility with training programs or certifying training courses

For sales advisors, mobility and development are often achieved by developing their skills in new markets. To support this mobility, the BPCE Campus and companies offer substantial certification or diploma courses.

The "Step Up Academy" system makes it possible to design and roll out retraining programs for the professions of the future, in cooperation with internal professionals, as well as schools with expertise in the training market.

Within the Group, employees working in a functional profession are also supported by training courses leading to certification. For example:

- the internal control and risk management certificate for financial institutions with Paris Dauphine;
- the certificate in banking and prudential accounting with ESCP Europe.

### Support for future jobs

Aware of the challenges related to job transformation to which the Group is exposed, several specific systems and pathways have been put in place:

For each of the Group's major business lines, a dedicated program prepares employees for the skills of tomorrow and encourages them to maintain their skills, develop and progress in their jobs, for example:

- the **'Progress within the network'** program enabled each Banque Populaire and Caisse d'Epargne to set up personalized development paths for its Sales Advisors so that they can **be comfortable in their jobs and at the level expected by their**

**customers.** On the basis of a skills and performance framework, the advisor can identify areas for improvement with their manager and, after a skills assessment, build their personalized career path with them;

- as part of the strategic **'Adding Value to Banking Services'** program, a new Job Skills framework was delivered in 2023 for these jobs, as well as a training catalog classified by skills and incorporating new job expertise and a strengthening of training offers concerning change management, in particular to support the Group's companies that want to support employees moving from a back office customer support job to a support more in contact with customers (Middle office).

## Impact awareness

### Climate School

At the end of 2022, the Climate School was launched Group-wide to raise employee awareness and develop skills and commitment to the success of the sustainable transition. It offers an online training experience, composed of more than 150 microlearning modules, 100% customizable with mini quizzes with two learning paths:

- "understanding" the environment to better act collectively. This is the objective of the Climate School, the new educational program dedicated to the climate and the ecological transition in 2023;
- "act" in 2024 looking back at the Group's initiatives.

### Launch of the BPCE Impact Campus

As part of the VISION 2030 strategic project, Groupe BPCE companies claim positive feedback, thanks to the strength of local solutions and are committed to making impact accessible to all. By transforming itself, the Group will be able to support the transitions of all its customers, in each of its regions.

With a view to continuous improvement, Groupe BPCE therefore set up an Impact Campus at the end of 2024. It aims to structure the training of all its employees with a tailor-made course consisting of a common core of general knowledge for all and operational modules specific to each business line and each level of expertise.

Within the BPCE Campus, the Impact Campus is a training program available as of 2025 and dedicated to ESG issues for the 100,000 Groupe BPCE employees. The objective is to raise awareness and acculturate all employees to ESG issues as part of the "VISION 2030" strategic project, and also to initiate the transformation of each business line through targeted training programs. It makes it possible to implement the Group's Impact program, which sets the operational priorities for 2024-2026.

## Strengthening the tech & digital campus and developing a positive AI culture

### Training programs

The objective of the Tech & Digital Campus is to support skills development by offering career paths, with specializations by business line and typology of players (employees, experts, managers and personae of the transformation program) so that each employee has the appropriate level of knowledge for the Group's AI transformation.

In 2024, the Campus continued its development through its training offer built around the nine strategic skills for the Group: user experience, agility at scale, Product Owner skills, quality of service, responsible digital services, data, technology and innovation, IS security, devOps.

Within the BPCE Tech & Digital Campus and under the aegis of the Data & AI division, the Data & IA Academy offers training that serves the Group's Data & AI transformation.

Group employees are offered training on:

- “The responsible use of data and AI”, the objective of which is to enable them to understand the opportunities and responsibilities of the advanced use of data and AI;
- “Generative AI for employees” helps to acculturate them and raise awareness of best practices in the use of generative AIs. This training is a prerequisite for the use of the Group’s generative AI tool (Maia);
- “The discovery of the essentials of prompt writing” in order to make employees autonomous and efficient in drafting prompts;
- “Mastery of the advanced techniques of the art of the prompt” enabling them to go further in the theory and practice of the use of prompts through use cases.

Managers have access to a training offer enabling them to familiarize themselves with generative AI, understand the business impacts and acquire the in-depth skills necessary to operate it on a daily basis and support novice users of their entities.

## ATTRACTIVENESS

### Launch of Great Place To Work

As part of the VISION 2030 strategic project, Groupe BPCE wants to embody a human model and a culture that is a source of commitment, trust and performance. One of the flagship projects is the deployment of Great Place To Work in the Group’s entities that may wish to do so according to their own strategy. It is a survey to measure the internal perception of the business model based on the assessment of five managerial pillars: credibility, respect, fairness, pride and conviviality. It is recognized in France and internationally and aims to gradually improve managerial quality and the commitment index.

In 2024, out of the Group’s four companies<sup>[1]</sup> who carried out the survey, 3 obtained the Great Place to Work label.

The Group’s senior executives receive training to provide them with the keys to building the strategic vision, including a good understanding of how AI works, an understanding of the transformation prospects and knowledge of the work launched by the Group.

### A secure chat to help employees familiarize themselves with AI

From the beginning of 2024, Groupe BPCE employees have access to a generative AI tool (Maia) enabling them to meet various needs: translation of text, generation of a summary, writing of a text, preparation of the agenda of a meeting, inspiration for a brainstorming, etc.

### Acculturation programs

To enable employees to take ownership of Data and AI technologies, managers and tools, acculturation actions and systems are deployed facilitated by a network of Data Managers in each Group establishment.

### Increased digital accessibility of the Group’s HR tools

In order to improve the employee experience and meet the requirements of the European directive, Groupe BPCE has embarked on a major program to improve digital accessibility across all its sites, tools and media. This work makes it possible to take into account all disabilities when using digital products. The recruitment website, the job market and internal time management tools are among the priority HR tools in 2025-2026.

### A benchmark employer

As part of the new VISION 2030 strategic plan, the Group wants to stand out on the market through an employer signature that can be adapted by each Group entity.

In connection with the employer brand, to highlight the Group’s actions and attract the best candidates, work is being carried out to redesign the Groupe BPCE’s career website by 2026. For this purpose, benchmarks and design thinking workshops are underway.

## 3.1.4 Targets

### 3.1.4.1 (S1-5) TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

#### 3.1.4.1.1 Human rights

In each of the Group’s locations, the objective is to monitor and enforce the application of the Group’s Human Rights Charter while being part of a process of continuous improvement.

#### 3.1.4.1.2 Dialog with employee representatives and working conditions

### SOCIAL DIALOGUE

Social dialog, as managed within the Group, enables it to comply with all of the legal obligations, whether in terms of negotiations or information for employee representatives.

The coordination of relations with employee representatives based on the negotiation and signature of collective agreements as well as the deployment of social policies aims to meet both the aspirations of employees and the challenges facing the Group’s companies. This social dialog supports the Group’s economic and social performance.

[1] BPCE Assurance, Banque Populaire du Sud, BPCE Vie.

## PERSONAL DATA PROTECTION

In terms of training, each employee must have had GDPR training within the last three years.

With regard to the exercise of rights within the meaning of the GDPR, the Group's entities endeavor to respond within the required timeframe, *i.e.* 30 days, except in the event of a complex request where this response period is extended to 90 days.

## RISK PREVENTION AND SAFETY AT WORK

To reduce the number of material negative incidents by implementing preventive measures and risk management protocols, Groupe BPCE has developed a risk management strategy that takes into account occupational risks and natural risks and, where applicable, industrial risks. This approach aims to anticipate and mitigate the effects on employees.

A safety policy is rolled out in all companies, taking into account the results of an adapted risk assessment (DUERP) and action plans, Annual plan for prevention and improvement of working conditions (PAPRIACT) revised annually.

They make it possible to ensure regular monitoring of prevention as closely as possible to the challenges of the regions.

## QUALITY OF LIFE AT WORK

The QLW policy is structured to be as close as possible to employees. Thus, each company sets its own targets with regard to its concerns, its territory and its organization. For this reason,

### 3.1.4.1.3 Discrimination and equal opportunities

## DIVERSITY & INCLUSION - GENDER EQUALITY

Groupe BPCE wishes to continue its commitments to gender equality through the following targets :

- strengthen support for women in accessing positions of responsibility *via* dedicated paths at Group or local level or by promoting mentoring or awareness-raising actions to combat self-censorship;

## DIVERSITY & INCLUSION - DISABILITY

In 2022, Groupe BPCE renewed its commitment to the employment of people with disabilities through the signing of four agreements approved for the period 2023-2025.

These agreements set targets at December 31, 2025 for each of the scopes (Banque Populaire, Caisse d'Epargne, Natixis):

### Banque Populaire branch:

**Overall logic:** targets set in the approved BP branch agreements in line with French legislation, which imposes a minimum of 6%.

- **Target:** achieve an employment rate of 6% by the end of 2025.
  - Reference value: 5.94% at the end of 2023.

Compliance with these deadlines is subject to permanent control, the results of which are presented to privacy committees or permanent controls.

The Group social report includes a section dedicated to accidents. The indicators of the consolidated companies make it possible to monitor its evolution and identify significant discrepancies without seeking to determine other target objectives.

The work and action plan initiated in 2023 should continue to be rolled out in companies during 2025.

These are structured around three main areas:

- Facilitate the declaration of incivilities, develop new protection tools
- Provide "incivility" training for employees and managers
- Strengthen the hot and cold analysis of each incivility and use the filing of a complaint as a lever to fight against incivility

the Group has not set measurable results-based targets at Group level.

- achieve 50% of women with the rank of manager/leader within Groupe BPCE by 2026<sup>(1)</sup>
  - at September 30, 2024, the rate was 47.6%,
  - at December 31, 2023, the rate was 47%.

- **Target:** recruit a minimum of 200 people recognized as BOETH over 3 years (recruitments taken into account: permanent contracts, fixed-term contracts of more than 6 months or work-study contracts - professionalization or apprenticeship), including a minimum share of 30% of permanent contracts (*i.e.* a minimum of 60).
  - Reference value: 90 people recognized as BOETH recruited in 2023.
- **Target:** welcome at least 45 work-study students with disabilities over the term of the agreement.
  - Reference value: 22 work-study students recruited in 2023.
- **Target:** maintain and promote actions that promote purchases entrusted to the structures of the Protected and Adapted Work Sector (STPA) as part of a commitment led by CSR and the Solidarity Purchasing division.

[1] **Calculation methodology:** Number of women managers/leaders/Total number of managers/leaders (workforce vision for Natixis, employment contract for BPCE excluding Natixis) // **BP & CE scope:** Sales network: Agency Director or higher management than Branch Director/Head office: classification H or higher in the collective agreement // **BPCE scope:** Managers.

**Caisse d'Epargne branch:**

**Overall logic:** targets set in approved CE branch agreements in line with French legislation, which imposes a minimum of 6%.

- Maintain an employment rate of over 6% at the end of 2025.
  - Reference value: 7.29% at the end of 2023.
- Recruit a minimum of 180 people recognized as BOETH over 3 years (recruitments taken into account: permanent contracts, fixed-term contracts of more than 6 months or work-study contracts - professionalization or apprenticeship), including a minimum share of 30% of permanent contracts (*i.e.* a minimum of 60).
- Recruitment of people recognized as BOETH: 65 people.
- Welcome at least 30 work-study students with disabilities over the term of the agreement.
  - Reference value: 12 work-study students with disabilities in 2023.

**3.1.4.1.4 Attractiveness, employee loyalty and commitment****SKILLS DEVELOPMENT**

By 2025, each Group company in France will have an onboarding program for new employees and a personalized training portal that will provide individualized training paths focused on its priorities with individual skill levels known and monitored by the manager/HR team.

By 2030, the ambition is to enable a rapid and massive adaptation of skills to meet the requirements of customer relationship excellence, facilitated by Artificial Intelligence (AI).

This challenge involves the transformation of national and local practices to, together, enable more targeted and agile skills development:

- decentralized: the Group's companies rely on the BPCE Campus to pool the design of the training programs deployed within the campuses of each institution;
- no intermediaries: the best educational partners in the market design the most effective learning solutions within the BPCE Campus directly with the expert business lines (simulation exercises, etc.);
- optimized: the content created within the Campus or purchased by each institution is managed and promoted as an educational asset *via* a platform;
- more internalized: the organization of in-house training is promoted by the development of training for certified designers within the BPCE Campus.

**Integration of young people into the Group's business lines with the BPCE Campus CFA**

**Objective:** ensure the development of the skills of young people who join the CFA (Training Center for Apprentices) of the BPCE Campus in order to constitute a qualitative pool:

- in 2025, the target is to maintain the success rate of the diploma of work-study students from the Campus CFA at more than 80% for both diplomas;
- in 2024, the success rates for both diplomas are as follows:
  - Bachelor in Banking Insurance: 80% stable compared to 2023,
  - Professional Banking Degree: 86% up 6%;
- in 2023, the success rates for both diplomas are as follows:
  - Bachelor in Banking Insurance: 80%,
  - Professional Banking Degree: 80%;

- Maintain and promote actions that promote purchases entrusted to the structures of the Protected and Adapted work sector (STPA) as part of a commitment led by the CSR and the Solidarity Purchasing division.

**Natixis:**

- Achieve an employment rate of 5% by the end of 2025.
  - Reference value: 4.59% at the end of 2023.
- Targets set Natixis approved agreement.
- Recruitment targets per year and per contract by 2025: 10 permanent hires, 8 fixed-term contracts, 10 work-study students, 8 internship hires.
  - 2023 reference value: 16 hires: 6 permanent contracts/9 work-study students/1 intern/1 fixed-term contract.

- the target is determined on the basis of the results of previous years (2022/2023) where the % was less than 80% and the benchmark for the sector on the same diplomas from other schools;
- in 2025, the second target is to maintain the integration rate of work-study students in the Campus CFA in Groupe BPCE at more than 30%;
- 2024 figures are not available. In 2023, the integration rate of work-study students is as follows:
  - Bachelor in Banking Insurance: 24%,
  - Professional Banking Degree: 23%;
- the target is determined in accordance with the terms described in the Group's GEPP agreement signed in July 2022.

**Professional mobility & job transformation**

**Objective:** monitor advisors' adherence to personalized development pathways and thus ensure the development of their skills in line with commercial priorities:

- by the end of 2025, at least 60% of employees who access the skills assessment will have completed at least one assessment and started at least one personalized development path;
- BP & CE commercial networks - In 2024 - 40% of employees concerned by the system carried out at least one diagnostic among the 10 entities deployed;
- target set with the commercial networks, companies and in line with a logic of deployment over time and a system that starts in 2024.

**Supporting the future of business lines: Developing strategic skills for tech, digital, data and AI**

**Objective:** ensure that the development of strategic tech and digital skills progresses since the Tech and Digital Campus brings them to the Group level:

- in 2025, the target is to enable at least 3,300 employees to be trained in the Tech and Digital Campus programs on strategic skills in face-to-face or virtual classrooms;
- in 2023, 2,500 employees received face-to-face or virtual classroom training;
- the target was set in line with the training objectives of the VISION 2030 strategic project. It is based on the training already carried out in 2023 and management's estimate.

## Supporting the future of business lines: impact awareness

**Objective:** ensure that all employees are trained in impact in their profession, in order to undergo in-depth transformation and provide the best advice and expertise to customers:

- the objective is to have 100% of employees and Board members trained in ESG issues by the end of 2026. This is an objective clearly stated in the HR strategic project: VISION 2030;

## ATTRACTIVENESS

### Strengthen employee engagement:

- the last Groupe BPCE Diapason engagement survey conducted with Ipsos measured an employee engagement rate at 72% in 2023. To measure the employee engagement rate, the Group is now committed to Great Place to Work. The methodologies used to measure the rate are very different between the two providers. The Group's target is therefore to reach an engagement rate of 65%<sup>[1]</sup> for the majority of its entities by 2026.

### Strengthen digital accessibility for employees

In terms of digital accessibility, a number of priority tools are considered as inaccessible today. For example:

- Reference value: no harmonized and fixed KPI;
- Methodology for setting the target: KPI set for the BPCE collective: 100% of employees trained in the common core "impact fundamentals" being developed. For the business lines and other Group companies: co-construction underway with Impact and HR.

- e-learning training courses, some of which are mandatory & regulatory;
- the HR leave declaration tool;
- by 2026, the Group's objective is to make the non-exhaustive examples of tools above accessible to all employees<sup>[2]</sup>.

### Strengthen the employer brand

- By 2026, the Group will have rolled out its employer signature on each of its brands. The employer signature is an essential component of the employer brand. It makes it possible to express the values held by the Group and the attention paid to employees. The aim is to enable candidates to identify with the values promoted by the Group.

## 3.1.5 Metrics

### 3.1.5.1 GENERAL INTRODUCTION - SCOPE OF APPLICATION

#### Scope of publication of S1 indicators for the 2024 CSRD:

Some of the Group's entities do not upload their data in the Group HR information system tools, in particular for international entities, which also comply with national legislation imposing heterogeneous requirements in social matters (e.g. minimum wage).

In this context, the Group has chosen a baseline scenario for the entities on which the indicators will be calculated for the CSRD 2024 publication (based on data collected via the Group's Information System and *ad hoc* manual data).

#### Entities included in the scope of publication of the S1 indicators - for the CSRD 2024:

The 14 institutions of the Banque Populaire network, the 15 institutions of the Caisse d'Epargne network and their subsidiaries in France included in the HRIS<sup>[3]</sup>, all BPCE subsidiaries (specialized financing, asset management, life and non-life insurance, payments, wealth management and retail banking) and BPCE SA.

#### And inclusion of other entities:

- Natixis consolidated scope: for the 2024 publication, the Natixis scope of coverage was studied indicator by indicator with the use of proxies for some. Data are collected for at least 78% and up to 100% of the own workers in 2025 on the mandatory indicators expected from 2025. Natixis aims to have the indicators calculated for 100% of the own workers by 2026 (refer to 3.1.5.14 - Annex - Natixis scope for more details);

- BRED international entities;
- Banque Palatine;
- Crédit Foncier de France;
- BPCE Life Luxembourg. **Attention point:** this entity will be excluded from the following indicators due to the unavailability of data in the HR information system: S1-12, S1-14, S1-15 and S1-16. We will thus have a coverage rate of 100% (for the Insurance division) for the other indicators and 90% (for the Insurance division) for the aforementioned indicators.

**Specificities relating to the Oney scope:** Some Oney subsidiaries do not have a payroll tool and are not integrated into the Group's HRIS, which makes data collection more complex. Thus, the scope used for the disclosure of the S1 metrics for the 2025 CSRD for Oney is as follows:

- Oney Bank France: 100% of indicators covered;
- Oney international subsidiaries: covered only for some of the S1-6 indicators.

#### Entities excluded from the scope:

- International and overseas subsidiaries of BP & CE (except BRED), and international subsidiaries of BPCE Lease;
- Banque BCP;
- Fintech Digital & Payments (PayPlug Entreprise);
- Pramex International.

#### Populations concerned:

Population exclusions (fixed-term contracts/work-study/VIE) according to the metrics were made for reasons of data availability and/or the relevance and reliability of the calculations.

[1] Great Place to Work methodology.

[2] Accessibility measurement carried out via audit by external firms specializing in digital accessibility.

[3] Human Resources Information System.

### 3.1.5.2 (S1-6) CHARACTERISTICS OF THE UNDERTAKING'S EMPLOYEES

#### A. General introduction: definition and transversal methods for S1-6 indicators

*Preliminary reminder: S1-6 only concerns employees (therefore non-employees are excluded from the scope of the indicators of S1-6).*

##### Scope

- for the Group scope excluding Natixis, see 3.1.5.1 General introduction - scope of application;
- for the Natixis scope, see 3.1.5.14.2 (S1-6) Characteristics of the undertaking's employees – Natixis.

Concerning the non-covered scopes, the following actions will be deployed:

- carry out studies to assess the feasibility of collecting unavailable data manually from the IS;
- define the methods for collecting data not currently available.

##### Definition

The total number of employees was calculated on the basis of the scope of entities subject to the CSRD and the following definition of employee status:

- permanent internal employees (CDI);
- temporary internal employees (fixed-term contracts - CDD);
- work-study employees;
- VIE.

Note:

Interns were not included in the scope, insofar as in France, interns are not considered as company employees.

##### Calculation

Methodology for calculating the total number of employees based on:

- a counting of the number of own workers in number of contracts;
- the number of employees present at the end of the reference period;
- a closing date at December 31 of the reference year.

#### B. Breakdown of own workers:

##### Completion of the table based on three fields:

- the "Men" and "Women" fields: based on the information available in the information system;
- the "Not stated" field is the field used in the event of data not available in the information system;
- the "Other" field is currently not available in the employee gender self-declaration process, as French legislation does not prescribe the place of such a system.

#### Breakdown of own workers by gender

	12/31/2024
Gender	Number of employees
Male	46,046
Female	57,372
Other	
Not declared	
<b>TOTAL SALARIED EMPLOYEES</b>	<b>103,418</b>



## C. Own workers by country

### Scope

Countries in which Groupe BPCE has at least 50 employees representing at least 10% of its total number of employees.

The calculation basis for own workers is that applied to the scope of publication of the CSRD.

## Presentation of the number of employees in countries where the company has at least 50 employees representing at least 10% of its total number of employees

	12/31/2024
Country	Number of employees
France	92,361

## D. Employees by type of contract

### Definition

The total number of employees was calculated on the basis of the scope of entities subject to the CSRD and the following definition of employee status:

- permanent internal employees (CDI);
- temporary internal employees (fixed-term contracts - CDD);
- work-study employees;
- VIE (for France).

Note:

Groupe BPCE has no employees on non-guaranteed hours, as this type of contract is not included in the Group's business model (see definition in the introduction).

### Calculation

- for the breakdown by gender: *see section B. Breakdown of own workers*;
- the breakdown by contract is detailed in the section A. *General introduction: definition and transversal methods for the metrics*;
- publication of the full-time/part-time split on a voluntary basis;
- is considered as full-time, any employee with a contractual FTE of 100%. All others are considered part-time.

Note: work-study students are considered as being part-time employees as they have a specific working time format dedicated to them.

## Presentation of information on employees by type of contract, broken down by gender

	12/31/2024				
	Women	Men	Other <sup>(*)</sup>	Not communicated	Total
Number of employees	57,372	46,046			103,418
Number of permanent employees	54,052	42,964			97,016
Number of temporary employees	3,320	3,082			6,402
Number of non-guaranteed hours employees					
Number of full-time employees	46,544	41,264			87,808
Number of part-time employees	9,994	3,488			13,482

\* Gender as specified by the employees themselves.

## E. Employees by type of contract, by region

### Definition

Definition of the term "Region": the Group understands the definition of region in the sense of geographical area. The Group distinguishes between four types of regions: **France/Americas/APAC/EMEA (excluding France)**.

### Calculation

- for the breakdown by gender: *see section B. Breakdown of own workers*;
- the breakdown by contract is detailed in the section *General introduction: definition and transversal methods for the metrics*.

## Presentation of information on employees by type of contract, broken down by region

	12/31/2024				
	FRANCE	EMEA <sup>(*)</sup>	AMER	APAC	TOTAL
Number of employees	92,265	5,432	2,748	2,973	103,418
Number of permanent employees	86,227	5,235	2,700	2,854	97,016
Number of temporary employees	6,038	197	48	119	6,402
Number of non-guaranteed hours employees					
Number of full-time employees	78,574	5,090	1,321	2,823	87,808
Number of part-time employees	13,211	184	33	54	13,482

\* excluding France

### F. Total number of employees who left the Group during the reference period

#### Definition

The metric presented only concerns permanent contracts.

#### Calculation

- The following reasons for departure were used in the calculation of the indicator: contractual terminations, resignations, deaths in the course of employment, dismissals and retirements.
- departures related to internal mobility have not been included in the calculation of the indicator.



### G. Employee turnover during the reference period:

Two indicators are published: the departure rate and the turnover rate.

#### Definition

The calculation is based on permanent employees present at the end of 2023.

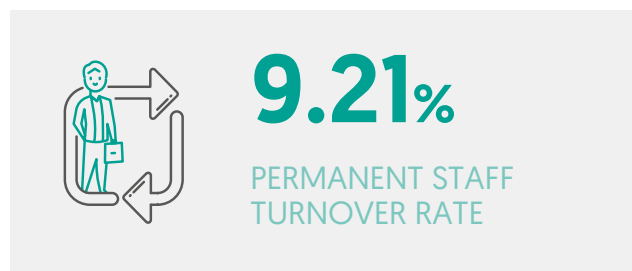
Note: fixed-term contracts, work-study employees and VIE employees have been excluded from the calculation of the turnover rate, as their presence in the Group is by definition temporary.

#### Calculation

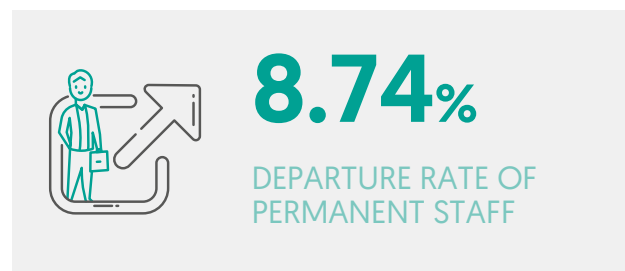
**departure rate:** 
$$\frac{\text{Number of permanent contract departures over the reference period}}{\text{permanent workforce at 12/31 of the reference year Y-1}}$$

**turnover rate:** 
$$\frac{(\text{number of permanent contract hires over the reference period} + \text{number of permanent contract departures during the reference period}) / 2}{\text{permanent workforce at 12/31 of the reference year Y-1}}$$

### Percentage of permanent staff turnover



### Departure rate of permanent staff



#### H. Reconciliation between the own workers mentioned in Section “3.1.4.2 [S1-6] Characteristics of the undertaking's employees” and the most representative workforce in the financial statements.

The Group Human Resources division relies on a notion of number of contracts and not FTE<sup>(1)</sup>, it is therefore not relevant to reconcile the FTEs with the financial statements for the 2024 reference year, as the latter are not comparable.

### 3.1.5.3 [S1-7] CHARACTERISTICS OF NON-EMPLOYEES IN THE UNDERTAKING'S OWN WORKFORCE

In accordance with the transitional application measure provided for by the regulations, this indicator is not published for the 2024 reference year.

The action plan for future publications is as follows:

- define the concept of “non-salaried employee” and identify the populations concerned based on the standard;
- list the companies for which the data can be collected *via* the tools (Group employee reference framework);
- the Group will collect the number of non-salaried employees manually and in declarative form, for companies that will not be included in the Group employee reference framework (RPG) tool<sup>(2)</sup>.

### 3.1.5.4 [S1-8] COLLECTIVE BARGAINING COVERAGE AND DIALOG WITH EMPLOYEE REPRESENTATIVES

#### A. General introduction

- in the France scope, regulations require that all employees meeting the definition criteria in Section “S1-6 - Characteristics of the undertaking's employees” be covered by a collective agreement and by a social dialog/employee representation;
- for the Group scope excluding Natixis, see 3.1.5.1 General introduction;
- for the Natixis scope, see 3.1.5.14.3 (S1-8) Collective bargaining coverage and social dialogue – Natixis;
- employees: the employees covered by a collective agreement are the fixed-term contracts (CDD), permanent contracts (CDI), work-study students;
- the Group indicates in which countries of the European Economic Area (EEA) it employs a significant number of employees (*i.e.* at least 50 employees representing at least 10% of the total number of employees).

#### B. Percentage of all employees covered by collective bargaining agreements

Collective convention, company agreements or any other form of agreement negotiated between an employer, a group of employers or one or more employers' organizations, on the one hand, and one or more trade unions or, in their absence, employee representatives elected in accordance with national laws and regulations, on the other hand, shall be considered as “collective agreements”.



[1] Full-time equivalent.

[2] Group employee reference framework.

The percentage of employees covered by collective agreements is calculated using the following formulas:

$$100 \times \frac{\text{Number of employees covered by collective bargaining agreements}}{\text{total number of employees}}$$

### C. Social dialog coverage rate & workplace representation

To calculate the information required, the Group indicates in which countries of the EEA it employs a significant number of employees (*i.e.* a workforce of at least 50 employees representing at least 10% of the total number of employees) and indicates the percentage by country of employees and by establishment, with employee representation. The notion of "establishment" includes any place of operations where the company carries out an economic activity on a non-temporary basis with human resources and property.

$$100 \times \frac{\text{Number of employees working in establishments in which employees are represented by representatives}}{\text{number of employees}}$$

### D. Percentage of employees covered by a collective agreement (outside the EU)

#### Definition

The employees covered by a collective agreement are fixed-term contracts (CDD), permanent contracts (CDI), work-study students.

### Model declaration on the coverage of collective bargaining and social dialog

Coverage rate	12/31/2024		
	Collective bargaining coverage		Social dialogue
	Employees - EEA (for countries > 50 employees representing > 10% of total employees)	Employees - non-EEA (estimate for regions with > 50 employees representing > 10% of total employees)	Workplace representation (EEA only) (for countries with > 50 employees representing > 10% of total employees)
0-19%			
20-39%			
40-59%			
60-79%			
80-100%	France		France

### 3.1.5.5 (S1-9) DIVERSITY METRICS

#### Scope:

- for the Group scope excluding Natixis, see 3.1.5.1 General introduction;
- for the Natixis scope, see 3.1.5.14.4 (S1-9) Diversity metrics.

#### Definition:

##### SENIOR MANAGEMENT METRIC:

Senior management means employees:

- who are entrusted with responsibilities for which the importance implies a great deal of independence in the organization of their schedule;
- who are empowered to make decisions on a largely autonomous basis;
- who receive pay within the highest levels of pay systems applied in their company or establishment.

##### BREAKDOWN OF EMPLOYEES BY AGE GROUP METRIC:

Fixed-term contracts (CDD), permanent contracts (CDI), work-study and VIE are taken into account for the calculation of the metrics.

#### Calculation:

##### BREAKDOWN BY GENDER AT SENIOR MANAGEMENT LEVEL IN NUMBER AND PERCENTAGE

**% of women in senior management:**  $\frac{\text{number of women in senior management}}{\text{number of employees in senior management}}$

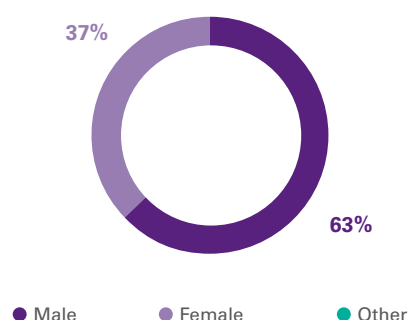
**% of men in senior management:**  $\frac{\text{number of men in senior management}}{\text{number of employees in senior management}}$

### BREAKDOWN OF EMPLOYEES BY AGE GROUP

$\frac{\text{Number of employees by age group}}{\text{Total number of employees (within the meaning of metric S1-6)}}$

- Breakdown by age group:
  - under 30
  - between 30 and 50 years
  - 50 years and over

### Breakdown by gender at senior management level



### Breakdown of employees by age group and percentage - Own workers

Age groups	12/31/2024	
	Number of employees (own workers)	%
< 30 years	18,839	18.22
>= 30 and < 50 years	54,191	52.40
>= 50 years	30,356	29.35
Not reported	32	0.03
<b>TOTAL SALARIED EMPLOYEES</b>	<b>103,418</b>	<b>100</b>

### 3.1.5.6 (S1-10) ADEQUATE WAGES

#### Scope:

- for the Group scope excluding Natixis, see 3.1.5.1. General introduction
- for the Natixis scope, see 3.1.5.14.5 (S1-10) Adequate wages - Natixis

All Group employees receive an adequate wage in accordance with the applicable benchmarks. The adequate wage refers to the minimum social wages set by legislation or collective bargaining or applicable benchmarks.

### 3.1.5.7 (S1-11) SOCIAL PROTECTION

#### In terms of social protection (health and personal risk coverage)

In France, all employees have social protection covering the five major life events: illness; unemployment, workplace accidents and disabilities, parental leave and retirement.

Internationally, according to the legal systems and local practices of the countries in which the Group operates, all employees benefit from health and/or personal protection insurance.

In the various countries in which it operates, the social protection and benefit schemes available to employees take into account not only applicable laws and regulations, but also market practices. Through the systems in place, the Group ensures that employees or their beneficiaries, for example, benefit from coverage in the event of a health situation that could lead to a loss of income, such as illness, maternity or accidents at work, or in the event of death.

In addition to the legal and contractual arrangements, depending on the regulations and practices of the countries in which Groupe BPCE operates, employees may benefit from additional social security in personal risk and/or health coverage.

In France, Groupe BPCE, in accordance with the French Social Security Code, offers all its employees comprehensive supplementary social protection through collective health insurance and personal risk, disability and death insurance plans. The social protection policy is managed directly by the Human Resources department.

Employees of the Caisse d'Epargne branch are covered in personal risk and health insurance by plans negotiated with the social partners at the level of the Caisse d'Epargne branch. Employees of the Banque Populaire branch are covered by a personal risk plan negotiated at the level of the Banque Populaire branch, while their health plan is negotiated at the level of each Banque Populaire.

With regard to employee benefits, the Group strives to implement an appropriate management system that complies with regulations, intended to limit risks as much as possible, in particular URSSAF.

#### In terms of pensions

Groupe BPCE employees may benefit from supplementary pension plans, the characteristics of which are set in accordance with local legislation and the HR practices and policies defined locally.

These plans supplement the mandatory and statutory plans to which the entities contribute for employees. They can be of two different types (defined benefit plans or defined contribution plans).

For example, employees of the CE and BP branches benefit from supplementary defined-contribution pension plans paid for mainly by the employer, these plans being negotiated at the level of each of the branches with the social partners. All social protection schemes are made available to employees according to the terms defined locally (employment contract, HR intranet, etc.).

### 3.1.5.8 (S1-12) PERSONS WITH DISABILITIES

#### Scope:

- for the Group scope excluding Natixis, see 3.1.5.1 General introduction;
- for the Natixis scope, refer to 3.1.5.14.6 (S1-12) Persons with disabilities – Natixis.

#### Definition:

- Number of employees with disabilities as of December 31 of the reference year.
- In order to maintain consistency between this metric and the other metrics published under the CSRD, the “own workers” data is to be considered as registered workforce (number of contracts) and not in FTE. The types of contract to be taken into account are those of S1-6 (permanent [CDI], fixed-term [CDD], work-study students, VIE).

#### Calculation:

- Calculation formula: 
$$\frac{\text{Workforce with disabilities at 12/31 of the reference year}}{\text{Total workforce (at 12/31 of the reference year)}}$$

Percentage of employees with disabilities in 2024 within the meaning of the CSRD in France and International scope: 5.40%.

### 3.1.5.9 (S1-13) TRAINING AND SKILLS DEVELOPMENT METRIC

#### Performance assessment

#### Scope:

- for the Group scope excluding Natixis, see 3.1.5.1 General introduction;
- for the Natixis scope, see 3.1.5.14.7 (S1-13) Training and skills development metrics – Natixis.

#### Definition:

All performance, career development and professional appraisal interviews must be taken into account.

#### Calculation:

- Population: permanent contracts
- Calculation formula: 
$$\frac{\text{number of employees who participated in regular performance and career development reviews}}{\text{the total number of employees present at 12/31 of the reference year}}$$



## Breakdown by gender of employees who participated in regular performance and career development reviews

Gender	12/31/2024	
	Number of assessments	%
Male	36,194	87.52
Female	45,414	86.23
Other		
Not declared		
<b>TOTAL SALARIED EMPLOYEES</b>	<b>81,608</b>	<b>86.8</b>

\* Gender as specified by the employees themselves.

### Training hours completed in 2024

#### Scope:

- for the Group scope excluding Natixis, see 3.1.5.1 General introduction;
- for the Natixis scope, see 3.1.5.14.7 (S1-13) Training and skills development metrics - Natixis.

#### Definition:

The calculation is made on the basis of training hours completed during the reference year, including training not completed.

#### Calculation

- Population: fixed-term contracts (CDD), permanent contracts (CDI), work-study students and VIE.

- Calculation formula: 
$$\frac{\text{number of training hours completed in the reference year}}{\text{total number of employees as of December 31 of the reference year}}$$

## Number of training hours by type of contract and by gender

	12/31/2024				Total
	Women	Men	Other <sup>(*)</sup>	Not communicated	
Average number of training hours	36	36			36
Permanent employees	35	35			35
Temporary employees	49	49			49
Non-guaranteed hours employees					

\*Gender as specified by the employees themselves.

### 3.1.5.10 (S1-14) HEALTH AND SAFETY METRICS

#### A. Health and Safety Management System

##### Scope:

For the **France scope**: the regulations require that all employees, according to the criteria defined in S1-6, are covered by a health and safety management system. For the **international scope**: data will be collected in accordance with local obligations and/or practices.

- for the Group scope excluding Natixis, see 3.1.5.1 General introduction;
- for the Natixis scope, see 3.1.5.14.8 (S1-14) Health and safety metrics - Natixis.

##### Calculation:

- population: permanent contracts (CDI), fixed-term contracts (CDD), work-study students, VIE;

- Calculation formula: 
$$\frac{\text{number of employees covered by the health and safety management system}}{\text{total number of employees}}$$

- percentage of own workers covered by the health and safety management system based on legal requirements and/or recognized standards or guidelines.



# 99.90%

## EMPLOYEE HEALTH AND SAFETY MANAGEMENT SYSTEM COVERAGE RATE

### B. Work-related accident frequency rate

#### Scope:

- for the Group scope excluding Natixis, see 3.1.5.1 General introduction;
- for the Natixis scope, see 3.1.5.14.8 (S1-14) Health and safety metrics - Natixis.

#### Definition:

The indicator used relates to the frequency rate of workplace accidents:

- the notion of “days lost” is interpreted as “days of absence” linked to work stoppage due to workplace/commuting accidents;
- the Group measures and collects data related to workplace and commuting accidents recognized by the social security;
- however, for occupational illnesses, the Group is not in a position to collect similar data.

#### Calculation:

- Population: permanent, fixed-term contracts
- the calculation of the indicator excludes:
  - data on occupational illnesses (not available for Groupe BPCE),
  - absences and accidents of non-salaried workers (in accordance with the publication deadline granted by the standard);
- the indicator used for the workplace accident rate is the frequency rate of workplace accidents involving permanent (CDI) and fixed-term (CDD) contracts. The formula for calculating the frequency rate, according to INSEE, is as follows: RIDER 38

$$\frac{\text{number of workplace accidents with days lost}}{\text{hours worked X 1,000,000}}$$

$$\frac{\text{the number of days of absence due to workplace accidents}}{\text{journey is to be considered in number of calendar days}}$$

### Occupational health and safety

	12/31/2024
Number of fatalities due to work-related accidents or illnesses	5
Number of work-related accidents over the period	1,166
Work-related accident rate (in %)	7.14
Number of days lost due to work-related accidents	41,510

### C. Regarding the health and safety indicators that we will not report, we are planning the following action plan:

#### Limitation on published information:

The quantitative information required by the CSRD standard is not published in Groupe BPCE’s CSRD sustainability report, given the unavailability of data.

#### Action plan:

- determine a common definition of the term “occupational illness”;
- list the companies for which the data can be collected via the information systems;
- list the scopes on which the data can be collected manually (if unavailable in the tools);
- define data collection methods.

### 3.1.5.11 (S1-15) WORK-LIFE BALANCE METRICS

- for the Group scope excluding Natixis, see 3.1.5.1 General introduction;
- for Natixis, see 3.1.5.14.9 (S1-15) Work-life balance – Natixis.

#### Definition

- The concept of family leave takes into account the following arrangements:
  - maternity leave;
  - paternity leave;
  - parental leave;
  - caregiver leave provided for by legislation or collective agreements.
- Population: permanent contracts (CDI)/fixed-term contracts (CDD)/work-study students/VIE.

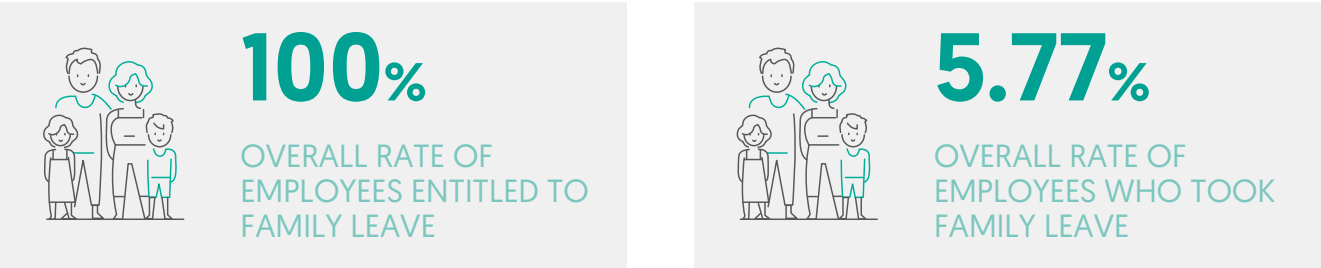
#### Calculation

##### “% of employees entitled to family leave”

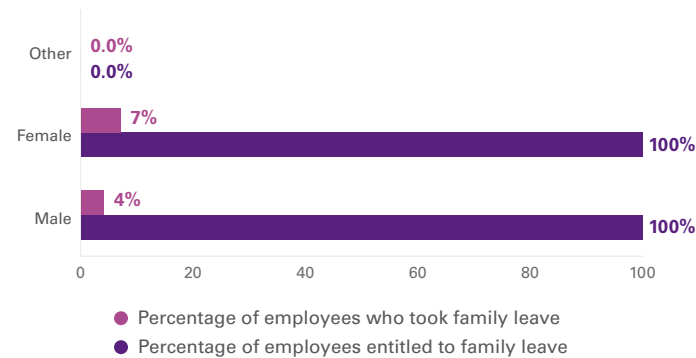
- Calculation formula: 
$$\frac{\text{Number of employees eligible for family leave}}{\text{Total number of employees}}$$

##### “% of employees concerned who took such leave, with a breakdown by gender”

- Calculation formula: 
$$\frac{\text{Number of employees who took family leave}}{\text{The number of eligible employees}}$$



#### Breakdown by gender of the percentage of employees entitled to and having taken family leave



### 3.1.5.12 (S1-16) REMUNERATION METRICS (PAY GAP AND TOTAL REMUNERATION)

#### Gender pay gap metric

##### Scope:

- for the Group scope excluding Natixis, see 3.1.5.1 General introduction;
- for the Natixis scope, see 3.1.5.14.10 (S1-16) Remuneration metrics (pay gap and total remuneration) – Natixis.

##### Definition:

- The consolidated population includes own workers on permanent contracts (CDI) who are present and paid at full rate throughout the reference year excluding:
  - corporate representatives;
  - employees on fixed-term contracts (CDD);
  - temporary workers;
  - work-study employees;
  - expatriate French employees;
  - people without an employment contract and employees on long-term illness (ALD).
- fixed wage and variable pay **are taken into account**.
- **Elements taken into account in the fixed wage:** theoretical full-time annual fixed wage + Fixed annual duty allowance, if applicable, for the reference year.
- **Elements taken into account in the variable pay:**
  - BPCE excluding Natixis: value-sharing bonus paid in the reference year + performance bonus or any individual bonus + variable pay paid in the reference year.
  - Natixis: variable pay awarded in respect of the previous year (including deferred portions) + exceptional bonus awarded, where applicable.

**Calculation:** 
$$\frac{\text{Average gross hourly pay of male employees} - \text{average level of gross hourly pay of female employees}}{\text{Average gross hourly pay of male employees}} \times 100$$

As the way in which the data is presented is different for Natixis, two distinct metrics are presented



#### Annual total remuneration ratio metric

##### Scope:

- for the Group scope excluding Natixis, see 3.1.5.1 General introduction;
- for the Natixis scope, see 3.1.5.14.10 (S1-16) Remuneration metrics (pay gap and total remuneration - Natixis).

##### Definition:

- The consolidated population includes own workers on permanent contracts (CDI) who are present and paid at full rate throughout the reference year excluding:
  - corporate representatives;
  - employees on fixed-term contracts (CDD);
  - temporary workers;
  - work-study employees;
  - expatriate French employees;
  - people without an employment contract and employees on long-term illness (ALD).
- Fixed wage and variable pay **are taken into account**.

- **Elements taken into account in the fixed wage:** theoretical full-time annual fixed wage + fixed annual duty allowance, if applicable, for the reference year.
- **Elements taken into account in the variable pay:**
  - BPCE excluding Natixis: value-sharing bonus paid in the reference year + performance bonus or any individual bonus + variable pay paid in the reference year;
  - Natixis: variable pay awarded in respect of the previous year (including deferred portions) + exceptional bonus awarded, where applicable.

**Calculation:**

- **Annual total remuneration ratio metric:** 
$$\frac{\text{Total annual remuneration for the highest-paid person in the company}}{\text{Median level of total annual remuneration (excluding highest-paid individual)}}$$
  - if the maximum annual total remuneration is the same for several employees, then they are excluded from the denominator in the calculation presented above (median level of annual total remuneration (excluding the highest-paid individual)).

The ratio of the total annual remuneration between the highest-paid employee and the median of other employees was 124.9 in 2024.

The ratio of total annual remuneration is established based on the scope of the BPCE Group, on the basis of gross remuneration, without neutralizing the differences in living standards between the countries in which the Group operates. Indeed, salary practices also reflect the economic conditions specific to each country, as well as market practices specific to the various business lines present in the Groupe BPCE. Therefore total annual remuneration ratio, therefore, incorporates very diverse local realities in terms of labor markets and living standards.

### 3.1.5.13 (S1-17) INCIDENTS, COMPLAINTS AND SEVERE HUMAN RIGHTS IMPACTS

**Limitation on published information:**

Given the multitude of channels for reporting alerts, the Group will not be able to provide an exhaustive response to this metric and proposes to include it in the next fiscal year through the action plan mentioned below.

**Action plan to publish metrics in future publications:**

- bring together the relevant contacts (compliance, diversity & harassment officer, labor & legal relations);
- agree on a common definition of the expected terms in the metrics: incidents of discrimination, harassment, complaints, violation of social and human rights matters, severe employee human rights issues and incidents;
- identify the channels for alert reporting such as Group whistleblowing tools, dedicated local email address, harassment or diversity contact, emergency number, listening unit.

### 3.1.5.14 ANNEX - NATIXIS SCOPE

#### 3.1.5.14.1 General Introduction to metrics S1-6 to S1-17

The following scopes are cited throughout the methods defining each metric:

- ▶ **Managed scope:** companies forming part of Natixis and its subsidiaries, at least 50% owned directly or indirectly, and for which individual data is available in the global Human Resources Information Systems (HRIS).
- ▶ **Other entities of the AWM division:** companies owned directly or indirectly at least 50% worldwide and for which individual data is not available in the Global HR Information Systems. Two of these companies (DNCA Finance France, Natixis US Advisors) were subject to manual collection for this first disclosure. We will refer to them as “AWM entities with manual collection” in the rest of this disclosure.
- ▶ **CIB M&A stores:** companies owned directly or indirectly at least 50% worldwide and for which individual data is not available in Global HR Information Systems (Peter J. Solomon/Azure Capital Limited/Vermilion Partners Limited/Fenchurch Advisory Partners/Natixis Partners Espana/Natixis Partners).
- ▶ **Scope of financial investments:** Natixis Algérie

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

- **Breakdown of own workers by gender**

- **Scope of coverage:**

- France & International managed scope
    - Other entities of the AWM France & International division
    - Scope of financial investments

- **Use of proxies:**

Proxies were calculated based on the own workers of entities in the "Other Natixis entities" scope, which is collected at the end of the year.

A proxy is calculated to obtain the percentage distribution of men and women: at the end of the year, the entities communicate information on their own workers (permanent, fixed-term, young jobs), when available. A proportion of male/female is calculated based on this file with regards to the M/F breakdown of own workers for year Y-1.

- **Own workers by country**

- **Scope of coverage**

- France & International managed scope
    - Other entities of the AWM France & International division

- **Employees by type of contract, by gender**

- **Scope of coverage**

- France & International managed scope
    - Other entities of the AWM France & International division
    - Scope of financial investments

- **Use of proxies:**

A proxy is calculated to obtain the breakdown of men and women as a percentage: at the end of the year, the entities communicate information on their own workers (permanent, fixed-term, youth employment), when available. A proportion of Men/Women is calculated based on this file with regards to the M/F breakdown of their own workers for year N-1.

- **Employees by type of contract, by region**

- **Scope of coverage:**

- France & International managed scope
    - Other entities of the AWM France & International division
    - Scope of financial investments

- **Total number of employees who left the Group during the reference period and employee turnover during the reference period**

- **Scope of coverage:**

- France & International managed scope
    - AWM entities with manual collection
    - Scope of financial investments

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

- **Scope of coverage**

- France managed scope
    - International managed scope: entities with the largest own workforce
    - AWM entities with manual collection
    - Scope of financial investments

### 3.1.5.14.4 [S1-9] Diversity metrics - Natixis

- **Senior management**

- **Scope of coverage:**

- France managed scope

- **Breakdown of employees by age group:**

- **Scope of coverage:**

- France & International managed scope
    - Other entities of the AWM France & International division
    - Scope of financial investments



► **Use of proxies:**

A proxy is calculated to obtain the percentage breakdown of men and women: at the end of the year, the entities communicate their own workers (permanent, fixed-term, young jobs) where the information is available. A proportion of male/female is calculated on the basis of this file with regard to the M/F breakdown of the own workers for year Y-1.

### 3.1.5.14.5 (S1-10) Adequate wages - Natixis

► **Scope of coverage:**

- France & International managed scope;
- AWM entities with manual collection.

### 3.1.5.14.6 (S1-12) Persons with disabilities - Natixis

► **Scope of coverage:**

- France managed scope (in first year of disclosure).

Note: from the second year of disclosure, the metric will be published at the level of the World scope.

### 3.1.5.14.7 (S1-13) Training and skills development metrics - Natixis

• **Performance assessment**

► **Scope of coverage:**

- France & International managed scope
- Scope of financial investments

• **Training hours completed in 2024**

► **Scope of coverage:**

- France managed scope

### 3.1.5.14.8 (S1-14) Health and safety metrics - Natixis

• **Health and Safety Management System**

► **Scope of coverage:**

- France managed scope
- International managed scope: entities with the largest number of own workers
- AWM entities with manual collection
- Scope of financial investments

• **Work-related accident frequency rate**

► **Scope of coverage:**

- France managed scope
- International managed scope: entities with the largest number of own workers
- AWM entities with manual collection
- Scope of financial investments

### 3.1.5.14.9 (S1-15) Work-life balance metrics - Natixis

► **Scope of coverage:**

- France managed scope

### 3.1.5.14.10 (S1-16) Pay metrics (pay gap and total remuneration) - Natixis

► **Scope of coverage:**

- France & International managed scope
- AWM entities with manual collection
- Scope of financial investments

## 3.2 S2 - Workers in the value chain

### 3.2.1 SBM 2 - Interests and views of stakeholders

Groupe BPCE is in ongoing dialog with its stakeholders. Groupe BPCE's stakeholder consultation process is based on systems that involve its stakeholders in its process of identifying and assessing impacts, risks, opportunities and levers for

improvement, both on environmental and societal topics. The summary of the dialog by stakeholder category is presented in Section 1.3.2 - SBM-2 Interests and views of stakeholders.

### 3.2.2 SBM 3 - Material incidents, risks and opportunities and their interaction with the strategy and business model

Groupe BPCE expects its suppliers and subcontractors to commit to applying the United Nations Guiding Principles on Business and Human Rights, in particular the prohibition of the use of forced labor, the elimination of child labor, the absence of discrimination, respect for health and safety and compliance with all laws, regulations and directives applicable in the countries where they operate, in terms of working hours and rest time. These commitments are set out in a Responsible Purchasing charter included in the tender documents.

This topic is a material matter for the Group, both in terms of the potential negative impacts that could affect the employees of suppliers and subcontractors, and in terms of reputational risk for the Group. Groupe BPCE ensures that its purchases and supplies are managed in such a way as to limit the risk of severe human rights violations.

Downstream in the value chain, the matters concern employees of financed companies or companies in which the Group invests (through its asset management activities).

For the global business lines, Natixis CIB's Corporate & Investment Banking activities are based on the financing of companies across a wide range of sectors and geographical areas downstream of its value chain. As a result, these activities may influence the working conditions of workers in the companies financed. To identify and minimize these impacts, Natixis CIB incorporates ESG criteria into the analysis of its financing, both for projects and corporate financing.

Natixis CIB's ESG analysis and CSR policies, based on international standards relating to human rights and working conditions, aim to identify and prevent the risks of violations of workers' rights, in particular child labor, forced labor and the use of violence. Particular attention is paid to workers in financed companies operating in sectors and geographical areas considered to be high risk. These impacts, whether systemic or occasional, can lead to a reputational risk for Natixis, regardless of the type of workers concerned, because this risk is global and can affect the entire organization. This could affect its business model by eroding the confidence of investors, customers and other stakeholders. The reputation risk management system is formalized in a dedicated policy applicable to the entire scope of Natixis.

To address human rights and working conditions matters, Natixis CIB has set up an ESG controversy monitoring system. This system, incorporating environmental, social and governance dimensions, enables to identify, analyze and manage the associated risks, particularly those related to working conditions within financed companies and projects. ESG processes, combining ESG analysis and controversy analysis, are fully integrated into the framework of credit decisions and influence financing decisions.

In the specific context of Natixis IM's asset management activities and its European management companies, this topic concerns workers in the value chain of the companies invested in. The double materiality assessment focused in particular on their working conditions, equal treatment and opportunities as well as other labor rights such as forced labor based on the sectoral exposures of assets under management. The integration of these matters into the activities of asset management companies is done through the investment process, the proposal of financial products and commitment activities. Each Natixis IM management company is responsible for its investment process and is ultimately responsible for integrating environmental, social and governance factors in compliance with its fiduciary duty.

As Natixis IM's activity is based on a multi-boutique model encompassing a variety of asset management companies with diversified convictions, management styles and approaches to sustainability, different levers are used by these asset management companies to take into account challenges for value chain workers:

- Some Natixis IM<sup>(1)</sup> European direct management companies<sup>(2)</sup> have integrated considerations related to value chain workers into their investment policies. With this in mind, the rating methodologies or analysis processes carried out on the companies involved enable to take this topic into account. These considerations may also lead to controversy monitoring procedures and exclusion policies for companies considered to be the worst offenders;
- Some Natixis IM European management companies<sup>(3)</sup> have developed thematic products specifically addressing the social challenges of value chain workers.
- In order to improve the practices of companies invested in, in connection with value chain workers, Natixis IM management companies participate in market initiatives and implement a dialog with their issuers as part of their shareholder engagement policies.

[1] Mirova, DNCA Finance, Dorval AM, Ossiam [for funds applying ESG criteria only], Ostrum AM, Thematics AM, Flexstone, MV Credit, Vauban IP, Ecofi, Seventure, Naxicap, AEW and Vega IM.

[2] Excluding Natixis IM International Solutions.

[3] Mirova, Ostrum AM and Thematics AM.

## 3.2.3 Incident, risk and opportunity management

### 3.2.3.1 (S2-1) POLICIES RELATED TO VALUE CHAIN WORKERS

#### 3.2.3.1.1 Upstream of the value chain

The Group's commitments to value chain workers are broken down at the purchasing level. BPCE Achats & Services deploys a Responsible Purchasing policy for suppliers and subcontractors with whom the Group has commercial relationships. It is available on Groupe BPCE's website<sup>(1)</sup>. This policy incorporates the Group's major CSR guidelines. (see G1 - 4.1.1.3.1). The Responsible purchasing policy sets out the Group's major procurement guidelines. It therefore applies to all institutions that can, at their levels, implement their own policy. This Responsible Purchasing Policy, distributed in 2021, was approved by the Board of Directors of BPCE Achats & Services, which represents the Group's companies (update scheduled for 2025).

The Responsible Procurement Policy incorporates the commitments of the United Nations Global Compact and adheres to its "Ten Principles", two of which relate to Human Rights<sup>(2)</sup>:

- promote and respect the protection of international human rights law. This responsibility relates to the internationally recognized human rights set out in the International Bill of Human Rights and the principles set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work;
- make sure they are not complicit in human rights violations.

Groupe BPCE is also committed to applying the guiding principles on business and human rights set out in the United Nations' "Protect, Respect and Remedy" framework. The Group's convictions and commitments have been set out in the form of "Principles" in Groupe BPCE's Code of Conduct and Ethical Standards. "Promoting respect for human rights in all our activities" is thus anchored in the Group's values framework.

These principles are included in the Responsible Procurement Charter<sup>(3)</sup> of the Banking Sector, a joint initiative of BPCE Achats & Services and the main French players in the banking and insurance sector. This charter is one of the reference documents in the tender documents sent to suppliers. The aim is to involve suppliers in the application of diligence measures in this area. In the "human rights and labor law" section, this includes vigilance with regard to suppliers' commitments and in particular:

- the prohibition of the use of forced or compulsory labor and the ill-treatment of their employees. This includes the prohibition of all practices of modern slavery and human trafficking;
- elimination of child labor;

- the absence of discrimination: no distinction, exclusion or preference may be based on color, sex, age, language, religion, sexual orientation or identity, national or social origin, opinion, or disability.

BPCE Achats & Services has set up a risk management system to comply with the Duty of Care with the aim of identifying, preventing and remedying negative impacts related to human rights and environmental issues.

As part of an AFNOR and Banking Sector-supported initiative, BPCE Achats & Services and three other banking groups have drawn up a CSR risk mapping based on a common nomenclature comprising over a hundred purchasing categories (142 in 2024).

Presented to the Purchasing and CSR departments from 2018 and associated with the Duty of Care plan, this mapping enables to identify, rank and prioritize, by purchasing category, the CSR risks to be monitored as part of supplier relations. It also incorporates the risk associated with the country in which the majority of the added value on each product and service is generated. This mapping is updated in real time.

BPCE Achats & Services has implemented a prevention and control system taking into account banking sector regulations (EBA), the specific nature of purchasing and all other regulations concerning it (Duty of Care, anti-corruption, labor law, etc.).

BPCE Achats & Services is in constant contact with the team in charge of monitoring BPCE SA's regulatory changes and the team in charge of relations with European regulators.

As an extension to the charter and backed by the responsible procurement standard ISO 20400, the Responsible Supplier Relations and Procurement (RFAR) certification is awarded by the company mediator (under the auspices of the French Ministry for the Economy) and the CNA (French association of purchasing managers). It aims to single out French companies that have established lasting, balanced relations with their suppliers.

BPCE Achats & Services and 12 Groupe BPCE companies have received the RFAR certification and have historically been committed to the continuous improvement process in Procurement induced by the label.

This Certification recognizes the Group's responsible procurement strategy led by BPCE Achats & Services and the deployment of CSR at the heart of the purchasing function and in relations with suppliers.

The development of the use of inclusive suppliers is also an action principle implemented by BPCE Achats & Services to integrate corporate social responsibility into its purchasing practices.

[1] <https://www.groupebpce.com/app/uploads/2024/01/politique-achats-responsables-du-Groupe-BPCE-2.pdf>.

[2] For more information, please refer to section S1-1 Human Rights.

[3] [08012018\\_Charte Achats Responsables\\_VF\\_FR](#).

### 3.2.3.1.2 Downstream of the value chain

#### Natixis CIB

Natixis CIB takes into account potential ESG controversies associated with counterparties and financed projects that could impact the risk profile of the counterparty/project.

#### SECTOR POLICIES

When developing its sectoral policies, Natixis makes sure to consult its key stakeholders, in particular representatives of civil society and sector experts. This approach enables to gather diversified perspectives and to ensure that the defined criteria effectively respond to the societal and environmental issues identified. Public sector policies (oil and gas, coal, defense, tobacco) are shared on the Natixis website.

The implementation of ESG policies is carried out by a committee at Groupe BPCE level, chaired by a member of the Executive Management Committee, which aims to define and monitor strategic guidelines related to ESG risks.

The following ESG policies include criteria aimed at ensuring adequate working conditions within the financed companies: mining and metals sector (internal policy), oil and gas sector (public policy), palm oil sector (internal policy).

#### EQUATOR PRINCIPLES

As part of the Equator Principles, Natixis CIB applies a rigorous methodology that aims to assess the environmental and social (E&S) risks of projects financed and the management of these risks by customers, regardless of their business sector. Since October 2020, Natixis CIB has applied the amended version of the Principles (EP IV Amendment), which incorporates more exhaustive criteria, in particular the application of IFC performance standards concerning the impact on local communities (IFC PS2 "Workforce and working conditions"), IFC PS4 "Community Health, Safety and Security", and IFC PS5 "Land Acquisition and Involuntary Resettlement". Each transaction submitted for review is classified into three categories according to the IFC classification:

- A = significant and adverse E&S impact;
- B = limited and adverse E&S impact;
- C = minimal E&S impact or no adverse impact.

This categorization affects the internal credit approval process. For category A and B projects, the ESG risk management team performs its own analysis and supports the business line in preparing and monitoring the environmental and social assessment carried out by an independent third-party consultant (key elements of the Equator Principles).

An E&S note summarizing the key elements of the project assessment must be presented for any new transaction pending credit approval. This is prepared by the business line and, for category A and B projects, enhanced by the ESG risk management team, which validates or modifies the project category and sets out its position and recommendations on the project. This note is an integral part of the loan application; therefore, the various members of the credit approval body review

this document before making any decision. For category A projects, the procedure provides for a referral to a higher-ranking credit approval body. Transactions are subject to E&S monitoring throughout the term of the loan. When deemed appropriate, the ESG risk management team may notify and inform Natixis' management of any aspect related to the E&S risks of transactions through the Reputational Risk Committee, Global Culture & Conduct Committee.

#### Natixis IM

In conjunction with value chain workers, Natixis IM's European asset management companies are implementing various policies that integrate these issues into investment and commitment activities.

#### RESPONSIBLE INVESTMENT POLICIES

The responsible investment or ESG policies of Natixis IM's European direct management companies<sup>(1)</sup> include the dimension of value chain workers in their investment approach.

This integration can be carried out through due diligence processes, research or by taking into account minimum standards.

These policies may thus describe the consideration of diversity in the companies considered, safety at work or respect for human rights and these criteria ultimately influence the non-financial rating of the companies. After having been combined with a set of other criteria, these criteria thus enable to take into account the impacts, risks and opportunities related to value chain workers. By way of illustration in listed asset management, as indicated in Ostrum AM's ESG policy, the GREaT rating method<sup>(2)</sup> applied to issuers/companies, takes into account human rights: quality of working conditions, supplier relationship management, etc.

#### MINIMUM STANDARDS

All European direct listed asset management companies<sup>(3)</sup> have defined minimum standards on the social issues to which their investments are subject, based on regulatory exclusions related to international standards:

- the United Nations Global Compact;
- United Nations Guiding Principles on Business and Human Rights; and/or
- the OECD Principles of Responsible Business Conduct.

Private asset companies have also adopted these international standards<sup>(4)</sup> or have adopted specific approaches<sup>(5)</sup> to their investment universes by including, for example, clauses in the contracts of real estate managers.

#### CONTROVERSY MONITORING POLICY

Natixis IM has defined a global ESG risk policy that requires the implementation of a controversy monitoring for Natixis IM and its asset management companies. This policy requires having a structure and a system to assess, quantify, manage, mitigate and communicate about severe forms of controversy as part of its reputational risk management system.

[1] Mirova, DNCA Finance, Dorval AM, Ossiam [for funds applying ESG criteria only], Ostrum AM, Thematics AM, Flexstone, MV Credit, Vauban IP, Ecofi, Seventure, Naxicap, AEW and Vega IM.

[2] Responsible management, sustainable management of resources, energy transition, regional development.

[3] Ostrum, Ecofi, DNCA Finance, Dorval AM, Mirova, Thematics AM, Vega IM. Ossiam, a quantitative and index-based management company, includes exclusion criteria in ESG funds.

[4] Flexstone, MV Credit and Vauban.

[5] For Naxicap, these principles are integrated into the ESG analysis processes rather than exclusions due to the type of companies involved. Seventure includes in these standards in the Due Diligence and in its annual ESG data collection questionnaire. AEW has included contractual provisions for some of its products with its property managers.

In particular, each asset management company must therefore have a system for taking into account controversies (either formalized via a dedicated policy or integrated into existing policies and procedures) that defines the governance and operational principles.

This monitoring of controversies makes it possible to identify, among other things, any social violations including breaches related to value chain workers.

### SHAREHOLDER ENGAGEMENT POLICIES

The engagement and voting policies of Natixis IM management companies may include principles relating to the social rights of value chain workers.

In terms of engagement, the interests of value chain workers are included in the dialog between asset management companies and issuers. Indeed, these interests are taken into account by several Natixis IM European management companies<sup>(1)</sup> as a topic of attention.

If the engagement processes result in responses deemed unsatisfactory by the asset management companies, a reporting procedure is provided for and takes the form of several actions specific to each engagement policy.

At any point in the reporting process, if the company's progress and/or practices are deemed insufficient to maintain eligibility, divestment may be considered.

### VOTING POLICIES

In terms of voting, several Natixis IM European asset management companies<sup>(2)</sup> take into account the interests of value chain workers when analyzing shareholder resolutions and voting.

In general, these voting policies support shareholder resolutions on social issues that improve long-term value for all stakeholders, including employees of the companies involved, and/or encourage greater transparency on the respect of their rights or the fair distribution of the value created.

- In this respect, Mirova's voting policy encourages companies to take into account the remuneration of employees in a fluctuating economy marked in particular by inflation and/or by pressures related to the cost of living. Mirova encourages companies to explain how they have approached the distribution of value. As part of the application of these principles, Mirova votes in favor of resolutions guaranteeing that the components of executive remuneration highlight, among other things, a fair distribution of value between the various stakeholders.
- In addition, in its voting policy, Ossiam also requires large listed companies to disclose information on their exposure and management of the main risks related to corporate social responsibility. This may include, but are not limited to, issues related to health and safety, human rights, modern slavery and labor standards. When companies do not publish this information or when Ossiam observes poor performance or poor management practices in terms of corporate social responsibility, the management company may vote against or abstain on the resolution to adopt the annual report and financial statements.

## 3.2.3.2 (S2-2) PROCESSES FOR ENGAGING WITH VALUE CHAIN WORKERS ABOUT IMPACTS

### 3.2.3.2.1 Upstream of the value chain

#### Process for engaging on preventing and identifying potential impacts with value chain workers.

The Responsible Supplier Relations and Procurement (RFAR) certification demonstrates the Group's attention to the quality of its supplier relationships. The aim of this Certification is to improve procurement practices by raising awareness among economic players of the importance of the quality of relations with the various suppliers.

BPCE Achats & Services has implemented a continuous progress plan for responsible purchasing. This plan is audited annually by an approved independent body.

#### Relationship monitoring system

BPCE Achats & Services has set up regular meetings with the Group's strategic suppliers (defined in particular according to the volume of purchases, the criticality of the services delivered for

the continuity of banking activities and/or essential to the Group's development). Major suppliers are met once a year. Strategic suppliers are met once every 18 months on average. The business lines are responsible for monitoring contracts with suppliers and meet with them in this context.

These meetings allow for a privileged exchange with suppliers on all aspects of the service. The Purchasing Director of BPCE Achats & Services is responsible for the proper application of the system.

In addition, BPCE Achats & Services has set up a system for "listening to the voice of suppliers" for the entire Group. This system, used by nine Group companies in 2024, has enabled to identify areas for optimization and implement progress plans to better understand the expectations and degree of satisfaction of suppliers in order to improve the relationship.

### 3.2.3.2.2 Downstream of the value chain

#### Natixis CIB

For the financing of projects falling within the framework of the Equator Principles, Natixis CIB implements a prior consultation of the workers of the projects financed by an independent consultant for all category A project financing and the majority of category B transactions. This includes an on-site visit and interviews, mainly to validate the conclusions of the initial analysis and identify any

additional action required to correct and mitigate potential impacts. An action plan is then drawn up and included in the project's financial documentation, thus guaranteeing that the borrower is required to comply with the planned actions throughout the duration of the loan. This procedure aims to remedy the negative impacts and allows the workers of the financed projects to express their concerns through the consultations carried out by the independent consultant.

[1] Mirova, DNCA Finance, Dorval AM, Ossiam (for funds applying ESG criteria only), Ostrum AM, Thematics AM, Flexstone, MV Credit, Vauban IP, Ecofi, Seventure, Naxicap, AEW and Vega IM.

[2] Ecofi, Mirova, Ossiam (for funds applying ESG criteria only), Ostrum AM, Thematics AM and Vega IM.

**Natixis IM**

In the context of asset management, Natixis IM management companies do not have the opportunity to interact directly with the employees of the companies invested in. However, asset management companies use data and research and analysis methodologies that address the issue of value chain workers. The response to this information point was made in this sense in the absence of guidelines for the asset management sector.

Natixis IM's European asset management companies use internal research services as well as analysis and due diligence processes to identify risks and opportunities related to the social issues of value chain workers. This consideration concerns both European asset management companies investing in listed assets<sup>(1)</sup> and those investing in private assets<sup>(2)</sup>.

- For example, for Ostrum AM, the investment process excludes investments by issuers for which proven severe controversies run counter to the principles defended by commonly established international standards (United Nations Global Compact, OECD Guidelines for multinational companies), thus seriously

undermining: human rights and labor rights. For this, Ostrum AM has defined an analysis methodology based on various criteria: the proven nature of the facts; the seriousness of the events and their impact on stakeholders; the systemic nature of the breaches observed and the absence of remediation or their ineffectiveness;

- For Thematics AM, the non-financial investment approach includes a behavioral analysis. As part of this analysis, Thematics AM identifies "non-compliant" companies, *i.e.* those that cause or contribute to serious, systemic and/or systematic violations of international standards concerning human and labor rights.

For private assets, Natixis IM's European asset management companies take social indicators into account in their due diligence and ESG risk integration process. For example, in its analysis of litigation and reputational risks, AEW includes risk, whose occurrence is ongoing, and which are related to challenges in the event of risk to the health or comfort of stakeholders and participants, on construction sites and in the operating phase of the assets.

### 3.2.3.3 (S2-3) PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR VALUE CHAIN WORKERS TO RAISE CONCERNS

#### Whistleblowing mechanism open to Groupe BPCE's third parties

Groupe BPCE companies have a platform to collect reporting of facts relating to serious breaches of the Code of Conduct, laws, safety, environmental impact, or any inappropriate behavior in the workplace. This whistleblowing system is open to all employees

and third parties of the Company, who can express themselves *via* a tool accessible by URL link, regardless of the country of operation (Europe, United States, etc.) and regardless of the business line (Retail Banking, Corporate & Investment Banking, etc.). For more details on the whistleblowing system, see Section G1-1 - 4.1.1.3.3.

#### 3.2.3.3.1 Upstream of the value chain

##### Risk management system and Duty of Care

The level of risk for each purchasing category is assessed along three axes covering the following issues:

- **fair practices and ethics:** fraud and corruption, personal data protection, property rights and patents;
- **human rights and social conditions:** child labor, forced labor and modern slavery, discrimination, health and safety, working conditions and freedom of association;
- **environment:** climate change and greenhouse gases, loss of biodiversity, depletion of natural resources, pollution, waste and end-of-life management.

Each purchasing category is assessed on a scale of four CSR risk levels: low, limited, high, very high. To assess the level of risk, the AFNOR expert takes into account the likelihood and potential severity of the risk for each factor.

Based on the risk assessment work, specific mitigation measures were developed:

- in 2024, BPCE Achats & Services adopted an additional module to CSR risk mapping. This AFNOR module can integrate specific criteria into specifications in order to mitigate risks according to the purchasing category;

- for high and very high-risk purchasing categories, a specific system has been set up: suppliers must answer a questionnaire specific to each category and communicate the actions taken to mitigate risks and prevent serious harm.

This action plan, evaluated by BPCE Achats & Services, generates a rating that is integrated into the supplier's overall score. Depending on the results, a progress plan may be drawn up (when relevant) with the selected suppliers and must be reviewed as part of the monitoring of the supplier relationship;

- for other purchasing categories, CSR requirements are gradually being implemented in the consultations;
- professionalization of the Purchasing function, through the gradual dissemination of best practices and the roll-out of training programs: in particular, all purchasers have been trained in the CSR issues and risks identification tool covering all 142 purchasing categories.

A collective CSR audit process has been initiated with a few major local banking institutions. This approach aims to verify the compliance of the CSR commitments made by suppliers.

[1] DNCA Finance, Mirova, Ostrum AM, Thematics AM, Ecofi, Ossiam [for funds applying ESG criteria only] and Dorval AM.

[2] Flexstone, Naxicap, AEW, Seventure, Vauban IP and MV Credit.



### Integration of specific contractual clauses

BPCE Achats & Services communicates on its commitments in terms of responsible purchasing and its expectations of suppliers, on the Group's institutional website and *via* the Banking Sector's Responsible Procurement Charter<sup>(1)</sup> in the consultation files.

BPCE Achats & Services systematically includes clauses in its contracts to ensure that its subcontractors comply with all regulations relating to fundamental rights and freedoms, health and safety of people, social and labor regulations or environmental regulations, whether they are of conventional origin (company agreements, branch agreements, collective agreements), national, European or international. The supplier must justify this at the customer's request.

### 3.2.3.3.2 Downstream of the value chain

#### Natixis CIB

ESG risk management is part of the procedure that aims to define the principles governing the credit risk decision process within Natixis CIB (*Credit Decision Process*). This procedure details the Bank's various commitments monitored in the context of granting a loan, such as:

- CSR policies in sensitive sectors, whether internal or public (coal, oil and gas, defense, tobacco, mining, nuclear, palm oil);
- the application of the Equator Principles for dedicated financing;
- commitments made proactively as part of the Act4Nature initiative;
- clients with a significant ESG or reputation risk.

#### Natixis IM

In the context of asset management, Natixis IM's management companies have no direct relationship with the employees of the companies invested in. It is these same companies invested in that may be subject to a whistleblowing mechanism by their own employees. In the absence of guidelines for asset management, the interpretation of requirements in this area concerns the monitoring of controversies, Principle Adverse Impacts (PAIs)<sup>(2)</sup> and engagement with companies.

Each Natixis IM management company must have a system to address controversies (formalized through a dedicated policy or integrated into existing policies and procedures).

Groupe BPCE also includes clauses in its contracts allowing employees to rely on a whistleblowing system and to be explicitly informed by their employer of the existence of this system.

Several existing channels are highlighted to allow the reporting of negative impacts; whether or not they are related to value chain workers:

- employees can use the whistleblowing system set up within Groupe BPCE (whistleblowing system described in section G1-1 - 4.1.1.3.3);
- an independent "Supplier Mediator" at BPCE Achats & Services has been appointed to help manage disputes;
- audits may be carried out by BPCE Achats & Services to ensure that the elements declared by the supplier in the CSR questionnaire are compliant (methods for sending the questionnaire described in section G1-2 - 4.1.1.4).

For the monitoring of controversies, Natixis IM management companies rely on data produced by external data providers, collected from third parties and/or on information communicated directly from the company invested in (for private assets).

External data providers are mainly ISS, MSCI, RepRisk and Sustainalytics. For the latter, social controversies are determined in part on the basis of cases of forced labor, violations of human rights and problems related to health and safety at work. Similarly, controversies as defined by MSCI also include elements related to workers' rights, child labor, potential health and safety issues at work and cases of discrimination.

European asset management companies also report quantitative indicators as part of their PAI reporting in order to monitor potential negative impacts on value chain workers.

In addition to PAI indicators for which publication is mandatory, certain of Natixis IM's European asset management companies publish additional PAI indicators in relation to value chain workers. Thus, Ostrum AM, Dorval AM and Vega IM also take into account which investment countries have breaches of social standards (PAI 16) in the context of sovereign and supranational issuers.

Finally, the engagement actions implemented, where applicable, by Natixis IM's management companies can help influence practices and remedy the negative impacts related to potential controversies or violations involving value chain workers.

<sup>(1)</sup> [groupebpce.com/app/uploads/2024/01/Charte-Achats-Responsables.pdf](https://groupebpce.com/app/uploads/2024/01/Charte-Achats-Responsables.pdf).

<sup>(2)</sup> PAIs (Principal Adverse Impact) are key indicators used to measure the most significant adverse impacts of investments on the environment, society and governance (ESG).

### 3.2.3.4 [S2-4] TAKING ACTION ON MATERIAL IMPACTS ON VALUE CHAIN WORKERS, AND APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO VALUE CHAIN WORKERS, AND EFFECTIVENESS OF THOSE ACTIONS

#### 3.2.3.4.1 Upstream of the value chain

The actions implemented for Groupe BPCE as a whole to limit negative impacts and seize opportunities are as follows:

##### Duty of Care

- the principles and actions related to the Duty of Care have been implemented in policies (responsible purchasing), actions and procedures since 2017. The procedure is constantly being adapted to cover high and very high-risk categories of purchases: January 2025;
  - implementation of obligations related to the Duty of Care (BPCE Achats & Services scope: General Purchasing Procedure): January 2025;
  - to date, no serious impact has been identified as part of the collaboration with the Group's suppliers;
- BPCE Achats & Services has set up dedicated tools for the Purchasing Function:
- availability since 2021 of CSR questionnaires covering all purchasing categories in order to measure the CSR performance of suppliers;
  - since 2022, an AFNOR CSR risk mapping platform has been deployed for Groupe BPCE's entire purchasing function. An internal control system verifies the compliance of the purchasing process deployed by BPCE Achats & Services on behalf of its internal specifiers;
  - in 2024, implementation of a "listening to the voice of suppliers" system for Group companies;
  - in 2025, BPCE Achats & Services intends to monitor the integration of CSR criteria into specifications.

#### 3.2.3.4.2 Downstream of the value chain

##### Natixis CIB

In 2024, there was no significant change in the ESG risk control system within Natixis CIB. However, as part of the ESG Inside program, several projects have been launched to improve this system as part of a continuous improvement approach. These initiatives will be rolled out throughout 2025.

In addition, it should be noted that the number of transactions analyzed, where the ESG risk is considered major, increased between 2023 and 2024, from 614 in 2023 to 800 in 2024.

Regarding the financing of projects covered by the Equator Principles, the measures described can also be used for possible remediation. These measures especially allow to establish communication and consultation channels through which the workers concerned can express their concerns. The involvement of the independent on-site consultant - and the development of a potential action plan, included in the financial documentation - strengthens ability of stakeholders to identify and correct potential impacts.

##### INTERNAL CONTROL SYSTEM

In order to verify the effectiveness of these actions, Natixis CIB has an internal control system that incorporates all risks, including environmental and social risks regarding value chain workers. It is based on three lines of defense:

The effectiveness of this system is currently measured using several annual indicators:

- the consultation rate including the integration of supplier CSR performance assessments;
- the compliance rate of purchasing files measured during internal controls.

##### Development of spending with Inclusion Market suppliers

- implementation in 2023 of inclusive service providers referencing;
- organization of events on the topics of inclusion and disability every year (March 2023 and October 2024);
- implementation in 2024 of a training module "Developing more inclusive purchasing with greater solidarity" for buyers and their business lines;
- provision for the Purchasing Function of a documentary space (SharePoint) dedicated to the Inclusion Market, which has been regularly enhanced since 2023 (access to contracts, sourcing platforms, training, indicators, etc.);
- in 2025, the implementation of an internal catalogue of inclusive suppliers is planned and enable to source and optimize regional synergies.

The effectiveness of these actions will be measured by:

- the number of people trained during training/events per year;
- the amount of annual expenses with the inclusion market.

- first line of defense: represented by sales, origination and distribution teams;

- second line of defense: embodied by the Risk and Compliance departments of Natixis. Risk acts as a second line of defense at transaction, counterparty, portfolio and corporate levels across all activities;

- third line of defense: Natixis CIB's Internal Audit department is in charge of periodic controls, and has integrated ESG-specific risks into its scope of activity; it carries out thematic controls on Natixis CIB activities.

##### Natixis IM

The actions explained below only concern the positive contributions generated by the products and the improvement of the issuer's practices thanks to the engagement actions related to value chain workers.

##### PRODUCTS

Some of Natixis IM's management companies offer products aimed specifically at creating a positive contribution or promoting good social practices related to the theme of value chain workers.

For example, for Mirova, the "*Insertion Emplois Dynamique*" fund (dynamic employment integration fund) adopts an original thematic approach based on long-term trends and job creation to identify investment opportunities across the value chain and in all business sectors. As such, part of the fund's assets are invested in unlisted securities of solidarity-based companies that promote the creation or consolidation of jobs in France.

For Thematics AM, the AI & robotics strategy contributes to the optimization of the use of resources, sustainable manufacturing and the health and safety of workers, in connection with, among other things, SDG 8 (access to employment). As such, the positive contribution is generated through the automation of logistics and industrial robots as part of factory automation, thus freeing workers from hazardous, dirty, difficult, repetitive and tedious tasks.

## SHAREHOLDER ENGAGEMENT

Engagement strategies can be proactive and therefore respond to the themes defined as priorities in the engagement policy, or implemented in response to a social controversy such as the violation of standards related to value chain workers (reactive). These controversies can be identified as part of the controversy monitoring processes of Natixis IM management companies, or *via* the analysis carried out by the service providers conducting the engagement.

- As part of its proactive engagement, Mirova reports actions in favor of diversity in its engagement report. For example, Mirova encourages companies in which it invests to adhere to the principles of UN Women Empowerment<sup>[1]</sup>.
- In addition, Ostrum AM reports that the main topics of dialog with issuers in 2023 concerned, on social issues: the development of human capital, strengthening relations with issuers' stakeholders, maintaining the balance of powers and compensation.
- As part of the reactive engagements carried out by Natixis IM's asset management companies, Ossiam explains that, *via* their collaborative engagement service provider, companies in significant violation of treaties and international rights are those identified as a priority to implement an engagement dialog.

In terms of voting, shareholders' resolutions at General Meetings are reviewed according to the principles defined in the voting policies and explained in section S2-1 - 3.2.3.1.2 of this document.

- Thematics AM generally votes for proposals requiring a company to disclose its diversity policies or initiatives, or proposals requesting the disclosure of full diversity data on a company's workforce.

- In addition, Ecofi's voting report shows that the asset management company regularly supports resolutions that invite companies to disclose information on respect for human rights within their value chain.

## Proactive participation in market initiatives

Some Natixis IM European management companies<sup>[2]</sup> have proactively joined market initiatives in order to collaborate with other investors to improve issuer practices, several of these initiatives are targeting issues related to value chain workers.

For European asset management companies active in listed investments:

- DNCA Finance and Mirova are signatories of the "Advance" PRI initiative. Since its launch in December 2022, this initiative has enabled the 115 investor members to establish an active dialog with 38 companies to encourage them to promote human rights in their activities;
- Ostrum AM and Mirova are founding members of the 30% Club France Investor Group initiative. Created in 2020, this club aims to promote better gender diversity within the management teams of SBF 120 companies, thus contributing to the sub-theme Equal treatment and equal opportunities for all. A first objective is to achieve at least 30% representation of women by 2025. The investor group currently has 16 members representing more than €6,000 billion in assets under management;

With regard to the Natixis IM European management companies specializing in private asset management, participation in the following market initiatives can be mentioned:

- the majority of private asset management companies<sup>[3]</sup> have signed the Parité France Invest charter<sup>[4]</sup>, which aims to increase efforts to promote parity at all levels in the organization of asset management companies and in portfolio companies. Concerning the companies invested in, the commitment is to reach at least 30% of women on Executive Committees by 2030;
- Mirova, Naxicap and Vauban IP are also signatories of the France Invest Value-Sharing Commitment Charter<sup>[5]</sup>. The signatories have defined the objective for companies invested in:
  - to increase, in the short term, the coverage rate of their employees by at least one annual value-sharing scheme (value-sharing bonuses, profit-sharing or incentive scheme);
  - to promote, over the long term, the sharing of shareholder value creation through employee shareholding and the distribution of capital gains in all situations where these two mechanisms are relevant.

[1] <https://unglobalcompact.org/take-action/action/women-principles>.

[2] DNCA Finance, Mirova, Ostrum AM, MV Credit, Flexstone, Vauban IP, Seventure and Naxicap.

[3] Mirova, MV Credit, Flexstone and Vauban IP.

[4] <https://www.franceinvest.eu/boite-outils/parite/charte-parite/>

[5] <https://www.franceinvest.eu/charte-dengagement-sur-le-partage-de-la-valeur/>

## 3.2.4 Metrics and targets

### 3.2.4.1 [(S2-5)] TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

#### 3.2.4.1.1 Upstream of the value chain

##### Duty of Care target

For several years, the Group has been raising awareness and equips the purchasing process to ensure compliance with the Duty of Vigilance Law.

Until 2024, no target had been defined.

As part of the launch of the new VISION 2030 strategic project, the target at BPCE Achats & Services is to be able to assess 100% of suppliers in high and very high CSR risk categories when entering into a relationship in order to prevent risks in these categories by the end of 2026. Already deployed, the system will concern 25 categories identified as the most at risk. This change will be made possible by the implementation of a specific Responsible purchasing procedure at the beginning of 2025.

#### 3.2.4.1.2 Downstream of the value chain

##### Natixis CIB

Natixis CIB has not defined performance indicators for the employees of the companies financed. Natixis CIB nevertheless aims to cover all clients and projects for which ESG issues, and in particular those relating to value chain workers, are identified as part of the analysis of potential controversies (carried out at the start of the relationship with a new client and in the monitoring of portfolio clients), the implementation of sectoral ESG policies and the Equator Principles.

No performance indicators have been identified for the employees of the companies financed, instead resources indicators implemented are considered.

##### Development of spending with Inclusion Market suppliers target

Within Groupe BPCE, the amount of spending on inclusive suppliers has stabilized in recent years. It amounted to €14.8 million in 2024<sup>(1)</sup>. This expenditure is made with structures, in particular the integration by economic activity (SIAE) and the disability structures (protected and adapted work sector - STPA - and Independent Workers with Disabilities - TIH).

It is planned to increase this amount by the end of 2026 through:

- raising the awareness of the purchasing sector and business lines through specific events and training;
- the provision of dedicated sourcing and referencing tools.

The ESG Risk team produces detailed analyses of Natixis CIB customers for whom ESG risk is considered a major concern (see S2-4 for the number of transaction analyzed in 2024).

##### Natixis IM

At this stage, Natixis IM has no performance indicators and is deploying a continuous improvement approach to resources and processes.

[1] This figure is the result of cross-referencing of data between the inclusion market supplier database [public inclusion market website] and the Group's purchasing expenditure database.

### 3.3 S3 - Affected communities

Groupe BPCE consists of brands with strong identities that meet all customer needs; fully-fledged regional houses with decentralized governance that enables local decision-making ; and differentiating expertise that makes it possible to address new markets, develop synergies, and pool certain functions.

With its many faces, Groupe BPCE is supported by high-performance banking houses promoted by their customers:

- Banque Populaire, a bank that is locally committed to the growth and the success of all its customers, is the:
  - Affinity and trustworthy bank for young people who wish to undertake professional and public sector roles;
  - Bank for corporates: co-pilot for day-to-day activities, a main banker supporting transitions and an advisory banker for diversifying and preserving wealth;
  - Partner bank for healthcare and blue economy players, expert in the industries of the future.
- Caisse d'Epargne, a bank open to all and useful to everyone, is the:
  - Bank for families and the prime partner for the regions, energizing and unifying public and private stakeholder communities;
  - Pioneer bank for transitions, assisting with the major challenge of housing and changes affecting society and all economic actors – Social & Solidarity Economy actors, corporates and professionals;
  - Partner bank of confidence, a leader in deposits & savings providing expertise, security and protection every day.

Rooted in the heart of the regions and closely connected to the local inhabitants and ecosystems, the Banques Populaires and the Caisses d'Epargne help enhance the economic, social, and cultural dynamics of these areas, thereby contributing to the well-being of communities. In its VISION 2030 strategic project, Groupe BPCE is focusing its actions on specific sectors and communities:

- **(A)** companies of all sizes, from VSEs to SMEs and mid-sized companies, as well as professionals, craftspeople, small retailers and liberal professions, by providing them with key expertise, strategy and transformation advisory and a structured and global approach to savings. By investing regional savings in the local economic fabric and financing regional projects, the Banques Populaires and the Caisses d'Epargne also indirectly help support the development of local employment opportunities;
- **(B)** the various structures of the social and solidarity economy (SSE), which respond to major societal challenges (healthcare, dependency, aging, fight against poverty, collaborative economy, etc.);
- **(C)** public sector players, including local authorities. As the main private financier of the French public sector<sup>(1)</sup>, the Group supports the transformation of regions, for the benefit of those who live there;
- **(D)** social housing operators and their beneficiaries, as long-standing partners and leading private bankers in social housing<sup>(2)</sup>;
- **(E and F)** key regional infrastructures, by financing players in the health sector (clinics, hospitals, etc.) or the sports economy (companies, associations), thus improving the living conditions of their beneficiaries.

As part of its financing activities, Natixis CIB identifies potentially affected communities as those that live or work near its customers' companies, sites and projects, that could be impacted by their activities.

In the specific context of Natixis IM's asset management activities, this topic concerns the impact of the companies invested in on the affected communities, in relation to economic, social and cultural rights, civil rights and freedoms as well as the specific rights of indigenous communities based on sector exposures of assets under management.

[1] *Observatoire de la dette Finance Active des Collectivités Locales* at the end of 2023 (published in 2024).

[2] *Milestones 136 USH "HLM in figures"* (August 2024).

### 3.3.1 SBM-2: Interests and views of stakeholders

Groupe BPCE is in ongoing dialog with its stakeholders. Groupe BPCE's stakeholder consultation process is based on systems that involve its stakeholders in its process of identifying and assessing impacts, risks, opportunities and levers for

improvement, both on environmental and societal topics. The summary of the dialog by stakeholder category is presented in Section 1.3.2 - SBM-2 Interests and views of stakeholders.

### 3.3.2 SBM-3 - Material incidents, risks and opportunities and their interaction with the strategy and business model

Within the framework of double materiality assessment, the financing of the economy and territorial actors has been identified as material for the Groupe BPCE.

The Banques Populaires and the Caisses d'Epargne have a positive impact by fostering local economic development through job creation and support for companies, professionals, local authorities, and public sector players. They also assist stakeholders and beneficiaries of the social and solidarity economy, as well as social housing operators, ultimately enhancing the living conditions of the communities they serve.

By supporting transitions, particularly environmental and social transitions, the Banque Populaire and Caisse d'Epargne networks are helping to support the various players and contribute to the territories competitiveness. Conversely, financing/investment in projects that have a negative impact on communities or in projects that are not aligned with the actual needs of society could damage the Group's reputation or increase the Group's legal risk. Reputational and litigation risk management systems are described in the ESRS 2 chapter.

At the downstream level of Natixis' value chain, financing activities can have positive impacts on communities through the financing of projects that meet societal needs and improve access to facilities related to social and cultural rights.

The process of granting financing by Natixis CIB incorporates ESG criteria, particularly concerning the communities affected, which allows for the identification, analysis, and management of any associated risks. Natixis CIB implements a reputation risk management system that includes controversy analyses. These analyses are fully integrated into credit decisions.

For Natixis IM and its European asset management companies, the integration of community matters (in connection with economic, social and cultural rights, civil rights and freedoms as well as the specific rights of indigenous communities) in the activities of asset management companies, is done through the investment process, the proposal of financial products and engagement activities. Each Natixis IM asset management company is responsible for its investment process and is ultimately responsible for integrating environmental, social and governance factors in compliance with their fiduciary duty. Diversified approaches are observed within Natixis IM's European asset management companies:

- all of<sup>(1)</sup> Natixis IM's<sup>(2)</sup> European direct asset management companies have incorporated considerations related to the affected communities into their investment policies. This is reflected in the rating methodologies or due diligence processes carried out on the invested companies;
- some of Natixis IM's European asset management companies<sup>(3)</sup> have developed products with the objective of specifically taking into account the impact of the companies invested in and/or implementing actions that have a positive impact on communities;
- as part of their shareholder engagement policies, Natixis IM's asset management companies participate in market initiatives<sup>(4)</sup> and engage in dialogs with the companies they invest in, with the aim of improving their practices related to communities. They also adhere to several international principles aimed at promoting respect for community rights.

Groupe BPCE's general approach to human rights is presented in the Group's Human Rights charter<sup>(5)</sup>.

[1] Within Natixis IM, direct management includes all asset management companies except the management of Natixis IM's International Solution's funds of funds.

[2] Mirova, DNCA Finance, Dorval AM, Ossiam (for funds applying ESG criteria only), Ostrum AM, Thematics AM, Flexstone, MV Credit, Vauban IP, Ecofi, Seventure, Naxicap, AEW and Vega IM.

[3] Dorval AM, AEW, Mirova, Ostrum AM and Thematics AM.

[4] For example, DNCA Finance and Mirova are members of the PRI Advance initiative, Dorval AM and Ostrum AM took part in a collective declaration by UNI Global Union.

[5] Extract [241007-charte-droits-humains-groupe-dles.pdf](#).



### 3.3.3 Incident, risk and opportunity management

#### 3.3.3.1 FINANCING THE ECONOMY AND REGIONAL PLAYERS IN FRANCE

##### 3.3.3.1.1 [S3-1] Policies related to affected communities

There are no policies applicable to the entire Group on this topic at this stage. They will be specified for the 2025 fiscal year, as part of the strategic project VISION 2030 by Groupe BPCE. Nevertheless, in 2024, Groupe BPCE is rolling out action plans for the aforementioned communities, which are specified in the dedicated section (see S3-4 - 3.3.3.1.4).

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

The Banques Populaires and Caisses d'Épargne interact with local players on an ongoing basis as part of their day-to-day activities:

**(A) With companies, in particular SMEs and mid-sized companies as well as professionals, craftspeople, retailers and liberal professions:** to collect the expectations of local ecosystems, the Banques Populaires and the Caisses d'Épargne interact with the Chambers of Commerce and Industry (CCI), the Chambers of Trades and Crafts, and the regional delegations of organizations employer organizations (such as MEDEF, CPME, U2P, etc.), entrepreneurial networks and regional orders;

**(B) With the various structures of the Social and Solidarity Economy:** the Banques Populaires, in particular Crédit Coopératif, and the Caisses d'Épargne support SSE players, coordinate partnerships and maintain ongoing dialog with representative networks and their members, support networks and all SSE players, associations, foundations, mutuals and cooperatives, particularly at the local level within the Regional Chambers of the Social and Solidarity Economy (RCSSE). These exchanges allow monitoring of issues, needs, and current events, leading to the integration of these elements into national and local strategies and allowing the co-construction of events, round tables, or joint disclosures.

The Banque Populaire and Caisse d'Épargne networks also work alongside the heads of networks and general or SSE representative bodies.

**(C) With public sector players, including local authorities:** the Banques Populaires, in particular Crédit Coopératif and CASDEN, and the Caisses d'Épargne, which historically support all public players, are in direct contact with the ecosystems of their regions and players in the public sphere. The Caisses d'Épargne are in constant contact with various public bodies (local and regional authorities, SEM, etc.) and forge partnerships at both national and local levels (associations of local authorities and elected representatives, EPL, etc.).

**(E and F) With key regional infrastructures:** the Banques Populaires and the Caisses d'Épargne support committed players with many partners in the health sector and institutions in the sports economy, such as GIE France Sport Expertise, Territoire d'Événements Sportifs and Union Sport & Cycle. They represent the banking sector in the Sport sector.

##### 3.3.3.1.3 [S3-3] Procedures to address negative impacts and channels for affected communities to raise concerns

###### Whistleblowing mechanism open to Groupe BPCE's third parties

Groupe BPCE companies have a platform to collect reports relating to serious breaches of the Code of Conduct, laws, safety, environmental impact, or any inappropriate behavior in the workplace. This whistleblowing system is open to all employees and third parties of the company, who can express themselves via a tool accessible by URL link, regardless of the country of operation (Europe, United States, etc.) and regardless of the business line (Retail Banking, Corporate & Investment Banking, etc.). For more details on the whistleblowing system, see G1.1 - 4.1.1.3.3.

Groupe BPCE is not aware of any cases of non-compliance with the guiding principles of the United Nations or the ILO Declaration on Fundamental Principles and Rights at Work regarding its customers.

In addition, no alert was raised via Whispli, Groupe BPCE's whistleblowing channel.

###### Channels for affected communities to raise concerns

The Group's cooperative model places dialog with stakeholders at the heart of its actions. This ongoing dialog with its customers and partners enables it to identify, understand and meet the specific needs of the players in the regions it supports, with the permanent aim of amplifying its social impact at the local level. Among the channels mobilized to collect the expectations of the affected communities, the Group includes:

- meetings with its stakeholders (see SBM-2 - 1.3.2 and S3-2 - 3.3.3.1.2);
- regular satisfaction monitoring, immediately after customer interactions and following events, to identify customer expectations;
- meetings with its customers: ESG dialogs, intended in particular to deepen the knowledge and maturity of ESG issues in the business models of corporate customers, are privileged channels for reporting needs, and any risks and impacts encountered by the latter. These strategic dialogs, covering environmental and social aspects, also make it possible to refine their needs in terms of support;
- BPCE L'Observatoire studies, which capture social and economic trends on topics related to savings and investment, real estate, companies, the sports economy, purchasing behavior and life changes.

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

The action plans identified are managed as part of the strategic programs and projects supporting the achievement of VISION 2030 and Groupe BPCE's 2026 ambitions.

These programs and projects, under the direct responsibility of a member of the Executive Management Committee or the Executive Committee, are subject to quarterly oversight by the Strategic Executive Management Committee.

For each program and project, this management is carried out by means of a "control sheet" which describes the objectives, achievements, risks, key indicators, schedule, budget as well as any points of attention and associated remedial actions.

#### A) COMPANIES, FROM VSES TO SMES AND MID-SIZED COMPANIES, AS WELL AS PROFESSIONALS, CRAFTSPEOPLE, SMALL RETAILERS AND LIBERAL PROFESSIONS

Ensuring the economic momentum of the regions is a priority for the Banques Populaires and the Caisses d'Epargne. Essential partners of companies, they allow local savings and results to serve the region, support a local economy and finance regional projects that take into account the specific economic, environmental and social needs of the regions, as well as their development, and that of their inhabitants.

#### Banque Populaire network

The Banques Populaires, the leading corporate banks, are a key player in the financing of the local economy. Created by and for entrepreneurs, they have a special relationship with companies, in particular SME and mid-sized companies:

- the Banque Populaire network is the leading corporate bank for the fourteenth year (*source: KANTAR 2023 PME PMI survey*). The Banques Populaires operate locally in all territories and are the reference banking partners of nearly one in two companies in France. Of these, two out of three companies have been customers for more than 10 years (*KANTAR 2023 PME PMI survey*). Today, they have nearly 160,000 corporate customers who are supported by specialized employees in all territories;
- positioned as the long-term banking partner for all companies, Banque Populaire supports its customers in addressing key issues related to ecological and societal transitions, supporting local activity and employment, and provides guidance in managing their liabilities and financial assets through solutions tailored to the specific needs of their region.

To support all transitions, both environmental and social, innovative products were launched such as the most accessible Impact loan on the market and the first packaged incentive contract for SMEs. The Banques Populaires want to encourage the greatest number of its executive customers to integrate an ESG policy into their strategy. To support them, regardless of the size of their company, the Banques Populaires rely on a team of corporate account managers trained in sustainable development issues. With the implementation of a system dedicated to strategic dialog focused on five areas, including ESG, the Banques Populaires are developing measures to support companies in their growth and transition challenges. In addition, by deploying

budgets of European subsidized resources with the help of the EIB, the Banques Populaires enable companies to finance green projects.

The Banques Populaires thus contribute to the development of regional economies, by supporting the growth of VSE/SME, the development of medium-sized companies, and the sale of business transfers. Reindustrialization, transition and decarbonization of companies are also subjects of expertise, crucial to ensure the long-term local economic dynamism.

#### Caisse d'Epargne network

The Caisses d'Epargne support the development of the plurality of players that make up the local economy in each region.

With more than 38,800 VSE, SME and mid-sized customers, the Caisses d'Epargne are committed to working alongside economic players and meeting their investment needs, in particular to support their environmental transitions. Specialized business managers (SMEs, ISEs, Large Corporates) and business centers located in all regions, enable the Caisses d'Epargne to contribute to the region's multiple economic and social challenges.

- by supporting the managers of SMEs, mid-sized companies and start-ups in the development of their business: they offer financing solutions for the operating cycle, innovation, transmission or external growth of companies. Each institution can rely on a Financial Engineering department;
- they affirm their commitment to proximity and responsibility through financing solutions tailored to the challenges faced by their clients, particularly in terms of ecological, energy, and social transitions. Caisse d'Epargne has been the first bank in the Group to offer the implementation of the Impact Loan to enhance its clients' efforts regarding environmental and social trajectories;
- by intensifying their relationship with executives through balance sheet optimization operations, Private Equity, sales, transfers or by meeting their support needs on various subjects (retirement, ESG policy and social engineering). They conduct an ESG dialog with Corporate customers to support their transformation approach on environmental, social and governance issues by helping them integrate these dimensions into their strategy.

Lastly, as a reference bank for its customers' savings reinvested in local projects, Caisse d'Epargne communicates to its customers the use of their savings, thus fulfilling its clients promise of sustainable savings.

#### (B) The various structures of the social and solidarity economy (SSE)

The Social and Solidarity Economy has a positive social and environmental impact on the French and regional economy by responding to strong societal challenges: health, care, dependency, aging, the fight against poverty, the collaborative economy, well-being and sport. Groupe BPCE, a key player in solidarity finance and social entrepreneurship, plays an important role in SSE structures.

## Banque Populaire network

The Banques Populaires support players in the Social and Solidarity Economy, regardless of their size and status: associations, cooperatives, foundations, mutual companies and ESUS (Social utility solidarity companies). The regional network of the Banques Populaires and the national presence of Crédit Coopératif provide SSE players with solutions that contribute to the development of projects with a direct impact in the regions.

To this end, the Banques Populaires support regional operations and accompany SSE structures in the major transition challenges they face, strengthening the consistency of the local regional cooperative model. They have thus accentuated the distribution of services covering:

- the need for virtuous financing, in particular with the Impact loan;
- the consideration of issues related to human resources with several social engineering systems helping, for example, to maintain a workforce that has struggled in recent years;
- the growing problems of fraud with the deployment of tools to meet the challenges of secure digitalization, dematerialized secure donations or cyber security;
- the sustainability and optimization of their cash flow by focusing, with a particular emphasis on financial support that meets SRI criteria.

## Caisse d'Epargne network

As a leading banking partner of companies with a social and/or environmental impact in the Social and Solidarity Economy, the Caisses d'Epargne include associations, foundations, mutuals and cooperatives among its customers falling under the status of the SSE, supported by dedicated account managers - experts in the specificities of these players - who operate locally in all regions.

By giving them access to all the banking products and solutions used by so-called "traditional" companies and by providing value-added advice, the Caisses d'Epargne offer a complete range of needs (strategic dialog, financing for the ecological transition, employee motivation and loyalty tools, Impact loan, etc.) The Caisses d'Epargne, whose DNA is geared towards social innovation with the commitment to being useful to development and transition issues, guarantee consistent support within each territory and create synergies that are sustainable over time:

- by supporting managing associations in the medico-social sector: these organizations, which serve as significant sources of employment for regions, are a fundamental link in the solidarity network for all vulnerable individuals (such as the sick, elderly, disabled, and children);
- by getting involved with private education;
- by supporting innovative social enterprises to promote the social and environmental impact of the economy (e.g. development of bio-waste collection services, recycling of electrical and electronic waste) or by supporting social inclusion through work.

## C) Public sector players, including local authorities

### BANQUE POPULAIRE RETAIL BANKING NETWORK

The Banques Populaires, in particular Crédit Coopératif, support public players. They implement their initiatives with a focus on dedicated services for regional development, benefiting the communities that reside there. As such, the Banques Populaires and Crédit Coopératif offer short-term and medium- to long-term financing solutions specifically tailored for local authorities.

### CAISSE D'EPARGNE RETAIL BANKING NETWORK

The Caisses d'Epargne, the main private financier in the French public sector<sup>(1)</sup>, offer local authorities a full range of financing solutions and services to support them in the transformation of their regions.

The Caisses d'Epargne support local authorities, in particular through the following actions:

- support for public/private structural entities (Local Public Enterprises - EPL), increasingly acknowledged within the regions for the implementation of structuring projects and the deployment of emblematic partnerships such as the *Fédération des EPL* (Local Public Enterprises) and *Territoires & Industrie*;
- assistance in finding subsidies;
- the marketing of European Investment Bank (EIB) subsidized budgets focused on: Water and Sanitation III, energy efficiency and sustainable mobility, Renovation and the extension of existing sports infrastructures;
- dedicated financing proposals to enhance their environmental or social commitment (ex. Impact loans).

## D) Social housing operators and their beneficiaries

As the leading private banking partner of social housing<sup>(2)</sup>, and very frequently holding operators' share capital and sitting on their Boards of Directors, the Caisse d'Epargne network continues its long-standing involvement in the public interest.

France's third-largest social housing player, Groupe Habitat en Région, a subsidiary of Groupe BPCE, manages 244,000 homes for 490,000 people and boasts 3,200 employees. Groupe Habitat en Région cultivates a decentralized business model, enabling it to cover a large part of mainland France in all its diversity. Committed to a mission of social utility, Habitat en région provides housing for the most disadvantaged individuals who do not have access to the private market. It acknowledges the social and environmental challenges faced by regions, their residents, and stakeholders, and contributes to urban planning and territorial development

To better accompany social housing players for their needs, in 2024, the Caisses d'Epargne supported:

- the implementation of the Intermediate Residential Loan;
- the creation of property structures for the development of intermediate housing;
- the promotion of the "Green" approach through emblematic partnerships, such as Delphis (innovation hub dedicated to social housing) and the organization of the second edition of the Sobriety trophies with the *Fédération des ESH* (*Entreprises Sociales pour l'Habitat*).

[1] *Observatoire de la dette Finance Active des Collectivités Locales* at the end of 2023 [published in 2024].

[2] *Milestones 136 USH "HLM in figures"* [published in August 2024].

## E) Key regional infrastructures, the financing of healthcare players

Within the framework of its strategic project, Groupe BPCE is pursuing its ambition to become the go-to partner in the healthcare sector. Number one private financier in the hospital sector<sup>[1]</sup>, it is also a partner of healthcare players (students, professionals and companies) and the innovative ecosystem (e-health, biotech, medtech, etc.). It works with the regions and their inhabitants by mobilizing to promote access to healthcare in all regions, by contributing to developing the fabric of companies that innovate in the health sector and by supporting healthcare professionals.

It thus plays a leading role in supporting students, healthcare professionals and those in the dependency sector (hospital public service, liberal professions, future healthcare professionals) in their practice, establishment, and transformation. To support them over the long term:

- since January 31, 2024, a new affinity area, developed in the Banques Populaires and Caisses d'Épargne sales portal, enables healthcare professionals to access useful tools and advice, consult offers and get in touch with the sales networks' healthcare experts;
- in order to support medical and nursing students, the Banques Populaires and CASDEN Banque Populaire, a cooperative bank for the public service, signed a partnership with the National Federation of Nursing Students (FNESI), and Caisse d'Épargne renewed its partnership with the InterSyndicale Nationale des Internes (ISNI) for the third consecutive year. The Caisses d'Épargne offer the Pass Future Installation, which ensures continuity of support between student life and the transition into self-employment for young graduates;
- to facilitate the financing of the installation or the development of healthcare professionals, particularly in the least endowed areas and in medical deserts:
  - since February 2024, the Banques Populaires and Caisses d'Épargne have offered an EIB Santé loan, financing backed by the European Investment Bank's resources, enabling a preferential rate to be proposed,
  - the Banques Populaires and the Caisses d'Épargne signed a partnership agreement with Médecins Solidaires. They support this collective of general practitioners who open health centers in under-resourced rural areas,
  - the Banques Populaires have rolled out the Medical Desert Zero-Interest Loan, a zero-percent loan of up to €20,000, to encourage the establishment of new practitioners and assist in the development of their activities or the completion of construction work;
- the Caisse d'Épargne network is also continuing its commitment to all players in the Silver economy by renewing its partnership with *France Silver économie* for the eighth consecutive year.

Groupe BPCE supports healthcare companies, the pharmaceutical industry and healthcare innovation markets (biotech, medtech, e-health) in their installation and growth. It improves access to healthcare by reinforcing the development of Health Tech start-ups (Biotech, Medtech and e-health players) and drawing on support and financing schemes for innovative companies (NextInnov for the Banque Populaire network and Néo Business for the Caisse d'Épargne network). The Banque Populaire network joined forces with France Biotech - the association of health innovation entrepreneurs - as an exclusive private banking partner, to encourage the development and sustainability of the fabric of companies, start-ups and SMEs, which innovate daily in France.

With regard to health infrastructure, Groupe BPCE supports public hospitals, private hospitals, nursing homes, multi-professional medical centers and social housing. As a recognized financier of healthcare infrastructures, Groupe BPCE supports their transformation through, for example, the financing of public hospitals, increasing concentration of healthcare infrastructure, and strengthening the Group's presence in a majority of operations concerning private hospitals and clinics or nursing homes, etc.

## F) Key regional infrastructures, the sports economy

As a leading banking player in sports, Groupe BPCE has been involved with local authorities, professionals and sports companies, and have supported the sports movement through federations and clubs (sailing, surfing, basketball, handball, rugby) thus promoting professional and amateur sports. The Banques Populaires and Caisses d'Épargne, which are heavily involved in each of their regions, build on the Sport and Health program to consolidate their positioning as Sports Bank and Health Bank.

With the *Entreprendre 2024* program, Groupe BPCE, the leading premium partner, mobilized to ensure that the Paris 2024 Olympic and Paralympic Games benefit companies, in particular VSE-SMEs and Social and Solidarity-based Economy (SSE) structures. By allowing them to take part in calls for tenders launched in the sectors of activity related to the construction of infrastructure and the organization of the event. Out of a total of 3,500 companies awarded contracts (over €100,000), 1,460 are customers of Banques Populaires and Caisses d'Épargne. In addition, 40% of these companies are located outside the Greater Paris region. Building on the momentum of the 2024 Paris Games, Groupe BPCE's companies continue to commit to sport, for a long-term legacy that is tangible for customers, cooperative shareholders, employees and all territories.

To serve the sports economy and local residents, a first fund dedicated to sports start-ups has been developed: Sport & Performance Capital was created and is managed by Seventure Partners (an affiliate of Natixis Investment Managers), with the support of the Caisses d'Épargne and supplemented by numerous external investors. The fund selects innovative companies in the field of sports and well-being, supports them, finances them and assists them in their development until 2029. Its portfolio is currently composed of 12 companies distributed geographically (Annecy, Brest, Bordeaux, Paris, Douai, etc.) and should be supplemented by four to six new investments by mid-2025. Seventure plans to launch a successor fund by mid-2025.

The Group's sporting ambitions are part of the VISION 2030 strategic project. In addition to national actions, regional institutions will also be required to implement actions and continue to support athletes in their regions. The next ambitions are to:

- actively contribute to the structuring of the sports economy, by supporting companies in the sector and financing sports infrastructure;
- contribute to sustainable and inclusive sport, in particular through support for inclusion (see the Caisses d'Épargne's Utility Pact);
- continue and develop support for athletes by accompanying them in their training, career and retraining. For the Olympic and Paralympic Games, more than 250 athletes and para-athletes from all over France were supported by Groupe BPCE companies;
- mobilize employees around the values of sport and fight against sedentary lifestyle.

[1] *Observatoire Finance Active Établissements de Santé* (published in 2024).

### G) Green or social bond issues for communities

In 2015, BPCE SA entered the sustainable bond market by issuing a first green bond related to Renewable Energy in addition to the Paris Agreement. Since then, Groupe BPCE has regularly issued bonds and has continued to extend the scope of sustainable bond issues to categories of eligible green and social projects, thus establishing itself as one of the main issuers of green and social bonds among financial institutions worldwide. As part of the execution of its VISION 2030 strategic plan, the Group has further intensified its issuance program by committing to at least five green or social issues per year to fully contribute to the development of more sustainable finance.

In 2024, Groupe BPCE carried out five social/green public bond issues for €3,650 million (compared with four in 2023 for €2,250 million):

- €500 million 12NC7 Tier-2 LED social Local Economic Development;

- Green Building covered bonds issued by BPCE SFH for €1,500 million over 10 years;
- Senior Preferred of €400 million over 10 years in the form of a shared coupon bond for the Institut Robert-Debré du Cerveau de l'Enfant supported by the Fondation de l'Assistance Publique - Hôpitaux de Paris (a first for a financial institution in France);
- €750 million of our RMBS BPCE Home Loans FCT 2024 Green Use of Proceeds;
- lastly, Compagnie de Financement Foncier launched its first social issue for €500 million. This transaction is intended to refinance Social Housing and Public Health assets.

Thus, by acting alongside them and supporting their transformations, the Banques Populaires and the Caisses d'Epargne have a positive impact on the regions and their communities. They contribute to improving communities' living conditions and well-being and provide answers to the regions' economic, environmental, and societal challenges.

## 3.3.3.2 FINANCING THE ECONOMY AND REGIONAL PLAYERS - GLOBAL BUSINESS LINES

### 3.3.3.2.1 [S3-1] Policies related to affected communities

#### Natixis CIB

##### Social impact financing for local communities

Natixis CIB supports its customers in the "social" certification of their financing (bonds or loans) according to the Social Bonds Principles of the ICMA (International Capital Market Association) and the Social Loan Principles of the LMA (Loan Market Association).

Five principles govern this certified financing:

- **Use of funds:** The proceeds of social financing must be exclusively applied to the financing of eligible social projects that provide clear social benefits.
- **Project assessment and selection process:** Issuers must clearly communicate the social objectives of the projects and the selection process to ensure that they meet the eligibility criteria.
- **Fund management:** Net income from obligations must be monitored and managed appropriately, with periodic adjustments to match allocations to eligible social projects.
- **Reporting:** Issuers must provide up-to-date information on the use of funds, including descriptions of the financed projects and their expected impact, on an annual basis.
- **External reviews:** Issuers are encouraged to establish a social obligation framework and obtain external reviews to ensure transparency and compliance with the principles.

##### Sector policies

It should be noted that certain criteria specific to sectoral policies, related to the impact on local communities, are included in the following policies:

- defense sector (public policy);
- tobacco sector (public policy);
- mining and metals sector (internal policy);
- oil and gas sector (public policy).

#### Natixis IM

Natixis IM's European asset management companies implement policies that integrate the issues, in conjunction with the affected communities, as part of their investment and engagement activities.

##### Investment policies

The responsible investment policies of certain of Natixis IM's European asset management companies<sup>(1)</sup> integrate the community dimension into their investment approach. This integration is done through due diligence processes, research processes or the consideration of minimum standards.

The criteria included in the investment analysis influence the company's extra-financial rating, thus making it possible to take into account the impacts, risks and opportunities related to communities. For example:

- For example, DNCA Investments states that one of the fundamental principles of its responsible investor philosophy is to assess the risk of corporate responsibility. As part of this assessment, the liability risk analysis includes interactions with all stakeholders, including local communities;

##### Minimum standards

All European direct listed asset management companies<sup>(2)</sup> have defined minimum standards on the social issues to which their investments are subject, based on regulatory exclusions related to international standards:

- the United Nations Global Compact;
- United Nations Guiding Principles on Business and Human Rights; and/or
- the OECD Principles of Responsible Business Conduct.

Private asset companies have also adopted these international standards<sup>(3)</sup> or have adopted specific approaches<sup>(4)</sup> to their investment universes by including, for example, clauses in real estate managers' contracts.

[1] DNCA Investments, Ossiam (for funds applying ESG criteria only), Mirova, Ostrum AM, Ecofi, Dorval AM, Vega IM, Thematics AM, Naxicap, AEW, Vauban IP, Flexstone, MV Credit and Seventure.

[2] Ostrum AM, Ecofi, DNCA Finance, Dorval AM, Mirova, Thematics AM, Vega IM, Ossiam, a quantitative and index-based management company, includes exclusion criteria in ESG funds.

[3] Flexstone, MV Credit and Vauban IP.

[4] For Naxicap, these principles are integrated into the ESG analysis processes rather than exclusions due to the type of companies involved. Seventure includes these standards in the Due Diligence and in its annual ESG data collection questionnaire. AEW has included contractual provisions for some of its products with its property managers.



### Engagement policies

In addition to exclusions, one of the significant levers for positively influencing corporate governance is shareholder engagement, *via* dialog with issuers and the exercise of voting rights.

Among these engagement policies, several<sup>[1]</sup> take into account the issues relating to the affected communities and make this one of their areas of engagement with issuers. For example, one of Ostrum AM's priority engagement themes stipulates that maintaining good relations with the various stakeholders (suppliers, employees in supply chains, local communities) is essential to ensuring business continuity and reducing exposure to reputational risk. This engagement theme is then divided into two areas, one of which relates to maintaining good relations with local communities.

#### 3.3.3.2.2 (S3-2) Processes for engaging with affected communities about impacts

##### Natixis CIB

#### Social impact financing for local communities

For this type of financing with social impact, Natixis CIB is only indirectly in contact with the communities concerned. As such, customers wishing to label their financing in the "social" format must ensure compliance with the principles defined in the market standards.

Thus, the beneficiary of social financing must have implemented a process to identify the mitigation systems for known material risks of negative social and/or environmental impacts of the project(s) concerned. These mitigation measures may include a clear and relevant analysis of the trade-offs and follow-up when the issuer assesses the potentially significant risks.

#### Equator Principles

Refer to paragraph S2-2 - 3.2.3.1.2, as the interactions described therein also include the local communities, notably thanks to the on-site visits and interviews carried out by the independent consultant with members of communities close to the funded sites/projects.

#### 3.3.3.2.3 (S3-3) Procedures to address negative impacts and channels for affected communities to raise concerns

##### Natixis CIB

The management of ESG risks (see Section S2-3 - 3.2.3.3.2) also benefits the affected communities. Indeed, this management is designed in a comprehensive manner and encompasses the potential impacts on all stakeholders, including local communities, thereby enabling remediation of any negative impacts on them.

##### Natixis IM

In the context of asset management, Natixis IM's management companies do not have a direct relationship with the companies invested in. It is these same companies invested in that may be subject to an alert mechanism from the affected communities. In the absence of guidelines for the asset management sector, the interpretation of requirements in this area concerns the monitoring of controversies, PAIs and engagement with companies.

### Controversy monitoring policies

Natixis IM has defined a global ESG risk policy that requires the implementation of controversy monitoring for Natixis IM and its asset management companies. This policy requires having a structure and a system to assess, quantify, manage, mitigate and communicate about severe forms of controversy as part of its reputational risk management system.

In particular, each asset management company has a mechanism for taking into account controversies (either formalized *via* a dedicated policy or integrated into existing policies and procedures) which defines the governance and operational principles.

##### Natixis IM

In the context of asset management, Natixis IM management companies do not have the opportunity to interact directly with the communities of the companies invested in. In the absence of guidelines for the asset management sector, the response to this information point was made by considering the due diligence and research processes in line with the issues on the communities of the companies invested in.

Natixis IM's European asset management companies use their proprietary research as well as due diligence processes to understand the risks, opportunities and impacts generated by the companies invested in on the affected communities. This consideration applies to both European direct asset management companies<sup>[2]</sup> that invest in listed assets<sup>[3]</sup> as well as those that invest in private assets<sup>[4]</sup>.

For private assets, Natixis IM's European asset management companies take into account social indicators related to communities in their due diligence process.

As part of the analysis carried out at the time of the investment, Natixis IM's management companies use data produced by external data providers, collected from third parties and/or on information communicated directly to the company invested in both to identify and monitor the controversy (see Section S2-1 - 3.2.3.1.2).

In order to identify these controversies, European asset management companies use data produced by external data providers, such as those from ISS, MSCI, World Check, Ethifinance, RepRisk or Sustainalytics, etc. For the latter, controversies are determined in part on the basis of cases of conflicts with local and indigenous communities and land and water rights.

Similarly, the MSCI ESG rating, used by several European asset management companies<sup>[5]</sup>, in addition to their internal method, assigns each company a score on each key issue selected.

[1] DNCA Finance, Mirova, Ostrum AM, AEW and Vega IM.

[2] Exclusion of Natixis IM International Solutions.

[3] DNCA Finance, Mirova, Ostrum AM, Thematics AM, Ecofi, Ossiam (for funds applying ESG criteria only), Dorval AM and Vega IM.

[4] Flexstone, Naxicap, AEW, Seventure, Vauban IP and MV Credit.

[5] Ostrum AM, Natixis IM International Solutions, Dorval AM and DNCA Finance.



MSCI also includes an identification of controversies that takes into account elements that have an impact on communities.

Other Natixis IM European asset management companies<sup>[1]</sup> also monitor the ESG rating of the data provider ISS, which is based on nearly 700 indicators, some of which are related to communities: human rights, dialog with stakeholders, relations with governments and influence on public policies and also social impacts of the product portfolio.

In addition, European asset management companies also report quantitative indicators as part of their Principal Adverse Impacts (PAI) reporting in order to monitor potential impacts on communities<sup>[3]</sup>.

Finally, the engagement actions put in place, where applicable, by NIM's asset management companies, can influence practices and remedy the adverse impacts in connection with potential controversies or infringements related to communities, as described in S2-4 - 3.2.3.4.2 of this document.

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

#### Natixis CIB

##### Social impact financing for local communities

Through several of its activities, Natixis CIB is a player in the financing of the economy and regional players, in particular:

- Support as an arranger and/or ESG coordinator of many key issuers in the region, through:
  - their local presence (sustainable emissions from the Île-de-France region, green emissions from the City of Paris, green and social emissions from the Wallonia region, etc.),
  - their work on essential infrastructures (such as green emissions from players such as Société des Grands Projets, SNCF, IDF Mobilité, RATP, Tisseo Mobilités, etc.),
  - their essential role as a social and economic shock absorber in the event of socioeconomic crises (through, for example, social issues by CADES or UNEDIC, including a strong focus on demonstrating compliance with their social promise in terms of monitoring beneficiaries, social justice or redistributive effects),
  - their essential role in financing transitions in regions or regional sectors such as CDC or BPI on the one hand, but also Groupe BPCE with its "Local Economic Development" bond issues dedicated to SMEs and associations in the most disadvantaged areas, or its "Sport & Santé" program aimed in particular at supporting sports infrastructures or associations as well as the green and social programs of Sfil/Caffil dedicated to the financing of sustainable investments by local authorities in France and for export,
  - their commitment to ensuring access to decent housing for all, in particular for the most vulnerable populations, through the essential issue of social housing financing (for example through the sustainable bonds of Action Logement Services or social bonds of Compagnie de Financement Foncier),
  - their mission of providing economic assistance and support to the development of local communities such as AFD, IBRD or BOAD, for which meeting societal needs and providing access to essential social services are at the heart of their financing,
  - their sovereign mission of regional development, in particular for access to essential services such as education, electricity, health, and food (for example, the sustainable loans of Senegal make it possible to raise funds for infrastructure projects and services that improve the quality of life of the

populations, thus contributing to the achievement of the country's sustainable development goals which aim to reduce poverty and improve the living conditions of Senegalese citizens),

- Strong positioning in the health sector (public and private hospital infrastructures and services) and the elderly (EPHAD, and home care services), in France and Europe, with a strong focus on social (quality of care and accessibility to healthcare) and environmental issues (building and operations) for both bank and bond financing products (for example: Icade Santé, Ramsay, Bastide, Colisée, Elsan, Vivalto, Sanofi);
- Natixis CIB Green & Sustainable Hub also supported the IDFC and its members in defining the concept of alignment with the Sustainable Development Goals (SDGs) through a dedicated study and tailor-made consulting sessions. The study presents the notion of alignment with the SDGs from the point of view of public development banks. It provides relevant definitions, assessment methods and tools to measure and manage their contribution to the SDGs at both local and consolidated level;
- Lastly, the Green Hub Networks (dedicated to mid-sized and public-sector customers of regional Banques Populaires and Caisses d'Épargne) supports the transitions of players in the region through the implementation of so-called impact financing (integrating CSR performance indicators into the margin mechanism) and a strategic dialog on CSR to support these customers in establishing and developing their sustainability trajectory.

#### Natixis IM

The actions described below relate exclusively to the positive contributions generated thanks to the products specifically related to the affected communities and the improvement of the practices of the companies involved thanks to the engagement actions.

##### Income

In addition to being able to benefit from the flexibility to be able to detect, analyze and measure social risks in the value chain, Natixis IM management companies also have the possibility of offering products aimed specifically at creating a positive impact or promoting good social practices. As such, several products offered by Natixis IM's European asset management companies specifically take into account the issue of impacts on communities.

[1] DNCA Finance, Dorval AM, Ecofi, Mirova and Ossiam [for funds applying ESG criteria only].

- The AEW UK Impact Focus Fund became the first fund approved by the Financial Conduct Authority under the Sustainability Disclosure Requirements as an “Impact Focus” fund in 2024. This provides a tailor-made real estate solution that meets local needs in the United Kingdom. Investments are made in collaboration with local authorities and aim to increase the provision of sustainable real estate assets with social use value for communities. These investments include residential housing, care facilities, daycare, community and leisure facilities.
- Mirova has a natural capital investment platform that enables the large-scale deployment of impact solutions based on natural capital. Through a direct investment approach, which targets a wide range of activities, it includes innovative and high-growth projects as well as more mature companies, whose environmental and social impact can be considerable, in particular thanks to the development of “Nature-based solutions”. These solutions aim to produce a net positive impact on climate, biodiversity, ecosystems and communities, while creating value for investors.
- In 2023, Dorval AM decided to allocate 10% of the management fees of the Dorval European Climate Initiative fund to the NGO Blue Venture via the EPIC Foundation. The Dorval European Climate Initiative fund invests in European companies mainly in the Eurozone whose products and/or services provide solutions to climate issues. Concerning the allocation of management fees, Blue Ventures is an NGO operating in Asia and Africa that supports coastal communities in the reconstruction of fisheries and the restoration of ocean life.

### Shareholder engagement

Engagement strategies can be proactive and therefore respond to the themes defined as priorities in the engagement policy, or implemented in response to a social controversy such as the violation of standards related to communities. These controversies can be identified as part of the controversy monitoring processes of Natixis IM's asset management

companies, or *via* the analysis carried out by the service providers conducting the engagement.

- For example, one of Mirova's commitment priorities is to promote social opportunities. Among the actions expected from issuers, the following can be mentioned:
  - implementing strategies for access to basic necessities, ensuring the development of local infrastructure and services in underserved regions (banking, medical, infrastructure, energy, etc.),
  - ensuring the development of products and services that address social challenges such as medical needs, antimicrobial resistance, healthy food, inequalities, etc.;
- DNCA Finance encourages the issue of respect for local communities to be taken into account in a transparent manner. DNCA Finance is convinced that companies must listen to local communities, and DNCA Finance wants each company to be able to integrate this dialog into its strategic decisions.

### Proactive participation in market initiatives

Certain Natixis IM European management companies<sup>[1]</sup> have joined market initiatives to collaborate with other investors to improve business practices. Several of these initiatives target issues related to affected communities.

- The asset management companies, DNCA Finance and Mirova, are members of the PRI Advance initiative. This initiative was launched in December 2022 to take into account, among other things, respect for employee and community relations, health and safety, and forced labor. This initiative considers that this type of recognition also makes it possible to protect the long-term returns of asset management companies.
- On the subject of health, Mirova and Ecofi are members of the “Access to Medicine Initiative”. It aims to improve access to medications and healthcare in low- and middle-income countries. Founded in 2001, this initiative focuses on how pharmaceutical companies, as well as other healthcare stakeholders, can contribute to solving the challenges of access to essential medicines, particularly for vulnerable populations.

[1] Dorval AM, Ecofi, Ostrum AM, DNCA Finance and Mirova.

### 3.3.4 Metrics and targets

#### 3.3.4.1 FINANCING THE ECONOMY AND REGIONAL PLAYERS IN FRANCE

##### Corporate customers, from VSEs to SMEs and mid-sized companies

As part of the VISION 2030 strategic project, Groupe BPCE has identified regional competitiveness as one of its priorities. The latter is reflected in support for SMEs and mid-sized companies, development of sustainable infrastructures and support for strategic sectors.

The Banque Populaire and Caisse d'Epargne networks aim to be number one in the professional and corporate market by 2030. The 2026 objectives for both networks are a 15% increase in active professional customers and a 21% increase in active company players.

##### The various structures of the social and solidarity economy (SSE), local authorities, social housing operators and their beneficiaries

As part of the VISION 2030 strategic project, the ambition by 2026 is to increase the financing of the SSE, social housing and public sector players by 8%.

More specifically, with regard to local authorities and social housing, faced with the major challenges facing these sectors (environmental transition, financing, etc.), Caisse d'Epargne has defined three major ambitions for 2030:

- strengthen the public-private connection to establish itself as the key partner for the regions;
- become the trusted partner that provides advice, expertise and innovation to local players in response to their changing needs;
- fulfill their role as a pioneering bank in social and environmental transitions to contribute to better housing and collective well-being.

With regard to the financing of the social economy, social housing and the public sector, annual production totaled €8.5 billion in 2024, an increase of 3.7% compared to 2023<sup>[1]</sup>.

#### 3.3.4.2 FINANCING THE ECONOMY AND REGIONAL PLAYERS - GLOBAL BUSINESS LINES

##### Natixis CIB

##### Social impact financing for local communities

As defined by market standards, a reporting process is established for financing labeled as "social". The beneficiary of the labeled funding is responsible for providing qualitative and/or quantitative impact indicators to measure the impacts on the communities.

##### Key infrastructures in the regions, financing of healthcare players

In 2025:

- The Banques Populaires intend to continue to develop among all players in the Health sector, whatever their time in life or their mode of practice (health students, civil servants, employees, freelancers or innovative entrepreneurs) for their private or professional projects.
- The Caisses d'Epargne professional market intends to consolidate its positioning in the Health sector in line with the Corporate/Professional and Individual customers markets, and to continue its development among healthcare professionals and future healthcare professionals throughout their various life stages, for their professional and private projects.
- The Caisses d'Epargne will continue their affinity approach with all health institutions and companies (hospitals, health and medico-social establishments, innovative health companies). The Caisse d'Epargne network's objective is to maintain its position as the leading financier of public health institutions, to regain its status as the first Financier of Medico Social players, and to be the preferred bank for healthcare professionals in their private and professional projects, while supporting the transformation of their modes of practice.

##### Key infrastructures in the regions, sports economy

Groupe BPCE has set targets for:

- in B-to-B: sports infrastructures, and in particular their renovation (EIB budget, swimming pool plan); as well as sports professionals and companies, including SporTech;
- in B-to-C: support for high-level athletes, sports amateurs, associations and sports clubs.

Following the Paris 2024 Games, a new roadmap is being prepared. Metrics are being built in conjunction with stakeholders.

Issuers must keep up-to-date and easily accessible information on the use of the financing obtained. An annual report should include a list of the projects to which the social financing revenues have been allocated, as well as a brief description of the projects, the amounts allocated, and their expected impact.

##### NATIXIS IM

At this stage, Natixis IM does not have any performance metrics and is deploying a continuous improvement approach to resources and processes.

[1] This metric sums up financing of the social and solidarity economy, social housing and the public sector: It is established for the Caisses d'Epargne on the basis of the Panorama BDR CE + HeR for social housing financing. Source SCF for the Banques Populaires.

## 3.4 S4 - Consumers and end-users

Groupe BPCE, a bank, insurer and asset manager, conducts its business activities close to the needs of its customers, including the most vulnerable. Its relational and regional banking model enables it to support all its customers, individuals, professionals, retailers and craftspeople, public sector players and companies, regardless of their size. In France, Groupe BPCE offers an

essential local service to its 35 million customers and the French economy. Internationally, Natixis CIB and Natixis IM are developing recognized expertise and positioning themselves as privileged partners of their customers, thanks to a range of adapted products and advice.

### 3.4.1 SBM-2: Interests and views of stakeholders

Groupe BPCE is in ongoing dialog with its stakeholders. Groupe BPCE's stakeholder consultation process is based on systems that involve its stakeholders in its process of identifying and assessing impacts, risks, opportunities and levers for

improvement, both on environmental and societal topics. The summary of the dialog by stakeholder category is presented in Section 1.3.2 - SBM-2 Interests and views of stakeholders.

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

Among the two themes related to consumers and end-users, "Information-related impacts for consumers and/or end-users" and "Financial inclusion and accessibility of the offer", four issues were identified as material: access to information, personal data protection and cybersecurity, access to products and services, responsible marketing practices, and non-discrimination.

The Group's convictions and commitments are expressed in its Code of Conduct and Ethical Standards<sup>[1]</sup>, which sets out the interests of the customer and cooperative shareholders and the Group's commitment to be a useful player over the long term.

With regard to "Impacts related to consumer and end user information", two material matters in terms of positive impact or negative risks and impacts were identified:

Employees are responsible for passing on offers to customers in a transparent and correct manner, as part of a relationship of trust. They must:

- **Protect the interests of customers and cooperative shareholders (Principle 3):** in particular, by constantly prioritizing the customer's interests and ensuring that the customer fully understands the nature and details of the solution recommended to them, but also by protecting the customer's private data;
- **Communicate in complete transparency (Principle 4):** the Group's customers must be certain that the services and products recommended to them are the solutions best suited to their needs and long-term interests. To achieve this, all Group entities undertake to communicate with their customers in a transparent and honest manner.

In terms of access to information, all the measures put in place have a positive impact for customers:

- as part of the distribution of products and services to individual customers, the protection system includes a set of rules relating to the validation of the products marketed as well as the commercial processes (regardless of the channel used);

- Natixis' strategy focuses on improving the transparency of its offerings, which enables a good understanding of products and their environmental, societal and governance (ESG) impact. This increased transparency represents a positive impact for Natixis on its clients, enabling them to make informed decisions.

The protection of personal data and cybersecurity are a major matter in terms of risks or negative impact: the Group is exposed to strict regulations such as the General Data Protection Regulation (GDPR). Strong privacy and cybersecurity measures are crucial to protecting customer data and complying with applicable regulations; the Group pays particular attention to the responsible use of data. Risks of sanctions or financial losses may arise in the event of non-compliance with regulations or insufficient measures to prevent or combat cybercrime, which may lead to leaks, theft or inappropriate use of customers' personal data. These risks and potential impacts, resulting from non-compliance with legislative and regulatory provisions, can be qualified as systemic.

The development of new innovative products and services to meet customer expectations opens up opportunities for the Group, in particular in terms of new markets, customer segments, partnerships, stimulating creativity and innovation and likely to strengthen customers' interest for these new products and services. The Group's territorial network, its international geographical locations and the deployment of adapted digital solutions have a positive impact for customers, in terms of proximity and accessibility.

With regard to the topic "Financial inclusion and accessibility of the offer", two material matters were identified: access to products and services and responsible marketing practices, non-discrimination.

[1] [Code of ethics-EN-2.pdf. \[groupebpce.com\]](#)

The Group considers that it is its social responsibility to:

- **Guarantee an impartial treatment for all our customers (Principle 2):** it offers a system for listening to and welcoming customers in situations of vulnerability, in particular due to financial difficulties, which allows the Group to tailor its services to their specific needs and to ensure that, in all cases, it continues to listen carefully to their individual needs and provides customized solutions.;
- **Contribute to the development of a socially responsible market economy (Principle 9):** it undertakes to finance all types of players active in the local and regional economy offering them tailor-made solutions ranging from microloans to major project financing;
- **Be a banking group that is socially inclusive and open to all (Principle 10):** it takes preventive action with individual customers to avoid over-indebtedness proceedings, and is careful to contact them, listen to them and offer simple solutions (account management, Fragile Customer Offer, loan restructuring solutions, etc.) and to put them in contact, if necessary, with dedicated correspondents. Through its managers and customer advisors, it undertakes to bear a particular responsibility to give as much support as possible to customers facing difficulties. The Group makes every effort to accommodate all customers, adapting and personalizing its services and relationships. This is why it is the leading banker for protected persons.

In terms of financial inclusion, specific systems are deployed to cover the various needs and issues of customers: support for financially vulnerable customers, populations in need of economic and social inclusion, protected persons, adaptation of insurance offers.

On the subject of non-discrimination, the implementation of dedicated financing or insurance policies and tools adapted to customers with disabilities generate a positive impact on the customers concerned.

Conversely, a lack of transparency in offers, abusive sales practices or discriminatory practices undermining the equality and inclusion of certain groups of customers, in particular those already identified as financially vulnerable or disabled, may have a

negative impact on these customers and constitute an image risk for the Group. These potential adverse impacts would concern isolated incidents and are not considered to be widespread or systemic.

In the specific context of asset management activities, this topic concerns consumers and end-users of the companies invested in and does not refer to the investors of the financial products offered by the asset management companies themselves.

For Natixis IM and its European asset management companies, the integration of these issues into the activities of asset management companies is done through the investment process, the proposal of financial products and engagement activities. Each Natixis IM management company is responsible for its investment process and is ultimately responsible for integrating environmental, social and governance factors in compliance with their fiduciary duty. Diversified approaches are thus observed within Natixis IM's European asset management companies.

The Group has not identified any material risks or opportunities that could result from its dependence on consumers and end-users.

In its VISION 2030 strategic project, Groupe BPCE intends to develop simplified relationship models, thanks to the best of people (clients choosing how they prefer to interact with their bank from 100% digital to 100% physical, transparent, simple and innovative offers) and digital (thanks to its banks' applications, the best rated on the market, thanks to 100% self-service pathways for all its clients and high-performance transactional spaces for professional and corporate customers), augmented by AI (to enrich the customer experience, make life easier for bank advisors and simplify the every day life for all clients and employees of customers and employees).

The management of material impacts, risks and opportunities is described in the following paragraphs, including developments specific to certain customers (customers in vulnerable economic situations, populations in need of economic and social inclusion, protected persons - *i.e.* adults benefiting from a legal or social protection measure decided by a guardianship judge, people with disabilities).

### 3.4.3 Incident, risk and opportunity management

#### 3.4.3.1 (S4-1) POLICIES RELATED TO CONSUMERS AND END-USERS

##### 3.4.3.1.1 Access to information and supervision of commercial practices

As part of the Group's policy on the transparency of offers, the systems listed below are applicable to the Caisses d'Épargne, the Banques Populaires and Natixis.

Various departments are committed to ensuring transparent offers that are adapted to customer needs. When intended for a consumer, product and service offers must comply with the provisions of Articles L. 121-1 to L. 121-24 of the French Consumer Code relating to prohibited commercial practices, with the exception of the refusal to sell. It is in this series of provisions that deceptive commercial practices (Articles L. 121-2 to L. 121-5) or aggressive practices are found (Articles L. 121-6 to L. 121-7). The policy is made available to Group companies through a practical guide produced by the Legal division.

When drafting commercial documents, regardless of their nature, writers are invited to be particularly vigilant concerning the adequacy between the marketing conditions, the method/process of providing information, and the targeted customers. The writer of promotional documentation must therefore pay close attention to the marketing channels considered and the appropriateness of the distribution strategy. All information, including advertising, must be correct, clear and not misleading. Clear information is that which is sufficient to enable customers to understand the main characteristics of the product they are about to subscribe to as well as the related benefits and risks.

Understanding the needs of the Group's customers in order to offer them the most appropriate products and services is at the heart of the principles of the Group's Code of Conduct. Employees strive to best serve the interests of customers by:

- taking the time to identify their needs, listening to them attentively;
- making an effort to identify the most appropriate solution, taking into account the customer's profile, their needs and their knowledge;
- treating all customers fairly, including when they have potentially conflicting interests.

The protection of customers' interests is a major concern for the Group and is reflected in the policies of each of the entities in France and internationally. In all circumstances, employees must serve customers with diligence, loyalty, honesty and professionalism, and offer products and services adapted to their skills and needs. In this context, and in order to maintain a high level of customer protection, the Group establishes and maintains a body of procedures and carries out controls on this topic. This is reflected in the implementation of various systems dedicated to customer information and knowledge, and by the implementation of governance for the products offered to them.

##### 3.4.3.1.2 Personal Data Protection and cybersecurity

###### Personal Data Protection

The purpose of Groupe BPCE's data protection policy is to describe the standards related to the processing of personal data and applies to all entities. It thus lays down the principles of use and ethics for the use of personal data.

The policy describes in particular:

- the organization and governance of Groupe BPCE to ensure the protection of personal data, through roles, responsibilities and reporting relationships;
- the data protection principles and practices to be respected by the entire Privacy sector;
- the tools offered by Groupe BPCE available to players in the sector.

This policy applies to all transactions processing Personal Data by any of Groupe BPCE's entities. As a result, it concerns:

- all Group employees;
- all countries where the Group operates (taking into account local contexts where applicable);
- all Group entities.

Applicable to each Group entity, this policy must be presented to the executive or to an umbrella committee dealing with risks. With regard to the integration of a new entity, the application of the policy may be subject to the determination of a compliance plan, the implementation period of which is defined jointly between the central institution and the entity.

Groupe BPCE is subject to several local and European standards and legal texts, including:

- the European Data Protection Regulation (Regulation (EU) 2016/679) and its application in French law, the Data Protection act of January 6, 1978 as amended;
- the guidelines of the G29 - now the European Data Protection Committee - provide clarifications on the reading of the Regulation;
- the guidelines of the European Data Protection Board also including the ePrivacy directive.

In addition to the regulatory texts in force, data protection must comply with Groupe BPCE's standards affecting this activity. It is in line with the CSR commitment or the Code of Conduct.

Local Data Protection legislation may require more stringent criteria or impose less stringent rules than those contained in this Policy. Thus, any national policy that diverges from the Group policy must be submitted for prior approval to the DPO-G (Group Data Protection Officer).

The contracts with service providers processing Personal Data are concluded in accordance with the legislation on the Protection of Personal Data and the Group's standards and instructions. They thus guarantee the strict use of personal data solely for the purpose of performing their services.

Any sharing of data within or outside the Group is strictly limited to legal obligations such as those relating to the fight against money laundering and the financing of terrorism.

The policy is accessible to all entities via the Group Intranet and can also be distributed - in electronic or physical format - to Employees and Service providers as needed.



## Cybersecurity

Information Systems (IS), resources essential to the Group's business, contain and process multiple sensitive data relating to customers commercial information, the Group's strategy, its financial results, its commercial development or its commitments, as well as personal information relating to customers, partners and employees.

Thus, IS must be protected from any known or emerging threat by taking into account the vulnerabilities inherent in the technologies on which they are based.

To achieve this objective, Groupe BPCE has adopted a Group Information Systems Security Policy (ISSP-G) to enable it to address IS Security issues in its best interests and image in line with best practices. This policy defines the guiding principles for IS protection and specifies the provisions to be followed by all Group entities.

The ISSP-G applies from its publication:

- to all Group Companies, in France and abroad;
- to all employees or persons authorized to access the resources comprising the Group's IS.

The ISSP-G covers the IS Retail, the IS of the BPCE central institution, the IS of Natixis, the private IS of the Banques Populaires and the Caisses d'Épargne and, more generally, the IS specific to the other Group companies.

The ISSP-G covers all the resources necessary for the automated processing of information: applications, data in all its forms, infrastructures and people. It aims to be independent of technologies in order to guarantee its applicability in different technical contexts.

Relationships with subsidiaries in which the Group is not the majority shareholder, users, partners, organizations and suppliers must be subject to contracts or agreements, as soon as they access the Group's IS, whether their own IS are linked to it or they store or process data from the Group's IS. These contracts or agreements must express the Group's security needs, based if possible on the wording of the ISSP-G rules.

It is supervised by the Group Security Department as well as by the Group Corporate Secretary's Office.

### 3.4.3.1.3 Financial inclusion and accessibility of the offer

#### Protecting vulnerable customers

In terms of supporting vulnerable customers, Groupe BPCE wants to give as many people as possible, and in particular people in difficulty, access to banking services. To manage the risk of exclusion, it has put in place in France systems that enable low-income customers to access financing and customers in vulnerable economic situations to manage their bank accounts with greater peace of mind.

This commitment makes all the more sense in view of the current economic context. After a period of high inflation that is gradually returning to normal, unemployment, although at a historically low level, is once again increasing slightly. More than 4.3 million customers are identified as vulnerable by banks in France, an increase of 4% between 2023 and 2022. At the same time, there has been a faster increase in the number of beneficiaries of the

The challenges of the ISSP-G are as follows:

- preserve the value of assets and secure business line processes;
- comply with legal and regulatory obligations;
- contribute to measuring and managing non-financial risks;
- look for possible optimizations;
- meet the IS Security requirements extended to third parties;
- contribute to protecting and enhancing the Group's image.

They are part of Groupe BPCE's desire to control and manage the risks associated with Information Systems, to preserve and increase its performance, to strengthen the trust of its customers and partners and to ensure the compliance of its actions with national and international laws and regulations.

Groupe BPCE undertakes to comply with the directives of European and international regulators. The chronology of regulations shows a shift towards stricter regulations, particularly in terms of data protection, transparency and control of technological risks.

In summary, here are the major changes observed:

- since 2014, the review and assessment process of the European Banking Authority (EBA) has covered ICT risks. The ECB-ACPR joint supervision team (JST) requests one or two visits concerning IT risks;
- in 2017, the EBA issued guidelines on the assessment of ICT risks as part of the SREP (Supervisory Review and Evaluation process);
- since June 30, 2020, the guidelines on the management of risks related to information and communication technologies (ICT) published by the EBA in 2019 are applicable;
- the future DORA regulation (Digital Operational Resilience act) should take over the EBA guidelines and include them in positive law;
- the Federal Reserve Bank (FRB) requires an IT risk management framework;
- in Asia, regulators have also been monitoring IT risks since 2003 (HKMA) and have recently strengthened their requirements (MAS).

specific Fragile Customer Offer (OCF): +24% compared to 2022 and +168% over the last five years<sup>(1)</sup>. At the end of 2023, the specific offer now benefits more than one million beneficiaries. Groupe BPCE is vigilant in this context and is continuing its efforts to provide the best possible support to its vulnerable customers.

To carry out its action, Groupe BPCE relies on the regulations in force, *i.e.*:

- the banking act of July 26, 2013 on the separation and regulation of banking activities imposes several measures to protect individual customers and support banking inclusion;
- Decree No. 2014-738 of June 30, 2014, relating to the specific offer to limit costs in the event of an incident (published in the Official Journal on July 1, 2014 and entered into force on October 1, 2014) specifies the conditions of application of this legal obligation;

[1] Annual report of the Observatoire de l'inclusion bancaire 2023 [published in 2024]: [https://www.banque-france.fr/system/files/2024-06/OIB-2023\\_Rapport-annuel.pdf](https://www.banque-france.fr/system/files/2024-06/OIB-2023_Rapport-annuel.pdf)

- Decree No. 2020-889 of July 20, 2020 (published in the Official Journal on July 22, 2020 and entered into force on November 1, 2020) modifies the conditions for assessing the financial vulnerability of their cardholder account-holding customers in order to identify these people more quickly and manage the duration of the financial fragility.

To complete this body of regulations, the French Banking Federation published commitments in September and December 2018. These commitments were introduced in a charter published by the French Association of Credit Institutions, Financing Companies and Investment Firms, entitled Charter for Banking Inclusion and the Prevention of Indebtedness (AFECEI). It applies to all credit institutions and aims to promote banking inclusion and prevent indebtedness.

When credit institutions, payment institutions, electronic money institutions and asset management companies offer a payment account management service accompanied by means of payment (transfer, direct debit, payment card, etc.), they commit in this charter to:

- implement measures to improve access to banking services for individuals not acting for business purposes and to facilitate their use;
- develop mechanisms to detect and deal with customers' difficulties early in order to better prevent indebtedness.

Thus, Groupe BPCE banks identify vulnerable customers on the basis of regulatory criteria:

- the incidents or irregularities in the operation of the account;
- if, for three consecutive months, there are at least fifteen payment incidents and the maximum amount of the average credit balance of the individual customer's account over the period is equivalent to three times the monthly net minimum wage (SMIC);
- if at least five irregularities or payment incidents are recorded over a month and the maximum amount of the customer's average credit balance over the period is equivalent to the monthly net minimum wage;
- registration in the Central Check Register (FCC), a database managed by the Banque de France: customers registered in the FCC who have been deprived of checkbooks because they have issued bounced checks or had their bank card withdrawn for three consecutive months;
- indebtedness, with a case declared admissible by a commission of the Banque de France, with effect for the entire duration of the repayment plan (Article L. 722 of the French Consumer Code), or a case that is being processed.

The issue of financial fragility within the meaning of the AFECEI Charter also applies to institutions that do not have deposit accounts. For Groupe BPCE, these are its subsidiaries BPCE Financement, BPCE Lease, ONEY Banque, Crédit Foncier, CASDEN and Capitole Finance.

Groupe BPCE also acts to prevent indebtedness. In accordance with the AFECEI Charter, all deposit accounts are subject to predictive score intended to detect in advance (six months before the occurrence of the risk) any deterioration in their financial position. This score is based on a modeling technique based on socio-demographic variables, equipment, flows, outstandings and banking incidents. It is subject to regular checks to monitor its performance.

Since 2021, Groupe BPCE has extended its method of identifying the risk of over-indebtedness to the individual customers and individual entrepreneurs of both networks. The aim is no longer to restrict itself to credit holders alone, but to target a wider audience in order to be more effective in terms of prevention.

This offer, dedicated to vulnerable customers, is supported by a governance managed by BPCE SA at the Retail banking and Insurance (RB&I) level. It is led by the Vulnerable Customers and Regulated Pricing Committee, which meets bimonthly in the presence of the Legal and Compliance divisions, as well as the IT development and services division.

In accordance with the Banking Inclusion Charter (AFECEI Charter) and faced with the financial difficulties encountered by certain customers, the acculturation of financial advisers to banking inclusion issues is crucial.

To coordinate its employees and its branches in the regions, Groupe BPCE and its institutions have set up a specific training program with a module dedicated to the prevention of indebtedness and customers in vulnerable situations, as well as a second dedicated to the right to an account. This training must be taken every five years by individual advisors in the branches and on the telephone platforms. In 2024, training for employees was dedicated to the AFECEI and the right to an account.

Groupe BPCE recently updated its training on indebtedness prevention and for customers in vulnerable situations, and made an online version of this module available to its Banque Populaire and Caisse d'Epargne institutions (e-learning) in order to facilitate its deployment. This module will make it possible to better identify the challenges of banking inclusion, and to best support the customers targeted by the prevention of indebtedness or financial vulnerability.

### Microcredit for financial inclusion

Microcredit covers specific categories of loans dedicated to groups in need of economic and social inclusion and who are excluded from traditional loans because of low income or a life hazard. The microloan makes it possible to finance a project of access to employment or mobility, to create a business, or to cover expenses related to housing, health and other unforeseen events. The implementation of microcredit is backed by a public guarantee and support from a general interest organization.

In 2023, according to the Banque de France's Banking Inclusion Observatory, microloans represented nearly €2 billion in outstandings and more than 100,000 microloans for new personal and professional projects financed and supported<sup>[1]</sup>.

Groupe BPCE supports microloans in France through its local banks:

- in line with their entrepreneurial positioning, the Banques Populaires are focusing their actions on professional microcredit, in particular through their support for ADIE (Association for the Right to Economic Initiative).

ADIE defends the idea that everyone, even without capital or a diploma, can become an entrepreneur or have access to a job if they obtain a microloan and personalized professional support based on trust, solidarity and responsibility. ADIE acts by:

- financing all types of professional activity with microloans up to €12 thousand (€15 thousand in French overseas territories);
- providing free personalized monitoring for each project thanks to the support of specialists; and

[1] Annual report of the Observatoire de l'inclusion bancaire 2023 [published in 2024]: [https://www.banque-france.fr/system/files/2024-06/OIB-2023\\_Rapport-annuel.pdf](https://www.banque-france.fr/system/files/2024-06/OIB-2023_Rapport-annuel.pdf)

- by fighting against obstacles and stereotypes, so that anyone who wants to can become an entrepreneur;
- the Caisses d'Épargne, with the *Parcours Confiance* associations and the *Créa-Sol* microfinance institute, offer different personal microloans, enabling people excluded from the banking system to be supported in their projects and in managing their budgets.

The practice of microloans is strictly regulated. According to Article R. 518-61 of the French Monetary and Financial Code, microloans range between €300 and €8,000 for a period of between 6 and 84 months. No personal guarantee is required from the borrower. However, they must have a professional integration project and not have access to traditional bank credit. The microloans are 50% guaranteed by BPI France.

In terms of governance, for the Banques Populaires, the relationship with ADIE on microloans is governed by the endowment fund at the sponsorship level. The FNBP participates in funders' clubs, partner meetings and boards of directors.

For the Caisses d'Épargne, governance is at the level of the Fédération Nationale des Caisses d'Épargne via its internal bodies. The indicators and guidelines are set and studied by a working group composed of three Chairmen of the Management Boards and three Chairmen of the Steering and Supervisory Committees (SOC). They are then approved by the Bureau (composed of six Chairmen) and then by the Board of Directors with all managers (executive and non-executive). Indicators are monitored annually in the reporting. Each Caisse d'Épargne then monitors the indicators and guidelines of their Board of Directors of their *Parcours Confiance* associations in conjunction with the Lead Financial Inclusion Directors.

The orientations of the offer are defined according in particular to market trends and studies carried out by the microloan operators (Banque de France, BPI France and non-profit organizations). Partners are consulted during the construction of a new offer in order to validate the need such as the Caremakers offer for leases with a purchase option.

In addition, the financial inclusion function is coordinated at two levels:

- the financial inclusion managers and advisors meet annually at a face-to-face seminar to monitor activity;
- meetings to present new offers or monitor partnerships are held by videoconference.

For the Banque Populaire network in particular, the link between the bank and ADIE is carried out at several levels: the first is at the regional level, between the 12 regional offices of ADIE and the 12 regional Banques Populaires. The second takes root at the national level, between the FNBP and ADIE - the national headquarters - at different strategic and/or more operational levels. Sharing and cohesion meetings are also organized at the level of the Fédération Nationale des Banques Populaires banks and via the internal social network.

### Securing the banking offer of protected persons

In France, 800,000 adults have received legal or social protection under a ruling by a guardianship judge. These measures, graded according to the degree of autonomy of the person, involve the banks through the management of the accounts and assets of these customers, in conjunction with their legal representative.

The Caisse d'Épargne network is the leader in this customer segment; it is the leading bank for protected persons under guardianship, trusteeship and family housing in France.

Crédit Coopératif is the Group's second-largest operator in this area.

The protected persons market is regulated by the act on planning and reform for the justice system of March 23, 2019, which made it possible to strengthen the autonomy of protected adults. A "norma", an internal document, lists all the regulatory obligations relating to this market.

In terms of governance, a Protected Persons and Vulnerable Customers Market Manager for Retail banking and Insurance is responsible for coordination (with monthly meetings and plenary meetings once or twice a year) within Groupe BPCE. Then, for each Caisse, the Protected Persons market is organized around a market manager. Depending on the Caisses d'Épargne, the Protected Persons market is allocated to Retail Banking or Regional Development Banking. The Development division issues recommendations to the Caisses to determine objectives and guidelines. The Caisses then decide on the orientations and objectives for the Protected Persons market.

In addition, think tanks are organized between the Caisses, BPCE and IT and professionals in order to adapt offers and services to market realities. This dynamism is illustrated in terms of market activity and presence, with:

- national: a presence at the meetings of the regional offices of the National Federation of Individual Judicial Officers, notably with a stand;
- regional: participation in events organized by sponsor associations and partners.

In November 2024, Groupe BPCE enhanced its offer with a new online banking tool - WEBPROTEXION, for professional guardians or curators. The changes are the result of feedback from both protection professionals and adult customers under protection measures.

### An inclusive insurance offer

BPCE Assurances is committed to providing all populations with insurance coverage to deal with risks that could cause damage to property or people.

Based on the principle of risk pooling, BPCE Assurances offers a wide range of products and rates to suit all types of needs and customers: particularly in the face of weather events, with home and automotive insurance offers covering the entire country without exclusions.

In terms of personal insurance, offers are eligible for the target of protected persons and the borrower's insurance contract is inclusive by definition. BPCE Assurances has chosen to focus its savings and protection offers on improving accessibility and inclusivity, including offering products that are accessible from modest amounts, as well as the integration of specific options for people with disabilities, and the assessment of the financial situations of vulnerable customers before subscription.

BPCE Assurances places particular emphasis on offering tailored assistance services and tailoring guarantees, in order to guarantee comprehensive and relevant coverage for all.

### Non-discrimination

For Groupe BPCE, fair treatment of its customers is a fundamental principle. It acts in this sense in favor of non-discrimination in its relations with customers and natural persons. Professional ethics are an integral part of the main principles of the Code of Conduct and Ethical Standards set by BPCE, then rolled out by each Group entity according to its specific characteristics. Compliance with the rules of good conduct by employees enables each entity to carry out its activities honestly, loyally and professionally, and to serve the best interests of its customers. The Group has thus drawn up a Code of Conduct and Ethical Standards to ensure customer interests, employer responsibility and social responsibility (for information on the structure, approach and management of the Code of Conduct, see section G1 - 4.1.1.2 and section G1 - 4.1.1.3).

The convictions and commitments in the Code of Conduct and Ethical Standards make it possible to describe the Group's vision with regard to the customer's interests and its desire to be a useful player. Among the twelve principles it lists, the Group considers that it is its social responsibility to:

- Guarantee an impartial treatment for all our customers (Principle 2): It offers a system for listening to and welcoming customers in situations of vulnerability, in particular due to financial difficulties, which allows the Group to tailor its services to their specific needs and to ensure that, in all cases, it continues to listen carefully to their individual needs and provides customized solutions.;
- Protect the interests of customers and cooperative shareholders (Principle 3); in particular, by constantly prioritizing the customer's interests and ensuring that the customer fully understands the nature and details of the solutions recommended to them.;
- Be a banking group that is socially inclusive and opens to all (Principle 10): the Group makes every effort to accommodate customers with disabilities, adapting and personalizing its services and relationships.

The Groupe BPCE Code of Conduct and Ethical Standards, approved by the Executive Management Committee and the Supervisory Board, is implemented operationally in the codes of conduct and charters of the Group's entities.

### Digital accessibility: ensuring inclusion for all

Digital accessibility is essential to meeting the objective of universality of digital services, since it aims to ensure that the information and functionalities of a digital service or content are accessible to everyone, regardless of the person's disability or their way of accessing information.

This means that everyone can:

- perceive and understand the information and functionalities of a digital service;
- navigate and interact with;
- and thus contribute on the web.

Digital accessibility thus determines the possibility for any service or digital content to be a vector of inclusion and autonomy for all. In this respect, it is part of the same approach as inclusion for full access to digital technology for each individual.

Groupe BPCE presents its commitments in this area via its multi-year accessibility plan for 2025-2027. The latter focuses on digital accessibility in the digital strategy of Groupe BPCE entities as well as in their policy to promote the integration of people with disabilities. Its launch reflects the Group's desire to include the inclusion of people with disabilities or those experiencing digital difficulties as one of its long-term strategic priorities.

This multi-year plan is common to all Groupe BPCE entities. However, each of them remains individually responsible for making its own digital services accessible, in line with the Group's ambitions and commitments.

Groupe BPCE's accessibility governance is based on an Accessibility function created to:

- ensure regulatory compliance;
- define the Group's ambitions and priority actions to be carried out, monitor and manage the application of accessibility standards by all Group entities;
- improve the user experience of the Group's customers and employees;
- enable operational efficiency.

The Accessibility function is structured to ensure optimal coordination and effective implementation of digital accessibility initiatives. It is composed of:

- the Group accessibility officer, supporting the Group's entities, promoting awareness-raising and training, and ensuring the monitoring and management of accessibility;
- a core team, made up of representatives of various key functions within the Group, acting as intermediaries for the various entities and internal and external regulators, steering the implementation of the Group's ambitions, centralizing best practices;
- local accessibility officers, each as an entry point for their entity guaranteeing compliance and continuous improvement of digital accessibility. It ensures compliance with accessibility standards, manages accessibility (relay between the core team and its entity, etc.) and raises awareness among the various audiences; and
- the IT relays of the various entities concerned.

In addition, a control system will be rolled out in the Group's entities to manage compliance with regulations and the accessibility of digital services. The system will be based on a set of KPIs produced by the local accessibility officers (first-level control), and supervised by the core team (second-level control).

Digital accessibility is part of a broader regulatory framework. It is a fundamental right, recognized by:

- the United Nations in the Convention on the Rights of Persons with Disabilities in particular;
- the application of the act of February 11, 2005 on equal rights and opportunities, participation and citizenship of people with disabilities. It is more specifically Article 47 of this act that makes accessibility a requirement for all online communication services of public bodies, as well as for certain private bodies;
- to complete this regulatory framework and define the resulting technical requirements, a dedicated framework has been drafted: the RGAA (General Accessibility Improvement Framework);
- it should be noted that in accordance with the latest changes in European regulations, French accessibility obligations have also been extended to certain categories of products and services.

It is in this context that Groupe BPCE entities must operate to ensure that their digital content and services are accessible to all their customers and employees, as well as to the general public.

This approach, built with the support of two firms specializing in accessibility, involved collaboration with various partners within the Group, such as the Legal division, the Communication division, BPCE-IS, etc. At the same time, the implementation of the Group's approach, particularly in the context of Retail Banking and Insurance (RB&I), which is also a member of the core team, involves dialog with specialist associations in these matters, in order to test the effectiveness of these policies.

The multi-year accessibility plan for 2025-2027 is a public document, accessible on all of the Group's institutional websites and mobile and web applications. A Coordination Committee meeting attended by a business line and IT correspondent from each Group entity and department (around 70 people), meets on a monthly basis. Specific workshops are also set up to co-construct ambitions, methods and tools with all Group entities.



### 3.4.3.2 [S4-2] PROCESSES FOR ENGAGING WITH CONSUMERS AND END-USERS ABOUT IMPACTS

#### 3.4.3.2.1 Customer satisfaction measurement

##### Banque Populaire and Caisse d'Epargne networks

Groupe BPCE has structured an ambitious plan to accelerate performance in terms of "customer satisfaction", for each institution, and focused on actions with a strong leverage effect. This mobilization has created a favorable environment for the commercial development of all Groupe BPCE institutions.

With its robust listening tools for customers, Groupe BPCE effectively assesses the feedback from each of its customers in all its markets:

- customer satisfaction is calculated in real time, resulting in faster deployment of improvement actions, whether regarding the mobile experience or the relationship with the branch and the advisor;
- these systems make it possible to interview 100% of customers once a year and each time they have contact with their advisor;
- in total, over 12 million Groupe BPCE customers are surveyed on a full-year basis across all markets.

In addition to listening to customers, very concrete actions have been taken to ensure that each institution benefits from the

Group's best practices for improving the customer experience. This is how best practices were disseminated concerning improving telephone accessibility, responsiveness to customer requests, etc.; the resulting action plans have increased the NPS of all Group institutions, in all markets since 2018.

In terms of customer satisfaction, the BPCE 2021-2024 strategic plan focused on the branch, the cornerstone of the relationship with our customers: 100% of branches and business centers have a positive NPS in 2024.

Over the 2021-2024 period, the net promoter score (NPS), a reference indicator for measuring satisfaction, increased steadily in all markets. At the end of 2024, the percentage of branches and business centers with a positive NPS was 95% for the Caisse d'Epargne network, 95% for the Banque Populaire network and 94% for the Groupe Crédit Coopératif.

This performance reflects the mobilization of all institutions on the fundamentals of customer satisfaction: strengthening of service quality, strong responsiveness to requests, continuity of the relationship and proactivity.

#### Customer Satisfaction: % of branches with positive NPS<sup>[1]</sup>

	% at the end of 2024	% at the end of 2023	% at the end of 2022
Banque Populaire network	95%	90%	82%
Groupe Crédit Coopératif	94%	94%	91%
Caisse d'Epargne network	95%	86%	74%

##### Natixis CIB

Natixis CIB builds a sustainable business model with its customers thanks to its proximity, the quality of its strategic dialog and the combination of its expertise. This privileged relationship with its customers is the preferred channel for knowing their point of view. In addition to customer relations, the systems described above help to identify customer expectations and, if necessary, remedy any negative impacts. As part of the continuous improvement of its systems, Natixis takes into account the recommendations of the regulators and participates in various market initiatives through the professional associations of which it is a member.

Natixis CIB measures customer satisfaction through the analysis of customer complaints received. A customer complaint indicates dissatisfaction with a service offered by the bank. Regular analysis makes it possible to identify sensitive complaints or customers who frequently make them, in order to put in place comprehensive action plans to prevent similar situations from occurring with other customers. These action plans are closely monitored to ensure their implementation and results within the allotted timeframe.

Performance measurement indicators are also presented at a quarterly regulatory committee meeting on Natixis CIB's customer complaints.

##### NATIXIS IM

All Natixis IM European direct management companies use their proprietary search service as well as due diligence processes to understand the risks, opportunities and impacts generated by the companies invested in on consumers and end-users.

In terms of analysis methodology, the theme of consumers and end-users is taken into account by all European direct management companies investing in both listed assets and private assets.

These considerations are also taken into account in the case of asset management companies investing in private assets. By way of illustration, Naxicap when carrying out the ESG due diligence on investment targets, incorporates the criteria: quality of service and customer satisfaction. The due diligence provides an in-depth analysis of each sustainability theme, including their level of importance to the company, their strategic importance to the sector, a summary of the company's performance and relevant key performance indicators (KPIs).

In addition to proprietary methodologies, asset management companies monitor the ratings of external data suppliers. Several of Natixis IM's asset management companies<sup>[2]</sup> use the ESG rating of the data provider MSCI. This rating assigns each company a score on each key issue selected, ranging from 0 to 10. For the social pillar, the scores assess the company's exposure to risks or opportunities as well as its ability to manage this exposure. These are calculated using the key issues exposure score and the management score for these key issues. Key

[1] The scope for reporting this indicator is made up of the Banque Populaire and Caisse d'Epargne networks. This indicator measures a customer's intention to recommend their bank. The calculation of this indicator is carried out after analyzing the feedback from the surveys sent by RB&I via its partners to all customers. This analysis of the overall NPS, networks, markets and institutions is followed by the production of an overall report.

[2] Ostrum AM, Natixis IM International Solutions, Dorval AM and DNCA Finance.

issues related to the consideration of the impacts of products on consumers include:

- chemical safety;
- financial protection of consumers;
- data security and confidentiality;
- product safety and quality.

Other Natixis IM asset management companies<sup>(1)</sup> use the ESG rating of the data provider ISS. Based on a set of approximately 700 indicators, several of them cover topics relating to customer responsibility issues and products specific to the company's business model and are therefore linked to the consideration of consumers' interest. For example:

- product safety;
- data confidentiality and information security;
- responsible marketing.

### 3.4.3.2.2 Personal Data Protection

As soon as the GDPR was implemented, Groupe BPCE drafted an information notice intended for retail banking customers (mainly Banques Populaires and Caisses d'Épargne), which aims to describe the main processing operations carried out in compliance with the rules set by the GDPR. Indeed, the regulations state that any processing must be based on proper and justified cause with a legal basis. In banking activities, this processing is in most cases the result of either a legal obligation or a contract. This notice was produced by Natixis, it is intended for its customers and natural persons related to its customers.

### 3.4.3.2.3 Cybersecurity

Groupe BPCE, as the Group's central institution, ensures that the measures taken by all Group companies are sufficient to ensure compliance with commitments to customers, employees, partners, regulators, and cooperative shareholders. To do this, the Group has set up an organization to:

- lead the development and evolution of the ISSP-G and monitor its deployment according to the management system described below;
- ensure the security of the Group's IS;
- ensure the security of the federal IS and the central institution.

To this end, BPCE appoints a Group IS Security Manager (RSSI-G), as well as an alternate.

The RSSI-G reports hierarchically to the Group Head of Security, who reports to the Group Secretary General (SGG) and functionally to the Chief Technology & Operations Officer (T&O).

Within the ISSP-G, each Group company adopts the ISS framework and the reference system of ISS rules and instructions, without adaptation. This framework is adapted according to the company's organization, the Internal Control Coordination Committee (3CI), the Risk Committee, the supervisory body or the executive management.

With regard to IS Security, each Group IT Operator ("Operator") formalizes and specifies in a document:

- the commitments of each party concerning the expected level of security for the main business applications, the deployment,

### BPCE Assurances

BPCE Assurances has set itself ambitious targets for its centers of expertise in a context of growth in its activities.

Two types of measurement indicators are closely monitored: satisfaction rates expressed by customers and the NPS (net promoter score), which assesses the intention to recommend.

In line with the customer listening system set up at Groupe BPCE level, BPCE Assurances interviews its policyholders after they have received telephone contact with one of the company's centers of expertise, or when the customer browses on the Digital Space.

For telephone contact, this survey is systematically carried out after an incoming call with a questionnaire sent to policyholders by text message. The customer answers the survey and then validates their answers, which are anonymous. These surveys take place at each interaction, with a 30-day non-solicitation period.

This notice also specifies the various rights that any natural person can exercise and the points of contact in institutions, in order to be able to activate them.

Although this notice was not mandatory, it fulfills a duty of transparency towards customers and prospects and demonstrates the Group's ambition in terms of personal data protection.

This notice is widely distributed and accessible to any person (customer or prospect) on the websites and App.

administration and use of security systems, as well as the exercise of ISS Level 2 permanent controls;

- the alert procedure between the Operator and its customers in the event of an incident;
- indicators enabling its customers to have permanent visibility on the level of security achieved with regard to the requirements defined by the business line managers.

Concretely, this translates into the implementation of security measures to protect its end-users:

- enhanced authentication: use of two-factor authentication (2FA) devices to secure access to online accounts;
- data encryption: sensitive data, such as personal and banking information, is encrypted to prevent unauthorized access;
- transaction monitoring: implementation of fraud detection systems that monitor transactions in real time to identify any suspicious activity;
- application security: development of mobile and web applications with robust security protocols to protect users against cyber threats;
- training and awareness: training programs for users on best practices in online security, including the recognition of phishing attempts;
- assistance and support: the provision of assistance services to assist users in the event of a security issue, such as identity theft or fraud;
- regular updates: application of regular updates to correct vulnerabilities in systems and applications;

[1] DNCA Finance, Dorval AM, Ecofi, Mirova and Ossiam [for funds applying ESG criteria only].



- access controls: limitation of access to data and systems according to roles, in order to minimize the risk of unauthorized access.

These measures aim to guarantee the security of end-user information and transactions, thus reinforcing confidence in the services provided by the Group to its customers.

BPCE also implements preventive actions to raise awareness among consumers and end users of the threats to which they may be exposed. "Security" pages are published on the institutional websites of the Group's institutions.

Customers also receive communications by email to inform them about the various possible attacks and how to guard against them. This system is supplemented by online banking. Recommendations for use are available through alerts on potential fraud at each connection.

Through Group security, Groupe BPCE organizes conferences where the objective is to raise awareness of cybersecurity among its professional clients. Finally, it proposes an offer entitled *cybersecur+*, aimed at protecting the activity of companies, improving their security and anticipating attacks. *Cybersecur+* is intended for VSEs, SMEs, mid-sized companies, public sector entities and associations.

### 3.4.3.3 (S4-3) PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR CONSUMERS AND END-USERS TO RAISE CONCERNS

#### Whistleblowing mechanism open to Groupe BPCE's third parties

Groupe BPCE companies have a platform to collect reports relating to serious breaches of the Code of Conduct, laws, safety, environmental impact, or any inappropriate behavior in the workplace. This whistleblowing system is open to all employees and third parties of the company, who can express themselves via a tool accessible by URL link, regardless of the country of operation (Europe, United States, etc.) and regardless of the business line (retail banking, Corporate & Investment Banking, etc.).

For more details on the whistleblowing system, see G1-1 – 4.1.1.3.3.

Groupe BPCE is not aware of any cases of non-compliance with the guiding principles of the United Nations or the ILO Declaration on Fundamental Principles and Rights at Work regarding its customers.

In addition, no alert was raised via Whispli, Groupe BPCE's whistleblowing channel.

#### 3.4.3.3.1 Complaint management

The collection of customer feedback in real time makes it possible to detect any dissatisfaction and to deal with them as quickly as possible in the complaints management process. The listening system deployed in all institutions as well as the complaints management system feed into discussions on areas for continuous improvement in the range of banking products and services offered by the Group. All Groupe BPCE entities have a department that handles customer complaints.

#### Banque Populaire and Caisse d'Epargne networks

##### Analysis and use of information about complaints

Group entities analyze complaints in order to detect possible failures, shortcomings and bad practices. This analysis allows them to establish corrective measures to be implemented with the relevant divisions. The search for the root causes of complaints is a continuous improvement process that also draws on comments made by customers in satisfaction surveys and on monitoring social networks and customer reviews.

##### The complaints handling process

Complaints are handled as follows:

- the branch or business center in charge of the local commercial relationship, is the customer's main contact;
- the customer relations department of the bank or subsidiary may be called upon, even if the answer or solution provided by the customer's main contact is not suitable;
- the mediator, an independent figure, may be solicited when no solution has been found with the bank, or in the absence of a response from the bank. The mediator has their own website, where the client can submit a request for mediation *via* an online form.

The procedure for discussing or transferring complaints between the Customer Relations departments of Group's banks, and those of the subsidiaries, is organized to ensure that each complaint is addressed as quickly as possible.

##### Informing customers about the complaints handling process

Customers are informed of the complaints handling process and how to contact the bank:

- on the websites of the Group's institutions: <https://www.banquepopulaire.fr/votre-banque/reclamation-et-mediation/> and <https://www.caisse-epargne.fr/votre-banque/reclamation-et-mediation/>;
- in fee guides;
- in the general terms and conditions.

##### Monitoring of the complaints handling process

This management concerns in particular the grounds for complaint, the products and services concerned by these complaints and the processing times. Key indicators are regularly submitted to Groupe BPCE bank directors, Internal Control departments and all sales structures.

Among the reasons for complaints, indicators are monitored which may reveal discrepancies between the service expected by the customer and the service provided, such as information and advice for 2.16% of complaints handled in 2024 and unauthorized transactions for 1.7%, down compared to 2023.

In 2024, 63% of complaints were handled within 10 working days. The average processing time was 15.8 days.

**Complaints: Average processing time for complaints, % processed within 10 days<sup>[1]</sup>**

	2024	2023	2022
<b>Average processing time</b>	<b>15.8 days</b>	<b>15.5 days</b>	<b>14.6 days</b>
% within 10 days	63%	61%	59%

**Natixis CIB**

A framework for managing customer complaints has been defined within Natixis CIB, the main objective of which is to ensure that all customer complaints are properly identified and captured. These complaints must be grouped within internal tools allowing a simplified search for complaints.

A systematic acknowledgment of receipt must be sent to the customer to confirm the handling of the claim (unless a response is sent within 10 days for France). In this acknowledgment of receipt, the customer is informed of the various steps to come, as well as the regulatory deadlines that apply. The information provided by the mediator, to whom the customer can contact in the event of persistent dissatisfaction, is also provided.

**Natixis IM**

In the context of asset management, Natixis IM's management companies do not have a direct relationship with the companies invested in. It is these same companies that may be subject to a whistleblowing mechanism or complaints from consumers and end-users. In the absence of guidelines for the asset management sector, the interpretation of requirements in this area concerns the monitoring of controversies, PAIs and engagement with companies.

As part of the analysis carried out at the time of the investment, Natixis IM's European asset management companies rely on data produced by external data providers, collected from third parties and/or on information communicated directly by the company invested in both to identify and monitor the controversy.

As part of the monitoring of ESG risks, each Natixis IM management company must have a mechanism for taking into account controversies, either formalized via a dedicated policy or integrated into existing policies and procedures (see S2-1 – 3.2.3.1.2).

In order to identify these controversies, European asset management companies may use data produced by external data providers, such as those from ISS, MSCI, World Check, Ethifinance, RepRisk or Sustainalytics.

**3.4.3.3.2 Personal Data Protection**

The Group continues to spread the data protection culture by strictly managing commercial prospecting. Thus, consent collection for commercial prospecting purposes has grown considerably:

- by bringing the Cookie policy into compliance in April 2021 with the new guidelines published by the CNIL in October 2020. Thus Internet users have access to comprehensive information through a Policy made available on the websites and App. Internet users are also asked to give or refuse their consent for the processing of their data according to the purposes pursued;
- by implementing the consent of customers for commercial solicitations based on payment data and on the use of information from the energy performance diagnosis and certain data from the tax notice;
- through the development of a consent center that brings together all the authorizations given by customers on cookies, commercial prospecting and specific processing requiring prior agreement.

**3.4.3.3.3 Cybersecurity**

In order to be able to listen to incidents affecting end-users, Groupe BPCE has made various communication channels available to them to report their incidents and express their concerns:

- the following public link points to the document describing the mission of the CERT and containing all the information necessary for the declaration of incidents concerning end-users<sup>[2]</sup>. This document describes how to interact with the CERT to report an incident online;
- a customer service *via* phone, email or online chat allows users to ask questions and report issues;
- users can visit branches to discuss their concerns with an advisor;
- the Group uses social media platforms to interact with customers and collect their feedback.

After a complaint or incident is reported, BPCE conducts an in-depth analysis of the incidents to identify the root causes and implement corrective actions.

In addition, performance indicators are used to assess the effectiveness of remedial measures and make continuous improvements.

In the event of persistent dissatisfaction, customers may turn to a banking mediator, who intervenes to resolve disputes.

Regular surveys collect customer opinions on services and identify areas for improvement.

These procedures and channels are essential to ensure that consumer concerns are taken into account and addressed effectively, thus helping to improve customer satisfaction and trust in BPCE's services.

BPCE also implements preventive actions to raise awareness among consumers and end-users of the threats to which they may be exposed. "Security" pages are published on the institutional websites of the Group's institutions:

- Security of your accounts and transactions | Banque Populaire;
- <https://www.caisse-epargne.fr/votre-banque/securite/>;
- Security: protect yourself against the risk of fraud | BRED;
- Security - CASDEN Banque Populaire.

[1] The scope for reporting these indicators is made up of the Banque Populaire and Caisse d'Épargne networks. The calculation of these indicators is carried out after the collection of data from the institutions' claims management tools on a quarterly basis, and the specific reporting from certain institutions [CERA, CEHD, BRED, CASDEN and BPSud].

[2] <https://www.groupebpce.com/app/uploads/2024/04/20190418-rfc2350-fr-v2-1.pdf>.

### 3.4.3.4 [S4-4] TAKING ACTION ON MATERIAL IMPACTS ON CONSUMERS AND END-USERS, AND APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO CONSUMERS AND END-USERS, AND EFFECTIVENESS OF THOSE ACTIONS

#### 3.4.3.4.1 Personal Data Protection and cybersecurity

##### Personal Data Protection

Work on the Privacy Center continued in 2024 to initiate consents to commercial prospecting on the basis of certain information from the tax notice and the Energy Performance Assessment. The information notice will also be updated to include the new processing. Lastly, governance work will continue on cookies on the one hand, and on Artificial Intelligence, on the other hand, given developments and recent recommendations in this area.

##### Cybersecurity

BPCE implements several measures to manage incidents and operational risks related to regulatory non-compliance, particularly in terms of personal data protection and communication of cybersecurity attacks. These measures concern both BPCE employees and end-users.

In terms of personal data protection risk management, the main actions are as follows:

- regulatory compliance:
  - BPCE ensures compliance with applicable regulations, such as the General Data Protection Regulation (GDPR), by implementing appropriate policies and procedures;

- Data Protection Officer (DPO):
  - appointment of a DPO to oversee data processing activities, ensure compliance and serve as a point of contact for regulatory authorities and customers;
- training and awareness-raising:
  - organization of regular training for staff on data protection, to raise employee awareness of best practices and legal obligations;
- audit and internal control:
  - conducting internal audits to assess compliance with regulations and identify weaknesses in data management;
- data breach management:
  - establishment of procedures to detect, report and remedy data breaches, including notification of competent authorities and the persons concerned where necessary.

In terms of communication of cybersecurity attacks, procedures are in place to quickly inform customers and regulatory authorities in the event of a significant attack, in accordance with legal obligations. In addition, a partnership has been established with cybersecurity experts and financial institutions to share information on cybersecurity threats and best practices.

#### 3.4.3.4.2 Financial inclusion and accessibility of the offer

##### Protecting vulnerable customers

The Fragile Customer Offer (OCF) is managed at Retail Banking (BDD). Its aim is to enable customers identified as fragile customers (2.9%<sup>(1)</sup> in 2024) to access an appropriate range of banking services (day-to-day banking, financing, insurance, etc.). This offer fully coincides with the Group's values of inclusion. All actions concerning the vulnerable customer market are carried out with the conviction that drives Groupe BPCE, both to comply with regulatory requirements and to give life to its image as a cooperative group.

##### A specific offer dedicated to vulnerable customers

The Banques Populaires and the Caisses d'Epargne propose a specific offer for vulnerable customers, billed at a maximum rate of €1/month and guaranteeing access to banking services essential to managing the account - the Fragile Customer Offer (OCF). 23.8% of those detected as vulnerable are equipped with it. This offer includes (non-exhaustive list):

- a systematically authorized payment card (CPAS);
- the specific cap on intervention fees and commissions at €4 per transaction and €20 per month (Article R. 312-4-2 of the French Monetary and Financial Code);

- capping of fees for payment incidents and irregularities in the operation of the account at €16.50/month;
- a subscription to products providing alerts on the status of the account by text message regarding the level of the account balance.

The concerned institutions provide details of the specific offer for vulnerable customers on their websites.

On their website, the Caisses d'Epargne also offer a space for customers experiencing financial difficulties, where they can find out about the full range of dedicated support available to them: <https://www.caisse-epargne.fr/clientele-fragile/>.

Three main sections are included:

- dedicated solutions: banking offers (OCF, microloans) and non-banking offers in partnership with Orange and Renault (vehicle leasing) <https://www.caisse-epargne.fr/clientele-fragile/services-mieux-gerer-comptes-ocf/>;
- advice: to support customers in managing their accounts and their day-to-day finances (tips on the Caisse d'Epargne app, practical sheets, links to Budget Advice Points, etc.) <https://www.caisse-epargne.fr/clientele-fragile/conseils-reprendre-budget-en-main/>;
- partners: with *Finance & Pédagogie*, *Parcours Confiance*, *Créa-Sol*, <https://www.caisse-epargne.fr/clientele-fragile/partenaires-engages/>.

[1] The scope for reporting these indicators is made up of the Banque Populaire and Caisse d'Epargne networks. The basis for calculating these indicators is made up of data collected on behalf of the OIB (*Observatoire de l'Inclusion Bancaire* - Banking Inclusion Observatory) relating to vulnerable customers and collected on an annual basis.

In addition, a customer relations program has been set up for all customers with banking inclusion (vulnerable customers, those at risk of indebtedness and those with rights to the account) to provide them with advice, best practices and information on budget management via an e-newsletter “*Les Clés de votre Budget*” (“The Keys to Your Budget”), and digital banners in their connected areas.

“Fragile” customers who do not wish to subscribe to the OCF nonetheless benefit from a cap on fees for payment incidents and account irregularities, set at €25/month in accordance with the commitments of the French Banking Federation.

For the subsidiaries BPCE Financement, BPCE Lease, ONEY Banque, Crédit Foncier, CASDEN and Capito Finance, the institutions have set up internal tools to detect customers in difficulty, accompanied by a process to facilitate the settlement of situations. In addition, they carried out awareness-raising campaigns for their advisors via dedicated training sessions.

In terms of support for its customers in potential risk of indebtedness or in a situation of proven financial vulnerability, the treatment of this customer is an essential topic of customer protection.

Groupe BPCE institutions were the first to use a tool to predict the risk of indebtedness or financial vulnerability (initiated in 2015).

In the procedure deployed within the Group, if a customer is identified as at risk of indebtedness, they receive a letter inviting them to make an appointment with their advisor to take stock of their situation and possibly readjust their banking products and services. Advisors can also direct customers towards non-banking solutions such as:

- Budget Advice Points;
- the Communal Social Action Centers;
- local associations;
- as well as the High Speed Budget Application tool, which allows customers to better manage their budget, and also to identify financial aid.

#### Reinforcing reception and listening to customers in difficulty

Groupe BPCE also continues its commitment to strengthening the reception and listening to customers in difficulty. The creation of entities (specialized branch, dedicated service within a customer relations center, telephone platform, etc.) dedicated to the reception, handling and monitoring of difficult banking situations is a good practice recommended at Group level. These entities provide more personalized support for customers on the road to a brighter future.

#### Developing financial education for all audiences

##### WITHIN THE BANQUE POPULAIRE NETWORK

The Banques Populaires also carry out educational actions to raise awareness of banking; over €5 million were invested in connection with inclusion and banking education.

Several Banques Populaires are taking part in the “I invite a banker into my classroom” initiative, which raises students’ awareness of budget management.

##### WITHIN THE CAISSE D’EPARGNE NETWORK

In terms of financial education, since 1957, the Caisses d’Epargne had the intuition that it was necessary to go further in supporting the French people on money matters, and thus created the *Finances & Pédagogie* association. It organizes educational programs on money matters across the country.

In response to changes in society, the association is supported by a network of 6,000 public, private and non-profit partners, with a strong ability to adapt its content to different needs. The target audience is made up of young people and actors from schools and universities, people in a situation of economic and financial difficulty, and social action and association professionals (volunteers or employees). More broadly, the association’s face-to-face and distance learning courses are aimed at the whole population, to help them to manage their everyday budgets and support life projects or crucial moments in financial management such as retraining or the transition to retirement. The association provides answers to the changing relationship to money linked to new societal lifestyles (digital, caregivers, sustainable consumption...). Trainers located in fifteen branches throughout the country carry out awareness-raising and training actions, both face-to-face and remotely. The association is certified: Qualiopi and ESUS (“Entreprise solidaire d’utilité sociale” - Solidarity company of social utility).

The quantitative and qualitative impacts of Finance and Education interventions contribute overall to the reduction of risks related to banking exclusion.

#### Microcredit for financial inclusion

##### WITHIN THE BANQUE POPULAIRE NETWORK

For more than 25 years, the Banques Populaires and ADIE have shared the same ambition: to open the doors of credit to those who, without resources or diplomas, embark on a determined and daring venture into entrepreneurship.

This partnership, which is embodied throughout the country, comes to life in each of the banks by involving employees, managers and even retirees, many of whom become ADIE volunteers.

Each year, ADIE’s mission with the Banques Populaires enables more than 26,000 men and women to bounce back or get started in life, and also to contribute to the economic momentum in all territories, including the most fragile such as rural municipalities, overseas territories or priority urban areas.

With nearly €42 million in refinancing lines made available to the association in 2024, representing 21% of ADIE’s microloan activity, the Banques Populaires network is a strategic partner of ADIE and thus contributes to maintaining 7,000 independent and salaried jobs in the regions.

The Banques Populaires network is also a committed sponsor alongside young entrepreneurs accompanied by ADIE by supporting the entire range of support services for those under the age of 30 years (*Je Deviens Entrepreneur* training program, honor loan funds dedicated to young people and the *Créadie Jeune Banque Populaire* award).

Lastly, the Banques Populaires are a long-standing partner of France Active with which they disburse microloans based on the France Active guarantee. They also grant additional loans to Initiative France’s Honor Loan Funds.

For the Banques Populaires, in 2024, credit lines were disbursed to finance 8,666 ADIE professional and mobility microloans, thus helping to maintain 7,000 independent and salaried jobs in the regions.

##### WITHIN THE CAISSE D’EPARGNE NETWORK

The financial inclusion of the Caisses d’Epargne is a long-term commitment that is part of a comprehensive and coherent strategy. By aligning their actions with the Group’s ambitions, they are working for a more inclusive and sustainable society, where everyone has the opportunity to access the financial services needed to carry out their projects. A major player in personal microloans in France, the Caisses d’Epargne confirm their commitment and wish to join forces by supporting the microfinance institute, *Parcours Confiance*.

The Caisses d'Épargne thus offer various personal microloans with the *Parcours Confiance* associations and the *Créa-Sol* microfinance institute. The *Parcours Confiance* microloan is intended to finance people who encounter financial difficulties in the realization of their project. The *Parcours Confiance* network mobilizes advisors able to intervene in all departments of mainland France. They support people looking for work or facing a life-threatening accident, and whose resources do not allow them to access traditional bank loans.

In addition, as part of their 2022-2024 CSR & Cooperative Guidelines, the Caisses d'Épargne aim to develop an offer of inclusive products and services for their vulnerable customers. As an illustration, new vehicles were financed thanks to the Caremakers offer, launched in 2017 by Renault, the Action Tank Entreprise & Poverty initiative, the Fédération Nationale des Caisses d'Épargne and ADIE. It allows people in difficulty to access a new vehicle thanks to a lease-to-buy option financed by a microloan. Pioneers in transitions, the Caisses d'Épargne continue to innovate by financing the first new electric vehicles through direct purchase. As part of the lease offer with a purchase option (LOA) in partnership with Groupe Renault, Pôle Emploi, FASTT and the "Entreprises et pauvreté" Action Tank, the Caisses d'Épargne are aiming for 4,000 vehicles delivered in 2025.

For the Caisses d'Épargne, in 2024, 1,923 professional microloans were granted, thanks to the advisors dedicated to this activity and the social partners mobilized throughout the country.

Overall, within the Banque Populaire and Caisse d'Épargne networks, there are 10,589 local projects<sup>(1)</sup> that were supported in 2024.

### Securing the banking offer of protected persons

As part of VISION 2030 strategic project, the Caisses d'Épargne wish to become the Bank for families. In this sense, the focus is on family measures, emphasizing listening, advice and expertise. The Caisse d'Épargne network aims to maintain its leading position in the Protected Persons market, both in terms of professional and family measures. In this context, support is provided to the network to welcome and manage family measures.

On an ongoing basis, the Caisses d'Épargne offer solutions that meet the specific needs of protected persons. To promote their autonomy, they can have access to payment cards equipped with contactless technology, as well as account consultation via an adapted remote bank. The customer's legal representative, whether a professional or a family member, also has a range of services to help manage their accounts.

Crédit Coopératif maintains a relationship of trust with legal guardians and guardians' associations. It has extended its solutions by establishing a clear distinction between the services offered to guardians' associations and those available to the protected adults. A specific customer onboarding charter has been drafted for protected persons.

The Caisses d'Épargne have a market penetration rate of 40%. They have experts spread across all regional banks and dedicated to this clientele.

Crédit Coopératif manages the situation of one in ten protected persons in France, with offers and management tools adapted to their situation.

### An inclusive insurance offer

BPCE Assurances, through its two Non-life (IARD) and Life insurance business lines, strives to offer insurance and savings solutions adapted to all profiles and budgets, including preferential rates for young people, cover for people with reduced mobility, and a borrower insurance policy accessible without exclusion for at-risk professions.

BPCE Assurances IARD offers a range of Non-life (IARD) and Health products for which the structure offers several formulas and options to adapt coverage to all profiles and budgets (particularly vulnerable populations). A few examples:

- preferential rates are offered for young people, as well as benefits for young people with small budgets;
- a range with guarantees for PRM (people with reduced mobility) included directly in the contracts, without additional cost (for example, extension of civil liability in multi-risk home insurance, damage to wheelchairs including electric ones);
- in Health insurance, the range of products includes a "responsible" supplementary health insurance that meets the requirements of the regulations: no medical selection at the time of subscription and the contributions are not set and do not change according to the health status of the person covered;
- for Life Accident coverage, in the event of disability following a covered accident, the policyholder receives assistance services on "Coping with disability" with a personal and professional situation report specific to the person's disability.

BPCE Vie savings products cover the largest number of customers, particularly with highly accessible consumer policies. Some BPCE Vie policies (life insurance, non-funded insurance and funeral protection policies) are eligible for the target group of protected persons and may be taken out, depending on the protection measure (safeguard, guardianship, trusteeship, etc.), either directly by the protected adult or by their legal representative. A disability savings option (regulatory) is offered on Life Insurance policies at the time of subscription, offering specific and favorable tax treatment.

BPCE Assurances facilitates access to insurance for people who have overcome breast cancer. They will now be able to take out a Group borrower insurance policy for a real estate or professional project without additional premiums or exclusion, even partial, and without waiting for the legal period of five years set by the right to be forgotten.

[1] The scope for reporting this indicator is made up of the Banque Populaire and Caisse d'Épargne networks. This indicator lists the annual number of professional projects financed by microloans. The calculation basis for this indicator is made up of the number of pro take-off loans carried out in the local banks and the amount of microloans made by the CE and BPs sent by external organizations (France Active, CREA-SOL and ADIE).



### Digital accessibility: ensuring inclusion for all

Accessibility concerns digital services for the general public, employees and customers (individuals and professionals) of Groupe BPCE. These are more particularly people with long-term or permanent sensory, motor or cognitive impairments, in addition to those with a temporary disability. With a view to digital inclusion, Groupe BPCE wanted to extend its actions in this area to people in a digital divide, while taking into account the aging of the population.

Before the publication of the 2025-2027 multi-year plan, Groupe BPCE decided to synchronize and harmonize the approach by setting up a dedicated governance structure, called the Accessibility function, and launching a program to strengthen digital accessibility. Since its creation, the Accessibility function has endeavored to disseminate digital accessibility issues and best practices to the various Group entities and to BPCE-SA's business line and IT departments.

In order to define the ambitions for the 2024-2025 horizon and lay the foundations of the program, it began with a diagnostic phase with the launch of work on:

- regulations and control systems:
  - development of the associated control system,
  - definition of management indicators relating to digital accessibility with a view to their implementation,
  - adoption and distribution of a Group standard to frame the accessibility of Groupe BPCE's digital services;
- target ambitions, organization and budget:
  - survey and analysis of the Group's existing digital services,
  - definition of target business line ambitions by 2030,
  - costing of the resources required for the remediation necessary to achieve the 2025 ambitions;
- tools, methods and change management:
  - provision of an accessibility statement template, the current multi-year plan and an annual action plan template,
  - definition of target IT project methodologies, accompanied by a toolkit for the production of accessible digital content and services "by design",
  - discussions on the conduct and industrialization of RGAA (General Framework for Improvement of Accessibility) compliance audits,
  - introduction of accessibility requirements in the Group's purchasing policy,
  - assessment of the maturity level of the digital accessibility of Groupe BPCE's major publishers with a view to implementing remediation plans,
  - provision of a training offer dedicated to business lines on digital accessibility within Groupe BPCE,
  - development of the change management plan for the Accessibility program.

### Improvement of the accessibility of digital services

As part of the Accessibility program, Groupe BPCE has set a twofold objective in its ambitions for 2025:

- in the priority scope, remedy the problems of accessibility of digital services to ensure at least partial accessibility (i.e. a compliance rate with the RGAA of more than 50%). To that end, the entities will have to conduct audits of compliance with the RGAA and plan the remediation necessary to achieve this objective *via* their own annual action plans, taking into account any user complaints;
- for new digital services, the evolution of project methodologies to take into account digital accessibility from their design in order to ensure an optimal level during their production;

To this end, the Group's entities will have target processes, accompanied by a toolbox to assist them through the diagnostic, design, development and deployment stages of a digital project.

The Accessibility Function is studying the opportunity to include user tests with disabled people for digital services in the priority or extended scope. To reap the full benefits, they will only be considered when the teams have a sufficient level of accessibility and maturity.

### Skills base

#### RECRUITMENT

Groupe BPCE wants to integrate technical skills related to digital accessibility in the profiles of eligible positions, as well as in the recruitment process of the corresponding profiles (in particular *via* dedicated criteria).

#### AWARENESS, TRAINING AND CHANGE MANAGEMENT

In 2025, Groupe BPCE will provide its entities with an internal training offer to disseminate the skills necessary for the accessibility of digital products and services. This will include, among other things:

- accessibility awareness sessions for all employees;
- technical training for a more specialized audience (developers, UI/UX designers, content creators, etc.).

In addition, the Accessibility function will develop various measures to raise the challenges of disability and inclusion among the Group's employees.

Alongside the skills development platform for employees, a change management plan is being drawn up to ensure the long-term accessibility of the entities' digital content and services.

#### DIAGNOSTICS AND AUDITS

The procedures for performing diagnostics and audits on compliance with the RGAA have not yet been defined. These will be detailed in this section during a subsequent review of this multi-year plan.

In the meantime, the Group's entities will conduct the diagnostics and audits according to the methods that seem most appropriate to their situation and level of maturity.

The Group's multi-year plan and these actions cover the French level.



### 3.4.4 Metrics and targets

#### 3.4.4.1 [S4-5] TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

##### 3.4.4.1.1 Cybersecurity

Groupe BPCE has drawn up a strategic plan that will be rolled out over the next few years, with the following ambitions and objectives:

- consolidate foundations to ensure trust, resilience and compliance;
- change practices to be more efficient;
- adapt to new threats, technological developments, particularly in terms of AI and quantum technology, and societal changes.

Groupe BPCE takes a holistic approach to manage material negative impacts, promote positive impacts, and manage material risks and opportunities.

In terms of managing material negative impacts, the processes in place are as follows:

- incident management plan:
  - implementation of incident management plans to quickly and effectively address major issues, such as data breaches, fraud and service outages;
- risk assessment and mitigation:
  - identification and assessment of risks, monitoring of the development of mitigation plans to minimize negative impacts,
  - the ISSP-G includes an instruction for mapping business line and IT risks from the Group's ISS:
    - its scope applies to Groupe BPCE as a whole,
    - the resulting risk mapping is updated regularly;
- communication and transparency:
  - proactive communication with stakeholders, including customers and regulators, in the event of a major incident, to maintain trust and transparency.

In terms of promoting positive impacts, the initiatives are as follows:

- innovation and product development:
  - development of innovative products and services that meet customers' needs and enhance their user experience;

- social and environmental responsibility initiatives:
  - implementation of programs that aim to have a positive impact on society and the environment, such as green finance initiatives and community development projects;
- customer satisfaction and loyalty:
  - implementation of loyalty and customer satisfaction programs to improve long-term engagement and satisfaction;
- strategic partnerships:
  - collaboration with external partners to co-develop solutions that add value to customers and society.

Lastly, with regard to the management of material risks and opportunities, the following principles are applied by BPCE:

- proactive risk management:
  - use of advanced technologies and robust methodologies to proactively identify, assess and manage risks;
- investment in technology:
  - investment in cutting-edge technologies to improve safety, operational efficiency and customer experience;
- continuous training and skills development:
  - regular training of employees on new regulations, best practices and technological innovations to ensure effective management of risks and opportunities;
- governance and oversight:
  - strong governance structures in place to oversee the management of risks and opportunities, with dedicated committees and rigorous reporting processes;
- open innovation and co-creation:
  - encouragement of open innovation and co-creation with customers and partners to identify and exploit new market opportunities.

To effectively manage these risks, BPCE conducts regular audits to assess the compliance and effectiveness of risk and opportunity management processes. It collects and analyzes feedback from customers and employees to identify areas for improvement and adjust the strategies accordingly.

### 3.4.4.1.2 Financial inclusion and accessibility of the offer

#### Microcredit for financial inclusion

As part of the VISION 2030 strategic project, Groupe BPCE aims to support 11,000 local social entrepreneurship projects per year. This KPI includes professional microloans.

#### Digital accessibility: ensuring inclusion for all

Groupe BPCE's strategic priorities described in its VISION 2030 strategic project include "improving the accessibility of digital products and services". The 2025-2027 multi-year accessibility plan and VISION 2030 promote an ethical approach to digital technology, in line with the Group's cooperative values.

In addition, all Groupe BPCE legal entities, including Banque Populaire and Caisse d'Épargne, are required to publish an accessibility statement for a legal maximum of three years. These are due to expire, and new audits are being carried out, managed by the Digital division. The results of these audits will enable to identify the technical changes in terms of accessibility that the Group may be able to implement.

#### An inclusive insurance offer

BPCE Assurances is mobilized in the development of inclusive digital products and services that meet the needs of various customer segments.

Non-discrimination practices enable BPCE Assurances to develop new products and services, thus opening up to new markets and customer segments. However, it is crucial to note that this inclusion must be managed, as abusive or forced sales could have negative effects on human rights. In addition, inaccessibility or a lack of legibility of offers could lead to risks of image and reputation, as well as a loss of customers.

Thus if BPCE Assurances failed to comply with these principles, the company would be exposed to negative social impacts, such as a lack of transparency with regard to customers, which could harm its reputation and the trust of its customers.

In view of these risks and potential impacts on consumers and end-users, BPCE Assurances has set itself the target of rolling out the online subscription process for savings policies (consumer life insurance and individual pensions, the deployment of which is scheduled for 2025). The objective is to adapt the functionalities of the offers for this new channel in order to simplify the contours of the online offers (offer essential/standard functionalities only, reduce complex options to explain, cap payments, etc.). This target is aligned with the objective of the internal governance and product monitoring policy. This involves providing educational elements in the paths, with the possibility of redirecting the customer to their advisor to benefit from human support at any time. This target concerns BPCE Assurances' activities upstream of its value chain. Progress will be measured from the year 2025.

## PART 4 - Governance information

### 4.1 G1 - Governance

#### 4.1.1 Impact, risk and opportunity management

##### 4.1.1.1 GOV-1 - THE ROLE OF THE ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

See the GOV-1 section in the General Information chapter.

##### 4.1.1.2 (IRO-1) DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

In order to identify material impacts, risks and opportunities relating to business conduct, Groupe BPCE has relied on:

- the list of sub (sub) themes indicated in AR16 of ESRS 1, particularly in terms of corporate culture, whistleblower protection, supplier relationship management and corruption;
- the mapping of the Group's non-compliance risks, which takes into account both the Group's activities and its sector of activity, particularly in terms of regulations relating to money laundering, terrorist financing and measures of sanctions, embargoes and asset freezes.

##### 4.1.1.3 (G1-1) CORPORATE CULTURE AND BUSINESS CONDUCT POLICIES

###### 4.1.1.3.1 Code of Conduct

BPCE's Code of Conduct and Ethical Standards is based on a Group ambition to prepare a practical and clear document for employees, suppliers and partners in their relations with the Group. The code highlights the rules of conduct and best practices to be adopted while respecting the best behavioral standards of transparency and confidentiality, with the aim of forging long-term relationships of trust and acting with integrity as responsible bankers.

The Code of Conduct, updated in October 2023, is based on twelve principles of conduct in three parts:

- Interests of customers and cooperative shareholders: Foster a spirit of openness and a trusting relationship, Guarantee an impartial treatment for all our customers, Protect the interests of our customers and cooperative shareholders, Communicate in complete transparency;
- Employer and employee responsibility: Promote exemplary, principled and considerate behavior, Promote respect for employees and favor their professional growth, Act in a manner consistent with ethical business practices at all times, Ensure the continuity of Groupe BPCE;
- Social responsibility: Contribute to the development of a socially responsible market economy consistent with human dignity, Be a banking group that is socially inclusive and open to all, Take effective steps to protect the environment and facilitate the transition toward a low carbon economy, Promote Human Rights in the pursuit of all our activities.

Groupe BPCE's Code of Conduct, which is reflected in the codes of conduct and charters of the Group's entities, is a guarantee of a high-quality working environment and long-term reputation.

In 2022, all entities<sup>(1)</sup> of the Group that had been questioned declared that they had deployed the Group's Code of Conduct or their own ethics charter (see 2022 Risk Assessment and Compliance questionnaire).

Groupe BPCE's Code of Conduct and Ethical Standards was approved by the Executive Management Committee (10 members, including the Chairman of Groupe BPCE's Management Board) and the Supervisory Board in 2018 (composed of 19 members representing the Group's entities and employees as well as 3 independent members and 6 non-voting directors), after review by the Cooperative and CSR Committee (composed of 7 executives from the Group's entities).

The principles of ethical and professional conduct set out in this code are considered fundamental by BPCE's Supervisory Board, Management Board and Executive Management Committee, as well as by all Group executives.

Groupe BPCE's Code of Conduct<sup>(2)</sup> and Ethical Standards is available on the Groupe BPCE intranet and on the Groupe BPCE website. All employees, including the new hires, can access it, as well as can all persons outside the Group who consult the BPCE website.

In addition, a regulatory training course, in e-learning format, has been developed to ensure that the principles of the Code of Conduct and Ethical Standards are known throughout the Group. This training is mandatory for all Group employees and for all new hires. As of December 31, 2024, 98.95% of registered employees had completed the training<sup>(3)</sup>.

Lastly, an annual reminder on the system relating to the Code of Conduct and Ethical Standards is conducted by the entity's Ethics Officer.

Groupe BPCE is also a signatory of the Human Rights Charter, details of which are available in Section 3.1.3.1 - S1 - Own workforce.

[1] The entities questioned using the questionnaire are as follows: the 14 institutions of the Banque Populaire network, the 15 institutions of the Caisse d'Épargne network, all BPCE subsidiaries [specialized financing, asset management, life and non-life insurance, payments, wealth management and retail banking] and BPCE SA. [B]

[2] Code of ethics-EN-2.pdf.

[3] **Scope:** The 14 Banques Populaires, the 15 Caisses d'Épargne, BPCE excluding Natixis Algérie, Banque de Savoie, Prépar-Vie, GIE Nord-Ouest Recouvrement, and Mobiliz. // **Source:** training infocenter via the Click & Learn tool - HR Data & Analysis services center - Group HR department. // **Calculation:** number of employees trained / number of employees targeted.

#### 4.1.1.3.2 Prevention of breaches of the Code of Conduct

Concerning violations of the Code of Conduct and Ethical Standards as well as the internal rules, local management identifies inappropriate behaviors and reports them to the entity's Human Resources for handling. In addition, during the annual employee performance appraisal interview, the manager formalizes any breaches of the Code of Conduct in a dedicated section. Sanctions may be imposed. They are presented half-yearly to the Cooperative and CSR Committee composed of members of the Banque Populaire and Caisse d'Épargne networks, and Groupe BPCE functions. This committee is responsible for making proposals and recommendations aimed at promoting both cooperative and societal values and long-term ethical professional relationships.

Breaches of the Code of Conduct can also be reported *via* the whistleblowing framework applicable in all Group entities. This is described in an internal "Whistleblowing framework" policy approved on May 5, 2023 by a dedicated committee chaired by the Group's control functions and composed of 12 management representatives from Groupe BPCE entities.

This policy, published on June 30, 2023, is applicable and rolled out in the procedure by all Group entities after consultation with the employee representative bodies. The policy applies to all legal entities of Groupe BPCE, in France and abroad, taking into account the regulatory specificities of the country in which they operate, regardless of the number of employees of the entity (including foreign branches or subsidiaries). They disseminate the policy by any means that ensures sufficient awareness among employees, in particular by means of notification, posting or publication, where applicable on their website or by electronic means, under conditions that make the policy permanently accessible to the persons concerned. For service providers and suppliers, a clause in their contract calls for dissemination of the policy.

The body of standards presents the type of alert that can be submitted, the process for submitting and handling alerts, the confidentiality of the information, the whistleblower's protected status and the penalties incurred in the event of non-compliance. The persons who can submit an alert are also specified:

- Groupe BPCE's employees, including internal or external, temporary or occasional employees (temporary staff, interns, service providers, etc.), including where their parent company has set up its own professional alert system;
- cooperative shareholders, partners and holders of voting rights at the entity's General Meeting;
- members of the administrative, management or supervisory body, external and occasional employees;
- co-contractors of the entity concerned, their subcontractors or, in the case of legal entities, members of the administrative, management or supervisory body of these co-contractors and subcontractors as well as members their staff;
- customers (excluding complaints processing).

#### 4.1.1.3.3 Protection of whistle-blowers

The internal "Whistleblower framework" policy describes the operational process for reporting and handling alerts in order to guarantee the integrity and confidentiality of the information collected but also to protect the persons eligible for the protection system against any retaliation or threats.

The policy was updated in 2023 to take into account the changes made by act No. 2022-401 of March 21, 2022 aimed at improving the protection of whistleblowers and its implementing decree of October 3, 2022.

Groupe BPCE employees and co-contractors have the opportunity to report any breaches *via* the internal whistleblowing system implemented in each Group entity (details are available in the following Section: 4.1.1.3.3 *Protection of whistleblowers*).

The whistleblowing must relate to conduct or situations likely to constitute a breach of the rules applicable to Groupe BPCE. It may also relate to a crime, an offense, a threat or harm to the general interest, a violation or an attempt to conceal a violation of an international commitment duly ratified or approved by France, or a unilateral act of an international organization made on the basis of such a commitment, or of a European Union or French law or regulation. The whistleblowing framework has been extended to allow the reporting of facts falling within the scope of the Duty of Care (identification of risks and prevention of serious violations of human rights and fundamental freedoms, health and safety of persons as well as the environment).

Groupe BPCE's "whistleblowing" framework is based on the following:

- act of December 9, 2016, known as the "Sapin 2" act, on the general provisions on whistleblowing;
- Directive (EU) 2019/1937 of the European Parliament of October 23, 2019 on the protection of persons who report breaches of EU law;
- act No. 2022-400 of March 21, 2022 aimed at strengthening the role of the defender of rights in terms of whistleblowing;
- act No. 2022-401 of March 21, 2022 aimed at improving the protection of whistleblowers;
- act No. 2017-399 of March 27, 2017 on the Duty of Care of parent companies and ordering companies;
- decree No. 2022-1284 of October 3, 2022 supplementing the act of March 21, 2022;
- decree No. 2022-1686 of December 28, 2022 on the matching contribution to the personal training account of a whistleblower employee.

In addition, Group entities with subsidiaries abroad must also meet similar requirements with regard to regulatory or internal texts (code of conduct). As a result, anonymity may be prohibited by law or regulation in a country. In such cases, the local measures will prevail over the policy.

In addition, a regulatory training course, in e-learning format, accompanies the deployment of the Whispli tool and specifies the rights, duties and protections of a whistleblower. It has been rolled out to Group employees since July 2023.

Group Compliance is responsible for managing the system and ensuring its proper application in all Group entities.

The main changes to the framework concern the extension of the persons benefiting from the guarantees provided for by the law, the collection and handling of alerts falling within the scope of the law, the guarantee of the confidentiality of the identity of the whistleblower and the information submitted and, lastly, the prohibition of retaliatory measures and/or threats by the employer.

## Whistleblowing channels

Whistleblowers can use the internal procedures in place in all Group entities to report breaches of the rules before they become serious risks. An alert may be submitted via any channel defined by the entity provided that the anonymity and confidentiality of the whistleblower be fully guaranteed (if the whistleblower so wishes).

### The Group's Whispli tool

The main channel for transmitting alerts for all entities participating in this framework is the Group's Whispli platform accessible via the Group's website.

It is a tool chosen for all Group entities, regardless of the country in which they operate and regardless of the business line (Retail banking, Corporate & Investment Banking, Insurance, etc.). The screens to which the whistleblower has access have been translated into more than 15 languages in line with the countries in which Groupe BPCE operates. Whispli offers all guarantees in terms of confidentiality and respect for anonymity (encrypted data, inability to retrieve the IP addresses of whistleblowers, etc.), as required by the regulatory requirements aiming to improve the protection of whistleblowers. The whistleblower may submit his or her alert and discuss it with the person managing it, with or without anonymity. The alert is sent directly to the department responsible for handling it thanks to the definition of routing rules specific to each institution as described in its procedure – these rules contribute to confidentiality. Example: a harassment-type alert will be sent to HR. The procedure indicates the function or department designated to collect and process each type of alert. The position or status of the designated function or department ensures that it has sufficient expertise, authority and resources to carry out its duties impartially.

#### 4.1.1.3.4 Training on business conduct

In order to enable the sustainable development of its business relationship with customers and to secure the activity, Groupe BPCE requires its employees to participate in regular training. Groupe BPCE and its entities are mobilized to offer training to employees enabling them to acquire the skills necessary to carry out their activities.

The Group "Mandatory Regulatory Training" (Formation Réglementaire Obligatoire - FRO) policy presents the scope of application of the FRO framework, defines what FRO is, describes the bodies in charge of the eligibility of FRO or related decision-making, and specifies the reports produced and the expected controls. It was validated by the Control Function Standards Validation Committee on November 21, 2023. This committee, chaired by the Group's control functions, comprises 12 management representatives from Groupe BPCE entities. The Group's "Mandatory Regulatory Training" policy was published in January 2024 on the NORMA tool.

The Group "Mandatory Regulatory Training" (Formation Réglementaire Obligatoire - FRO) policy applies to all Groupe BPCE entities, taking into account specific regulatory requirements depending on the country in which it operates. The entities are responsible for ensuring that the content of the training is adapted to the specificities and activities of the company. It concerns all employees.

Mandatory Regulatory Training is identified, monitored and managed by the Group FRO Committee, whose first session was held in June 2024. In this committee, the following are represented: Group Human Resources, Group Compliance and, if

## Other channels for submitting an alert

An alert can also be submitted directly to a line manager or via a dedicated generic address. However, it is recommended that alerts be submitted through the Group tool or be sent directly to the Chief Compliance Officer so that the whistleblower protection system can be fully complied with (compliance with response and handling times, handling of alerts received orally, commitment in terms of confidentiality).

### Protection of whistleblowers

Strict confidentiality of the information collected in an alert is guaranteed, in particular the identity of the person submitting the alert (if he or she so wishes), the persons targeted by the alert and any third party mentioned in it, throughout the handling of the alert.

The policy specifies the categories of persons who are subject to protection: the whistleblower, the facilitators, the persons linked with the whistleblower, and the legal entities controlled by a whistleblower and in which he or she works or with which he or she is connected in a professional context. Under no circumstances may they be subject to any disciplinary sanction or legal action, provided that they act without direct financial compensation and in good faith. They may not be subject to retaliation, threats or attempts to resort to such measures. The policy mentions the various forms of retaliation against which the whistleblower is protected (suspension, dismissal, terminal or equivalent measures; coercion, intimidation, harassment or ostracism; abusive referral to mental or medical treatment, etc.).

With regard to training, two mandatory regulatory formats support the whistleblower protection framework: the e-learning course on the Code of Conduct which refers to it and the e-learning course which supports the deployment of the tool and which specifies in particular the rights, duties and protections of whistleblowers. It has been rolled out to Group employees since July 2023.

necessary, the Group's business lines that have functional responsibility for one or more FRO. This body validates the entry or exit of a training course from the FRO mapping but also any changes to the characteristics related to FRO (e.g. the profile of the employees to be targeted).

Mandatory Regulatory Training (Formation Réglementaire Obligatoire - FRO) is set up to meet a regulatory obligation to which the Group's entities are subject (law, regulation, directive, etc.). Example: the "Whistleblower" training is based on all the laws, directives and decrees governing the subject of whistleblowers such as the Sapin 2 act of 2016 for France, the act of March 21, 2022 - Wasserman act. A FRO can also be set up to respond to a recommendation from a regulator at the end of an audit mission within a Group entity.

Groupe BPCE's entities must apply all the FROs validated by the decision-making body at Groupe BPCE level, in accordance with their activities. A new control sheet on the proper implementation of the Group's "Mandatory Regulatory Training" (FRO) policy within the entities will be rolled out in 2025 and will be the subject of a report to the committee.

In terms of business conduct, three training courses are identified as mandatory regulatory training courses:

- Code of Conduct and Ethical Standards e-learning course;
- Whistleblower e-learning course;
- Essentials of professional ethics and the fight against corruption e-learning course.

## Details of the implementation of these training courses within the Group:

BPCE name	Global business line name	RBP & RCE	BPCE excluding global business lines	Global business lines
Code of Conduct and Ethical Standards	Code of Conduct	yes	yes	yes
Whistleblower	Whistleblowing	yes	yes	yes
Essentials of professional ethics and the fight against corruption	Professional ethics and awareness Fight against corruption	yes	yes	yes

Groupe BPCE's FROs are mapped according to the activity and scope of each division. This mapping details the target employees to be trained, the duration of the training, its frequency, the timeframe for carrying out the training and the type of contracts concerned.

By way of illustration, the mapping of the Banque Populaire and Caisse d'Epargne networks was defined as follows:

### Code of Conduct and Ethical Standards e-learning course

Target	Duration	Training frequency	Time to complete training from entering the company or employment	Type of contract	Monitoring: Employees enrolled at a date or enrolled over a period	Standard target jobs (title)
All employees	20 min	Every 5 years	6 months	All permanent and fixed-term contracts, including work-study students	Employees enrolled to date	All employees

In addition, a "Conflicts of interest" e-learning training supplements the business conduct training system. This is a 30-minute training course for all Banques Populaires, Caisses d'Epargne and BPCE SA employees.

All training courses are directly accessible in the training tool chosen by the entity such as Click and Learn and HR One.

### Whistleblower e-learning course

Target	Duration	Training frequency	Time to complete training from entering the company or employment	Type of contract	Monitoring: Employees enrolled at a date or enrolled over a period	Standard target jobs (title)
All employees	30 min	All Group employees in 2023 New hires in subsequent years	6 months	All except temporary holiday personnel	Employees enrolled to date	All employees

### Essentials of professional ethics and the fight against corruption e-learning course

Target	Duration	Training frequency	Time to complete training from entering the company or employment	Type of contract	Monitoring: Employees enrolled at a date or enrolled over a period	Standard target jobs (title)
All employees	1 hour	Every 5 years	6 months	All permanent and fixed-term contracts, including work-study students	Employees enrolled to date	All employees

At the level of Groupe BPCE, the monitoring of the performance of the FROs is presented by Human Resources, at least once a year, to the Group Risk and Compliance Committee composed of the Executive Management Committee (10 members including the Chairman of Groupe BPCE's Management Board) and a representative of the Internal Audit function. At the level of each entity, the monitoring of the completion of the MRTs within the entity is presented to a local *ad hoc* committee at least once a year.

## 4.1.1.4 (G1-2) MANAGEMENT OF RELATIONSHIPS WITH SUPPLIERS

### 4.1.1.4.1 SYSTEM FOR MONITORING PAYMENT TERMS

For several years BPCE Achats & Services has had a system for monitoring payment terms with Group companies as well as a "White Paper on Payment Terms". This white paper is made available to the Group's institutions via an internal Sharepoint. This commitment is also set out in the Group's Responsible Purchasing Policy on page 9.

The purpose of this system is to:

- monitor the payment terms of the Group's companies on a quarterly basis;
- recall the regulatory context of the law on the modernization of the economy, with regulation of inter-company payment terms, the cap on payment terms set by Articles L. 441-10 *et seq.* of the French Commercial Code;

- monitor the 28-day target defined for the Group. Launched well before the Covid-19 crisis, the work carried out by Groupe BPCE on the improvement of supplier payment terms have since been intensified, giving rise to a collective dynamic among the Group's companies. Executive Management has reiterated the importance of the Group's commitment to its customers but also to its suppliers, calling for an acceleration of the procedure for payment of services rendered, targeting the Group target set at 28 days. Mandated by Executive Management, BPCE Achats & Services manages this indicator at the level of the Group. Since April 2020, regular monitoring of the payment terms of Group institutions is carried out through a survey that collects data such as:
  - the average cumulative payment period since January 1;
  - the share of invoices pending payment issued more than 60 days ago;
  - the total amount of the outstanding invoices;



- in the first few months, the scope of the invoices and rules were refined. The working group defined common rules to enable a relevant analysis of all institutions; and
- share best practices in terms of payment terms.

This white paper and a dedicated dashboard are made available to all Group institutions.

The dashboard makes it possible to communicate quarterly to all executives, in particular during the quarterly Group Supplier Risk Committee.

#### 4.1.1.4.2 Supplier relations

The Group is committed to promoting a sustainable and balanced relationship with suppliers.

This is one of the commitments made as part of its Responsible Purchasing Policy.

Through its cooperative model, Groupe BPCE's companies contribute to the dynamism and collaboration within their regions by relying on local suppliers. The share of these suppliers (VSEs / SMEs) within the Banques Populaires and Caisses d'Epargne is on average 75% <sup>(2)</sup>.

The Group's institutions are very involved in local life and contribute to the development of suppliers who are often vulnerable.

Groupe BPCE is also involved in the government initiative "I choose French Tech", which brings together more than 300 signatory companies and 80 institutional players. This initiative aims to double the use of French start-ups by 2027.

The Group pays particular attention to the risk of its vulnerable suppliers becoming dependent on the Group.

In line with the responsible procurement charter and based on the sustainable procurement standard ISO 20400, the Responsible Supplier Relations and Procurement Label (*Label relations fournisseurs et achats responsables* - RFAR) is awarded by the French Business Mediation Committee (attached to the Ministry of the Economy and Finance) and the French National Procurement Council (*Conseil national des achats* - CNA). It aims to single out French companies that have established lasting, balanced relations with their suppliers.

Thirteen of Groupe BPCE's companies (Banque Populaire Alsace Lorraine Champagne, Banque Populaire Grand Ouest, Banque

In 2024, BPCE Achats & Services continued to conduct groupwide surveys to measure payment terms, the results of which are included in the Group's procurement reporting tools. The process was enhanced in 2024 to identify suppliers under in legal proceedings and thus reduce any potential reputational risk. Particular attention was paid to suppliers under legal proceedings. BPCE Achats & Services manages an indicator since end 2024 for ongoing legal actions related to late payments to ensure proactive and effective management.

The share of spending with SMEs represents 37% of the total spending with suppliers <sup>(1)</sup>. The aim of this monitoring of payment terms is to guarantee the proper payment of all suppliers, in particular SMEs.

Populaire Méditerranée, Banque Populaire Rives de Paris, Banque Populaire du Sud, Caisse d'Epargne Aquitaine Poitou-Charentes, Caisse d'Epargne Bretagne Pays de Loire, Caisse d'Epargne Côte d'Azur, Caisse d'Epargne Grand Est Europe, Caisse d'Epargne Hauts de France, Caisse d'Epargne Ile-de-France, Caisse d'Epargne Rhône Alpes, BPCE Achats & Services) are historically committed to the continuous progress of Responsible Purchasing induced by the Label.

BPCE Achats & Services, awarded the label in 2024, will gradually extend this approach to all its companies through the implementation of a Groupe BPCE RFAR label.

BPCE Achats & Services has set up regular meetings with the Group's strategic suppliers (defined in particular according to the volume of purchases, the criticality of the services delivered for the continuity of banking activities and/or essential to the Group's development).

These meetings have led to significant progress in the management of purchasing with these key suppliers. The purpose of the meetings is to discuss the supplier's strategy (innovations, HR, external growth, changes to the products and services offered, etc.) and positioning, in order to adjust the Group's strategy accordingly. They are part of the management of the Group's challenges and risks and contribute to new opportunities between the Group's companies and suppliers, particularly in terms of CSR.

BPCE Achats & Services plans to conduct supplier feedback surveys in order to assess the level of supplier satisfaction with the relationship (see 3.2 - S2 "Workers in the value chain"). A successful pilot was carried out in 2024. The system will be perpetuated in 2025.

#### 4.1.1.4.3 Social and environmental criteria to select suppliers

The Responsible Procurement policy, updated in 2021, is in line with the Group's CSR ambitions and commitments, in which the Purchasing function has an essential role to play. A driver of transformation and development, the Responsible Procurement approach is part of a global and sustainable performance objective, involving the Group's companies and their suppliers.

CSR is incorporated:

- in Groupe BPCE's Responsible Purchasing Policy;
- in the procurement process, which specifies how to implement responsible procurement;
- in procurement cases by including appropriate CSR criteria in the decision-making process, by indicating in the specifications the CSR performance of the products and services planned and by increasing the weight of the CSR evaluation of suppliers in decision-making. Since 2022, 100% of the purchasing categories have been covered by specific CSR assessment questionnaires.

A method for taking into account the cost of ownership, which covers the costs of acquisition, use and end of life, is currently being deployed within the Procurement function;

- in contracts with contractual CSR clauses;
- in the tool for identifying the CSR issues and risks intrinsic to each of the purchasing categories, upstream of purchasing projects, for each of the 142 purchasing categories;
- in the professionalization of the Procurement function, with a regularly expanded training program (Responsible Procurement, training deployed with AFNOR on the ISO 20400 standard), plenary sessions bringing together all the Procurement and CSR functions to share information and best practices. The Group's ambition is to continue to deploy and systematize, in all the cases handled, the inclusion of CSR in a procurement decision-making by 2024, and the sharing of best practices and systematic monitoring of CSR criteria.

[1] **Methodology:** this rate is obtained by dividing the amount of expenses incurred with VSEs / SMEs by the total amount of Groupe BPCE's supplier expenses.

[2] **Methodology:** this rate is calculated by dividing the amount of expenses incurred by the Caisses d'Epargne and the Banques Populaires with VSEs / SMEs by the amount of total supplier expenses of these two networks over one year.

#### 4.1.1.5 (G1-3) PREVENTION AND DETECTION OF CORRUPTION AND BRIBERY

##### 4.1.1.5.1 Detect and prevent incidents of corruption and other breaches of probity

Groupe BPCE's rules and procedures help to prevent and detect behaviors likely to characterize acts of corruption or influence peddling:

- a corruption risk map is drawn up and regularly updated by the Group's entities, according to a methodology complying with the recommendations of the French Anti-Corruption Agency (*Agence française anticorruption* - AFA). It is based on discussions with the business lines that make it possible to identify and assess the risks of corruption, whether active or passive, direct or indirect (complicity, concealment), and to achieve a shared vision of the challenges of the fight against corruption. The results of the risk assessment, including any ensuing action plans, are presented for approval to the management bodies of each Group entity. A consolidation of the mappings is presented to the Group Risk and Compliance Committee, as well as to BPCE's supervisory body. The next update of the mapping by each entity will include a requirement to present it to its supervisory body;
- action plans are formalized to reduce the level of risk of certain scenarios, when it remains too high after taking into account the mitigation measures;
- the Group's "gifts, advantages and invitations" policy: it sets a maximum threshold for gifts received or given, above which prior authorization from management and a declaration to Compliance are required. As part of the sponsorship of the Paris 2024 Olympic and Paralympic Games, specific vigilance rules were adopted to secure the allocation of hospitality to customers and other third parties;
- the alerts submitted through the whistleblowing framework concerning acts of corruption are subject to an anonymous and annual Group reporting;
- suppliers from which the Group makes purchases of at least a total of €50,000 are assessed, taking into account a certain number of criteria (purchase category, geographical criterion, negative information about the supplier, etc.). This assessment leads, if necessary, to additional procedures aimed at assessing the ultimate risk, particularly with regard to the anti-corruption measures put in place by the supplier;
- relations with intermediaries (including business introducers) and customers are regulated: contracts and agreements include anti-corruption clauses; approval committees are stipulated; the consideration of the risk of corruption in the granting of credit to corporate customers and in relations with intermediaries is being formalized at Group level; the integrity of the Group's new partners is also assessed by the Group's "New Products and New Activities Committee";
- Groupe BPCE has an extensive body of standards and procedures providing a general framework for the strict separation of operational and control functions, including in particular a system of delegations for granting credit and relations with politically exposed persons, and a KYC framework. As part of the organization of internal control, permanent control plans contribute to the security of the system. The components of this system are explicitly targeted at the corruption risks identified in the risk map;
- Groupe BPCE has accounting standards and procedures that comply with professional standards. The Group's internal control system for accounting information is based on a structured audit process to check the conditions in which such information is assessed, recorded, stored and made available, in particular by verifying the existence of the audit trail. A Group control framework has been drawn up to help prevent and detect fraud, corruption and influence peddling, and its deployment in the entities is monitored by Group Financial Control;
- the anti-corruption rules of conduct, which can be consulted on the "Ethics and compliance" page of Groupe BPCE's website ([Ethics and compliance: Groupe BPCE's actions and commitments](#)), are intended to be adapted by each entity and appended to its internal regulations. Disciplinary sanctions, up to and including dismissal, are provided for in the event of failure to comply with these rules;
- the handling of allegations relating to acts of corruption is not subject to a specific Group procedure. However, guidelines have been defined for the handling of cases as part of the whistleblowing framework. The formalization of a Group procedure is included in the roadmap for 2025. It will include a requirement for reporting to the entities' management and supervisory bodies;
- in general, the policies and procedures formalized at Group level are co-drafted by Group Compliance and the representatives of the compliance/anti-corruption function in the entities and then validated in Group bodies. They are communicated to all the players concerned. In some cases, their implementation is ensured by the use of Group tools (mapping, controls, supplier assessment, whistleblowing framework). The frameworks that are intended to apply to all employees are the subject of specific internal communication (appendix to the internal regulations for the rules of conduct, intranet for the whistleblowing framework and the gift policy, individual monitoring for training).

##### Legal framework

The following rules and mechanisms make it possible to comply with the requirements introduced by Article 17 of act No. 2016-1691 of December 9, 2016 on transparency, the fight against corruption and the modernization of the economy (the "Sapin 2" act).

### Training indicator

- All employees, including employees in exposed positions, in particular executive managers, are required to undergo training in professional ethics and the fight against corruption. With regard to the administrative and supervisory bodies, awareness-raising sessions on corruption are organized by the Fédération Nationale des Caisses d'Epargne (in 2024) and the Fédération Nationale des Banques Populaires (scheduled for H1-2025). BPCE's Supervisory Board is also scheduled to raise awareness of corruption in 2025. In this context, excluding Natixis, the percentage of at-risk functions within the workforce covered by training programs is 99.1%. The exposed personnel of a subsidiary of a bank affiliated with the central body, five people, will receive anti-corruption training in 2025.
- The indicator is defined as follows for Group entities (excluding Natixis):
  - "at-risk functions" are defined, within the personnel (in accordance with the "Sapin 2" act), as the Material Risk Takers (MRT), which include executive managers; in the event that the executive managers do not meet the strict definition of MRT, they are nevertheless taken into account;
  - if an entity has deployed a "Mandatory Regulatory Training" (Formation Réglementaire Obligatoire - FRO) course on professional ethics and the fight against corruption to all its employees, the at-risk functions are considered as covered;
  - the percentage of at-risk functions covered by the training program, at Group level (excluding Natixis), is therefore the at-risk staff of entities that have deployed an anti-corruption FRO, compared to the at-risk staff of all entities;
  - this indicator is calculated on the scope of so-called "material entities", with the exception of entities without employees, i.e.:

- BPCE SA, Crédit Foncier, Banque Palatine, Natixis Algérie, BPCE Payments, BPCE Payment Services, Payplug, subsidiaries of the Insurance entity;
- BPCE Lease, and its subsidiaries Car Lease and Lease Immo;
- BPCE Factor, Socfim, BPCE Financement, CEGC;
- Oney Bank SA, Oney Servicios Financieros EFC SAU (Oney Spain);
- the Caisses d'Epargne; their subsidiaries Capitole Finance (CEMP), Banque de Nouvelle Calédonie (CEIDF), Banque de Tahiti (CEIDF), BCP (CEIDF), Banque du Léman (CERA);
- the regional Banques Populaires; Banque de Savoie (subsidiary BPAURA);
- BRED and its subsidiaries BCI Mer Rouge, BIC BRED Suisse, Prepar, BRED Bank Fidji, BRED Bank Cambodge;
- CASDEN; Crédit Coopératif and its subsidiary BTP Banque.

Natixis has set up specific training courses on the anti-corruption framework for at-risk employees.

The percentage of at-risk functions covered by training programs is 100% for Natixis.

Positions for which employees are qualified as "Material Risk Takers" are considered to be at-risk functions covered by training programs.

The percentage of at-risk functions covered by training programs is the ratio between the at-risk functions covered by anti-corruption training and the total number of at-risk functions within Natixis.

The scope includes all entities consolidated by Natixis.

### 4.1.1.5.2 Combating money laundering and the financing of terrorism

The fight against money laundering and terrorism financing (AML-CFT) has a dual objective:

- preventing criminal activities by depriving them of funds, on the one hand;
- ensuring the soundness, integrity and stability of the economic and financial system, on the other hand.

As an AML-CFT obliged entity, Groupe BPCE is fully committed in the fight against illegal financial circuits, in addition to the action of public authorities: financial intelligence units, law enforcement agencies, and judicial authorities.

Groupe BPCE's ML-TF risk assessment and management system includes measures to prevent, mitigate and remediate financial transactions that may be linked to criminal activities. It is based on a **corporate culture** promoted across all hierarchical levels and all "lines of defense" (LOD), as well as an **appropriate internal organization and resources** (human resources, IT, data).

The AML-CFT framework applies to all Groupe BPCE entities (banks of the Banques Populaires and Caisses d'Epargne networks and their subsidiaries and branches, as well as BPCE SA, its subsidiaries and branches in France and abroad), which are subject to AML-CFT requirements.

### Main components of the AML-CFT framework of Groupe BPCE and its affiliates

The Group AML-CFT system is based on five main components:

- **ML-TF risk assessment.** Each entity, subsidiary or branch of the Group, subject to the AML-CFT requirements, assesses its exposure to the risks described by the public authorities according to factors related to customers, activities and products, transactions and delivery channels, as well as geographical zones of activities. In addition, a risk profile is

attributed for each customer based on a certain number of criteria which, in particular, set the "Know Your Customer" (KYC) review frequency and due diligence on the customer's transactions;

- **Know Your Customer (KYC).** In addition to identifying the customer and verifying the customer's identity, KYC includes, in particular, information on the nature of the customers' business, including, in the case of undertakings, whether they carry out activities, or of their employment or occupation, as well as reputation information available in trustworthy media, so that obliged entities are able to have an overall understanding of the customer's financial transactions (origin, destination and purpose of funds and transfers). Customer due diligence encompasses, in particular, the detection of politically exposed persons (PEP) and the identification of beneficial owners for legal entities;
- **Ongoing monitoring of transactions, throughout the business relationship.** Due diligence on transactions relies on the ML-TF risk profile and is based on human vigilance as well as on automated means of detecting unusual transactions, in strict compliance with the rules provided for by the General Data Protection Regulation (GDPR). Alerts are mainly handled by client advisors. Most sensitive alerts or those suspicious are forwarded to the local financial security department;
- **Alert processing resources, for which deadlines are monitored locally and at the level of the central institution.** Enhanced due diligence measures are undertaken to raise doubts over legality of amounts or atypical/unusual transactions, when one of the following three alternative conditions is fulfilled: (i) the transaction is of a particularly complex nature, (ii) the transaction is unusually large or (iii) the transaction does not have an apparent economic or lawful purpose. This analysis requires entities to carry out a certain number of verifications: global analysis of operations, request for documents, etc.;

- **Reporting of "suspicions" to the Financial Intelligence Unit (FIU; TRACFIN in France) of doubtful/suspicious amounts or transactions when there is a concern about their legality.**

Entities are required to report to the French financial intelligence Unit, where they know, suspect or have reasonable grounds to suspect that funds or activities are the proceeds of an offense punishable by more than one year's imprisonment (organized crime, trafficking of various kinds, corruption, misuse of corporate assets, laundering of all crimes and offenses, tax, social security or customs fraud, etc.) or are related to terrorist financing. Conversely, in the event due diligence makes it possible to remove any doubt as to the regular nature of the amounts or transactions, the alert is "closed" and accompanied by an audit trail of the verifications performed. Reporting time periods are monitored as part of the risk appetite policy.

Other elements supplement this framework such as, in particular, a permanent and periodic control system, regular training and information for employees and managers of the Group and affiliates, regular monitoring of dedicated indicators by the governance bodies, and periodic reporting to national supervisors.

#### 4.1.1.5.3 Compliance with national and international sanctions (embargoes and asset freezes)

##### Applicable legal framework

Compliance with national and international financial sanctions is a key element of Groupe BPCE's compliance system, which, as a French and European entity, strictly complies with French and European Union laws and regulations and with the Resolutions of United Nations Security Council (UNSC).

In addition, all entities within the scope of Groupe BPCE comply with the US financial sanctions regime due to Groupe BPCE's presence in the United States and the large volume of transactions in US dollars and due to other criteria such as the extraterritorial scope of certain US financial sanctions regulations, including for example secondary sanctions that extend US sanctions extraterritoriality to all transactions without any US nexus.

French, European, UN and US regulations therefore constitute a "common base" in terms of financial sanctions applicable to Groupe BPCE. The other regulations of the jurisdictions in which Groupe BPCE operates apply locally, and concurrently to the common base. The strictest provisions prevail.

##### Applicable legal framework

All Groupe BPCE entities subject to AML-CFT requirements apply the legal and regulatory provisions in accordance with:

- the French Monetary and Financial Code, legislative and regulatory sections of Book V, Title VI, Chapter 1, as well as related non-codified regulations:
  - the case law of the French Prudential Supervisory Authority (*Autorité de contrôle prudentiel et de résolution* - ACPR) and national supervisors for entities located abroad;
  - the sectoral guidelines, recommendations and/or application principles of national and European supervisors.

The legal framework is implemented by the Group's obliged entities, whose compliance resources are designed, according to their specificities in terms of geographical locations, internal organization or information systems.

##### Types of sanctions (asset freezes, embargoes, etc.) applied by Groupe BPCE

Groupe BPCE complies with all applicable forms of financial sanctions, which may target a country or territory, an organization, an individual, a legal entity, a vessel, an aircraft, certain goods or services, or certain activities. The sanctions may take the form of assets and / or economic resources freezing, global embargoes, restrictions or targeted embargoes on particular types of transactions (for example, long-term financing or transactions that are carried out by sanctioned individuals or legal entities) or on the export or import of certain goods, services or technologies (for example, military goods to or from sanctioned countries or territories).

Groupe BPCE fully complies with the regulations and does not accept any activity which the purpose or effect is to circumvent the prohibitions provided for therein.

## 4.1.2 Metrics and targets

### 4.1.2.1 [G1-4] CONFIRMED INCIDENTS OF CORRUPTION OR BRIBERY

Groupe BPCE does not tolerate corruption under any circumstances or in any form. The same applies to influence peddling. People working within Groupe BPCE are required to comply with the internal rules and procedures that help to prevent and detect behaviors likely to characterize acts of corruption or influence peddling in their companies. Any employee who engages in such behavior is subject to disciplinary sanctions, up to and including dismissal.

In the reference year 2024, there was one conviction for breaches of anti-corruption legislation and for acts of corruption. This relates to a conviction for the passive corruption of an employee of an establishment affiliated with the central institution. As the employee was dismissed, he was no longer part of the workforce at December 31, 2024.

The amount of the fines paid for violation of anti-corruption and anti-bribery laws is €0.

#### Background information on the published indicators [MDR-M requirement]:

Excluding Natixis, these two indicators are calculated for the Group's so-called "material entities", with the exception of entities without employees, i.e. the same entities as those described in Section 4.1.1.5.1.

For each entity in the scope, the convictions taken into account are as follows:

- administrative sanctions against the company for breaches of anti-corruption legislation, imposed by the French Anti-Corruption Agency's Sanctions Commission or by a foreign supervisor competent to monitor the application of equivalent laws and regulations abroad;

- criminal convictions of the company for offenses of corruption, influence peddling, complicity in corruption, concealment of corruption, complicity in influence peddling, concealment of influence peddling, regardless of the jurisdiction; approved judicial agreements in the public interest (Conventions judiciaires d'intérêt public - CJIP) or other similar transactions are included;
- criminal convictions of an executive or employee for offenses of corruption, influence peddling, complicity in corruption, concealment of corruption, complicity in influence peddling, concealment of influence peddling committed as part of his or her duties in the company, regardless of the jurisdiction.

For each entity in the scope, the fines taken into account are those corresponding to the sanctions imposed on the company in 2024:

- administrative sanctions for breaches of anti-corruption legislation imposed by the French Anti-Corruption Agency's Sanctions Commission or by a foreign supervisor competent to monitor the application of equivalent laws and regulations abroad;
- criminal convictions of the company for offenses of corruption, influence peddling, complicity in corruption, concealment of corruption, complicity in influence peddling, concealment of influence peddling, regardless of the jurisdiction; approved judicial agreements in the public interest (Conventions judiciaires d'intérêt public - CJIP) or other similar transactions are included.

The data on convictions and fines concerning the scope of the entities consolidated by Natixis are taken from a report presented to a quarterly internal Natixis committee.

### 4.1.2.2 [G1-6] PAYMENT PRACTICES

The Group undertakes to comply with regulatory payment terms, in accordance with the legal definition, which stipulates a period of 60 days from the date of issue of the invoice. In 2024, 95.5% of payments (by amount) met this commitment. In addition, the Group has implemented a policy aimed at paying suppliers within 30 days (from the date of issue of the invoice); the average payment period complies with this requirement and amounts to 24.89 days. Lastly, there are no ongoing legal proceedings concerning late payments. The scope of intervention includes all extra-group invoices, including Natixis CIB's international entities.

#### Background information on the published indicators [MDR-M]:

The average payment term for invoices paid in 2024 includes all invoices paid between January 1 and December 31, 2024, regardless of their date of issue. Expense claims are not taken into account in this analysis.

The payment term is calculated as the difference between the issue date (i.e. not from the date of receipt or recognition) and the settlement date.

Several indicators resulting from this analysis are monitored on a quarterly basis, among which the most significant are: the average payment term (expressed in days) and the total amount of invoices paid after 60 days.

The objective is to achieve the lowest possible values for these two indicators, and thus comply with the regulations in force.

#### LIMITATION ON PUBLISHED INFORMATION:

The indicator "description of the company's standard payment terms (in number of days) by major supplier category and the percentage of payments made within these terms", corresponding to the disclosure requirement of Section 33b of DR G1-6 of the CSRD standard, is not published. Indeed, the Group is not in a position to publish this indicator for the 2024 reference year, given the unavailability of data. An action plan will be put in place to meet the disclosure requirement.



# PART 5 - INDICATORS OF THE EUROPEAN TAXONOMY ON SUSTAINABLE ACTIVITIES

## Tables to be published in accordance with Article 8 of the Taxonomy Regulation

The information relating to GAR is presented below in accordance with the template tables applicable to credit institutions as set out in Annex VI of Delegated Regulation 2023/2486.

### Template 0 - Summary of KPIs to be disclosed by credit institutions under Article 8 of the Taxonomy Regulation

		Total environmentally sustainable assets	KPI****	KPI*****	% coverage (over total assets)***	% of asset excluded from the GAR (Article 7 (2) and (3) and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7 and Section 1.2.4 of Annex V)
Main KPI	Green asset ratio (GAR) stock	40,324	4.09%	4.22%	66.18%	27.29%	33.82%
		Total environmentally sustainable activities	KPI	KPI	% coverage (over total assets)	% of asset excluded from the GAR (Article 7 (2) and (3) and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7 and Section 1.2.4 of Annex V)
Additional KPIs	GAR (flow)	3,505	2.70%	2.96%	89.03%	46.01%	10.97%
	Trading book*						
	Financial guarantees	2,752	4.90%	5.81%			
	Assets under management	9,934	0.88%	0.71%			
	Fees and commissions received**						

\* For credit institutions not fulfilling the conditions of Article 94 (1) or Article 325a (1) of the CRR

\*\* Fees and commissions on services other than loans and asset management

Institutions shall provide forward-looking information for these KPIs, in particular on the targets concerned, and relevant explanations of the method applied.

\*\*\* Percentage of assets covered by the KPI, compared to total banking assets

\*\*\*\* Based on the KPI of the counterparty's turnover

\*\*\*\*\* Based on the KPI of the counterparty's CapEx, except for general lending activities, for which the turnover KPI is used



## Template 1 - Assets for the calculation of GAR (Turnover basis)

	a	b	c	d	e	f	g	h	i	j	k	l	m	n
	12/31/2024													
	Climate change mitigation (CCM)					Climate change adaptation (CCA)				Water and marine resources (WMR)				
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
	Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
	Total (gross) carrying amount		Of which use of proceeds	Of which transitional	Of which enabling			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling	
<i>in millions of euros</i>														
<b>GAR – Covered assets in both numerator and denominator</b>														
<b>1 Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation</b>	<b>579,323</b>	<b>371,631</b>	<b>40,324</b>											
<b>2 Financial companies</b>	<b>39,436</b>	<b>170</b>	<b>89</b>											
3 Credit institutions	10,997	6	1											
4 Loans and advances	2,682	0	- 0											
5 Debt securities, including specific use of proceeds (UoP)	7,285	6	1											
6 Equity instruments	1,029													
7 Other financial companies	28,439	164	88											
8 of which investment firms														
9 Loans and advances														
10 Debt securities, including specific use of proceeds (UoP)														
11 Equity instruments														
12 of which management companies														
13 Loans and advances														
14 Debt securities, including specific use of proceeds (UoP)														
15 Equity instruments														
16 of which insurance undertakings	9,103	-	-											
17 Loans and advances	3,049	-	-											
18 Debt securities, including specific use of proceeds (UoP)	119	-	-											
19 Equity instruments	5,935	-	-											
<b>20 Non-financial companies</b>	<b>35,983</b>	<b>6,416</b>	<b>2,113</b>											
21 Loans and advances	27,523	5,291	1,707											
22 Debt securities, including specific use of proceeds (UoP)	5,090	1,126	406											
23 Equity instruments	3,371													
<b>24 Households</b>	<b>448,909</b>	<b>361,709</b>	<b>38,122</b>											
25 of which loans collateralized by residential immovable property	355,211	355,211	38,122											
26 of which building renovation loans	1,189	1,189	-											
27 of which motor vehicle loans	6,365	5,309	-											
<b>28 Local governments financing</b>	<b>54,994</b>	<b>3,336</b>	<b>-</b>											
29 Housing financing	3,336	3,336	-											
<b>30 Other local government financing</b>	<b>51,658</b>	<b>-</b>	<b>-</b>											
<b>31 Collateral obtained by taking possession: residential and commercial immovable properties</b>	<b>5</b>	<b>-</b>	<b>-</b>											
<b>32 Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>	<b>406,655</b>													
33 Financial and Non-financial companies	343,562													
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	281,634													
35 Loans and advances	280,331													
36 of which loans collateralized by commercial immovable property	51,625													
37 of which building renovation loans	61													
38 Debt securities	1,303													
39 Equity instruments	-													
40 Non-EU country counterparties not subject to NFRD disclosure obligations	61,928													
41 Loans and advances	54,587													
42 Debt securities	5,846													
43 Equity instruments	1,495													

	a	b	c	d	e	f	g	h	i	j	k	l	m	n
	12/31/2024													
	Total (gross) carrying amount	Climate change mitigation (CCM)					Climate change adaptation (CCA)				Water and marine resources (WMR)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
			Of which use of proceeds	Of which transitional	Of which enabling			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling	
<i>in millions of euros</i>														
44 Derivatives	7,624													
45 On demand interbank loans	5,690													
46 Cash and cash equivalents	2,908													
47 Other categories of assets (e.g. goodwill, commodities, etc.)	46,871													
48 TOTAL GAR ASSETS	985,983	371,631	40,324											
49 Assets not covered for GAR calculation	503,906													
50 Central governments and supranational issuers	152,993													
51 Central banks exposure	133,311													
52 Trading book	217,602													
53 TOTAL ASSETS	1,489,889	371,631	40,324											
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations														
54 Financial guarantees	56,205	8,447	2,752											
55 Assets under management	1,132,162	94,004	9,934											
56 Of which debt securities	451,561	32,868	4,717											
57 Of which equity instruments	102,648	61,136	5,216											

1. This template shall include information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates (NFC), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments/municipalities (house financing).

2. The following accounting categories of financial assets should be considered: 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, and real estate collaterals obtained by credit institutions by taking possession in exchange in of cancellation of debts.

3. Banks with non-EU subsidiary should provide this information separately for exposures towards non-EU counterparties. For non-EU exposures, while there are additional challenges in terms of absence of common disclosure requirements and methodology, as the EU taxonomy and the NFRD apply only at EU level, given the relevance of these exposures for those credit institutions with non-EU subsidiaries, these institutions should disclose a separate GAR for non-EU exposures, on a best effort basis, in the form of estimates and ranges, using proxies, and explaining the assumptions, caveats and limitations.

4. For motor vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure.

	o	p	q	r	s	t	u	v	w	x	z	aa
	12/31/2024											
	Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
	Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
		Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling	
<i>in millions of euros</i>												
<b>GAR – Covered assets in both numerator and denominator</b>												
<b>Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation</b>												
<b>1</b>												
<b>2 Financial companies</b>												
3 Credit institutions												
4 Loans and advances												
5 Debt securities, including specific use of proceeds (UoP)												
6 Equity instruments												
7 of which financial companies												
8 of which investment firms												
9 Loans and advances												
10 Debt securities, including specific use of proceeds (UoP)												
11 Equity instruments												
12 of which management companies												
13 Loans and advances												
14 Debt securities, including specific use of proceeds (UoP)												
15 Equity instruments												
16 of which insurance undertakings												
17 Loans and advances												
18 Debt securities, including specific use of proceeds (UoP)												
19 Equity instruments												
<b>20 Non-financial companies</b>												
21 Loans and advances												
22 Debt securities, including specific use of proceeds (UoP)												
23 Equity instruments												
<b>24 Households</b>												
25 of which loans collateralized by residential immovable property												
26 of which building renovation loans												
27 of which motor vehicle loans												
<b>28 Local governments financing</b>												
29 Housing financing												
<b>30 Other local government financing</b>												
<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>												
<b>31</b>												
<b>Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>												
<b>32</b>												
33 Financial and Non-financial companies												
34 SMEs and NFCs (other than SMEs) not subject to CSRD disclosure obligations												
35 Loans and advances												
36 of which loans collateralized by commercial immovable property												
37 of which building renovation loans												
38 Debt securities												
39 Equity instruments												
40 Non-EU country counterparties not subject to CSRD disclosure obligations												
41 Loans and advances												
42 Debt securities												
43 Equity instruments												
<b>44 Derivatives</b>												
<b>45 On demand interbank loans</b>												
<b>46 Cash and cash equivalents</b>												
<b>47 Other categories of assets (e.g. goodwill, commodities, etc.)</b>												
<b>48 TOTAL GAR ASSETS</b>												

	o	p	q	r	s	t	u	v	w	x	z	aa
	12/31/2024											
	Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
	Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
		Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling	
in millions of euros												
49 Assets not covered for GAR calculation												
50 Central governments and supranational issuers												
51 Central banks exposure												
52 Trading book												
53 TOTAL ASSETS												
Off-balance sheet exposures - Undertakings subject to NFRD disclosure obligations												
54 Financial guarantees												
55 Assets under management												
56 Of which debt securities												
57 Of which equity instruments												

1. This template shall include information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates (NFC), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments/municipalities (house financing).
2. The following accounting categories of financial assets should be considered: 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, and real estate collaterals obtained by credit institutions by taking possession in exchange in of cancellation of debts.
3. Banks with non-EU subsidiary should provide this information separately for exposures towards non-EU counterparties. For non-EU exposures, while there are additional challenges in terms of absence of common disclosure requirements and methodology, as the EU taxonomy and the NFRD apply only at EU level, given the relevance of these exposures for those credit institutions with non-EU subsidiaries, these institutions should disclose a separate GAR for non-EU exposures, on a best effort basis, in the form of estimates and ranges, using proxies, and explaining the assumptions, caveats and limitations
4. For motor vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure

	ab	ac	ad	ae	af
	12/31/2024				
	TOTAL (CCM + CCA + WMR + CE + PRP + BIO)				
	Of which environmentally sustainable (Taxonomy-aligned)				
			Of which use of proceeds	Of which transitional	Of which enabling
<i>in millions of euros</i>					
<b>GAR – Covered assets in both numerator and denominator</b>					
<b>1 Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation</b>	<b>371,631</b>	<b>40,324</b>			
<b>2 Financial companies</b>	<b>170</b>	<b>89</b>			
3 Credit institutions	6	1			
4 Loans and advances	0	- 0			
5 Debt securities, including specific use of proceeds (UoP)	6	1			
6 Equity instruments					
7 Other financial companies	164	88			
8 of which investment firms					
9 Loans and advances					
10 Debt securities, including specific use of proceeds (UoP)					
11 Equity instruments					
12 of which management companies					
13 Loans and advances					
14 Debt securities, including specific use of proceeds (UoP)					
15 Equity instruments					
16 of which insurance undertakings	-	-			
17 Loans and advances	-	-			
18 Debt securities, including specific use of proceeds (UoP)	-	-			
19 Equity instruments	-	-			
<b>20 Non-financial companies</b>	<b>6,416</b>	<b>2,113</b>			
21 Loans and advances	5,291	1,707			
22 Debt securities, including specific use of proceeds (UoP)	1,126	406			
23 Equity instruments					
<b>24 Households</b>	<b>361,709</b>	<b>38,122</b>			
25 of which loans collateralized by residential immovable property	355,211	38,122			
26 of which building renovation loans	1,189	-			
27 of which motor vehicle loans	5,309	-			
<b>28 Local governments financing</b>	<b>3,336</b>	<b>-</b>			
29 Housing financing	3,336	-			
<b>30 Other local government financing</b>	<b>-</b>	<b>-</b>			
<b>31 Collateral obtained by taking possession: residential and commercial immovable properties</b>	<b>-</b>	<b>-</b>			
<b>32 Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>					
33 Financial and Non-financial companies					
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations					
35 Loans and advances					
36 of which loans collateralized 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					
<b>44 Derivatives</b>					
<b>45 On demand interbank loans</b>					
<b>46 Cash and cash equivalents</b>					
<b>47 Other categories of assets (e.g. goodwill, commodities, etc.)</b>					
<b>48 TOTAL GAR ASSETS</b>	<b>371,631</b>	<b>40,324</b>			

in millions of euros

	ab	ac	ad	ae	af
	12/31/2024				
	TOTAL (CCM + CCA + WMR + CE + PRP + BIO)				
	Of which environmentally sustainable (Taxonomy-aligned)				
			Of which use of proceeds	Of which transitional	Of which enabling
49 Assets not covered for GAR calculation					
50 Central governments and supranational issuers					
51 Central banks exposure					
52 Trading book					
53 TOTAL ASSETS	371,631	40,324			
Off-balance sheet exposures - Undertakings subject to CSRD disclosure obligations					
54 Financial guarantees	8,447	2,752			
55 Assets under management	94,004	9,934			
56 Of which debt securities	32,868	4,717			
57 Of which equity instruments	61,136	5,216			

1. This template shall include information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates (NFC), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments/municipalities (house financing).

2. The following accounting categories of financial assets should be considered: 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, and real estate collaterals obtained by credit institutions by taking possession in exchange in of cancellation of debts.

3. Banks with non-EU subsidiary should provide this information separately for exposures towards non-EU counterparties. For non-EU exposures, while there are additional challenges in terms of absence of common disclosure requirements and methodology, as the EU taxonomy and the NFRD apply only at EU level, given the relevance of these exposures for those credit institutions with non-EU subsidiaries, these institutions should disclose a separate GAR for non-EU exposures, on a best effort basis, in the form of estimates and ranges, using proxies, and explaining the assumptions, caveats and limitations

4. For motor vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure



	ag	ah	ai	aj	ak	al	am	an	ao	ap	aq	ar	as	at
	12/31/2023													
	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)					
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
	Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)					
	Total (gross) carrying amount		Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
<i>in millions of euros</i>														
<b>GAR – Covered assets in both numerator and denominator</b>														
<b>Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation</b>	<b>563,898</b>	<b>375,063</b>	<b>38,512</b>											
<b>1 Financial companies</b>	<b>31,696</b>	<b>30</b>	<b>4</b>											
3 Credit institutions	6,193	0	(0)											
4 Loans and advances	2,693	0	(0)											
5 Debt securities, including specific use of proceeds (UoP)	3,499	-	-											
6 Equity instruments	1													
7 Other financial companies	25,503	30	4											
8 of which investment firms														
9 Loans and advances														
10 Debt securities, including specific use of proceeds (UoP)														
11 Equity instruments														
12 of which management companies														
13 Loans and advances														
14 Debt securities, including specific use of proceeds (UoP)														
15 Equity instruments														
16 of which insurance undertakings	8,179	0	0											
17 Loans and advances	2,914	0	0											
18 Debt securities, including specific use of proceeds (UoP)	131	-	-											
19 Equity instruments	5,134													
<b>20 Non-financial companies</b>	<b>30,215</b>	<b>4,202</b>	<b>1,556</b>											
21 Loans and advances	26,833	4,168	1,538											
22 Debt securities, including specific use of proceeds (UoP)	532	33	18											
23 Equity instruments	2,850													
<b>24 Households</b>	<b>449,598</b>	<b>367,259</b>	<b>36,951</b>											
25 of which loans collateralized by residential immovable property	362,149	362,149	36,951											
26 of which building renovation loans	918	918	-											
27 of which motor vehicle loans	6,242	4,192	-											
<b>28 Local governments financing</b>	<b>52,388</b>	<b>3,572</b>	<b>-</b>											
29 Housing financing	3,572	3,572	-											
<b>30 Other local government financing</b>	<b>48,816</b>	<b>-</b>	<b>-</b>											
<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	<b>5</b>	<b>-</b>	<b>-</b>											
<b>31 Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>	<b>403,009</b>													
33 Financial and Non-financial companies														
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations														
35 Loans and advances														
36 of which loans collateralized 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														
<b>44 Derivatives</b>														
<b>45 On demand interbank loans</b>														
<b>46 Cash and cash equivalents</b>														

	ag	ah	ai	aj	ak	al	am	an	ao	ap	aq	ar	as	at
	12/31/2023													
	Climate Change Mitigation (CCM)				Climate Change Adaptation (CCA)				Water and marine resources (WTR)					
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
	Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)					
	Total (gross) carrying amount			Of which Use of Proceeds	Of which transition al	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
in millions of euros														
47 Other categories of assets (e.g. goodwill, commodities, etc.)														
48 TOTAL GAR ASSETS	966,912	375,063	38,512											
49 Assets not covered for GAR calculation	494,589													
50 Central governments and supranational issuers	137,817													
51 Central banks exposure	153,459													
52 Trading book	203,313													
53 TOTAL ASSETS	1,461,501	375,063	38,512											
Off-balance sheet exposures - Undertakings subject to CSRD disclosure obligations														
54 Financial guarantees	52,097	790	260											
55 Assets under management	1,185,642	88,139	7,755											
56 Of which debt securities	510,716	30,573	3,017											
57 Of which equity instruments	93,359	57,566	4,737											

- This template shall include information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates (NFC), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments/municipalities (house financing).
- The following accounting categories of financial assets should be considered: 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, and real estate collaterals obtained by credit institutions by taking possession in exchange in of cancellation of debts.
- Banks with non-EU subsidiary should provide this information separately for exposures towards non-EU counterparties. For non-EU exposures, while there are additional challenges in terms of absence of common disclosure requirements and methodology, as the EU taxonomy and the NFRD apply only at EU level, given the relevance of these exposures for those credit institutions with non-EU subsidiaries, these institutions should disclose a separate GAR for non-EU exposures, on a best effort basis, in the form of estimates and ranges, using proxies, and explaining the assumptions, caveats and limitations.
- For motor vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure.

	au	av	aw	ax	ay	az	ba	bb	bc	bd	be	bf
	12/31/2023											
	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
	Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
		Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
<i>in millions of euros</i>												
<b>GAR – Covered assets in both numerator and denominator</b>												
<b>Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation</b>												
<b>1 Financial companies</b>												
3 Credit institutions												
4 Loans and advances												
5 Debt securities, including specific use of proceeds (UoP)												
6 Equity instruments												
7 Other financial companies												
8 of which investment firms												
9 Loans and advances												
10 Debt securities, including specific use of proceeds (UoP)												
11 Equity instruments												
12 of which management companies												
13 Loans and advances												
14 Debt securities, including specific use of proceeds (UoP)												
15 Equity instruments												
16 of which insurance undertakings												
17 Loans and advances												
18 Debt securities, including specific use of proceeds (UoP)												
19 Equity instruments												
<b>20 Non-financial companies</b>												
21 Loans and advances												
22 Debt securities, including specific use of proceeds (UoP)												
23 Equity instruments												
<b>24 Households</b>												
25 of which loans collateralized by residential immovable property												
26 of which building renovation loans												
27 of which motor vehicle loans												
<b>28 Local governments financing</b>												
29 Housing financing												
<b>30 Other local government financing</b>												
<b>31 Collateral obtained by taking possession: residential and commercial immovable properties</b>												
<b>32 Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>												
33 Financial and Non-financial companies												
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations												
35 Loans and advances												
36 of which loans collateralized 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												
<b>44 Derivatives</b>												
<b>45 On demand interbank loans</b>												
<b>46 Cash and cash equivalents</b>												
<b>47 Other categories of assets (e.g. goodwill, commodities, etc.)</b>												
<b>48 TOTAL GAR ASSETS</b>												
<b>49 Assets not covered for GAR calculation</b>												
<b>50 Central governments and supranational issuers</b>												
<b>51 Central banks exposure</b>												
<b>52 Trading book</b>												

	au	av	aw	ax	ay	az	ba	bb	bc	bd	be	bf
	12/31/2023											
	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
	Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
in millions of euros												
53 TOTAL ASSETS												
Off-balance sheet exposures - Undertakings subject to CSRD disclosure obligations												
54 Financial guarantees												
55 Assets under management												
56 Of which debt securities												
57 Of wich equity instruments												

1. This template shall include information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates (NFC), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments/municipalities (house financing).
2. The following accounting categories of financial assets should be considered: 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, and real estate collaterals obtained by credit institutions by taking possession in exchange in of cancellation of debts.
3. Banks with non-EU subsidiary should provide this information separately for exposures towards non-EU counterparties. For non-EU exposures, while there are additional challenges in terms of absence of common disclosure requirements and methodology, as the EU taxonomy and the NFRD apply only at EU level, given the relevance of these exposures for those credit institutions with non-EU subsidiaries, these institutions should disclose a separate GAR for non-EU exposures, on a best effort basis, in the form of estimates and ranges, using proxies, and explaining the assumptions, caveats and limitations.
4. For motor vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure.

	bg	bh	bi	bj	bk
	12/31/2023				
	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
	Of which environmentally sustainable (Taxonomy-aligned)				
			Of which Use of Proceeds	Of which transitional	Of which enabling
<i>in millions of euros</i>					
<b>GAR - Covered assets in both numerator and denominator</b>					
<b>1 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation</b>	<b>375,063</b>	<b>38,512</b>			
<b>2 Financial undertakings</b>	<b>30</b>	<b>4</b>			
3 Credit institutions	0	(0)			
4 Loans and advances	0	(0)			
5 Debt securities, including UoP	-	-			
6 Equity instruments					
7 Other financial corporations	30	4			
8 of which investment firms					
9 Loans and advances					
10 Debt securities, including UoP					
11 Equity instruments					
12 of which management companies					
13 Loans and advances					
14 Debt securities, including UoP					
15 Equity instruments					
16 of which insurance undertakings	0	0			
17 Loans and advances	0	0			
18 Debt securities, including UoP	-	-			
19 Equity instruments					
<b>20 Non-financial undertakings</b>	<b>4,202</b>	<b>1,556</b>			
21 Loans and advances	4,168	1,538			
22 Debt securities, including UoP	33	18			
23 Equity instruments					
<b>24 Households</b>	<b>367,259</b>	<b>36,951</b>			
25 of which loans collateralised by residential immovable property	362,149	36,951			
26 of which building renovation loans	918	-			
27 of which motor vehicle loans	4,192	-			
<b>28 Local governments financing</b>	<b>3,572</b>	-			
29 Housing financing	3,572	-			
<b>30 Other local government financing</b>	-	-			
<b>31 Collateral obtained by taking possession: residential and commercial immovable properties</b>	-	-			
<b>32 Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>					
33 Financial and Non-financial undertakings					
34 SMEs and NFCs (other than SMEs) not subject to 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					
<b>44 Derivatives</b>					
<b>45 On demand interbank loans</b>					
<b>46 Cash and cash-related assets</b>					
<b>47 Other categories of assets (e.g. Goodwill, commodities etc.)</b>					
<b>48 TOTAL GAR ASSETS</b>	<b>375,063</b>	<b>38,512</b>			
<b>49 Assets not covered for GAR calculation</b>					
<b>50 Central governments and Supranational issuers</b>					
<b>51 Central banks exposure</b>					
<b>52 Trading book</b>					
<b>53 TOTAL ASSETS</b>	<b>375,063</b>	<b>38,512</b>			

	bg	bh	bi	bj	bk
	12/31/2023				
	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
	Of which environmentally sustainable (Taxonomy-aligned)				
			Of which Use of Proceeds	Of which transitional	Of which enabling
in millions of euros					
<b>Off-balance sheet exposures - Undertakings subject to CSRD disclosure obligations</b>					
54 Financial guarantees	790	260			
55 Assets under management	88,139	7,755			
56 Of which debt securities	30,573	3,017			
57 Of which equity instruments	57,566	4,737			

1. This template shall include information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates (NFC), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments/municipalities (house financing).
2. The following accounting categories of financial assets should be considered: 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, and real estate collaterals obtained by credit institutions by taking possession in exchange in of cancellation of debts.
3. Banks with non-EU subsidiary should provide this information separately for exposures towards non-EU counterparties. For non-EU exposures, while there are additional challenges in terms of absence of common disclosure requirements and methodology, as the EU taxonomy and the NFRD apply only at EU level, given the relevance of these exposures for those credit institutions with non-EU subsidiaries, these institutions should disclose a separate GAR for non-EU exposures, on a best effort basis, in the form of estimates and ranges, using proxies, and explaining the assumptions, caveats and limitations.
4. For motor vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure.



## Template 1 - Assets for the calculation of GAR [CapEx basis]

	a	b	c	d	e	f	g	h	i	j	k	l	m	n
	12/31/2024													
	Climate change mitigation (CCM)					Climate change adaptation (CCA)			Water and marine resources (WMR)					
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)					
	Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)					
	Total (gross) carrying amount		Of which use of proceeds	Of which transitional	Of which enabling		Of which use of proceeds	Of which enabling		Of which use of proceeds	Of which enabling		Of which use of proceeds	Of which enabling
<i>in millions of euros</i>														
<b>GAR – Covered assets in both numerator and denominator</b>														
<b>Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation</b>	<b>579,323</b>	<b>373,489</b>	<b>41,602</b>											
<b>1 Financial companies</b>	<b>39,436</b>	<b>231</b>	<b>154</b>											
3 Credit institutions	10,997	6	1											
4 Loans and advances	2,682	0	0											
5 Debt securities, including specific use of proceeds (UoP)	7,285	6	1											
6 Equity instruments	1,029													
7 Other financial companies	28,439	226	153											
8 of which investment firms														
9 Loans and advances														
10 Debt securities, including specific use of proceeds (UoP)														
11 Equity instruments														
12 of which management companies														
13 Loans and advances														
14 Debt securities, including specific use of proceeds (UoP)														
15 Equity instruments														
16 of which insurance undertakings	9,103	-	-											
17 Loans and advances	3,049	-	-											
18 Debt securities, including specific use of proceeds (UoP)	119	-	-											
19 Equity instruments	5,935	-	-											
<b>20 Non-financial companies</b>	<b>35,983</b>	<b>8,213</b>	<b>3,326</b>											
21 Loans and advances	27,523	6,590	2,511											
22 Debt securities, including specific use of proceeds (UoP)	5,090	1,622	816											
23 Equity instruments	3,371													
<b>24 Households</b>	<b>448,909</b>	<b>361,709</b>	<b>38,122</b>											
25 of which loans collateralized by residential immovable property	355,211	355,211	38,122											
26 of which building renovation loans	1,189	1,189	-											
27 of which motor vehicle loans	6,365	5,309	-											
<b>28 Local governments financing</b>	<b>54,994</b>	<b>3,336</b>	<b>-</b>											
29 Housing financing	3,336	3,336	-											
30 Other local government financing	51,658	-	-											
31 Collateral obtained by taking possession: residential and commercial immovable properties	5	-	-											
32 Assets excluded from the numerator for GAR calculation (covered in the denominator)	406,655													
33 Financial and Non-financial companies	343,562													
34 SMEs and NFCs (other than SMEs) not subject to CSRD disclosure obligations	281,634													
35 Loans and advances	280,331													
36 of which loans collateralized by commercial immovable property	51,625													
37 of which building renovation loans	61													
38 Debt securities	1,303													
39 Equity instruments	-													
40 Non-EU country counterparties not subject to CSRD disclosure obligations	61,928													
41 Loans and advances	54,587													
42 Debt securities	5,846													
43 Equity instruments	1,495													

	a	b	c	d	e	f	g	h	i	j	k	l	m	n
	12/31/2024													
	Total (gross) carrying amount	Climate change mitigation (CCM)					Climate change adaptation (CCA)			Water and marine resources (WMR)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)			Of which environmentally sustainable (Taxonomy-aligned)				
			Of which use of proceeds	Of which transitional	Of which enabling			Of which use of proceeds	Of which enabling		Of which use of proceeds	Of which enabling		
in millions of euros														
44 Derivatives	7,624													
45 On demand interbank loans	5,690													
46 Cash and cash equivalents	2,908													
47 Other categories of assets (e.g. goodwill, commodities, etc.)	46,871													
48 TOTAL GAR ASSETS	985,983	373,489	41,602											
49 Assets not covered for GAR calculation	503,906													
50 Central governments and supranational issuers	152,993													
51 Central banks exposure	133,311													
52 Trading book	217,602													
53 TOTAL ASSETS	1,489,889	373,489	41,602											
Off-balance sheet exposures - Undertakings subject to CSRD disclosure obligations														
54 Financial guarantees	56,205	8,413	3,265											
55 Assets under management	1,132,162	26,043	8,038											
56 Of which debt securities	451,561	-	-											
57 Of which equity instruments	102,648	26,043	8,038											

1. This template shall include information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates (NFC), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments/municipalities (house financing).
2. The following accounting categories of financial assets should be considered: 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, and real estate collaterals obtained by credit institutions by taking possession in exchange in of cancellation of debts.
3. Banks with non-EU subsidiary should provide this information separately for exposures towards non-EU counterparties. For non-EU exposures, while there are additional challenges in terms of absence of common disclosure requirements and methodology, as the EU taxonomy and the NFRD apply only at EU level, given the relevance of these exposures for those credit institutions with non-EU subsidiaries, these institutions should disclose a separate GAR for non-EU exposures, on a best effort basis, in the form of estimates and ranges, using proxies, and explaining the assumptions, caveats and limitations.
4. For motor vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure.

	o	p	q	r	s	t	u	v	w	x	z	aa
	12/31/2024											
	Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
	Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
		Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling	
<i>in millions of euros</i>												
GAR – Covered assets in both numerator and denominator												
1 Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation												
2 financial companies												
3 Credit institutions												
4 Loans and advances												
5 Debt securities, including specific use of proceeds (UoP)												
6 Equity instruments												
7 Other financial companies												
8 of which investment firms												
9 Loans and advances												
10 Debt securities, including specific use of proceeds (UoP)												
11 Equity instruments												
12 of which management companies												
13 Loans and advances												
14 Debt securities, including specific use of proceeds (UoP)												
15 Equity instruments												
16 of which insurance undertakings												
17 Loans and advances												
18 Debt securities, including specific use of proceeds (UoP)												
19 Equity instruments												
20 Non-financial companies												
21 Loans and advances												
22 Debt securities, including specific use of proceeds (UoP)												
23 Equity instruments												
24 Households												
25 of which loans collateralized by residential immovable property												
26 of which building renovation loans												
27 of which motor vehicle loans												
28 Local governments financing												
29 Housing financing												
30 Other local government financing												
31 Collateral obtained by taking possession: residential and commercial immovable properties												
32 Assets excluded from the numerator for GAR calculation (covered in the denominator)												
33 Financial and Non-financial companies												
34 SMEs and NFCs (other than SMEs) not subject to CSRD disclosure obligations												
35 Loans and advances												
36 of which loans collateralized by commercial immovable property												
37 of which building renovation loans												
38 Debt securities												
39 Equity instruments												
40 Non-EU country counterparties not subject to CSRD disclosure obligations												
41 Loans and advances												
42 Debt securities												
43 Equity instruments												
44 Derivatives												
45 On demand interbank loans												
46 Cash and cash equivalents												
47 Other categories of assets (e.g. goodwill, commodities, etc.)												
48 <b>TOTAL GAR ASSETS</b>												

		o	p	q	r	s	t	u	v	w	x	z	aa
		12/31/2024											
		Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
				Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling
in millions of euros													
49	Assets not covered for GAR calculation												
50	Central governments and supranational issuers												
51	Central banks exposure												
52	Trading book												
53	TOTAL ASSETS												
Off-balance sheet exposures - Undertakings subject to CSRD disclosure obligations													
54	Financial guarantees												
55	Assets under management												
56	Of which debt securities												
57	Of which equity instruments												
1. This template shall include information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates (NFC), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments/municipalities (house financing).													
2. The following accounting categories of financial assets should be considered: 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, and real estate collaterals obtained by credit institutions by taking possession in exchange in of cancellation of debts.													
3. Banks with non-EU subsidiary should provide this information separately for exposures towards non-EU counterparties. For non-EU exposures, while there are additional challenges in terms of absence of common disclosure requirements and methodology, as the EU taxonomy and the NFRD apply only at EU level, given the relevance of these exposures for those credit institutions with non-EU subsidiaries, these institutions should disclose a separate GAR for non-EU exposures, on a best effort basis, in the form of estimates and ranges, using proxies, and explaining the assumptions, caveats and limitations													
4. For motor vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure													

	ab	ac	ad	ae	af
	12/31/2024				
	TOTAL (CCM + CCA + WMR + CE + PRP + BIO)				
	Of which environmentally sustainable (Taxonomy-aligned)				
			Of which use of proceeds	Of which transitional	Of which enabling
<i>in millions of euros</i>					
GAR – Covered assets in both numerator and denominator					
1	Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation	373,489	41,602		
2	financial companies	231	154		
3	Credit institutions	6	1		
4	Loans and advances	0	-0		
5	Debt securities, including specific use of proceeds (UoP)	6	1		
6	Equity instruments				
7	Other financial companies	226	153		
8	of which investment firms				
9	Loans and advances				
10	Debt securities, including specific use of proceeds (UoP)				
11	Equity instruments				
12	of which management companies				
13	Loans and advances				
14	Debt securities, including specific use of proceeds (UoP)				
15	Equity instruments				
16	of which insurance undertakings	-	-		
17	Loans and advances	-	-		
18	Debt securities, including specific use of proceeds (UoP)	-	-		
19	Equity instruments	-	-		
20	Non-financial companies	8,213	3,326		
21	Loans and advances	6,590	2,511		
22	Debt securities, including specific use of proceeds (UoP)	1,622	816		
23	Equity instruments				
24	Households	361,709	38,122		
25	of which loans collateralized by residential immovable property	355,211	38,122		
26	of which building renovation loans	1,189	-		
27	of which motor vehicle loans	5,309	-		
28	Local governments financing	3,336	-		
29	Housing financing	3,336	-		
30	Other local government financing	-	-		
31	Collateral obtained by taking possession: residential and commercial immovable properties	-	-		
32	Assets excluded from the numerator for GAR calculation (covered in the denominator)				
33	Financial and Non-financial companies				
34	SMEs and NFCs (other than SMEs) not subject to CSRD disclosure obligations				
35	Loans and advances				
36	of which loans collateralized by commercial immovable property				
37	of which building renovation loans				
38	Debt securities				
39	Equity instruments				
40	Non-EU country counterparties not subject to CSRD disclosure obligations				
41	Loans and advances				
42	Debt securities				
43	Equity instruments				
44	Derivatives				
45	On demand interbank loans				
46	Cash and cash equivalents				
47	Other categories of assets (e.g. goodwill, commodities, etc.)				
48	<b>TOTAL GAR ASSETS</b>	<b>373,489</b>	<b>41,602</b>		
49	Assets not covered for GAR calculation				
50	Central governments and supranational issuers				
51	Central banks exposure				
52	Trading book				
53	<b>TOTAL ASSETS</b>	<b>373,489</b>	<b>41,602</b>		

ab	ac	ad	ae	af
12/31/2024				
TOTAL (CCM + CCA + WMR + CE + PRP + BIO)				
Of which environmentally sustainable (Taxonomy-aligned)				
		Of which use of proceeds	Of which transitional	Of which enabling

in millions of euros

**Off-balance sheet exposures - Undertakings subject to CSRD disclosure obligations**

54	Financial guarantees	8,412	3,265		
55	Assets under management	26,042	8,037		
56	Of which debt securities	-	-		
57	Of which equity instruments	26,042	8,037		

1. This template shall include information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates (NFC), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments/municipalities (house financing).

2. The following accounting categories of financial assets should be considered: 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, and real estate collaterals obtained by credit institutions by taking possession in exchange in of cancellation of debts.

3. Banks with non-EU subsidiary should provide this information separately for exposures towards non-EU counterparties. For non-EU exposures, while there are additional challenges in terms of absence of common disclosure requirements and methodology, as the EU taxonomy and the NFRD apply only at EU level, given the relevance of these exposures for those credit institutions with non-EU subsidiaries, these institutions should disclose a separate GAR for non-EU exposures, on a best effort basis, in the form of estimates and ranges, using proxies, and explaining the assumptions, caveats and limitations

4. For motor vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure



	ag	ah	ai	aj	ak	al	am	an	ao	ap	aq	ar	as	at
	12/31/2023													
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)				
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
	Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
	Total (gross) carrying amount			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
<i>in millions of euros</i>														
<b>GAR – Covered assets in both numerator and denominator</b>														
<b>1 Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation</b>	<b>563,898</b>	<b>377,127</b>	<b>39,660</b>											
<b>2 Financial companies</b>	<b>31,696</b>	<b>31</b>	<b>15</b>											
3 Credit institutions	6,193	0	0											
4 Loans and advances	2,693	0	0											
5 Debt securities, including specific use of proceeds (UoP)	3,499	0	0											
6 Equity instruments	1													
7 Other financial companies	25,503	31	15											
8 of which investment firms														
9 Loans and advances														
10 Debt securities, including specific use of proceeds (UoP)														
11 Equity instruments														
12 of which management companies														
13 Loans and advances														
14 Debt securities, including specific use of proceeds (UoP)														
15 Equity instruments														
16 of which insurance undertakings	8,179	0	-											
17 Loans and advances	2,914	0	-											
18 Debt securities, including specific use of proceeds (UoP)	131	-	-											
19 Equity instruments	5,134													
<b>20 Non-financial companies</b>	<b>30,215</b>	<b>6,265</b>	<b>2,694</b>											
21 Loans and advances	26,833	6,151	2,637											
22 Debt securities, including specific use of proceeds (UoP)	532	114	57											
23 Equity instruments	2,850													
<b>24 Households</b>	<b>449,598</b>	<b>367,259</b>	<b>36,951</b>											
25 of which loans collateralized by residential immovable property	362,149	362,149	36,951											
26 of which building renovation loans	918	918	-											
27 of which motor vehicle loans	6,242	4,192	-											
<b>28 Local governments financing</b>	<b>52,388</b>	<b>3,572</b>	<b>-</b>											
29 Housing financing	3,572	3,572	-											
30 Other local government financing	48,816	-	-											
31 Collateral obtained by taking possession: residential and commercial immovable properties	5	-	-											
32 Assets excluded from the numerator for GAR calculation (covered in the denominator)														
33 Financial and Non-financial companies														
34 SMEs and NFCs (other than SMEs) not subject to CSRD disclosure obligations														
35 Loans and advances														
36 of which loans collateralized by commercial immovable property														
37 of which building renovation loans														
38 Debt securities														
39 Equity instruments														
40 Non-EU country counterparties not subject to CSRD disclosure obligations														
41 Loans and advances														
42 Debt securities														
43 Equity instruments														
44 Derivatives														
45 On demand interbank loans														
46 Cash and cash equivalents														
47 Other categories of assets (e.g. goodwill, commodities, etc.)														

	ag	ah	ai	aj	ak	al	am	an	ao	ap	aq	ar	as	at
	12/31/2023													
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					Water and marine resources (WTR)			
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
	Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)			
	Total (gross) carrying amount			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
in millions of euros														
48 TOTAL GAR ASSETS	966,912	377,127	39,660											
49 Assets not covered for GAR calculation	494,589													
50 Central governments and supranational issuers	137,817													
51 Central banks exposure	153,459													
52 Trading book	203,313													
53 TOTAL ASSETS	1,461,501	377,127	39,660											
Off-balance sheet exposures - Undertakings subject to CSRD disclosure obligations														
54 Financial guarantees	52,097	1,271	412											
55 Assets under management	1,185,642	18,258	7,002											
56 Of which debt securities	510,716	-	-											
57 Of which equity instruments	93,359	18,258	7,002											

1. This template shall include information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates (NFC), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments/municipalities (house financing).
2. The following accounting categories of financial assets should be considered: 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, and real estate collaterals obtained by credit institutions by taking possession in exchange in of cancellation of debts.
3. Banks with non-EU subsidiary should provide this information separately for exposures towards non-EU counterparties. For non-EU exposures, while there are additional challenges in terms of absence of common disclosure requirements and methodology, as the EU taxonomy and the NFRD apply only at EU level, given the relevance of these exposures for those credit institutions with non-EU subsidiaries, these institutions should disclose a separate GAR for non-EU exposures, on a best effort basis, in the form of estimates and ranges, using proxies, and explaining the assumptions, caveats and limitations.
4. For motor vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure.

	au	av	aw	ax	ay	az	ba	bb	bc	bd	be	bf
	12/31/2023											
	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
	Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
		Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
<i>in millions of euros</i>												
GAR – Covered assets in both numerator and denominator												
Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation												
<b>2 Financial companies</b>												
3 Credit institutions												
4 Loans and advances												
5 Debt securities, including specific use of proceeds (UoP)												
6 Equity instruments												
7 Other financial companies												
8 of which investment firms												
9 Loans and advances												
10 Debt securities, including specific use of proceeds (UoP)												
11 Equity instruments												
12 of which management companies												
13 Loans and advances												
14 Debt securities, including specific use of proceeds (UoP)												
15 Equity instruments												
16 of which insurance undertakings												
17 Loans and advances												
18 Debt securities, including specific use of proceeds (UoP)												
19 Equity instruments												
<b>20 Non-financial companies</b>												
21 Loans and advances												
22 Debt securities, including specific use of proceeds (UoP)												
23 Equity instruments												
<b>24 Households</b>												
25 of which loans collateralized by residential immovable property												
26 of which building renovation loans												
27 of which motor vehicle loans												
<b>28 Local governments financing</b>												
29 Housing financing												
30 Other local government financing												
31 Collateral obtained by taking possession: residential and commercial immovable properties												
Assets excluded from the numerator for GAR calculation (covered in the denominator)												
33 Financial and Non-financial companies												
34 SMEs and NFCs (other than SMEs) not subject to CSRD disclosure obligations												
35 Loans and advances												
36 of which loans collateralized by commercial immovable property												
37 of which building renovation loans												
38 Debt securities												
39 Equity instruments												
40 Non-EU country counterparties not subject to CSRD disclosure obligations												
41 Loans and advances												
42 Debt securities												
43 Equity instruments												
44 Derivatives												
45 On demand interbank loans												
46 Cash and cash equivalents												
47 Other categories of assets (e.g. goodwill, commodities, etc.)												
<b>48 TOTAL GAR ASSETS</b>												
49 Assets not covered for GAR calculation												
50 Central governments and supranational issuers												
51 Central banks exposure												
52 Trading book												

	au	av	aw	ax	ay	az	ba	bb	bc	bd	be	bf
	12/31/2023											
	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
	Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
in millions of euros												
53 TOTAL ASSETS												
Off-balance sheet exposures - Undertakings subject to CSRD disclosure obligations												
54 Financial guarantees												
55 Assets under management												
56 Of which debt securities												
57 of equity instruments												

1. This template shall include information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates (NFC), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments/municipalities (house financing).
2. The following accounting categories of financial assets should be considered: 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, and real estate collaterals obtained by credit institutions by taking possession in exchange in of cancellation of debts.
3. Banks with non-EU subsidiary should provide this information separately for exposures towards non-EU counterparties. For non-EU exposures, while there are additional challenges in terms of absence of common disclosure requirements and methodology, as the EU taxonomy and the NFRD apply only at EU level, given the relevance of these exposures for those credit institutions with non-EU subsidiaries, these institutions should disclose a separate GAR for non-EU exposures, on a best effort basis, in the form of estimates and ranges, using proxies, and explaining the assumptions, caveats and limitations.
4. For motor vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure.

	bg	bh	bi	bj	bk
	12/31/2023				
	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Of which environmentally sustainable (Taxonomy-aligned)				
			Of which Use of Proceeds	Of which transitiona l	Of which enabling
<i>in millions of euros</i>					
GAR – Covered assets in both numerator and denominator					
1 Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation	377,127	39,660			
2 Financial companies	31	15			
3 Credit institutions	0	0			
4 Loans and advances	0	0			
5 Debt securities, including specific use of proceeds (UoP)	0	0			
6 Equity instruments					
7 Other financial companies	31	15			
8 of which investment firms					
9 Loans and advances					
10 Debt securities, including specific use of proceeds (UoP)					
11 Equity instruments					
12 of which management companies					
13 Loans and advances					
14 Debt securities, including specific use of proceeds (UoP)					
15 Equity instruments					
16 of which insurance undertakings	0	-			
17 Loans and advances	0	-			
18 Debt securities, including specific use of proceeds (UoP)	-	-			
19 Equity instruments					
20 Non-financial companies	6,265	2,694			
21 Loans and advances	6,151	2,637			
22 Debt securities, including specific use of proceeds (UoP)	114	57			
23 Equity instruments					
24 Households	367,259	36,951			
25 of which loans collateralized by residential immovable property	362,149	36,951			
26 of which building renovation loans	918	-			
27 of which motor vehicle loans	4,192	-			
28 Local governments financing	3,572	-			
29 Housing financing	3,572	-			
30 Other local government financing	-	-			
31 Collateral obtained by taking possession: residential and commercial immovable properties	-	-			
32 Assets excluded from the numerator for GAR calculation (covered in the denominator)					
33 Financial and Non-financial companies					
34 SMEs and NFCs (other than SMEs) not subject to CSRD disclosure obligations					
35 Loans and advances					
36 of which loans collateralized by commercial immovable property					
37 of which building renovation loans					
38 Debt securities					
39 Equity instruments					
40 Non-EU country counterparties not subject to CSRD disclosure obligations					
41 Loans and advances					
42 Debt securities					
43 Equity instruments					
44 Derivatives					
45 On demand interbank loans					
46 Cash and cash equivalents					
47 Other categories of assets (e.g. goodwill, commodities, etc.)					
48 TOTAL GAR ASSETS	377,127	39,660			
49 Assets not covered for GAR calculation					
50 Central governments and supranational issuers					
51 Central banks exposure					
52 Trading book					
53 TOTAL ASSETS	377,127	39,660			

	bg	bh	bi	bj	bk
	12/31/2023				
	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)				
	Of which environmentally sustainable (Taxonomy-aligned)				
			Of which Use of Proceeds	Of which transitiona I	Of which enabling
in millions of euros					
Off-balance sheet exposures - Undertakings subject to CSRD disclosure obligations					
54 Financial guarantees	1,271	412			
55 Assets under management	18,258	7,002			
56 Of which debt securities	-	-			
57 Of which equity instruments	18,258	7,002			

1. This template shall include information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates (NFC), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments/municipalities (house financing).
2. The following accounting categories of financial assets should be considered: 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, and real estate collaterals obtained by credit institutions by taking possession in exchange in of cancellation of debts.
3. Banks with non-EU subsidiary should provide this information separately for exposures towards non-EU counterparties. For non-EU exposures, while there are additional challenges in terms of absence of common disclosure requirements and methodology, as the EU taxonomy and the NFRD apply only at EU level, given the relevance of these exposures for those credit institutions with non-EU subsidiaries, these institutions should disclose a separate GAR for non-EU exposures, on a best effort basis, in the form of estimates and ranges, using proxies, and explaining the assumptions, caveats and limitations.
4. For motor vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure.



## Template 2 - GAR sector information (turnover basis)

Breakdown by sector - NACE 4 digits level (code and label)	a	b	c	d	e	f	g	h	i	j	k	l
	Climate change mitigation (CCM)				Climate change adaptation (CCA)				Water and marine resources (WMR)			
	Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
1 01.11 - Growing of cereals (except rice), pulses and oil seeds	1	-										
2 01.13 - Growing of vegetables, melons, roots and tubers	65	-										
3 01.21 - Vine growing	1	-										
4 01.47 - Poultry farming	0	-										
5 03.11 - Sea fishing	7	-										
6 06.10 - Extraction of crude oil	556	14										
7 06.20 - Natural gas extraction	66	-										
8 07.10 - Extraction of iron ore	104	-										
9 07.29 - Mining of other non-ferrous metal ores	724	-										
10 08.12 - Mining of gravel and sand pits, extraction of clay and kaolin	25	3										
11 08.91 - Extraction of chemical minerals and mineral fertilizers	20	0										
12 08.99 - Other mining and quarrying activities n.e.c.	4	-										
13 09.10 - Support activities for hydrocarbon extraction	15	-										
14 09.90 - Support activities for other mining and quarrying	10	1										
15 10.11 - Meat processing and preservation	35	-										
16 10.12 - Poultry meat processing and preservation	0	-										
17 10.13 - Preparation of meat products	3	-										
18 10.20 - Processing and preserving of fish, crustaceans and mollusks	1	-										
19 10.51 - Dairies and cheese production	148	-										
20 10.51 - Dairies and cheese production	0	-										
21 10.51 - Dairies and cheese production	29	-										
22 10.51 - Dairies and cheese production	10	-										
23 10.61 - Grain processing	3	-										
24 10.72 - Manufacture of cookies, rusks and pastries	0	-										
25 10.82 - Manufacture of cocoa, chocolate and confectionery products	0	-										
26 10.85 - Manufacture of prepared meals	3	-										
27 10.89 - Manufacture of other food products n.e.c.	65	-										
28 10.91 - Manufacture of prepared feeds for farm animals	3	-										
29 11.02 - Wine production (from grapes)	89	-										
30 11.02 - Wine production (from grapes)	0	-										
31 11.04 - Production of other non-distilled fermented beverages	17	-										
32 11.05 - Manufacture of beers	59	-										
33 11.07 - Mineral water and other bottled water and soft drinks industry	6	-										
34 11.07 - Mineral water and other bottled water and soft drinks industry	83	-										
35 12.00 - Manufacture of tobacco products	5	-										
36 13.20 - Weaving	43	-										
37 13.95 - Manufacture of non-wovens, except clothing	(0)	(0)										
38 13.96 - Manufacture of other technical and industrial textiles	0	-										
39 14.13 - Manufacture of outerwear	0	-										
40 14.14 - Manufacture of underwear	4	-										
41 14.31 - Manufacture of knitted footwear	1	-										
42 15.12 - Manufacture of travel goods, leather goods and saddlery	215	-										
43 16.10 - Lumber sawing and planing	10	-										
44 16.21 - Manufacture of veneer and wood panels	2	-										
45 16.23 - Manufacture of frames and other joinery products	3	-										
46 16.24 - Manufacture of wooden packaging	47	-										
47 16.29 - Manufacture of miscellaneous wooden articles, manufacture of articles of cork, basketry and straw goods	3	-										
48 17.12 - Manufacture of paper and paperboard	79	0										
49 17.21 - Manufacture of corrugated paper and paperboard and of packaging of paper or paperboard	0	0										

Breakdown by sector - NACE 4 digits level (code and label)	a	b	c	d	e	f	g	h	i	j	k	l
	Climate change mitigation (CCM)				Climate change adaptation (CCA)				Water and marine resources (WMR)			
	Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
50 17.21 - Manufacture of corrugated paper and paperboard and of packaging of paper or paperboard	0	-										
51 17.22 - Manufacture of paper articles for sanitary and domestic use	0	-										
52 17.23 - Manufacture of stationery products	1	-										
53 17.29 - Manufacture of other paper and paperboard products	0	-										
54 18.12 - Other printing (commercial)	11	-										
55 19.20 - Oil refining	189	1										
56 20.11 - Manufacture of industrial gases	147	1										
57 20.13 - Manufacture of other basic inorganic chemical products	12	-										
58 20.14 - Manufacture of other basic organic chemicals	32	(0)										
59 20.16 - Manufacture of basic plastics	54	0										
60 20.30 - Manufacture of paints, varnishes, inks and mastics	0	0										
61 20.41 - Manufacture of soaps, detergents and cleaning products	26	-										
62 20.42 - Manufacture of perfumes and toilet preparations	1	-										
63 20.51 - Manufacture of explosives	0	-										
64 20.52 - Manufacture of adhesives	0	0										
65 20.53 - Manufacture of essential oils	5	-										
66 20.59 - Manufacture of other chemical products n.e.c.	70	0										
67 20.60 - Manufacture of artificial and synthetic fibers	5	-										
68 21.10 - Manufacturing of basic pharmaceutical products	10	0										
69 21.20 - Manufacture of pharmaceutical preparations	449	-										
70 22.11 - Manufacturing and retreading of tires	0	-										
71 22.19 - Manufacture of other rubber products	0	-										
72 22.21 - Manufacture of plastic plates, sheets, tubes and profiles	4	0										
73 22.22 - Manufacture of plastic packaging	1	-										
74 22.23 - Manufacture of plastic components for construction	5	-										
75 22.29 - Manufacture of other plastic products	1	-										
76 22.29 - Manufacture of other plastic products	0	-										
77 23.13 - Manufacture of hollow glass	4	-										
78 23.14 - Manufacture of glass fibers	0	-										
79 23.51 - Manufacture of cement	45	2										
80 23.61 - Manufacture of concrete products for construction purposes	1	0										
81 23.62 - Manufacture of plaster products for construction purposes	0	-										
82 23.63 - Manufacture of ready-mixed concrete	12	0										
83 23.91 - Manufacture of abrasive products	9	-										
84 23.99 - Manufacture of other non-metallic mineral products	166	2										
85 24.10 - Steel industry	22	-										
86 24.20 - Manufacture of steel tubes, pipes, hollow sections and related fittings	16	-										
87 24.31 - Cold drawing of bars	1	-										
88 24.33 - Cold forming by shaping or bending	0	-										
89 24.42 - Aluminum metallurgy	109	1										
90 24.44 - Copper metallurgy	97	1										
91 24.45 - Metallurgy of other non-ferrous metals	61	-										
92 24.51 - Cast iron	0	-										
93 24.54 - Casting of other non-ferrous metals	8	-										
94 25.11 - Manufacture of metal structures and parts of structures	0	0										
95 25.50 - Forging, stamping, powder metallurgy	10	-										
96 25.50 - Forging, stamping, powder metallurgy	0	-										
97 25.61 - Treatment and coating of metals	0	-										
98 25.62 - Machining	0	-										
99 25.62 - Machining	24	0										
100 25.92 - Manufacture of light metal packaging	0	-										
101 25.93 - Manufacture of wire products, chain and springs	30	13										

Breakdown by sector - NACE 4 digits level (code and label)	a	b	c	d	e	f	g	h	i	j	k	l
	Climate change mitigation (CCM)				Climate change adaptation (CCA)				Water and marine resources (WMR)			
	Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
102 25.99 - Manufacture of other metal products n.e.c.	2	-										
103 26.11 - Manufacture of electronic components	193	0										
104 26.12 - Manufacture of assembled electronic boards	9	-										
105 26.20 - Manufacture of computers and peripheral equipment	265	-										
106 26.30 - Manufacture of communication equipment	12	0										
107 26.40 - Manufacture of consumer electronics	4	-										
108 26.51 - Manufacture of instruments and appliances for measuring, testing and navigation	0	0										
109 26.51 - Manufacture of instruments and appliances for measuring, testing and navigation	1	-										
110 26.60 - Manufacture of medical irradiation equipment, electromedical and electrotherapeutic equipment	3	0										
111 26.70 - Manufacture of optical and photographic equipment	38	2										
112 26.80 - Manufacture of magnetic and optical media	7	-										
113 27.11 - Manufacture of electric motors, generators and transformers	2	1										
114 27.12 - Manufacture of electrical distribution and control equipment	192	58										
115 27.20 - Manufacture of primary batteries and accumulators	25	-										
116 27.33 - Manufacture of electrical installation equipment	30	2										
117 27.40 - Manufacture of electric lighting equipment	3	0										
118 27.51 - Manufacture of household appliances	91	0										
119 28.11 - Manufacture of engines and turbines, except aircraft and vehicle engines	1	-										
120 28.13 - Manufacture of other pumps and compressors	5	-										
121 28.14 - Manufacture of other valves and fittings	2	-										
122 28.15 - Manufacture of gears and mechanical transmission components	0	-										
123 28.22 - Manufacture of lifting and handling equipment	103	22										
124 28.25 - Manufacture of industrial ventilation and refrigeration equipment	2	0										
125 28.29 - Manufacture of miscellaneous general-purpose machinery	2	-										
126 28.30 - Manufacture of agricultural and forestry machinery	9	-										
127 28.41 - Manufacture of metal forming machinery	0	0										
128 28.49 - Manufacture of other machinery	0	-										
129 28.91 - Manufacture of machinery for the metal industry	0	-										
130 28.93 - Manufacture of machinery for the food industry	29	-										
131 28.94 - Manufacture of machinery for the textile industry	41	-										
132 28.95 - Manufacture of machinery for the paper and paperboard industries	1	-										
133 28.99 - Manufacture of other special-purpose machinery n.e.c.	2	0										
134 29.10 - Manufacture of motor vehicles	273	25										
135 29.20 - Manufacture of coachwork and trailers	0	-										
136 29.32 - Manufacture of other automotive equipment	445	60										
137 30.12 - Construction of pleasure craft	26	2										
138 30.20 - Construction of locomotives and other railway rolling stock	43	2										
139 30.30 - Aeronautical and space construction	404	0										
140 30.92 - Manufacture of bicycles and disabled vehicles	3	-										
141 30.99 - Manufacture of other transport equipment n.e.c.	15	3										
142 31.01 - Manufacture of office and shop furniture	0	-										
143 31.09 - Manufacture of furniture	4	-										
144 32.12 - Manufacture of jewelry items	10	-										
145 32.30 - Manufacture of sporting goods	3	-										
146 32.50 - Manufacture of medical and dental instruments and supplies	13	-										
147 32.50 - Manufacture of medical and dental instruments and supplies	11	-										
148 32.99 - Other manufacturing activities n.e.c.	4	(0)										
149 33.12 - Repair of machinery and equipment	29	-										
150 33.13 - Repair of electronic and optical equipment	0	-										
151 33.16 - Repair and maintenance of aircraft and space vehicles	26	-										

Breakdown by sector - NACE 4 digits level (code and label)	a	b	c	d	e	f	g	h	i	j	k	l
	Climate change mitigation (CCM)				Climate change adaptation (CCA)				Water and marine resources (WMR)			
	Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
152 33.20 - Installation of industrial machinery and equipment	5	-										
153 33.20 - Installation of industrial machinery and equipment	1	0										
154 33.20 - Installation of industrial machinery and equipment	0	-										
155 33.20 - Installation of industrial machinery and equipment	3	-										
156 35.11 - Generation of electricity	1,675	428										
157 35.12 - Transmission of electricity	9	-										
158 35.13 - Distribution of electricity	106	7										
159 35.14 - Electricity wholesale trade	6	0										
160 35.21 - Production of gaseous fuels	46	0										
161 35.22 - Distribution of gaseous fuels through pipelines	44	(0)										
162 35.23 - Sale of gaseous fuels through pipelines	455	55										
163 35.30 - Steam and air conditioning production and supply	10	2										
164 36.00 - Water collection, treatment and supply	6	1										
165 37.00 - Wastewater collection and treatment	5	3										
166 38.11 - Collection of non-hazardous waste	97	63										
167 38.12 - Collection of hazardous waste	0	0										
168 38.21 - Treatment and disposal of non-hazardous waste	11	6										
169 38.22 - Treatment and disposal of hazardous waste	0	0										
170 38.31 - Dismantling of wrecks	2	1										
171 38.32 - Recovery of sorted waste	81	65										
172 41.10 - Real estate development	238	74										
173 41.10 - Real estate development	88	12										
174 41.10 - Real estate development	152	21										
175 41.10 - Real estate development	283	67										
176 41.20 - Construction of residential and non-residential buildings	10	0										
177 41.20 - Construction of residential and non-residential buildings	58	5										
178 42.11 - Road and motorway construction	76	16										
179 42.12 - Construction of surface and underground railways	26	6										
180 42.13 - Construction of bridges and tunnels	0	0										
181 42.21 - Construction of networks for fluids	4	1										
182 42.22 - Construction of electricity and telecommunications networks	52	2										
183 42.91 - Construction of maritime and river infrastructure	2	0										
184 42.99 - Construction of other civil engineering works n.e.c.	109	24										
185 43.11 - Demolition work	7	1										
186 43.12 - Site preparation work	119	11										
187 43.12 - Site preparation work	8	2										
188 43.13 - Drilling and test pits	1	-										
189 43.21 - Electrical installation	6	3										
190 43.21 - Electrical installation	10	3										
191 43.22 - Plumbing, heating and air conditioning installation	3	0										
192 43.29 - Other installation work	0	-										
193 43.32 - Joinery work	0	0										
194 43.39 - Other finishing work	13	-										
195 43.99 - Other specialized construction work n.e.c.	1	0										
196 43.99 - Other specialized construction work n.e.c.	0	0										
197 45.11 - Sale of cars and light motor vehicles	117	1										
198 45.19 - Sale of other motor vehicles	(0)	(0)										
199 45.20 - Maintenance and repair of motor vehicles	0	0										
200 45.31 - Wholesale trade of motor vehicle parts and acc	38	12										
201 45.32 - Retail trade of automotive equipment	79	-										
202 46.11 - Agents involved in the sale of agricultural commodities, live animals, textile commodities, and semi-finished products	194	-										

Breakdown by sector - NACE 4 digits level (code and label)	a	b	c	d	e	f	g	h	i	j	k	l
	Climate change mitigation (CCM)				Climate change adaptation (CCA)				Water and marine resources (WMR)			
	Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
203 46.12 - Agents involved in the sale of fuels, metals, minerals and chemical products	518	0										
204 46.14 - Agents involved in the sale of machinery, industrial equipment, ships and aircraft	25	-										
205 46.18 - Agents specialized in the sale of other specific products	0	-										
206 46.19 - Agents involved in the sale of miscellaneous goods	16	-										
207 46.19 - Agents involved in the sale of miscellaneous goods	35	0										
208 46.21 - Wholesale trade of cereals, non-manufactured tobacco, seeds and animal feed	75	-										
209 46.22 - Wholesale trade of flowers and plants	14	-										
210 46.31 - Wholesale trade of fruit and vegetables	8	-										
211 46.32 - Wholesale trade of meat and meat products	1	-										
212 46.33 - Wholesale trade of dairy products, eggs, edible oils and fats	0	0										
213 46.34 - Wholesale of beverages	37	-										
214 46.37 - Wholesale trade of coffee, tea, cocoa and spices	31	-										
215 46.38 - Wholesale trade of other food products, including fish, crustaceans and mollusks	0	0										
216 46.39 - Non-specialized wholesale trade of food, beverages and tobacco	4	0										
217 46.41 - Wholesale trade of textiles	1	-										
218 46.42 - Wholesale trade of clothing and footwear	15	-										
219 46.43 - Wholesale trade of electrical household appliances	8	1										
220 46.44 - Wholesale trade of tableware, glassware and cleaning products	0	0										
221 46.45 - Wholesale trade of perfumes and cosmetics	1	-										
222 46.46 - Wholesale trade of pharmaceutical products	71	-										
223 46.47 - Wholesale trade of furniture, rugs and lighting equipment	0	0										
224 46.49 - Wholesale trade of other household goods	11	-										
225 46.51 - Wholesale trade of computers, computer peripheral equipment and software	22	0										
226 46.52 - Wholesale trade of electronic and telecommunication components and equipment	31	5										
227 46.63 - Wholesale trade of mining, construction and civil engineering machinery	0	0										
228 46.69 - Wholesale trade of other machinery and equipment	15	4										
229 46.69 - Wholesale trade of other machinery and equipment	13	0										
230 46.69 - Wholesale trade of other machinery and equipment	0	-										
231 46.71 - Wholesale of fuel and related products	682	4										
232 46.72 - Wholesale trade of minerals and metals	455	-										
233 46.73 - Wholesale trade of timber, construction materials and sanitary equipment	29	0										
234 46.73 - Wholesale trade of timber, construction materials and sanitary equipment	0	-										
235 46.74 - Wholesale trade of hardware, plumbing and heating supplies	0	-										
236 46.75 - Wholesale trade of chemical products	242	1										
237 46.76 - Wholesale trade of other intermediate products	(0)	-										
238 46.77 - Wholesale trade of waste and scrap	1	0										
239 46.90 - Non-specialized wholesale trade	54	1										
240 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs	0	-										
241 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs	2	0										
242 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs	1	0										
243 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs	38	0										
244 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs	5	0										
245 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs	38	0										
246 47.19 - Other retail trade in non-specialized stores	98	-										

Breakdown by sector - NACE 4 digits level (code and label)	a	b	c	d	e	f	g	h	i	j	k	l
	Climate change mitigation (CCM)				Climate change adaptation (CCA)				Water and marine resources (WMR)			
	Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
247 47.19 - Other retail trade in non-specialized stores	114	4										
248 47.29 - Other retail sale of food in specialized stores	0	0										
249 47.41 - Retail trade of computers, peripheral units and software in specialized stores	35	-										
250 47.54 - Retail trade of household appliances in specialized stores	2	-										
251 47.59 - Retail trade of furniture, lighting equipment and other household items in specialized stores	17	-										
252 47.59 - Retail trade of furniture, lighting equipment and other household items in specialized stores	0	-										
253 47.61 - Retail trade of books in specialized stores	131	0										
254 47.71 - Retail trade of clothing in specialized stores	1	-										
255 47.72 - Retail trade of footwear and leather goods in specialized stores	0	-										
256 47.74 - Retail trade of medical and orthopedic articles in specialized stores	0	-										
257 47.75 - Retail sale of perfume and beauty products in specialized stores	0	-										
258 47.76 - Retail trade of flowers, plants, seeds, fertilizers, pet animals and pet food in specialized stores	0	-										
259 47.77 - Retail trade of watches and jewelry in specialized stores	100	-										
260 47.78 - Other retail trade of new goods in specialized stores	1	-										
261 47.91 - Distance selling	10	0										
262 47.91 - Distance selling	20	-										
263 49.31 - Urban and suburban passenger transport	1	-										
264 49.39 - Other passenger land transport n.e.c.	0	0										
265 49.39 - Other passenger land transport n.e.c.	9	-										
266 49.39 - Other passenger land transport n.e.c.	48	-										
267 49.41 - Freight transport by road	50	0										
268 49.41 - Freight transport by road	0	0										
269 49.41 - Freight transport by road	2	0										
270 49.50 - Transport via pipelines	183	4										
271 50.10 - Maritime and coastal passenger transport	5	2										
272 50.20 - Maritime and coastal freight transport	114	1										
273 51.10 - Passenger air transport	186	-										
274 52.10 - Warehousing and storage	0	0										
275 52.10 - Warehousing and storage	74	6										
276 52.21 - Services incidental to land transport	72	10										
277 52.22 - Services incidental to water transport	2	0										
278 52.23 - Services incidental to air transport	105	2										
279 52.24 - Handling	0	-										
280 52.29 - Other services incidental to transport	11	0										
281 52.29 - Other services incidental to transport	17	0										
282 55.10 - Hotels and similar accommodation	265	0										
283 55.20 - Tourist accommodation and other short-term accommodation	12	2										
284 56.10 - Restaurants and mobile food services	15	-										
285 56.10 - Restaurants and mobile food services	3	-										
286 56.21 - Catering services	0	-										
287 56.29 - Other food services	3	-										
288 56.29 - Other food services	9	-										
289 58.11 - Book publishing	101	-										
290 58.12 - Edition of directories and address files	1	-										
291 58.14 - Publishing of magazines and periodicals	5	-										
292 58.19 - Other publishing activities	14	-										
293 58.21 - Publishing of electronic games	86	-										
294 58.29 - Publishing of other software	8	0										
295 58.29 - Publishing of other software	20	-										



Breakdown by sector - NACE 4 digits level (code and label)	a	b	c	d	e	f	g	h	i	j	k	l
	Climate change mitigation (CCM)				Climate change adaptation (CCA)				Water and marine resources (WMR)			
	Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
296 59.11 - Motion picture, video and television program production	443	5										
297 59.11 - Motion picture, video and television program production	0	0										
298 59.11 - Motion picture, video and television program production	15	-										
299 59.13 - Distribution of motion pictures, video and television programs	3	-										
300 59.20 - Sound recording and music publishing	75	-										
301 60.20 - Television programming and broadcasting	20	1										
302 61.10 - Fixed-line telecommunications	712	0										
303 61.20 - Cordless telecommunications	38	0										
304 61.30 - Satellite telecommunications	285	1										
305 61.90 - Other telecommunications activities	765	0										
306 62.01 - Computer programming	20	0										
307 62.02 - IT consultancy	154	1										
308 62.02 - IT consultancy	0	0										
309 62.03 - IT facilities management	12	0										
310 62.09 - Other IT activities	268	4										
311 63.11 - Data processing, hosting and related activities	168	17										
312 63.12 - Internet portals	0	-										
313 64.19 - Other monetary intermediation	0	0										
314 64.20 - Holding company activities	1,583	116										
315 64.30 - Investment funds and similar financial entities	558	1										
316 64.19 - Leasing	0	-										
317 64.92 - Other credit distribution	233	3										
64.99 - Other financial service activities, except insurance and pension funding, n.e.c.	1,526	13										
318 65.11 - Life insurance	(0)	-										
320 65.12 - Other insurance	(0)	-										
321 65.20 - Reinsurance	0	-										
322 65.30 - Pension funds	41	17										
323 66.12 - Brokerage of securities and commodities	119	-										
66.19 - Other activities auxiliary to financial services, except insurance and pension funding	189	-										
325 66.19 - Other activities auxiliary to financial services, except insurance and pension funding	350	3										
326 66.22 - Activities of insurance agents and brokers	2	0										
327 66.30 - Fund management	506	3										
328 68.10 - Activities of real estate dealers	281	28										
329 68.20 - Rental and operation of own or leased real estate	249	16										
330 68.20 - Rental and operation of own or leased real estate	2,821	352										
331 68.31 - Real estate agencies	13	1										
332 68.32 - Property management	122	5										
333 68.32 - Property management	23	5										
334 69.20 - Accounting activities	79	5										
335 70.10 - Activities of head offices	1,207	101										
336 70.22 - Business and other management advice	547	79										
337 71.12 - Engineering activities	256	134										
338 71.20 - Technical control and analysis activities	0	0										
339 72.11 - Research and development in biotechnology	54	6										
340 72.19 - Research and development in other physical and natural sciences	150	1										
341 73.11 - Activities of advertising agencies	85	-										
342 73.12 - Media advertising services	(0)	(0)										
343 73.20 - Market research and opinion polls	0	0										
344 74.10 - Specialized design activities	0	0										

Breakdown by sector - NACE 4 digits level (code and label)	a	b	c	d	e	f	g	h	i	j	k	l
	Climate change mitigation (CCM)				Climate change adaptation (CCA)				Water and marine resources (WMR)			
	Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
345 74.20 - Photographic activities	1	-										
346 74.90 - Other professional, scientific and technical activities n.e.c.	16	1										
347 77.11 - Rental and leasing of cars and light motor vehicles	239	19										
348 77.11 - Rental and leasing of cars and light motor vehicles	112	0										
349 77.12 - Truck rental and leasing	114	0										
350 77.21 - Rental and leasing of leisure and sporting goods	12	4										
351 77.29 - Rental and leasing of other personal and household goods	64	-										
352 77.32 - Renting and leasing of construction and civil engineering machinery and equipment	0	-										
353 77.33 - Rental and leasing of office machinery and equipment	0	-										
354 77.34 - Rental and leasing of equipment for water transport	0	-										
355 77.35 - Rental and leasing of air transport equipment	817	-										
356 77.39 - Rental and leasing of other machinery, equipment and physical assets n.e.c.	8	-										
357 77.40 - Leasing of intellectual property and similar products, excluding copyrighted works	220	0										
358 78.10 - Employment agency activities	0	-										
359 78.20 - Activities of temporary employment agencies	3	-										
360 78.30 - Other provision of human resources	17	(0)										
361 79.11 - Travel agency activities	38	0										
362 79.12 - Tour operator activities	0	-										
363 79.90 - Other reservation services and related activities	0	-										
364 80.10 - Private security activities	0	-										
365 81.21 - General cleaning of buildings	0	0										
366 81.22 - Other building and industrial cleaning activities	1	0										
367 82.11 - Combined office administrative services	32	3										
368 82.19 - Copying, document preparation and other specialized office support activities	3	-										
369 82.30 - Organization of trade shows and conventions	1	-										
370 82.92 - Packaging activities	1	0										
371 82.99 - Other business support activities n.e.c.	101	6										
372 85.20 - Primary education	8	-										
373 85.59 - Miscellaneous education	0	0										
374 85.59 - Miscellaneous education	1	-										
375 86.10 - Hospital activities	26	0										
376 86.21 - Activity of general practitioners	2	-										
377 86.22 - Specialist physician activity	9	-										
378 86.22 - Specialist physician activity	0	-										
379 87.10 - Residential care	867	0										

Breakdown by sector - NACE 4 digits level (code and label)	a	b	c	d	e	f	g	h	i	j	k	l
	Climate change mitigation (CCM)				Climate change adaptation (CCA)				Water and marine resources (WMR)			
	Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
380 87.30 - Social housing for the elderly or physically disabled	54	0										
381 88.10 - Social action without housing for the elderly and the disabled	0	-										
382 88.91 - Social action without housing for young children	0	0										
383 90.01 - Performing arts	0	-										
384 90.04 - Management of theaters	0	-										
385 92.00 - Gambling activities	392	-										
386 93.19 - Other sports-related activities	1	1										
387 93.21 - Activities of amusement parks and theme parks	2	-										
388 93.29 - Other recreational and leisure activities	162	3										
389 94.20 - Activities of trade unions	0	0										
390 95.12 - Repair of communications equipment	1	0										
95.22 - Repair of household appliances and household and garden equipment	0	-										
391 96.01 - Laundromat	0	0										
393 96.04 - Personal maintenance	0	-										
394 96.09 - Other personal services n.e.c.	0	0										
395 NACE code not identified	3,396	-										

1. In this template, credit institutions provide information on the exposures of the banking book to sectors covered by the taxonomy (level 4 of NACE sectors), using the relevant NACE codes for the counterparty's main activity.

2. The attachment of the counterparty to a NACE sector is based exclusively on the nature of the direct counterparty. The classification of exposures jointly concerning more than one debtor is based on the characteristics of the debtor that was the most relevant, or the most significant, for the authorization of the exposure by the institution. The breakdown by NACE code of the exposures incurred jointly depends on the characteristics of the most relevant or significant debtor. The information is published by the institutions by NACE code with the level of detail required in the template.

		m	n	o	p	q	r	s	t	u	v	w	x
		Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
Breakdown by sector - NACE 4 digits level (code and label)													
1	01.11 - Growing of cereals (except rice), pulses and oil seeds												
2	01.13 - Growing of vegetables, melons, roots and tubers												
3	01.21 - Vine growing												
4	01.47 - Poultry farming												
5	03.11 - Sea fishing												
6	06.10 - Extraction of crude oil												
7	06.20 - Natural gas extraction												
8	07.10 - Extraction of iron ore												
9	07.29 - Mining of other non-ferrous metal ores												
10	08.12 - Mining of gravel and sand pits, extraction of clay and kaolin												
11	08.91 - Extraction of chemical minerals and mineral fertilizers												
12	08.99 - Other mining and quarrying activities n.e.c.												
13	09.10 - Support activities for hydrocarbon extraction												
14	09.90 - Support activities for other mining and quarrying												
15	10.11 - Meat processing and preservation												
16	10.12 - Poultry meat processing and preservation												
17	10.13 - Preparation of meat products												
18	10.20 - Processing and preserving of fish, crustaceans and mollusks												
19	10.51 - Dairies and cheese production												
20	10.51 - Dairies and cheese production												
21	10.51 - Dairies and cheese production												
22	10.51 - Dairies and cheese production												
23	10.61 - Grain processing												
24	10.72 - Manufacture of cookies, rusks and pastries												
25	10.82 - Manufacture of cocoa, chocolate and confectionery products												
26	10.85 - Manufacture of prepared meals												
27	10.89 - Manufacture of other food products n.e.c.												
28	10.91 - Manufacture of prepared feeds for farm animals												
29	11.02 - Wine production (from grapes)												
30	11.02 - Wine production (from grapes)												
31	11.04 - Production of other non-distilled fermented beverages												
32	11.05 - Manufacture of beers												
33	11.07 - Mineral water and other bottled water and soft drinks industry												
34	11.07 - Mineral water and other bottled water and soft drinks industry												
35	12.00 - Manufacture of tobacco products												
36	13.20 - Weaving												
37	13.95 - Manufacture of non-wovens, except clothing												
38	13.96 - Manufacture of other technical and industrial textiles												
39	14.13 - Manufacture of outerwear												
40	14.14 - Manufacture of underwear												
41	14.31 - Manufacture of knitted footwear												
42	15.12 - Manufacture of travel goods, leather goods and saddlery												
43	16.10 - Lumber sawing and planning												
44	16.21 - Manufacture of veneer and wood panels												
45	16.23 - Manufacture of frames and other joinery products												
46	16.24 - Manufacture of wooden packaging												
47	16.29 - Manufacture of miscellaneous wooden articles, manufacture of articles of cork, basketry and straw goods												
48	17.12 - Manufacture of paper and paperboard												
49	17.21 - Manufacture of corrugated paper and paperboard and of packaging of paper or paperboard												
50	17.21 - Manufacture of corrugated paper and paperboard and of packaging of paper or paperboard												

		m	n	o	p	q	r	s	t	u	v	w	x
		Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
Breakdown by sector - NACE 4 digits level (code and label)													
51	17.22 - Manufacture of paper articles for sanitary and domestic use												
52	17.23 - Manufacture of stationery products												
53	17.29 - Manufacture of other paper and paperboard products												
54	18.12 - Other printing (commercial)												
55	19.20 - Oil refining												
56	20.11 - Manufacture of industrial gases												
57	20.13 - Manufacture of other basic inorganic chemical products												
58	20.14 - Manufacture of other basic organic chemicals												
59	20.16 - Manufacture of basic plastics												
60	20.30 - Manufacture of paints, varnishes, inks and mastics												
61	20.41 - Manufacture of soaps, detergents and cleaning products												
62	20.42 - Manufacture of perfumes and toilet preparations												
63	20.51 - Manufacture of explosives												
64	20.52 - Manufacture of adhesives												
65	20.53 - Manufacture of essential oils												
66	20.59 - Manufacture of other chemical products n.e.c.												
67	20.60 - Manufacture of artificial and synthetic fibers												
68	21.10 - Manufacturing of basic pharmaceutical products												
69	21.20 - Manufacture of pharmaceutical preparations												
70	22.11 - Manufacturing and retreading of tires												
71	22.19 - Manufacture of other rubber products												
72	22.21 - Manufacture of plastic plates, sheets, tubes and profiles												
73	22.22 - Manufacture of plastic packaging												
74	22.23 - Manufacture of plastic components for construction												
75	22.29 - Manufacture of other plastic products												
76	22.29 - Manufacture of other plastic products												
77	23.13 - Manufacture of hollow glass												
78	23.14 - Manufacture of glass fibers												
79	23.51 - Manufacture of cement												
80	23.61 - Manufacture of concrete products for construction purposes												
81	23.62 - Manufacture of plaster products for construction purposes												
82	23.63 - Manufacture of ready-mixed concrete												
83	23.91 - Manufacture of abrasive products												
84	23.99 - Manufacture of other non-metallic mineral products												
85	24.10 - Steel industry												
86	24.20 - Manufacture of steel tubes, pipes, hollow sections and related fittings												
87	24.31 - Cold drawing of bars												
88	24.33 - Cold forming by shaping or bending												
89	24.42 - Aluminum metallurgy												
90	24.44 - Copper metallurgy												
91	24.45 - Metallurgy of other non-ferrous metals												
92	24.51 - Cast iron												
93	24.54 - Casting of other non-ferrous metals												
94	25.11 - Manufacture of metal structures and parts of structures												
95	25.50 - Forging, stamping, powder metallurgy												
96	25.50 - Forging, stamping, powder metallurgy												
97	25.61 - Treatment and coating of metals												
98	25.62 - Machining												
99	25.62 - Machining												
100	25.92 - Manufacture of light metal packaging												
101	25.93 - Manufacture of wire products, chain and springs												

		m	n	o	p	q	r	s	t	u	v	w	x
		Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
<b>Breakdown by sector - NACE 4 digits level (code and label)</b>													
102	25.99 - Manufacture of other metal products n.e.c.												
103	26.11 - Manufacture of electronic components												
104	26.12 - Manufacture of assembled electronic boards												
105	26.20 - Manufacture of computers and peripheral equipment												
106	26.30 - Manufacture of communication equipment												
107	26.40 - Manufacture of consumer electronics												
108	26.51 - Manufacture of instruments and appliances for measuring, testing and navigation												
109	26.51 - Manufacture of instruments and appliances for measuring, testing and navigation												
110	26.60 - Manufacture of medical irradiation equipment, electromedical and electrotherapeutic equipment												
111	26.70 - Manufacture of optical and photographic equipment												
112	26.80 - Manufacture of magnetic and optical media												
113	27.11 - Manufacture of electric motors, generators and transformers												
114	27.12 - Manufacture of electrical distribution and control equipment												
115	27.20 - Manufacture of primary batteries and accumulators												
116	27.33 - Manufacture of electrical installation equipment												
117	27.40 - Manufacture of electric lighting equipment												
118	27.51 - Manufacture of household appliances												
119	28.11 - Manufacture of engines and turbines, except aircraft and vehicle engines												
120	28.13 - Manufacture of other pumps and compressors												
121	28.14 - Manufacture of other valves and fittings												
122	28.15 - Manufacture of gears and mechanical transmission components												
123	28.22 - Manufacture of lifting and handling equipment												
124	28.25 - Manufacture of industrial ventilation and refrigeration equipment												
125	28.29 - Manufacture of miscellaneous general-purpose machinery												
126	28.30 - Manufacture of agricultural and forestry machinery												
127	28.41 - Manufacture of metal forming machinery												
128	28.49 - Manufacture of other machinery												
129	28.91 - Manufacture of machinery for the metal industry												
130	28.93 - Manufacture of machinery for the food industry												
131	28.94 - Manufacture of machinery for the textile industry												
132	28.95 - Manufacture of machinery for the paper and paperboard industries												
133	28.99 - Manufacture of other special-purpose machinery n.e.c.												
134	29.10 - Manufacture of motor vehicles												
135	29.20 - Manufacture of coachwork and trailers												
136	29.32 - Manufacture of other automotive equipment												
137	30.12 - Construction of pleasure craft												
138	30.20 - Construction of locomotives and other railway rolling stock												
139	30.30 - Aeronautical and space construction												
140	30.92 - Manufacture of bicycles and disabled vehicles												
141	30.99 - Manufacture of other transport equipment n.e.c.												
142	31.01 - Manufacture of office and shop furniture												
143	31.09 - Manufacture of furniture												
144	32.12 - Manufacture of jewelry items												
145	32.30 - Manufacture of sporting goods												
146	32.50 - Manufacture of medical and dental instruments and supplies												
147	32.50 - Manufacture of medical and dental instruments and supplies												
148	32.99 - Other manufacturing activities n.e.c.												
149	33.12 - Repair of machinery and equipment												

		m	n	o	p	q	r	s	t	u	v	w	x
		Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
<b>Breakdown by sector - NACE 4 digits level (code and label)</b>													
150	33.13 - Repair of electronic and optical equipment												
151	33.16 - Repair and maintenance of aircraft and space vehicles												
152	33.20 - Installation of industrial machinery and equipment												
153	33.20 - Installation of industrial machinery and equipment												
154	33.20 - Installation of industrial machinery and equipment												
155	33.20 - Installation of industrial machinery and equipment												
156	35.11 - Generation of electricity												
157	35.12 - Transmission of electricity												
158	35.13 - Distribution of electricity												
159	35.14 - Electricity wholesale trade												
160	35.21 - Production of gaseous fuels												
161	35.22 - Distribution of gaseous fuels through pipelines												
162	35.23 - Sale of gaseous fuels through pipelines												
163	35.30 - Steam and air conditioning production and supply												
164	36.00 - Water collection, treatment and supply												
165	37.00 - Wastewater collection and treatment												
166	38.11 - Collection of non-hazardous waste												
167	38.12 - Collection of hazardous waste												
168	38.21 - Treatment and disposal of non-hazardous waste												
169	38.22 - Treatment and disposal of hazardous waste												
170	38.31 - Dismantling of wrecks												
171	38.32 - Recovery of sorted waste												
172	41.10 - Real estate development												
173	41.10 - Real estate development												
174	41.10 - Real estate development												
175	41.10 - Real estate development												
176	41.20 - Construction of residential and non-residential buildings												
177	41.20 - Construction of residential and non-residential buildings												
178	42.11 - Road and motorway construction												
179	42.12 - Construction of surface and underground railways												
180	42.13 - Construction of bridges and tunnels												
181	42.21 - Construction of networks for fluids												
182	42.22 - Construction of electricity and telecommunications networks												
183	42.91 - Construction of maritime and river infrastructure												
184	42.99 - Construction of other civil engineering works n.e.c.												
185	43.11 - Demolition work												
186	43.12 - Site preparation work												
187	43.12 - Site preparation work												
188	43.13 - Drilling and test pits												
189	43.21 - Electrical installation												
190	43.21 - Electrical installation												
191	43.22 - Plumbing, heating and air conditioning installation												
192	43.29 - Other installation work												
193	43.32 - Joinery work												
194	43.39 - Other finishing work												
195	43.99 - Other specialized construction work n.e.c.												
196	43.99 - Other specialized construction work n.e.c.												
197	45.11 - Sale of cars and light motor vehicles												
198	45.19 - Sale of other motor vehicles												
199	45.20 - Maintenance and repair of motor vehicles												
200	45.31 - Wholesale trade of motor vehicle parts and acc												
201	45.32 - Retail trade of automotive equipment												
202	46.11 - Agents involved in the sale of agricultural commodities, live animals, textile commodities, and semi-finished products												



Breakdown by sector - NACE 4 digits level (code and label)	m	n	o	p	q	r	s	t	u	v	w	x
	Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
	Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
203 46.12 - Agents involved in the sale of fuels, metals, minerals and chemical products												
204 46.14 - Agents involved in the sale of machinery, industrial equipment, ships and aircraft												
205 46.18 - Agents specialized in the sale of other specific products												
206 46.19 - Agents involved in the sale of miscellaneous goods												
207 46.19 - Agents involved in the sale of miscellaneous goods												
208 46.21 - Wholesale trade of cereals, non-manufactured tobacco, seeds and animal feed												
209 46.22 - Wholesale trade of flowers and plants												
210 46.31 - Wholesale trade of fruit and vegetables												
211 46.32 - Wholesale trade of meat and meat products												
212 46.33 - Wholesale trade of dairy products, eggs, edible oils and fats												
213 46.34 - Wholesale of beverages												
214 46.37 - Wholesale trade of coffee, tea, cocoa and spices												
215 46.38 - Wholesale trade of other food products, including fish, crustaceans and mollusks												
216 46.39 - Non-specialized wholesale trade of food, beverages and tobacco												
217 46.41 - Wholesale trade of textiles												
218 46.42 - Wholesale trade of clothing and footwear												
219 46.43 - Wholesale trade of electrical household appliances												
220 46.44 - Wholesale trade of tableware, glassware and cleaning products												
221 46.45 - Wholesale trade of perfumes and cosmetics												
222 46.46 - Wholesale trade of pharmaceutical products												
223 46.47 - Wholesale trade of furniture, rugs and lighting equipment												
224 46.49 - Wholesale trade of other household goods												
225 46.51 - Wholesale trade of computers, computer peripheral equipment and software												
226 46.52 - Wholesale trade of electronic and telecommunication components and equipment												
227 46.63 - Wholesale trade of mining, construction and civil engineering machinery												
228 46.69 - Wholesale trade of other machinery and equipment												
229 46.69 - Wholesale trade of other machinery and equipment												
230 46.69 - Wholesale trade of other machinery and equipment												
231 46.71 - Wholesale of fuel and related products												
232 46.72 - Wholesale trade of minerals and metals												
233 46.73 - Wholesale trade of timber, construction materials and sanitary equipment												
234 46.73 - Wholesale trade of timber, construction materials and sanitary equipment												
235 46.74 - Wholesale trade of hardware, plumbing and heating supplies												
236 46.75 - Wholesale trade of chemical products												
237 46.76 - Wholesale trade of other intermediate products												
238 46.77 - Wholesale trade of waste and scrap												
239 46.90 - Non-specialized wholesale trade												
240 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs												
241 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs												
242 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs												
243 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs												
244 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs												
245 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs												

		m	n	o	p	q	r	s	t	u	v	w	x
		Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
<b>Breakdown by sector - NACE 4 digits level (code and label)</b>													
246	47.19 - Other retail trade in non-specialized stores												
247	47.19 - Other retail trade in non-specialized stores												
248	47.19 - Other retail trade in non-specialized stores												
249	47.41 - Retail trade of computers, peripheral units and software in specialized stores												
250	47.54 - Retail trade of household appliances in specialized stores												
251	47.59 - Retail trade of furniture, lighting equipment and other household items in specialized stores												
252	47.59 - Retail trade of furniture, lighting equipment and other household items in specialized stores												
253	47.61 - Retail trade of books in specialized stores												
254	47.71 - Retail trade of clothing in specialized stores												
255	47.72 - Retail trade of footwear and leather goods in specialized stores												
256	47.74 - Retail trade of medical and orthopedic articles in specialized stores												
257	47.75 - Retail sale of perfume and beauty products in specialized stores												
258	47.76 - Retail trade of flowers, plants, seeds, fertilizers, pet animals and pet food in specialized stores												
259	47.77 - Retail trade of watches and jewelry in specialized stores												
260	47.78 - Other retail trade of new goods in specialized stores												
261	47.91 - Distance selling												
262	47.91 - Distance selling												
263	49.31 - Urban and suburban passenger transport												
264	49.39 - Other passenger land transport n.e.c.												
265	49.39 - Other passenger land transport n.e.c.												
266	49.39 - Other passenger land transport n.e.c.												
267	49.41 - Freight transport by road												
268	49.41 - Freight transport by road												
269	49.41 - Freight transport by road												
270	49.50 - Transport via pipelines												
271	50.10 - Maritime and coastal passenger transport												
272	50.20 - Maritime and coastal freight transport												
273	51.10 - Passenger air transport												
274	52.10 - Warehousing and storage												
275	52.10 - Warehousing and storage												
276	52.21 - Services incidental to land transport												
277	52.22 - Services incidental to water transport												
278	52.23 - Services incidental to air transport												
279	52.24 - Handling												
280	52.29 - Other services incidental to transport												
281	52.29 - Other services incidental to transport												
282	55.10 - Hotels and similar accommodation												
283	55.20 - Tourist accommodation and other short-term accommodation												
284	56.10 - Restaurants and mobile food services												
285	56.10 - Restaurants and mobile food services												
286	56.21 - Catering services												
287	56.29 - Other food services												
288	56.29 - Other food services												
289	58.11 - Book publishing												
290	58.12 - Edition of directories and address files												
291	58.14 - Publishing of magazines and periodicals												
292	58.19 - Other publishing activities												
293	58.21 - Publishing of electronic games												
294	58.29 - Publishing of other software												

Breakdown by sector - NACE 4 digits level (code and label)	m	n	o	p	q	r	s	t	u	v	w	x
	Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
	Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
295 58.29 - Publishing of other software												
296 59.11 - Motion picture, video and television program production												
297 59.11 - Motion picture, video and television program production												
298 59.11 - Motion picture, video and television program production												
59.13 - Distribution of motion pictures, video and television programs												
299												
300 59.20 - Sound recording and music publishing												
301 60.20 - Television programming and broadcasting												
302 61.10 - Fixed-line telecommunications												
303 61.20 - Cordless telecommunications												
304 61.30 - Satellite telecommunications												
305 61.90 - Other telecommunications activities												
306 62.01 - Computer programming												
307 62.02 - IT consultancy												
308 62.02 - IT consultancy												
309 62.03 - IT facilities management												
310 62.09 - Other IT activities												
311 63.11 - Data processing, hosting and related activities												
312 63.12 - Internet portals												
313 64.19 - Other monetary intermediation												
314 64.20 - Holding company activities												
315 64.30 - Investment funds and similar financial entities												
316 64.19 - Leasing												
317 64.92 - Other credit distribution												
64.99 - Other financial service activities, except insurance and pension funding, n.e.c.												
318												
319 65.11 - Life insurance												
320 65.12 - Other insurance												
321 65.20 - Reinsurance												
322 65.30 - Pension funds												
323 66.12 - Brokerage of securities and commodities												
66.19 - Other activities auxiliary to financial services, except insurance and pension funding												
324												
66.19 - Other activities auxiliary to financial services, except insurance and pension funding												
325												
66.22 - Activities of insurance agents and brokers												
326												
66.30 - Fund management												
327												
68.10 - Activities of real estate dealers												
328												
68.20 - Rental and operation of own or leased real estate												
329												
68.20 - Rental and operation of own or leased real estate												
330												
68.31 - Real estate agencies												
331												
68.32 - Property management												
332												
68.32 - Property management												
333												
69.20 - Accounting activities												
334												
70.10 - Activities of head offices												
335												
70.22 - Business and other management advice												
336												
71.12 - Engineering activities												
337												
71.20 - Technical control and analysis activities												
338												
72.11 - Research and development in biotechnology												
339												
72.19 - Research and development in other physical and natural sciences												
340												
73.11 - Activities of advertising agencies												
341												
73.12 - Media advertising services												
342												
73.20 - Market research and opinion polls												
343												
74.10 - Specialized design activities												
344												

Breakdown by sector - NACE 4 digits level (code and label)	m	n	o	p	q	r	s	t	u	v	w	x
	Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
	Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
345 74.20 - Photographic activities												
346 74.90 - Other professional, scientific and technical activities n.e.c.												
347 77.11 - Rental and leasing of cars and light motor vehicles												
348 77.11 - Rental and leasing of cars and light motor vehicles												
349 77.12 - Truck rental and leasing												
350 77.21 - Rental and leasing of leisure and sporting goods												
351 77.29 - Rental and leasing of other personal and household goods												
352 77.32 - Rental and leasing of construction machinery and equipment												
353 77.33 - Rental and leasing of office machinery and equipment												
354 77.34 - Rental and leasing of equipment for water transport												
355 77.35 - Rental and leasing of air transport equipment												
356 77.39 - Rental and leasing of other machinery, equipment and physical assets n.e.c.												
357 77.40 - Leasing of intellectual property and similar products, excluding copyrighted works												
358 78.10 - Employment agency activities												
359 78.20 - Activities of temporary employment agencies												
360 78.30 - Other provision of human resources												
361 79.11 - Travel agency activities												
362 79.12 - Tour operator activities												
363 79.90 - Other reservation services and related activities												
364 80.10 - Private security activities												
365 81.21 - General cleaning of buildings												
366 81.22 - Other building and industrial cleaning activities												
367 82.11 - Combined office administrative services												
368 82.19 - Copying, document preparation and other specialized office support activities												
369 82.30 - Organization of trade shows and conventions												
370 82.92 - Packaging activities												
371 82.99 - Other business support activities n.e.c.												
372 85.20 - Primary education												
373 85.59 - Miscellaneous education												
374 85.59 - Miscellaneous education												
375 86.10 - Hospital activities												
376 86.21 - Activity of general practitioners												
377 86.22 - Specialist physician activity												
378 86.22 - Specialist physician activity												
379 87.10 - Residential care												
380 87.30 - Social housing for the elderly or physically disabled												
381 88.10 - Social action without housing for the elderly and the disabled												
382 88.91 - Social action without housing for young children												
383 90.01 - Performing arts												
384 90.04 - Management of theaters												
385 92.00 - Gambling activities												
386 93.19 - Other sports-related activities												
387 93.21 - Activities of amusement parks and theme parks												
388 93.29 - Other recreational and leisure activities												
389 94.20 - Activities of trade unions												
390 95.12 - Repair of communications equipment												

Breakdown by sector - NACE 4 digits level (code and label)	m	n	o	p	q	r	s	t	u	v	w	x
	Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
	Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD		Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
391 95.22 - Repair of household appliances and household and garden equipment												
392 96.01 - Laundromat												
393 96.04 - Personal maintenance												
394 96.09 - Other personal services n.e.c.												
395 NACE code not identified												

1. In this template, credit institutions provide information on the exposures of the banking book to sectors covered by the taxonomy (level 4 of NACE sectors), using the relevant NACE codes for the counterparty's main activity.

2. The attachment of the counterparty to a NACE sector is based exclusively on the nature of the direct counterparty. The classification of exposures jointly concerning more than one debtor is based on the characteristics of the debtor that was the most relevant, or the most significant, for the authorization of the exposure by the institution. The breakdown by NACE code of the exposures incurred jointly depends on the characteristics of the most relevant or significant debtor. The information is published by the institutions by NACE code with the level of detail required in the template.

Breakdown by sector - NACE 4 digits level (code and label)	y	z	aa	ab
	TOTAL (CCM + CCA + WMR + CE + PRP + BIO)			
	Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount	
	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
1 01.11 - Growing of cereals (except rice), pulses and oil seeds	1	-		
2 01.13 - Growing of vegetables, melons, roots and tubers	65	-		
3 01.21 - Vine growing	1	-		
4 01.47 - Poultry farming	0	-		
5 03.11 - Sea fishing	7	-		
6 06.10 - Extraction of crude oil	556	14		
7 06.20 - Natural gas extraction	66	-		
8 07.10 - Extraction of iron ore	104	-		
9 07.29 - Mining of other non-ferrous metal ores	724	-		
10 08.12 - Mining of gravel and sand pits, extraction of clay and kaolin	25	3		
11 08.91 - Extraction of chemical minerals and mineral fertilizers	20	0		
12 08.99 - Other mining and quarrying activities n.e.c.	4	-		
13 09.10 - Support activities for hydrocarbon extraction	15	-		
14 09.90 - Support activities for other mining and quarrying	10	1		
15 10.11 - Meat processing and preservation	35	-		
16 10.12 - Poultry meat processing and preservation	0	-		
17 10.13 - Preparation of meat products	3	-		
18 10.20 - Processing and preserving of fish, crustaceans and mollusks	1	-		
19 10.51 - Dairies and cheese production	148	-		
20 10.51 - Dairies and cheese production	0	-		
21 10.51 - Dairies and cheese production	29	-		
22 10.51 - Dairies and cheese production	10	-		
23 10.61 - Grain processing	3	-		
24 10.72 - Manufacture of cookies, rusks and pastries	0	-		
25 10.82 - Manufacture of cocoa, chocolate and confectionery products	0	-		
26 10.85 - Manufacture of prepared meals	3	-		
27 10.89 - Manufacture of other food products n.e.c.	65	-		
28 10.91 - Manufacture of prepared feeds for farm animals	3	-		
29 11.02 - Wine production (from grapes)	89	-		
30 11.02 - Wine production (from grapes)	0	-		
31 11.04 - Production of other non-distilled fermented beverages	17	-		
32 11.05 - Manufacture of beers	59	-		
33 11.07 - Mineral water and other bottled water and soft drinks industry	6	-		
34 11.07 - Mineral water and other bottled water and soft drinks industry	83	-		
35 12.00 - Manufacture of tobacco products	5	-		
36 13.20 - Weaving	43	-		
37 13.95 - Manufacture of non-wovens, except clothing	- 0	- 0		
38 13.96 - Manufacture of other technical and industrial textiles	0	-		
39 14.13 - Manufacture of outerwear	0	-		
40 14.14 - Manufacture of underwear	4	-		
41 14.31 - Manufacture of knitted footwear	1	-		
42 15.12 - Manufacture of travel goods, leather goods and saddlery	215	-		
43 16.10 - Lumber sawing and planning	10	-		
44 16.21 - Manufacture of veneer and wood panels	2	-		
45 16.23 - Manufacture of frames and other joinery products	3	-		
46 16.24 - Manufacture of wooden packaging	47	-		
47 16.29 - Manufacture of miscellaneous wooden articles, manufacture of articles of cork, basketry and straw goods	3	-		
48 17.12 - Manufacture of paper and paperboard	79	0		
49 17.21 - Manufacture of corrugated paper and paperboard and of packaging of paper or paperboard	0	0		
50 17.21 - Manufacture of corrugated paper and paperboard and of packaging of paper or paperboard	0	-		
51 17.22 - Manufacture of paper articles for sanitary and domestic use	0	-		
52 17.23 - Manufacture of stationery products	1	-		
53 17.29 - Manufacture of other paper and paperboard products	0	-		
54 18.12 - Other printing (commercial)	11	-		
55 19.20 - Oil refining	189	1		
56 20.11 - Manufacture of industrial gases	147	1		
57 20.13 - Manufacture of other basic inorganic chemical products	12	-		
58 20.14 - Manufacture of other basic organic chemicals	32	(0)		
59 20.16 - Manufacture of basic plastics	54	0		
60 20.30 - Manufacture of paints, varnishes, inks and mastics	0	0		

Breakdown by sector - NACE 4 digits level (code and label)	y	z	aa	ab
	TOTAL (CCM + CCA + WMR + CE + PRP + BIO)			
	Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount	
	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
61 20.41 - Manufacture of soaps, detergents and cleaning products	26	-		
62 20.42 - Manufacture of perfumes and toilet preparations	1	-		
63 20.51 - Manufacture of explosives	0	-		
64 20.52 - Manufacture of adhesives	0	0		
65 20.53 - Manufacture of essential oils	5	-		
66 20.59 - Manufacture of other chemical products n.e.c.	70	0		
67 20.60 - Manufacture of artificial and synthetic fibers	5	-		
68 21.10 - Manufacturing of basic pharmaceutical products	10	0		
69 21.20 - Manufacture of pharmaceutical preparations	449	-		
70 22.11 - Manufacturing and retreading of tires	0	-		
71 22.19 - Manufacture of other rubber products	0	-		
72 22.21 - Manufacture of plastic plates, sheets, tubes and profiles	4	0		
73 22.22 - Manufacture of plastic packaging	1	-		
74 22.23 - Manufacture of plastic components for construction	5	-		
75 22.29 - Manufacture of other plastic products	1	-		
76 22.29 - Manufacture of other plastic products	0	-		
77 23.13 - Manufacture of hollow glass	4	-		
78 23.14 - Manufacture of glass fibers	0	-		
79 23.51 - Manufacture of cement	45	2		
80 23.61 - Manufacture of concrete products for construction purposes	1	0		
81 23.62 - Manufacture of plaster products for construction purposes	0	-		
82 23.63 - Manufacture of ready-mixed concrete	12	0		
83 23.91 - Manufacture of abrasive products	9	-		
84 23.99 - Manufacture of other non-metallic mineral products	166	2		
85 24.10 - Steel industry	22	-		
86 24.20 - Manufacture of steel tubes, pipes, hollow sections and related fittings	16	-		
87 24.31 - Cold drawing of bars	1	-		
88 24.33 - Cold forming by shaping or bending	0	-		
89 24.42 - Aluminum metallurgy	109	1		
90 24.44 - Copper metallurgy	97	1		
91 24.45 - Metallurgy of other non-ferrous metals	61	-		
92 24.51 - Cast iron	0	-		
93 24.54 - Casting of other non-ferrous metals	8	-		
94 25.11 - Manufacture of metal structures and parts of structures	0	0		
95 25.50 - Forging, stamping, powder metallurgy	10	-		
96 25.50 - Forging, stamping, powder metallurgy	0	-		
97 25.61 - Treatment and coating of metals	0	-		
98 25.62 - Machining	0	-		
99 25.62 - Machining	24	0		
100 25.92 - Manufacture of light metal packaging	0	-		
101 25.93 - Manufacture of wire products, chain and springs	30	13		
102 25.99 - Manufacture of other metal products n.e.c.	2	-		
103 26.11 - Manufacture of electronic components	193	0		
104 26.12 - Manufacture of assembled electronic boards	9	-		
105 26.20 - Manufacture of computers and peripheral equipment	265	-		
106 26.30 - Manufacture of communication equipment	12	0		
107 26.40 - Manufacture of consumer electronics	4	-		
108 26.51 - Manufacture of instruments and appliances for measuring, testing and navigation	0	0		
109 26.51 - Manufacture of instruments and appliances for measuring, testing and navigation	1	-		
110 26.60 - Manufacture of medical irradiation equipment, electromedical and electrotherapeutic equipment	3	0		
111 26.70 - Manufacture of optical and photographic equipment	38	2		
112 26.80 - Manufacture of magnetic and optical media	7	-		
113 27.11 - Manufacture of electric motors, generators and transformers	2	1		
114 27.12 - Manufacture of electrical distribution and control equipment	192	58		
115 27.20 - Manufacture of primary batteries and accumulators	25	-		
116 27.33 - Manufacture of electrical installation equipment	30	2		
117 27.40 - Manufacture of electric lighting equipment	3	0		
118 27.51 - Manufacture of household appliances	91	0		
119 28.11 - Manufacture of engines and turbines, except aircraft and vehicle engines	1	-		
120 28.13 - Manufacture of other pumps and compressors	5	-		



	y	z	aa	ab
	TOTAL (CCM + CCA + WMR + CE + PRP + BIO)			
	Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount	
Breakdown by sector - NACE 4 digits level (code and label)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
121 28.14 - Manufacture of other valves and fittings	2	-		
122 28.15 - Manufacture of gears and mechanical transmission components	0	-		
123 28.22 - Manufacture of lifting and handling equipment	103	22		
124 28.25 - Manufacture of industrial ventilation and refrigeration equipment	2	0		
125 28.29 - Manufacture of miscellaneous general-purpose machinery	2	-		
126 28.30 - Manufacture of agricultural and forestry machinery	9	-		
127 28.41 - Manufacture of metal forming machinery	0	0		
128 28.49 - Manufacture of other machinery	0	-		
129 28.91 - Manufacture of machinery for the metal industry	0	-		
130 28.93 - Manufacture of machinery for the food industry	29	-		
131 28.94 - Manufacture of machinery for the textile industry	41	-		
132 28.95 - Manufacture of machinery for the paper and paperboard industries	1	-		
133 28.99 - Manufacture of other special-purpose machinery n.e.c.	2	0		
134 29.10 - Manufacture of motor vehicles	273	25		
135 29.20 - Manufacture of coachwork and trailers	0	-		
136 29.32 - Manufacture of other automotive equipment	445	60		
137 30.12 - Construction of pleasure craft	26	2		
138 30.20 - Construction of locomotives and other railway rolling stock	43	2		
139 30.30 - Aeronautical and space construction	404	0		
140 30.92 - Manufacture of bicycles and disabled vehicles	3	-		
141 30.99 - Manufacture of other transport equipment n.e.c.	15	3		
142 31.01 - Manufacture of office and shop furniture	0	-		
143 31.09 - Manufacture of furniture	4	-		
144 32.12 - Manufacture of jewelry items	10	-		
145 32.30 - Manufacture of sporting goods	3	-		
146 32.50 - Manufacture of medical and dental instruments and supplies	13	-		
147 32.50 - Manufacture of medical and dental instruments and supplies	11	-		
148 32.99 - Other manufacturing activities n.e.c.	4	- 0		
149 33.12 - Repair of machinery and equipment	29	-		
150 33.13 - Repair of electronic and optical equipment	0	-		
151 33.16 - Repair and maintenance of aircraft and space vehicles	26	-		
152 33.20 - Installation of industrial machinery and equipment	5	-		
153 33.20 - Installation of industrial machinery and equipment	1	0		
154 33.20 - Installation of industrial machinery and equipment	0	-		
155 33.20 - Installation of industrial machinery and equipment	3	-		
156 35.11 - Generation of electricity	1,675	428		
157 35.12 - Transmission of electricity	9	-		
158 35.13 - Distribution of electricity	106	7		
159 35.14 - Electricity wholesale trade	6	0		
160 35.21 - Production of gaseous fuels	46	0		
161 35.22 - Distribution of gaseous fuels through pipelines	44	- 0		
162 35.23 - Sale of gaseous fuels through pipelines	455	55		
163 35.30 - Steam and air conditioning production and supply	10	2		
164 36.00 - Water collection, treatment and supply	6	1		
165 37.00 - Wastewater collection and treatment	5	3		
166 38.11 - Collection of non-hazardous waste	97	63		
167 38.12 - Collection of hazardous waste	0	0		
168 38.21 - Treatment and disposal of non-hazardous waste	11	6		
169 38.22 - Treatment and disposal of hazardous waste	0	0		
170 38.31 - Dismantling of wrecks	2	1		
171 38.32 - Recovery of sorted waste	81	65		
172 41.10 - Real estate development	238	74		
173 41.10 - Real estate development	88	12		
174 41.10 - Real estate development	152	21		
175 41.10 - Real estate development	283	67		
176 41.20 - Construction of residential and non-residential buildings	10	0		
177 41.20 - Construction of residential and non-residential buildings	58	5		
178 42.11 - Road and motorway construction	76	16		
179 42.12 - Construction of surface and underground railways	26	6		
180 42.13 - Construction of bridges and tunnels	0	0		

Breakdown by sector - NACE 4 digits level (code and label)	y	z	aa	ab
	TOTAL (CCM + CCA + WMR + CE + PRP + BIO)			
	Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount	
	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
181 42.21 - Construction of networks for fluids	4	1		
182 42.22 - Construction of electricity and telecommunications networks	52	2		
183 42.91 - Construction of maritime and river infrastructure	2	0		
184 42.99 - Construction of other civil engineering works n.e.c.	109	24		
185 43.11 - Demolition work	7	1		
186 43.12 - Site preparation work	119	11		
187 43.12 - Site preparation work	8	2		
188 43.13 - Drilling and test pits	1	-		
189 43.21 - Electrical installation	6	3		
190 43.21 - Electrical installation	10	3		
191 43.22 - Plumbing, heating and air conditioning installation	3	0		
192 43.29 - Other installation work	0	-		
193 43.32 - Joinery work	0	0		
194 43.39 - Other finishing work	13	-		
195 43.99 - Other specialized construction work n.e.c.	1	0		
196 43.99 - Other specialized construction work n.e.c.	0	0		
197 45.11 - Sale of cars and light motor vehicles	117	1		
198 45.19 - Sale of other motor vehicles	- 0	- 0		
199 45.20 - Maintenance and repair of motor vehicles	0	0		
200 45.31 - Wholesale trade of motor vehicle parts and acc	38	12		
201 45.32 - Retail trade of automotive equipment	79	-		
202 46.11 - Agents involved in the sale of agricultural commodities, live animals, textile commodities, and semi-finished products	194	-		
203 46.12 - Agents involved in the sale of fuels, metals, minerals and chemical products	518	0		
204 46.14 - Agents involved in the sale of machinery, industrial equipment, ships and aircraft	25	-		
205 46.18 - Agents specialized in the sale of other specific products	0	-		
206 46.19 - Agents involved in the sale of miscellaneous goods	16	-		
207 46.19 - Agents involved in the sale of miscellaneous goods	35	0		
208 46.21 - Wholesale trade of cereals, non-manufactured tobacco, seeds and animal feed	75	-		
209 46.22 - Wholesale trade of flowers and plants	14	-		
210 46.31 - Wholesale trade of fruit and vegetables	8	-		
211 46.32 - Wholesale trade of meat and meat products	1	-		
212 46.33 - Wholesale trade of dairy products, eggs, edible oils and fats	0	0		
213 46.34 - Wholesale of beverages	37	-		
214 46.37 - Wholesale trade of coffee, tea, cocoa and spices	31	-		
215 46.38 - Wholesale trade of other food products, including fish, crustaceans and mollusks	0	0		
216 46.39 - Non-specialized wholesale trade of food, beverages and tobacco	4	0		
217 46.41 - Wholesale trade of textiles	1	-		
218 46.42 - Wholesale trade of clothing and footwear	15	-		
219 46.43 - Wholesale trade of electrical household appliances	8	1		
220 46.44 - Wholesale trade of tableware, glassware and cleaning products	0	0		
221 46.45 - Wholesale trade of perfumes and cosmetics	1	-		
222 46.46 - Wholesale trade of pharmaceutical products	71	-		
223 46.47 - Wholesale trade of furniture, rugs and lighting equipment	0	0		
224 46.49 - Wholesale trade of other household goods	11	-		
225 46.51 - Wholesale trade of computers, computer peripheral equipment and software	22	0		
226 46.52 - Wholesale trade of electronic and telecommunication components and equipment	31	5		
227 46.63 - Wholesale trade of mining, construction and civil engineering machinery	0	0		
228 46.69 - Wholesale trade of other machinery and equipment	15	4		
229 46.69 - Wholesale trade of other machinery and equipment	13	0		
230 46.69 - Wholesale trade of other machinery and equipment	0	-		
231 46.71 - Wholesale of fuel and related products	682	4		
232 46.72 - Wholesale trade of minerals and metals	455	-		
233 46.73 - Wholesale trade of timber, construction materials and sanitary equipment	29	0		
234 46.73 - Wholesale trade of timber, construction materials and sanitary equipment	0	-		
235 46.74 - Wholesale trade of hardware, plumbing and heating supplies	0	-		
236 46.75 - Wholesale trade of chemical products	242	1		
237 46.76 - Wholesale trade of other intermediate products	- 0	-		
238 46.77 - Wholesale trade of waste and scrap	1	0		
239 46.90 - Non-specialized wholesale trade	54	1		
240 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs	0	-		

Breakdown by sector - NACE 4 digits level (code and label)	y	z	aa	ab
	TOTAL (CCM + CCA + WMR + CE + PRP + BIO)			
	Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount	
	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
241 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs	2	0		
242 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs	1	0		
243 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs	38	0		
244 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs	5	0		
245 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs	38	0		
246 47.19 - Other retail trade in non-specialized stores	98	-		
247 47.19 - Other retail trade in non-specialized stores	114	4		
248 47.19 - Other retail trade in non-specialized stores	0	0		
249 47.41 - Retail trade of computers, peripheral units and software in specialized stores	35	-		
250 47.54 - Retail trade of household appliances in specialized stores	2	-		
251 47.59 - Retail trade of furniture, lighting equipment and other household items in specialized stores	17	-		
252 47.59 - Retail trade of furniture, lighting equipment and other household items in specialized stores	0	-		
253 47.61 - Retail trade of books in specialized stores	131	0		
254 47.71 - Retail trade of clothing in specialized stores	1	-		
255 47.72 - Retail trade of footwear and leather goods in specialized stores	0	-		
256 47.74 - Retail trade of medical and orthopedic articles in specialized stores	0	-		
257 47.75 - Retail sale of perfume and beauty products in specialized stores	0	-		
258 47.76 - Retail trade of flowers, plants, seeds, fertilizers, pet animals and pet food in specialized stores	0	-		
259 47.77 - Retail trade of watches and jewelry in specialized stores	100	-		
260 47.78 - Other retail trade of new goods in specialized stores	1	-		
261 47.91 - Distance selling	10	0		
262 47.91 - Distance selling	20	-		
263 49.31 - Urban and suburban passenger transport	1	-		
264 49.39 - Other passenger land transport n.e.c.	0	0		
265 49.39 - Other passenger land transport n.e.c.	9	-		
266 49.39 - Other passenger land transport n.e.c.	48	-		
267 49.41 - Freight transport by road	50	0		
268 49.41 - Freight transport by road	0	0		
269 49.41 - Freight transport by road	2	0		
270 49.50 - Transport via pipelines	183	4		
271 50.10 - Maritime and coastal passenger transport	5	2		
272 50.20 - Maritime and coastal freight transport	114	1		
273 51.10 - Passenger air transport	186	-		
274 52.10 - Warehousing and storage	0	0		
275 52.10 - Warehousing and storage	74	6		
276 52.21 - Services incidental to land transport	72	10		
277 52.22 - Services incidental to water transport	2	0		
278 52.23 - Services incidental to air transport	105	2		
279 52.24 - Handling	0	-		
280 52.29 - Other services incidental to transport	11	0		
281 52.29 - Other services incidental to transport	17	0		
282 55.10 - Hotels and similar accommodation	265	0		
283 55.20 - Tourist accommodation and other short-term accommodation	12	2		
284 56.10 - Restaurants and mobile food services	15	-		
285 56.10 - Restaurants and mobile food services	3	-		
286 56.21 - Catering services	0	-		
287 56.29 - Other food services	3	-		
288 56.29 - Other food services	9	-		
289 58.11 - Book publishing	101	-		
290 58.12 - Edition of directories and address files	1	-		
291 58.14 - Publishing of magazines and periodicals	5	-		
292 58.19 - Other publishing activities	14	-		
293 58.21 - Publishing of electronic games	86	-		
294 58.29 - Publishing of other software	8	0		
295 58.29 - Publishing of other software	20	-		
296 59.11 - Motion picture, video and television program production	443	5		
297 59.11 - Motion picture, video and television program production	0	0		
298 59.11 - Motion picture, video and television program production	15	-		
299 59.13 - Distribution of motion pictures, video and television programs	3	-		
300 59.20 - Sound recording and music publishing	75	-		

Breakdown by sector - NACE 4 digits level (code and label)	y	z	aa	ab
	TOTAL (CCM + CCA + WMR + CE + PRP + BIO)			
	Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount	
	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
301 60.20 - Television programming and broadcasting	20	1		
302 61.10 - Fixed-line telecommunications	712	0		
303 61.20 - Cordless telecommunications	38	0		
304 61.30 - Satellite telecommunications	285	1		
305 61.90 - Other telecommunications activities	765	0		
306 62.01 - Computer programming	20	0		
307 62.02 - IT consultancy	154	1		
308 62.02 - IT consultancy	0	0		
309 62.03 - IT facilities management	12	0		
310 62.09 - Other IT activities	268	4		
311 63.11 - Data processing, hosting and related activities	168	17		
312 63.12 - Internet portals	0	-		
313 64.19 - Other monetary intermediation	0	0		
314 64.20 - Holding company activities	1,583	116		
315 64.30 - Investment funds and similar financial entities	558	1		
316 64.19 - Leasing	0	-		
317 64.92 - Other credit distribution	233	3		
318 64.99 - Other financial service activities, except insurance and pension funding, n.e.c.	1,526	13		
319 65.11 - Life insurance	- 0	-		
320 65.12 - Other insurance	- 0	-		
321 65.20 - Reinsurance	0	-		
322 65.30 - Pension funds	41	17		
323 66.12 - Brokerage of securities and commodities	119	-		
324 66.19 - Other activities auxiliary to financial services, except insurance and pension funding	189	-		
325 66.19 - Other activities auxiliary to financial services, except insurance and pension funding	350	3		
326 66.22 - Activities of insurance agents and brokers	2	0		
327 66.30 - Fund management	506	3		
328 68.10 - Activities of real estate dealers	281	28		
329 68.20 - Rental and operation of own or leased real estate	249	16		
330 68.20 - Rental and operation of own or leased real estate	2,821	352		
331 68.31 - Real estate agencies	13	1		
332 68.32 - Property management	122	5		
333 68.32 - Property management	23	5		
334 69.20 - Accounting activities	79	5		
335 70.10 - Activities of head offices	1,207	101		
336 70.22 - Business and other management advice	547	79		
337 71.12 - Engineering activities	256	134		
338 71.20 - Technical control and analysis activities	0	0		
339 72.11 - Research and development in biotechnology	54	6		
340 72.19 - Research and development in other physical and natural sciences	150	1		
341 73.11 - Activities of advertising agencies	85	-		
342 73.12 - Media advertising services	-0	-0		
343 73.20 - Market research and opinion polls	0	0		
344 74.10 - Specialized design activities	0	0		
345 74.20 - Photographic activities	1	-		
346 74.90 - Other professional, scientific and technical activities n.e.c.	16	1		
347 77.11 - Rental and leasing of cars and light motor vehicles	239	19		
348 77.11 - Rental and leasing of cars and light motor vehicles	112	0		
349 77.12 - Truck rental and leasing	114	0		
350 77.21 - Rental and leasing of leisure and sporting goods	12	4		
351 77.29 - Rental and leasing of other personal and household goods	64	-		
352 77.32 - Rental and leasing of construction machinery and equipment	0	-		
353 77.33 - Rental and leasing of office machinery and equipment	0	-		
354 77.34 - Rental and leasing of equipment for water transport	0	-		
355 77.35 - Rental and leasing of air transport equipment	817	-		
356 77.39 - Rental and leasing of other machinery, equipment and physical assets n.e.c.	8	-		
357 77.40 - Leasing of intellectual property and similar products, excluding copyrighted works	220	0		
358 78.10 - Employment agency activities	0	-		
359 78.20 - Activities of temporary employment agencies	3	-		
360 78.30 - Other provision of human resources	17	-0		

	y	z	aa	ab
	TOTAL (CCM + CCA + WMR + CE + PRP + BIO)			
	Non-Financial corporates (Subject to CSRD)		SMEs and other NFC not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount	
Breakdown by sector - NACE 4 digits level (code and label)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
361 79.11 - Travel agency activities	38	0		
362 79.12 - Tour operator activities	0	-		
363 79.90 - Other reservation services and related activities	0	-		
364 80.10 - Private security activities	0	-		
365 81.21 - General cleaning of buildings	0	0		
366 81.22 - Other building and industrial cleaning activities	1	0		
367 82.11 - Combined office administrative services	32	3		
368 82.19 - Copying, document preparation and other specialized office support activities	3	-		
369 82.30 - Organization of trade shows and conventions	1	-		
370 82.92 - Packaging activities	1	0		
371 82.99 - Other business support activities n.e.c.	101	6		
372 85.20 - Primary education	8	-		
373 85.59 - Miscellaneous education	0	0		
374 85.59 - Miscellaneous education	1	-		
375 86.10 - Hospital activities	26	0		
376 86.21 - Activity of general practitioners	2	-		
377 86.22 - Specialist physician activity	9	-		
378 86.22 - Specialist physician activity	0	-		
379 87.10 - Residential care	867	0		
380 87.30 - Social housing for the elderly or physically disabled	54	0		
381 88.10 - Social action without housing for the elderly and the disabled	0	-		
382 88.91 - Social action without housing for young children	0	0		
383 90.01 - Performing arts	0	-		
384 90.04 - Management of theaters	0	-		
385 92.00 - Gambling activities	392	-		
386 93.19 - Other sports-related activities	1	1		
387 93.21 - Activities of amusement parks and theme parks	2	-		
388 93.29 - Other recreational and leisure activities	162	3		
389 94.20 - Activities of trade unions	0	0		
390 95.12 - Repair of communications equipment	1	0		
391 95.22 - Repair of household appliances and household and garden equipment	0	-		
392 96.01 - Laundromat	0	0		
393 96.04 - Personal maintenance	0	-		
394 96.09 - Other personal services n.e.c.	0	0		
395 NACE code not identified	3,396	-		

1. In this template, credit institutions provide information on the exposures of the banking book to sectors covered by the taxonomy (level 4 of NACE sectors), using the relevant NACE codes for the counterparty's main activity.

2. The attachment of the counterparty to a NACE sector is based exclusively on the nature of the direct counterparty. The classification of exposures jointly concerning more than one debtor is based on the characteristics of the debtor that was the most relevant, or the most significant, for the authorization of the exposure by the institution. The breakdown by NACE code of the exposures incurred jointly depends on the characteristics of the most relevant or significant debtor. The information is published by the institutions by NACE code with the level of detail required in the template.

## Template 3 - GAR KPI stock (Turnover basis)

	a	b	c	d	e	f	g	h	i	j	k	l	m
	12/31/2024												
	Climate change mitigation (CCM)					Climate change adaptation (CCA)				Water and marine resources (WMR)			
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
% (compared to total covered assets in the denominator)		Of which use of proceeds	Of which transitional	Of which enabling			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling	
<b>GAR – Covered assets in both numerator and denominator</b>													
Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation	64.15%	6.96%											
<b>1 Financial companies</b>	0.43%	0.23%											
3 Credit institutions	0.05%	0.01%											
4 Loans and advances	0.00%	(0.00%)											
5 Debt securities, including specific use of proceeds (UoP)	0.08%	0.01%											
6 Equity instruments													
7 Other financial companies	0.58%	0.31%											
8 of which investment firms													
9 Loans and advances													
10 Debt securities, including specific use of proceeds (UoP)													
11 Equity instruments													
12 of which management companies													
13 Loans and advances													
14 Debt securities, including specific use of proceeds (UoP)													
15 Equity instruments													
16 of which insurance undertakings	0.00%	0.00%											
17 Loans and advances	0.00%	0.00%											
18 Debt securities, including specific use of proceeds (UoP)	0.00%	0.00%											
19 Equity instruments	0.00%	0.00%											
<b>20 Non-financial companies</b>	17.83%	5.87%											
21 Loans and advances	19.22%	6.20%											
22 Debt securities, including specific use of proceeds (UoP)	22.12%	7.99%											
23 Equity instruments													
<b>24 Households</b>	80.58%	8.49%											
25 of which loans collateralized by residential immovable property	100.00%	10.73%											
26 of which building renovation loans	100.00%	0.00%											
27 of which motor vehicle loans	83.40%	0.00%											
<b>28 Local governments financing</b>	6.07%	0.00%											
29 Housing financing	100.00%	0.00%											
30 Other local government financing	0.00%	0.00%											
<b>31 Collateral obtained by taking possession: residential and commercial immovable properties</b>	0.00%	0.00%											
<b>32 TOTAL GAR ASSETS</b>	<b>37.69%</b>	<b>4.09%</b>											

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Information on the GAR (green asset ratio of "eligible" activities) shall be accompanied with information on the proportion of total assets covered by the GAR.

3. Credit institutions can, in addition to the information included in this template, show the proportion of assets funding taxonomy relevant sectors that are environmentally sustainable (Taxonomy-aligned). This information would enrich the information on the KPI on environmentally sustainable assets compared to total covered assets.

4. Credit institutions shall duplicate this template for the information based on income received and CapEx.

	n	o	p	q	r	s	t	u	v	w	x	z
	12/31/2024											
	Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling
% (compared to total covered assets in the denominator)												
GAR – Covered assets in both numerator and denominator												
Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation												
1 Financial companies												
2 Credit institutions												
3 Loans and advances												
4 Debt securities, including specific use of proceeds (UoP)												
5 Equity instruments												
6 Other financial companies												
7 of which investment firms												
8 Loans and advances												
9 Debt securities, including specific use of proceeds (UoP)												
10 Equity instruments												
11 of which management companies												
12 Loans and advances												
13 Debt securities, including specific use of proceeds (UoP)												
14 Equity instruments												
15 of which insurance undertakings												
16 Loans and advances												
17 Debt securities, including specific use of proceeds (UoP)												
18 Equity instruments												
19 Non-financial companies												
20 Loans and advances												
21 Debt securities, including specific use of proceeds (UoP)												
22 Equity instruments												
23 Households												
24 of which loans collateralized by residential immovable property												
25 of which building renovation loans												
26 of which motor vehicle loans												
27 Local governments financing												
28 Housing financing												
29 Other local government financing												
30 Collateral obtained by taking possession: residential and commercial immovable properties												
31												
32 TOTAL GAR ASSETS												

- The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.
- Information on the GAR (green asset ratio of "eligible" activities) shall be accompanied with information on the proportion of total assets covered by the GAR.
- Credit institutions can, in addition to the information included in this template, show the proportion of assets funding taxonomy relevant sectors that are environmentally sustainable (Taxonomy-aligned). This information would enrich the information on the KPI on environmentally sustainable assets compared to total covered assets.
- Credit institutions shall duplicate this template for the information based on income received and CapEx.



	aa	ab	ac	ad	ae	af
	12/31/2024					
	TOTAL (CCM + CCA + WMR + CE + PRP + BIO)					
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
			Of which use of proceeds	Of which transitional	Of which enabling	Share of total assets covered
% (compared to total covered assets in the denominator)						
GAR – COVERED ASSETS IN BOTH NUMERATOR AND DENOMINATOR						
1	Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation	64.15%	6.96%			38.88%
2	<b>financial companies</b>	0.43%	0.23%			2.65%
3	Credits institution	0.05%	0.01%			0.74%
4	Loans and advances	0.00%	(0.00%)			0.18%
5	Debt securities, including specific use of proceeds (UoP)	0.08%	0.01%			0.49%
6	Equity instruments					0.07%
7	Other financial companies	0.58%	0.31%			1.91%
8	of which investment firms					
9	Loans and advances					
10	Debt securities, including specific use of proceeds (UoP)					
11	Equity instruments					
12	of which management companies					
13	Loans and advances					
14	Debt securities, including specific use of proceeds (UoP)					
15	Equity instruments					
16	of which insurance undertakings	0.00%	0.00%			0.61%
17	Loans and advances	0.00%	0.00%			0.20%
18	Debt securities, including specific use of proceeds (UoP)	0.00%	0.00%			0.01%
19	Equity instruments	0.00%	0.00%			0.40%
20	<b>Non-financial companies</b>	17.83%	5.87%			2.42%
21	Loans and advances	19.22%	6.20%			1.85%
22	Debt securities, including specific use of proceeds (UoP)	22.12%	7.99%			0.34%
23	Equity instruments					0.23%
24	<b>Households</b>	80.58%	8.49%			30.13%
25	of which loans collateralized by residential immovable property	100.00%	10.73%			23.84%
26	of which building renovation loans	100.00%	0.00%			0.08%
27	of which motor vehicle loans					
28	<b>Local governments financing</b>	6.07%	0.00%			3.69%
29	Housing financing	100.00%	0.00%			0.22%
30	Other local government financing	0.00%	0.00%			3.47%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%			0.00%
32	<b>TOTAL GAR ASSETS</b>	<b>37.69%</b>	<b>4.09%</b>			<b>66.18%</b>

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Information on the GAR (green asset ratio of "eligible" activities) shall be accompanied with information on the proportion of total assets covered by the GAR.

3. Credit institutions can, in addition to the information included in this template, show the proportion of assets funding taxonomy relevant sectors that are environmentally sustainable (Taxonomy-aligned). This information would enrich the information on the KPI on environmentally sustainable assets compared to total covered assets.

4. Credit institutions shall duplicate this template for the information based on income received and CapEx.

	ag	ah	ai	aj	ak	al	am	an	ao	ap	aq	ar	as
	12/31/2023												
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
% (compared to flow of total eligible assets)													
GAR - Covered assets in both numerator and denominator													
1 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	66.51%	6.83%											
2 Financial undertakings	0.10%	0.01%											
3 Credit institutions	0.00%	(0.00%)											
4 Loans and advances	0.00%	(0.00%)											
5 Debt securities, including UoP	0.00%	0.00%											
6 Equity instruments													
7 Other financial corporations	0.12%	0.02%											
8 of which investment firms													
9 Loans and advances													
10 Debt securities, including UoP													
11 Equity instruments													
12 of which management companies													
13 Loans and advances													
14 Debt securities, including UoP													
15 Equity instruments													
16 of which insurance undertakings	0.00%	0.00%											
17 Loans and advances	0.00%	0.00%											
18 Debt securities, including UoP	0.00%	0.00%											
19 Equity instruments													
20 Non-financial undertakings	13.91%	5.15%											
21 Loans and advances	15.53%	5.73%											
22 Debt securities, including UoP	6.24%	3.32%											
23 Equity instruments													
24 Households	81.69%	8.22%											
25 of which loans collateralised by residential immovable property	100.00%	10.20%											
26 of which building renovation loans	100.00%	0.00%											
27 of which motor vehicle loans													
28 Local governments financing	6.82%	0.00%											
29 Housing financing	100.00%	0.00%											
30 Other local government financing	0.00%	0.00%											
31 Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%											
32 TOTAL GAR ASSETS	38.79%	3.98%											

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Information on the GAR (green asset ratio of "eligible" activities) shall be accompanied with information on the proportion of total assets covered by the GAR.

3. Credit institutions can, in addition to the information included in this template, show the proportion of assets funding taxonomy relevant sectors that are environmentally sustainable (Taxonomy-aligned). This information would enrich the information on the KPI on environmentally sustainable assets compared to total covered assets.

4. Credit institutions shall duplicate this template for the information based on income received and CapEx.

	at	au	av	aw	ax	ay	az	ba	bb	bc	bd	be
	12/31/2023											
	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
% (compared to flow of total eligible assets)												
GAR - Covered assets in both numerator and denominator												
1 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation												
2 Financial undertakings												
3 Credit institutions												
4 Loans and advances												
5 Debt securities, including UoP												
6 Equity instruments												
7 Other financial corporations												
8 of which investment firms												
9 Loans and advances												
10 Debt securities, including UoP												
11 Equity instruments												
12 of which management companies												
13 Loans and advances												
14 Debt securities, including UoP												
15 Equity instruments												
16 of which insurance undertakings												
17 Loans and advances												
18 Debt securities, including UoP												
19 Equity instruments												
20 Non-financial undertakings												
21 Loans and advances												
22 Debt securities, including UoP												
23 Equity instruments												
24 Households												
25 of which loans collateralised by residential immovable property												
26 of which building renovation loans												
27 of which motor vehicle loans												
28 Local governments financing												
29 Housing financing												
30 Other local government financing												
31 Collateral obtained by taking possession: residential and commercial immovable properties												
32 TOTAL GAR ASSETS												

- The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.
- Information on the GAR (green asset ratio of "eligible" activities) shall be accompanied with information on the proportion of total assets covered by the GAR.
- Credit institutions can, in addition to the information included in this template, show the proportion of assets funding taxonomy relevant sectors that are environmentally sustainable (Taxonomy-aligned). This information would enrich the information on the KPI on environmentally sustainable assets compared to total covered assets.
- Credit institutions shall duplicate this template for the information based on income received and CapEx.

		bf	bg	bh	bi	bj	bk
		12/31/2023					
		TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
		Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total assets covered
				Of which Use of Proceeds	Of which transitional	Of which enabling	
% (compared to flow of total eligible assets)							
GAR - COVERED ASSETS IN BOTH NUMERATOR AND DENOMINATOR							
1	Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	66.51%	6.83%				58.32%
2	Financial undertakings	0.10%	0.01%				3.28%
3	Credit institutions	0.00%	(0.00%)				0,64%
4	Loans and advances	0.00%	(0.00%)				0,28%
5	Debt securities, including UoP	0.00%	0.00%				0,36%
6	Equity instruments						0.00%
7	Other financial corporations	0.12%	0.02%				2.64%
8	of which investment firms						
9	Loans and advances						
10	Debt securities, including UoP						
11	Equity instruments						
12	of which management companies						
13	Loans and advances						
14	Debt securities, including UoP						
15	Equity instruments						
16	of which insurance undertakings	0.00%	0.00%				0,85%
17	Loans and advances	0.00%	0.00%				0,30%
18	Debt securities, including UoP	0.00%	0.00%				0,01%
19	Equity instruments						0,53%
20	Non-financial undertakings	13.91%	5.15%				3.12%
21	Loans and advances	15.53%	5.73%				2.78%
22	Debt securities, including UoP	6.24%	3.32%				0,06%
23	Equity instruments						0,29%
24	Households	81.69%	8.22%				46,50%
25	of which loans collateralised by residential immovable property	100.00%	10.20%				37.45%
26	of which building renovation loans	100.00%	0.00%				0,09%
27	of which motor vehicle loans	67.16%	0.00%				0,65%
28	Local governments financing	6.82%	0.00%				5.42%
29	Housing financing	100.00%	0.00%				0,37%
30	Other local government financing	0.00%	0.00%				5.05%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%				0,00%
32	TOTAL GAR ASSETS	38.79%	3.98%				100%

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Information on the GAR (green asset ratio of "eligible" activities) shall be accompanied with information on the proportion of total assets covered by the GAR.

3. Credit institutions can, in addition to the information included in this template, show the proportion of assets funding taxonomy relevant sectors that are environmentally sustainable (Taxonomy-aligned). This information would enrich the information on the KPI on environmentally sustainable assets compared to total covered assets.

4. Credit institutions shall duplicate this template for the information based on income received and CapEx.

## Template 3 - GAR KPI stock (CapEx basis)

	a	b	c	d	e	f	g	h	i	j	k	l	m
	12/31/2024												
	Climate change mitigation (CCM)					Climate change adaptation (CCA)				Water and marine resources (WMR)			
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which use of proceeds	Of which transitional	Of which enabling			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling
% (compared to total covered assets in the denominator)													
GAR – Covered assets in both numerator and denominator													
Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation	64.47%	7.18%											
<b>1 Financial companies</b>	0.59%	0.39%											
3 Credit institutions	0.05%	0.01%											
4 Loans and advances	0.00%	(0.00%)											
5 Debt securities, including specific use of proceeds (UoP)	0.08%	0.02%											
6 Equity instruments													
7 Other financial companies	0.79%	0.54%											
8 of which investment firms													
9 Loans and advances													
10 Debt securities, including specific use of proceeds (UoP)													
11 Equity instruments													
12 of which management companies													
13 Loans and advances													
14 Debt securities, including specific use of proceeds (UoP)													
15 Equity instruments													
16 of which insurance undertakings	0.00%	0.00%											
17 Loans and advances	0.00%	0.00%											
18 Debt securities, including specific use of proceeds (UoP)	0.00%	0.00%											
19 Equity instruments	0.00%	0.00%											
<b>20 Non-financial companies</b>	22.82%	9.24%											
21 Loans and advances	23.95%	9.12%											
22 Debt securities, including specific use of proceeds (UoP)	31.87%	16.03%											
23 Equity instruments													
<b>24 Households</b>	80.58%	8.49%											
25 of which loans collateralized by residential immovable property	100.00%	10.73%											
26 of which building renovation loans	100.00%	0.00%											
27 of which motor vehicle loans	83.40%	0.00%											
<b>28 Local governments financing</b>	6.07%	0.00%											
29 Housing financing	100.00%	0.00%											
30 Other local government financing	0.00%	0.00%											
Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%											
<b>31</b>													
<b>32 TOTAL GAR ASSETS</b>	<b>37.88%</b>	<b>4.22%</b>											

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Information on the GAR (green asset ratio of "eligible" activities) shall be accompanied with information on the proportion of total assets covered by the GAR.

3. Credit institutions can, in addition to the information included in this template, show the proportion of assets funding taxonomy relevant sectors that are environmentally sustainable (Taxonomy-aligned). This information would enrich the information on the KPI on environmentally sustainable assets compared to total covered assets.

4. Credit institutions shall duplicate this template for the information based on income received and CapEx.

	n	o	p	q	r	s	t	u	v	w	x	z
	12/31/2024											
	Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
% (compared to total covered assets in the denominator)			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling
GAR – Covered assets in both numerator and denominator												
Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation												
1 financial companies												
2 Credits institution												
3 Loans and advances												
4 Debt securities, including specific use of proceeds (UoP)												
5 Equity instruments												
6 Other financial companies												
7 of which investment firms												
8 Loans and advances												
9 Debt securities, including specific use of proceeds (UoP)												
10 Equity instruments												
11 of which management companies												
12 Loans and advances												
13 Debt securities, including specific use of proceeds (UoP)												
14 Equity instruments												
15 of which insurance undertakings												
16 Loans and advances												
17 Debt securities, including specific use of proceeds (UoP)												
18 Equity instruments												
19 Non-financial companies												
20 Loans and advances												
21 Debt securities, including specific use of proceeds (UoP)												
22 Equity instruments												
23 Households												
24 of which loans collateralized by residential immovable property												
25 of which building renovation loans												
26 of which motor vehicle loans												
27 Local governments financing												
28 Housing financing												
29 Other local government financing												
30 Collateral obtained by taking possession: residential and commercial immovable properties												
31												
32 TOTAL GAR ASSETS												

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Information on the GAR (green asset ratio of "eligible" activities) shall be accompanied with information on the proportion of total assets covered by the GAR.

3. Credit institutions can, in addition to the information included in this template, show the proportion of assets funding taxonomy relevant sectors that are environmentally sustainable (Taxonomy-aligned). This information would enrich the information on the KPI on environmentally sustainable assets compared to total covered assets.

4. Credit institutions shall duplicate this template for the information based on income received and CapEx.

	aa	ab	ac	ad	ae	af
	12/31/2024					
	TOTAL (CCM + CCA + WMR + CE + PRP + BIO)					
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
			Of which Use of Proceeds	Of which transitional	Of which enabling	Proportion of total assets covered
% (compared to total covered assets in the denominator)						
GAR – Covered assets in both numerator and denominator						
1	Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation	64.47%	7.18%			38.88%
2	Financial companies	0.59%	0.39%			2.65%
3	Credit institutions	0.05%	0.01%			0.74%
4	Loans and advances	0.00%	(0.00%)			0.18%
5	Debt securities, including specific use of proceeds (UoP)	0.08%	0.02%			0.49%
6	Equity instruments					0.07%
7	Other financial companies	0.79%	0.54%			1.91%
8	of which investment firms					
9	Loans and advances					
10	Debt securities, including specific use of proceeds (UoP)					
11	Equity instruments					
12	of which management companies					
13	Loans and advances					
14	Debt securities, including specific use of proceeds (UoP)					
15	Equity instruments					
16	of which insurance undertakings	0.00%	0.00%			0.61%
17	Loans and advances	0.00%	0.00%			0.20%
18	Debt securities, including specific use of proceeds (UoP)	0.00%	0.00%			0.01%
19	Equity instruments	0.00%	0.00%			0.40%
20	Non-financial companies	22.82%	9.24%			2.42%
21	Loans and advances	23.95%	9.12%			1.85%
22	Debt securities, including specific use of proceeds (UoP)	31.87%	16.03%			0.34%
23	Equity instruments					0.23%
24	Households	80.58%	8.49%			30.13%
25	of which loans collateralized by residential immovable property	100.00%	10.73%			23.84%
26	of which building renovation loans	100.00%	0.00%			0.08%
27	of which motor vehicle loans					
28	Local governments financing	6.07%	0.00%			3.69%
29	Housing financing	100.00%	0.00%			0.22%
30	Other local government financing	0.00%	0.00%			3.47%
31	Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%			0.00%
32	TOTAL GAR ASSETS	37.88%	4.22%			66.18%

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Information on the GAR (green asset ratio of "eligible" activities) shall be accompanied with information on the proportion of total assets covered by the GAR.

3. Credit institutions can, in addition to the information included in this template, show the proportion of assets funding taxonomy relevant sectors that are environmentally sustainable (Taxonomy-aligned). This information would enrich the information on the KPI on environmentally sustainable assets compared to total covered assets.

4. Credit institutions shall duplicate this template for the information based on income received and CapEx.



	ag	ah	ai	aj	ak	al	am	an	ao	ap	aq	ar	as
	12/31/2023												
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
<b>% (compared to flow of total eligible assets)</b>													
GAR - Covered assets in both numerator and denominator													
<b>1</b> Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	66.88%	7.03%											
<b>2</b> Financial undertakings	0.10%	0.05%											
<b>3</b> Credit institutions	0.00%	0.00%											
<b>4</b> Loans and advances	0.00%	0.00%											
<b>5</b> Debt securities, including UoP	0.00%	0.00%											
<b>6</b> Equity instruments													
<b>7</b> Other financial corporations	0.12%	0.06%											
<b>8</b> of which investment firms													
<b>9</b> Loans and advances													
<b>10</b> Debt securities, including UoP													
<b>11</b> Equity instruments													
<b>12</b> of which management companies													
<b>13</b> Loans and advances													
<b>14</b> Debt securities, including UoP													
<b>15</b> Equity instruments													
<b>16</b> of which insurance undertakings	0.00%	0.00%											
<b>17</b> Loans and advances	0.00%	0.00%											
<b>18</b> Debt securities, including UoP	0.00%	0.00%											
<b>19</b> Equity instruments													
<b>20</b> Non-financial undertakings	20.73%	8.92%											
<b>21</b> Loans and advances	22.92%	9.83%											
<b>22</b> Debt securities, including UoP	21.38%	10.72%											
<b>23</b> Equity instruments													
<b>24</b> Households	81.69%	8.22%											
<b>25</b> of which loans collateralised by residential immovable property	100.00%	10.20%											
<b>26</b> of which building renovation loans	100.00%	0.00%											
<b>27</b> of which motor vehicle loans													
<b>28</b> Local governments financing	6.82%	0.00%											
<b>29</b> Housing financing	100.00%	0.00%											
<b>30</b> Other local government financing	0.00%	0.00%											
<b>31</b> Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%											
<b>32 TOTAL GAR ASSETS</b>	<b>39.00%</b>	<b>4.10%</b>											

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Information on the GAR (green asset ratio of "eligible" activities) shall be accompanied with information on the proportion of total assets covered by the GAR.

3. Credit institutions can, in addition to the information included in this template, show the proportion of assets funding taxonomy relevant sectors that are environmentally sustainable (Taxonomy-aligned). This information would enrich the information on the KPI on environmentally sustainable assets compared to total covered assets.

4. Credit institutions shall duplicate this template for the information based on income received and CapEx.

	at	au	av	aw	ax	ay	az	ba	bb	bc	bd	be
	12/31/2023											
	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
% (compared to flow of total eligible assets)												
GAR - Covered assets in both numerator and denominator												
1 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation												
2 Financial undertakings												
3 Credit institutions												
4 Loans and advances												
5 Debt securities, including UoP												
6 Equity instruments												
7 Other financial corporations												
8 of which investment firms												
9 Loans and advances												
10 Debt securities, including UoP												
11 Equity instruments												
12 of which management companies												
13 Loans and advances												
14 Debt securities, including UoP												
15 Equity instruments												
16 of which insurance undertakings												
17 Loans and advances												
18 Debt securities, including UoP												
19 Equity instruments												
20 Non-financial undertakings												
21 Loans and advances												
22 Debt securities, including UoP												
23 Equity instruments												
24 Households												
25 of which loans collateralised by residential immovable property												
26 of which building renovation loans												
27 of which motor vehicle loans												
28 Local governments financing												
29 Housing financing												
30 Other local government financing												
31 Collateral obtained by taking possession: residential and commercial immovable properties												
32 TOTAL GAR ASSETS												

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Information on the GAR (green asset ratio of "eligible" activities) shall be accompanied with information on the proportion of total assets covered by the GAR.

3. Credit institutions can, in addition to the information included in this template, show the proportion of assets funding taxonomy relevant sectors that are environmentally sustainable (Taxonomy-aligned). This information would enrich the information on the KPI on environmentally sustainable assets compared to total covered assets.

4. Credit institutions shall duplicate this template for the information based on income received and CapEx.

	bf	bg	bh	bi	bj	bk
	12/31/2023					
	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total assets covered
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
			Of which Use of Proceeds	Of which transitional	Of which enabling	
% (compared to flow of total eligible assets)						
GAR - Covered assets in both numerator and denominator						
1 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	66.88%	7.03%				100%
2 Financial undertakings	0.10%	0.05%				5.62%
3 Credit institutions	0.00%	0.00%				1.10%
4 Loans and advances	0.00%	0.00%				0.48%
5 Debt securities, including UoP	0.00%	0.00%				0.62%
6 Equity instruments						0.00%
7 Other financial corporations	0.12%	0.06%				4.52%
8 of which investment firms						
9 Loans and advances						
10 Debt securities, including UoP						
11 Equity instruments						
12 of which management companies						
13 Loans and advances						
14 Debt securities, including UoP						
15 Equity instruments						
16 of which insurance undertakings	0.00%	0.00%				1.45%
17 Loans and advances	0.00%	0.00%				0.52%
18 Debt securities, including UoP	0.00%	0.00%				0.02%
19 Equity instruments						0.91%
20 Non-financial undertakings	20.73%	8.92%				5.36%
21 Loans and advances	22.92%	9.83%				4.76%
22 Debt securities, including UoP	21.38%	10.72%				0.09%
23 Equity instruments						0.51%
24 Households	81.69%	8.22%				79.73%
25 of which loans collateralised by residential immovable property	100.00%	10.20%				64.22%
26 of which building renovation loans	100.00%	0.00%				0.16%
27 of which motor vehicle loans	67.16%	0.00%				1.11%
28 Local governments financing	6.82%	0.00%				9.29%
29 Housing financing	100.00%	0.00%				0.63%
30 Other local government financing	0.00%	0.00%				8.66%
31 Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%				0.00%
32 TOTAL GAR ASSETS	39.00%	4.10%				66.16%

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Information on the GAR (green asset ratio of "eligible" activities) shall be accompanied with information on the proportion of total assets covered by the GAR.

3. Credit institutions can, in addition to the information included in this template, show the proportion of assets funding taxonomy relevant sectors that are environmentally sustainable (Taxonomy-aligned). This information would enrich the information on the KPI on environmentally sustainable assets compared to total covered assets.

4. Credit institutions shall duplicate this template for the information based on income received and CapEx.

## Template 4 – GAR KPIs flow (Turnover basis)

	a	b	c	d	e	f	g	h	i	j	k	l	m
	12/31/2024												
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
% (compared to flow of total eligible assets)													
GAR - Covered assets in both numerator and denominator													
1 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	47.05%	5.59%											
2 Financial undertakings	0.88%	0.08%											
3 Credit institutions	0.09%	0.01%											
4 Loans and advances	0.00%	0.00%											
5 Debt securities, including UoP	0.22%	0.02%											
6 Equity instruments													
7 Other financial corporations	1.49%	0.13%											
8 of which investment firms													
9 Loans and advances													
10 Debt securities, including UoP													
11 Equity instruments													
12 of which management companies													
13 Loans and advances													
14 Debt securities, including UoP													
15 Equity instruments													
16 of which insurance undertakings	0.00%	0.00%											
17 Loans and advances	0.00%	0.00%											
18 Debt securities, including UoP	0.00%	0.00%											
19 Equity instruments	0.00%	0.00%											
20 Non-financial undertakings	21.05%	9.29%											
21 Loans and advances	19.72%	9.65%											
22 Debt securities, including UoP	29.25%	7.09%											
23 Equity instruments													
24 Households	70.64%	7.30%											
25 of which loans collateralised by residential immovable property	100.00%	11.50%											
26 of which building renovation loans	100.00%	0.00%											
27 of which motor vehicle loans	100.00%	0.00%											
28 Local governments financing	5.70%	0.00%											
29 Housing financing	100.00%	0.00%											
30 Other local government financing	0.00%	0.00%											
31 Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%											
32 TOTAL GAR ASSETS	22.74%	2.70%											

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Credit institutions shall duplicate this template for the information based on income received and CapEx.

	n	o	p	q	r	s	t	u	v	w	x	z
	12/31/2024											
	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
% (compared to flow of total eligible assets)												
<b>GAR - Covered assets in both numerator and denominator</b>												
1 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation												
<b>2 Financial undertakings</b>												
3 Credit institutions												
4 Loans and advances												
5 Debt securities, including UoP												
6 Equity instruments												
7 Other financial corporations												
8 of which investment firms												
9 Loans and advances												
10 Debt securities, including UoP												
11 Equity instruments												
12 of which management companies												
13 Loans and advances												
14 Debt securities, including UoP												
15 Equity instruments												
16 of which insurance undertakings												
17 Loans and advances												
18 Debt securities, including UoP												
19 Equity instruments												
<b>20 Non-financial undertakings</b>												
21 Loans and advances												
22 Debt securities, including UoP												
23 Equity instruments												
<b>24 Households</b>												
25 of which loans collateralised by residential immovable property												
26 of which building renovation loans												
27 of which motor vehicle loans												
<b>28 Local governments financing</b>												
29 Housing financing												
30 Other local government financing												
<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>												
<b>31</b>												
<b>32 TOTAL GAR ASSETS</b>												

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.  
2. Credit institutions shall duplicate this template for the information based on income received and CapEx.

	aa	ab	ac	ad	ae	af
		12/31/2024				
	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total assets covered
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
		Of which Use of Proceeds	Of which transitional	Of which enabling		
% (compared to flow of total eligible assets)						
GAR - Covered assets in both numerator and denominator						
1 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	47.05%	5.59%				43.02%
2 Financial undertakings	0.88%	0.08%				7.53%
3 Credit institutions	0.09%	0.01%				3.27%
4 Loans and advances	0.00%	0.00%				1.90%
5 Debt securities, including UoP	0.22%	0.02%				1.38%
6 Equity instruments						
7 Other financial corporations	1.49%	0.13%				4.25%
8 of which investment firms						
9 Loans and advances						
10 Debt securities, including UoP						
11 Equity instruments						
12 of which management companies						
13 Loans and advances						
14 Debt securities, including UoP						
15 Equity instruments						
16 of which insurance undertakings	0.00%	0.00%				0.45%
17 Loans and advances	0.00%	0.00%				0.45%
18 Debt securities, including UoP	0.00%	0.00%				0.00%
19 Equity instruments	0.00%	0.00%				0.00%
20 Non-financial undertakings	21.05%	9.29%				4.74%
21 Loans and advances	19.72%	9.65%				4.08%
22 Debt securities, including UoP	29.25%	7.09%				0.66%
23 Equity instruments						
24 Households	70.64%	7.30%				26.83%
25 of which loans collateralised by residential immovable property	100.00%	11.50%				17.04%
26 of which building renovation loans	100.00%	0.00%				0.24%
27 of which motor vehicle loans	100.00%	0.00%				1.67%
28 Local governments financing	5.70%	0.00%				3.92%
29 Housing financing	100.00%	0.00%				0.22%
30 Other local government financing	0.00%	0.00%				3.70%
31 Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%				0.00%
32 TOTAL GAR ASSETS	22.74%	2.70%				89.03%

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Credit institutions shall duplicate this template for the information based on income received and CapEx.

## Template 4 – 4. GAR KPIs flow [CapEx basis]

	a	b	c	d	e	f	g	h	i	j	k	l	m
	12/31/2024												
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
	Of which Use of Proceeds					Of which Use of Proceeds				Of which Use of Proceeds			
	Of which transitional					Of which transitional				Of which transitional			
	Of which enabling					Of which enabling				Of which enabling			
% (compared to flow of total eligible assets)													
GAR - Covered assets in both numerator and denominator													
1 Loans and advances, debt securities and equity instruments not HTI eligible for GAR calculation	47.87%	6.12%											
2 Financial undertakings	0.84%	0.25%											
3 Credit institutions	0.09%	0.02%											
4 Loans and advances	0.00%	0.00%											
5 Debt securities, including UoP	0.22%	0.05%											
6 Equity instruments													
7 Other financial corporations	1.43%	0.42%											
8 of which investment firms													
9 Loans and advances													
10 Debt securities, including UoP													
11 Equity instruments													
12 of which management companies													
13 Loans and advances													
14 Debt securities, including UoP													
15 Equity instruments													
16 of which insurance undertakings	0.00%	0.00%											
17 Loans and advances	0.00%	0.00%											
18 Debt securities, including UoP	0.00%	0.00%											
19 Equity instruments	0.00%	0.00%											
20 Non-financial undertakings	28.55%	13.82%											
21 Loans and advances	26.98%	13.87%											
22 Debt securities, including UoP	38.28%	13.47%											
23 Equity instruments													
24 Households	70.64%	7.30%											
25 of which loans collateralised by residential immovable property	100%	11.50%											
26 of which building renovation loans	100%	0.00%											
27 of which motor vehicle loans	100%	0.00%											
28 Local governments financing	5.70%	0.00%											
29 Housing financing	100%	0.00%											
30 Other local government financing	0.00%	0.00%											
31 Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%											
<b>32 TOTAL GAR ASSETS</b>	<b>23.13%</b>	<b>2.96%</b>											

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Credit institutions shall duplicate this template for the information based on income received and CapEx.



	n	o	p	q	r	s	t	u	v	w	x	z
	12/31/2024											
	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
	Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling		Of which Use of Proceeds		Of which enabling	
% (compared to flow of total eligible assets)												
GAR - Covered assets in both numerator and denominator												
1 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation												
2 Financial undertakings												
3 Credit institutions												
4 Loans and advances												
5 Debt securities, including UoP												
6 Equity instruments												
7 Other financial corporations												
8 of which investment firms												
9 Loans and advances												
10 Debt securities, including UoP												
11 Equity instruments												
12 of which management companies												
13 Loans and advances												
14 Debt securities, including UoP												
15 Equity instruments												
16 of which insurance undertakings												
17 Loans and advances												
18 Debt securities, including UoP												
19 Equity instruments												
20 Non-financial undertakings												
21 Loans and advances												
22 Debt securities, including UoP												
23 Equity instruments												
24 Households												
25 of which loans collateralised by residential immovable property												
26 of which building renovation loans												
27 of which motor vehicle loans												
28 Local governments financing												
29 Housing financing												
30 Other local government financing												
31 Collateral obtained by taking possession: residential and commercial immovable properties												
32 TOTAL GAR ASSETS												

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Credit institutions shall duplicate this template for the information based on income received and CapEx.

	aa	ab	ac	ad	ae	af
	12/31/2024					
	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total new assets covered
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
		Of which Use of Proceeds	Of which transitional	Of which enabling		
% (compared to flow of total eligible assets)						
GAR - Covered assets in both numerator and denominator						
Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	47.87%	6.12%				43.02%
Financial undertakings	0.84%	0.25%				7.53%
Credit institutions	0.09%	0.02%				3.27%
Loans and advances	0.00%	0.00%				1.90%
Debt securities, including UoP	0.22%	0.05%				1.38%
Equity instruments						
Other financial corporations	1.43%	0.42%				4.25%
of which investment firms						
Loans and advances						
Debt securities, including UoP						
Equity instruments						
of which management companies						
Loans and advances						
Debt securities, including UoP						
Equity instruments						
of which insurance undertakings	0.00%	0.00%				0.45%
Loans and advances	0.00%	0.00%				0.45%
Debt securities, including UoP	0.00%	0.00%				0.00%
Equity instruments	0.00%	0.00%				0.00%
Non-financial undertakings	28.55%	13.82%				4.74%
Loans and advances	26.98%	13.87%				4.08%
Debt securities, including UoP	38.28%	13.47%				0.66%
Equity instruments						
Households	70.64%	7.30%				26.83%
of which loans collateralised by residential immovable property	100%	11.50%				17.04%
of which building renovation loans	100%	0.00%				0.24%
of which motor vehicle loans	100%	0.00%				1.67%
Local governments financing	5.70%	0.00%				3.92%
Housing financing	100%	0.00%				0.22%
Other local government financing	0.00%	0.00%				3.70%
Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%				0.00%
TOTAL GAR ASSETS	23.13%	2.96%				89.03%

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Credit institutions shall duplicate this template for the information based on income received and CapEx.

## Template 5 - KPI off-balance sheet exposures (Turnover basis)

	a	b	c	d	e	f	g	h	i	j	k	l	m
	12/31/2024												
	Climate change mitigation (CCM)				Climate change adaptation (CCA)				Water and marine resources (WMR)				
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
	Of which use of proceeds		Of which transitional	Of which enabling	Of which use of proceeds		Of which transitional	Of which enabling	Of which use of proceeds		Of which transitional	Of which enabling	
% (relative to total eligible off-balance sheet assets)													
1 Financial guarantees (FinGuar KPI)	15.03%	4.90%											
2 Assets under management (AuM KPI)	8.30%	0.88%											

1. Institution shall disclose in this template the KPIs for off-balance sheet exposures (financial guarantees and AuM) calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template

2. Institutions shall duplicate this template to disclose stock and flow KPIs for off-balance sheet exposures

	n	o	p	q	r	s	t	u	v	w	x	z
	12/31/2024											
	Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
	Of which use of proceeds		Of which enabling		Of which use of proceeds		Of which enabling		Of which use of proceeds		Of which enabling	
% (relative to total eligible off-balance sheet assets)												
1 Financial guarantees (FinGuar KPI)												
2 Assets under management (AuM KPI)												

1. Institution shall disclose in this template the KPIs for off-balance sheet exposures (financial guarantees and AuM) calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template

2. Institutions shall duplicate this template to disclose stock and flow KPIs for off-balance sheet exposures

	aa	ab	ac	ad	ae
	12/31/2024				
	TOTAL (CCM + CCA + WMR + CE + PRP + BIO)				
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
	Of which use of proceeds		Of which transitional	Of which enabling	
% (relative to total eligible off-balance sheet assets)					
1 Financial guarantees (FinGuar KPI)	15.03%	4.90%			
2 Assets under management (AuM KPI)	8.30%	0.88%			

1. Institution shall disclose in this template the KPIs for off-balance sheet exposures (financial guarantees and AuM) calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template

2. Institutions shall duplicate this template to disclose stock and flow KPIs for off-balance sheet exposures

## Template 5 - KPI off-balance sheet exposures (CapEx basis)

	a	b	c	d	e	f	g	h	i	j	k	l	m
	12/31/2024												
	Climate change mitigation (CCM)				Climate change adaptation (CCA)				Water and marine resources (WMR)				
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
			Of which use of proceeds	Of which transitional	Of which enabling		Of which use of proceeds	Of which enabling		Of which use of proceeds	Of which enabling		
% (relative to total eligible off-balance sheet assets)													
1 Financial guarantees (FinGuar KPI)	14.97%	5.81%											
2 Assets under management (AuM KPI)	2.30%	0.71%											
1. Institution shall disclose in this template the KPIs for off-balance sheet exposures (financial guarantees and AuM) calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template													
2. Institutions shall duplicate this template to disclose stock and flow KPIs for off-balance sheet exposures													

	n	o	p	q	r	s	t	u	v	w	x	z
	12/31/2024											
	Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
	Of which use of proceeds		Of which enabling		Of which use of proceeds		Of which enabling		Of which use of proceeds		Of which enabling	
% (relative to total eligible off-balance sheet assets)												
1 Financial guarantees (FinGuar KPI)												
2 Assets under management (AuM KPI)												
1. Institution shall disclose in this template the KPIs for off-balance sheet exposures (financial guarantees and AuM) calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template												
2. Institutions shall duplicate this template to disclose stock and flow KPIs for off-balance sheet exposures												

	aa	ab	ac	ad	ae
	12/31/2024				
	TOTAL (CCM + CCA + WMR + CE + PRP + BIO)				
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
	Of which use of proceeds		Of which transitional	Of which enabling	
% (relative to total eligible off-balance sheet assets)					
1 Financial guarantees (FinGuar KPI)	14.97%	5.81%			
2 Assets under management (AuM KPI)	2.30%	0.71%			
1. Institution shall disclose in this template the KPIs for off-balance sheet exposures (financial guarantees and AuM) calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template					
2. Institutions shall duplicate this template to disclose stock and flow KPIs for off-balance sheet exposures					

## Nuclear and fossil gas - Template 1 - Activities related to nuclear energy and fossil gas

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

## Nuclear and fossil - Template 2 - Taxonomy-aligned economic activities (denominator) - (Turnover basis)

Row	Economic activities	Amount and proportion (information must be presented in monetary amounts and percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(0)	0%	(0)	0%	(0)	0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(1)	0%	(1)	0%	(0)	0%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	140	0%	140	0%	(0)	0%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(0)	0%	(0)	0%	(0)	0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(0)	0%	(0)	0%	(0)	0%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(0)	0%	(0)	0%	(0)	0%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	<b>40,183</b>	<b>4%</b>	<b>40,183</b>	<b>4%</b>	<b>(0)</b>	<b>0%</b>
8.	<b>Total applicable KPI</b>	<b>985,983</b>	<b>4%</b>	<b>985,983</b>	<b>4%</b>		<b>0%</b>

## Nuclear and fossil - Template 2 - Taxonomy-aligned economic activities (denominator) - (CapEx basis)

Row	Economic activities	Amount and proportion (information must be presented in monetary amounts and percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0%	-	0%	-	0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	21	0%	21	0%	[gross] carrying amount	0%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	112	0%	112	0%	-	0%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0%	4	0%	-	0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0%	1	0%	-	0%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0%	-	0%	-	0%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	<b>41,465</b>	<b>4%</b>	<b>41,465</b>	<b>4%</b>	-	0%
8.	<b>Total applicable KPI</b>	<b>985,983</b>	<b>4%</b>	<b>985,983</b>	<b>4%</b>	<b>985,983</b>	<b>0%</b>

## Nuclear and fossil gas - Template 3 - Taxonomy-aligned economic activities (numerator) - (Turnover basis)

Row	Economic activities	Amount and proportion (information must be presented in monetary amounts and percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	0%	-	0%	-	0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	4	0%	4	0%		0%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	254	1%	254	1%		0%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	0%		0%		0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	0%		0%		0%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	0%		0%		0%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	<b>40,066</b>	<b>99%</b>	<b>40,066</b>	<b>99%</b>		<b>0%</b>
8.	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	<b>40,324</b>	<b>100%</b>	<b>40,324</b>	<b>100%</b>		<b>0%</b>



## Nuclear and fossil gas - Template 3 - Taxonomy-aligned economic activities (numerator) - (CapEx basis)

Row	Economic activities	Amount and proportion (information must be presented in monetary amounts and percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	0%	-	0%	(Gross) carrying amount	0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	31	0%	31	0%	-	0%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	173	0%	173	0%	-	0%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	4	0%	4	0%	-	0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	2	0%	2	0%	-	0%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	0%	-	0%	-	0%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	<b>41,393</b>	<b>99%</b>	<b>41,393</b>	<b>99%</b>	-	0%
8.	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	<b>41,602</b>	<b>100%</b>	<b>41,602</b>	<b>100%</b>	-	0%

## Nuclear and fossil - Template 4 - Taxonomy-eligible but not taxonomy-aligned economic activities - (turnover basis)

Row	Economic activities	Amount and proportion (information must be presented in monetary amounts and percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI		0%		0%		0%
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 2021/2139 in the denominator of the applicable KPI		0%		0%		0%
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 2021/2139 in the denominator of the applicable KPI		0%		0%		0%
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 2021/2139 in the denominator of the applicable KPI	28	0%	28	0%		0%
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 2021/2139 in the denominator of the applicable KPI	3	0%	3	0%		0%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0%		0%		0%
7.	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	<b>331,276</b>	<b>100%</b>	<b>331,276</b>	<b>100%</b>		<b>0%</b>
8.	<b>Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI</b>	<b>331,307</b>	<b>100%</b>	<b>331,307</b>	<b>100%</b>		<b>0%</b>

## Nuclear and fossil gas - Template 4 - Taxonomy-eligible but not taxonomy-aligned economic activities - [CapEx basis]

Row	Economic activities	Amount and proportion (information must be presented in monetary amounts and percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0%	-	0%	(Gross) carrying amount	0%
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 2021/2139 in the denominator of the applicable KPI	-	0%	-	0%	-	0%
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 2021/2139 in the denominator of the applicable KPI	-	0%	-	0%	-	0%
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 2021/2139 in the denominator of the applicable KPI	13	0%	13	0%	-	0%
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 2021/2139 in the denominator of the applicable KPI	2	0%	2	0%	-	0%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0%	-	0%	-	0%
7.	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	<b>331,872</b>	<b>100%</b>	<b>331,872</b>	<b>100%</b>	-	0%
8.	<b>Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI</b>	<b>331,887</b>	<b>100%</b>	<b>331,887</b>	<b>100%</b>	-	0%

## Nuclear and fossil gas - Template 5 - Taxonomy non-eligible economic activities - (Turnover basis)

Row	Economic activities	Amount	Percentage
1.	Amount and proportion of the economic activity referred to in line 1 of Template 1 that is not eligible for taxonomy, 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%
2.	Amount and proportion of the economic activity referred to in line 2 of Template 1 that is not eligible for taxonomy, in accordance with Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139, in the denominator of the applicable KPI	2	0%
3.	Amount and proportion of the economic activity referred to in line 3 of Template 1 that is not eligible for taxonomy, in accordance with Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139, in the denominator of the applicable KPI	15	0%
4.	Amount and proportion of the economic activity referred to in line 4 of Template 1 that is not eligible for taxonomy, 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%
5.	Amount and proportion of the economic activity referred to in line 5 of Template 1 that is not eligible for taxonomy, 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%
6.	Amount and proportion of the economic activity referred to in line 6 of Template 1 that is not eligible for taxonomy, 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%
7.	<b>Amount and proportion of other taxonomy non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	<b>614,335</b>	<b>100%</b>
8.	<b>Total amount and total proportion of economic activities not eligible for taxonomy in the denominator of the applicable KPI</b>	<b>614,352</b>	<b>100%</b>

## Nuclear and fossil gas - Template 5 - Taxonomy non-eligible economic activities - (CapEx basis)

Row	Economic activities	Amount	Percentage
1.	Amount and proportion of the economic activity referred to in line 1 of Template 1 that is not eligible for taxonomy, 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%
2.	Amount and proportion of the economic activity referred to in line 2 of Template 1 that is not eligible for taxonomy, in accordance with Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139, in the denominator of the applicable KPI	117	0%
3.	Amount and proportion of the economic activity referred to in line 3 of Template 1 that is not eligible for taxonomy, in accordance with Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139, in the denominator of the applicable KPI	10	0%
4.	Amount and proportion of the economic activity referred to in line 4 of Template 1 that is not eligible for taxonomy, 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%
5.	Amount and proportion of the economic activity referred to in line 5 of Template 1 that is not eligible for taxonomy, 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%
6.	Amount and proportion of the economic activity referred to in line 6 of Template 1 that is not eligible for taxonomy, 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%
7.	<b>Amount and proportion of other taxonomy non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	<b>612,367</b>	<b>100%</b>
8.	<b>Total amount and total proportion of economic activities not eligible for taxonomy in the denominator of the applicable KPI</b>	<b>612,494</b>	<b>100%</b>

## 2.2 Statutory Auditors' report on the Groupe BPCE Sustainability report

### **Report on the certification of sustainability information and verification of the disclosure requirements under Article 8 of Regulation (EU) 2020/852 of Groupe BPCE**

**Year ended December 31, 2024**

*This is a translation into English of the statutory auditors' report on the certification of sustainability information and verification of the disclosure requirements under Article 8 of Regulation (EU) 2020/852 of the Company issued in French and it is provided solely for the convenience of English speaking users.*

*This report should be read in conjunction with, and construed in accordance with, French law and the H2A guidelines on "Limited assurance engagement - Certification of sustainability reporting and verification of disclosure requirements set out in Article 8 of Regulation (EU) 2020/852".*

To the General Assembly

#### **GROUPE BPCE**

7, promenade Germaine Sablon

75013 PARIS

This report is issued in our capacity as statutory auditor of Groupe BPCE. It covers the sustainability information and the information required by Article 8 of Regulation (EU) 2020/852, relating to the year ended December 31, 2024 and included in the group management report and disclosed in section 2.1 "Groupe BPCE Sustainability report" in the chapter 2 of the universal registration document (below the "Groupe BPCE Sustainability report").

Pursuant to Article L. 233-28-4 of the French Commercial Code, Groupe BPCE is required to include the above mentioned information in a separate section of the group management report. This information has been prepared in the context of the first time application of the aforementioned articles, a context characterized by uncertainties regarding the interpretation of the laws and regulations, the use of significant estimates, the absence of established practices and frameworks in particular for the double-materiality assessment, and an evolving internal control system. It enables an understanding of the impact of the activity of the group on sustainability matters, as well as the way in which these matters influence the development of the business of the group, its performance and position. Sustainability matters include environmental, social and corporate governance matters.

Pursuant to Article L.821-54 paragraph II of the aforementioned Code our responsibility is to carry out the procedures necessary to issue a conclusion, expressing limited assurance, on:

- compliance with the sustainability reporting standards adopted pursuant to Article 29 b of Directive (EU) 2013/34 of the European Parliament and of the Council of 14 December 2022 (hereinafter ESRS for European Sustainability Reporting Standards) of the process implemented by Groupe BPCE to determine the information reported, and compliance with the requirement to consult the social and economic committee provided for in the sixth paragraph of Article L. 2312-17 of the French Labour Code;
- compliance of the sustainability information included in the Groupe BPCE Sustainability report with the requirements of Article L. 233-28-4 of the French Commercial Code, including ESRS; and
- compliance with the reporting requirements set out in Article 8 of Regulation (EU) 2020/852.

This engagement is carried out in compliance with the ethical rules, including independence, and quality control rules prescribed by the French Commercial Code.

It is also governed by the H2A guidelines on "Limited assurance engagement - Certification of sustainability reporting and verification of disclosure requirements set out in Article 8 of Regulation (EU) 2020/852".

In the three separate sections of the report that follow, we present, for each of the sections of our engagement, the nature of the procedures that we carried out, the conclusions that we drew from these procedures and, in support of these conclusions, the elements to which we paid particular attention and the procedures that we carried out with regard to these elements. We draw your attention to the fact that we do not express a conclusion on any of these elements taken individually and that the procedures described should be considered in the overall context of the formation of the conclusions issued in respect of each of the three sections of our engagement.

Finally, where deemed necessary to draw your attention to one or more disclosures of sustainability information provided by Groupe BPCE in the group management report, we have included an emphasis of matter paragraph hereafter.

#### Limits of our engagement

As the purpose of our engagement is to express limited assurance, the nature (choice of techniques), extent (scope) and timing of the procedures are less than those required to obtain reasonable assurance.

Furthermore, this engagement does not provide guarantee regarding the viability or the quality of the management of Groupe BPCE, in particular it does not provide an assessment, of the relevance of the choices made by Groupe BPCE in terms of action plans, targets, policies, scenario analyses and transition plans, which would go beyond compliance with the ESRS reporting requirements.

It does, however, allow us to express conclusions regarding the entity's process for determining the sustainability information to be reported, the sustainability information itself, and the information reported pursuant to Article 8 of Regulation (EU) 2020/852, as to the absence of identification or, on the contrary, the identification of errors, omissions or inconsistencies of such importance that they would be likely to influence the decisions that readers of the information subject to this engagement might make.

Any comparative information that would be included in the group management report are not covered by our engagement.

**Compliance with the ESRS of the process implemented by Groupe BPCE to determine the information reported, and compliance with the requirement to consult the social and economic committee provided for in the sixth paragraph of Article L. 2312-17 of the French Labour Code**

Nature of procedures carried out

Our procedures consisted in verifying that:

- the process defined and implemented by Groupe BPCE has enabled it, in accordance with the ESRS, to identify and assess its impacts, risks and opportunities related to sustainability matters, and to identify the material impacts, risks and opportunities, that lead to the publication of information disclosed in the Groupe BPCE Sustainability report, and
- the information provided on this process also complies with the ESRS.

We also checked the compliance with the requirement to consult the social and economic committee.

Conclusion of the procedures carried out

On the basis of the procedures we have carried out, we have not identified any material errors, omissions or inconsistencies regarding the compliance of the process implemented by Groupe BPCE with the ESRS.

Concerning the consultation of the social and economic committee provided for in the sixth paragraph of Article L. 2312-17 of the French Labour Code we inform you that as of the date of this report, this consultation has not yet been held.

Emphasis of matter

Without qualifying the conclusion expressed above, we draw your attention to the information provided in the note 1.1.2.3 "*Sources of estimation and outcome uncertainty*" which underlines the uncertainty and limitations related to the methodologies used to perform the double materiality analysis regarding the thematic standards E2, E3, E4 and E5 (pollution, water and marine resources, biodiversity and ecosystems, and resource use and circular economy) for the year 2024.

Elements that received particular attention

We set out below the elements that have been the subject of particular attention in relation to our assessment of compliance with the ESRS of the process implemented by Groupe BPCE to determine the information reported.

- Concerning the identification of stakeholders

Information on the identification of stakeholders is set out in the note 1.3.2 "SBM2 – Interests and views of stakeholders" of the Groupe BPCE Sustainability report.

We interviewed management and others within the entity as appropriate and inspected available documentation.

We also assessed the consistency of the primary stakeholders identified by Groupe BPCE in view of the nature of its activities and its geographical location, taking into account its business relationships, its cooperative dimension and value chain.

- Concerning the identification of impacts, risks and opportunities

Information on the identification of impacts, risks and opportunities is provided in the note 1.5.1.1 "IRO-1 – Description of the identification and assessment of material impacts" of the Groupe BPCE Sustainability report.

- We obtained an understanding of the process implemented by the entity to identify actual or potential impacts – both negative and positive – risks and opportunities (IROs), in relation to the sustainability matters mentioned in paragraph AR 16 of ESRS 1, "Application requirements", and where applicable, those specific to Groupe BPCE, as presented in the above cited note.

In particular, we assessed the approach taken by the entity to determine its impacts and dependencies, which may be a source of risks or opportunities, including the dialogue undertaken, where appropriate, with stakeholders.

We obtained an understanding of the group's mapping of identified IROs, including a description of their distribution within the group's own operations and its value chain, as well as their time horizon (short, medium or long term), and assessed the consistency of this mapping with our knowledge of Groupe BPCE and, where applicable, with the risk analyses conducted by Groupe BPCE.

- Concerning the assessment of impact materiality and financial materiality

Information on the assessment of impact materiality and financial materiality is provided in the note 1.5.1.1 "IRO-1 – Description of the identification and assessment of material impacts" the Groupe BPCE Sustainability report.

Through interviews with management and inspection of available documentation, we obtained an understanding of the process implemented by the entity to assess impact materiality and financial materiality, and assessed its compliance with the criteria defined in ESRS 1.

In particular, we assessed the way in which the entity established and applied the materiality criteria defined in ESRS 1, including those relating to the setting of thresholds, in order to determine the following material information reported:

- metrics relating to material IROs identified in accordance with the relevant ESRS standards;
- entity-specific disclosures.

## **Compliance of the sustainability information included in the Groupe BPCE Sustainability report with the requirements of Article L.233-28-4 of the French Commercial Code, including the ESRS**

### Nature of procedures carried out

Our procedures consisted in verifying that, in accordance with legal and regulatory requirements, including the ESRS:

- the disclosures provided enable an understanding of the general basis for the preparation and governance of the sustainability information included in the Groupe BPCE Sustainability report, including the basis for determining the information relating to the value chain and the exemptions from disclosures used;
- the presentation of this information ensures its readability and understandability;
- the scope chosen by Groupe BPCE for providing this information is appropriate; and
- on the basis of a selection, based on our analysis of the risks of non-compliance of the information provided and the expectations of users, that this information does not contain any material errors, omissions or inconsistencies, i.e. that are likely to influence the judgement or decisions of users of this information.

### Conclusion of the procedures carried out

Based on the procedures we have carried out, we have not identified material errors, omissions or inconsistencies regarding the compliance of the sustainability information included in the Groupe BPCE Sustainability report, with the requirements of Article L.233-28-4 of the French Commercial Code, including the ESRS.

### Emphasis of matter

Without qualifying the conclusion expressed above, we draw your attention to the information provided in the notes 1.1.2.3 "Sources of estimation and outcome uncertainty", 2.2.3.1 "(E1-1) Transition plan for climate change mitigation" and 2.2.4.2 "(E1-6) Gross scopes 1, 2, 3 and total GHG emissions", which disclose the scope selected for the transition plan and for the calculation of financed emissions related to the value chain (category 15 of scope 3 according to the *GHG Protocol*), as well as the limitations related to data availability, the assumptions used, and the methodologies applied to determine the estimates related to decarbonization targets and the greenhouse gas emissions balance.

### Elements that received particular attention

- Information provided in application of the standards relating to general requirements and general disclosure (ESRS 1 – Climate change)

We set out below the elements that have been the subject of particular attention in relation to our assessment of compliance with the ESRS of the following information disclosed in the notes 2.2.3.1 "Transition plan for climate change mitigation" and 2.2.4 "Metrics and targets".

With regard to the information published on the greenhouse gas emissions (ESRS E1-6), as mentioned in the note 2.2.4.2 "(E1-6) Gross scopes 1, 2, 3 and total GHG emissions" of the Groupe BPCE Sustainability report, our work consisted primarily of:

- obtaining an understanding of the process, methods, frames, data and estimates used by Groupe BPCE to prepare the information (including procedures and internal control);
- with regard to Scope 3 emissions (categories 1, 2 and 6) regarding Groupe BPCE own operations:
  - assessing the appropriateness of the emission factors used and the calculation of the related conversions, taking into account the uncertainty inherent in the state of scientific or economic knowledge and the quality of the external data;
  - reconciling physical data, on a sample basis, to the underlying data used to draw up the greenhouse gas emissions assessment and tracing to supporting documents
- with regard to financed emissions (scope 3, category 15 of *GHG Protocol*):
  - Understanding the scope of covered assets as described and assess its justification in regard of the applicable framework;
  - Verifying that the base used for computing financed emissions corresponds to the scope of covered assets as described in the note 2.2.4.2 and reconciling it with the consolidated general balance
  - assessing the appropriateness of the method for determining estimates, including the sectoral proxies chosen;
  - verifying the accuracy of the calculations used to prepare this information on a sample basis.

With regard to the information published on the Transition plan for climate change mitigation and adaptation (ESRS E1-1), as defined in the note 2.2.3.1 "(E1-1) Transition plan for climate change mitigation" of the Groupe BPCE Sustainability report, our work consisted primarily of:

- assessing the information related to the scope chosen for the Transition Plan (transition plan for own activities and sector-specific transition plans covering the value chain), as well as the processes, methodologies, frameworks, data, and estimates adopted by the Group to prepare the published information;
- assessing the description of the structural assumptions and reference climate scenarios underlying this plan, it being understood that we are not required to express a conclusion on the appropriateness or the level of ambition of the transition plan's objectives ;
- assessing whether the transition plan reflects the commitments made by Groupe BPCE as stated in the minutes of its governance bodies' meetings and other group communications;;
- assessing whether the transition plan is in line with the strategic plan as approved by the governing bodies and the financial planning of Groupe BPCE;
- assessing the information related to the scope chosen for the analysis of transition risks (physical and transition risks), as well as the methodologies, scenarios, and assumptions adopted by the group, and their integration into risk mapping of the Group.



**Compliance with the reporting requirements set out in Article 8 of Regulation (EU) 2020/852**Nature of procedures carried out

Our procedures consisted in verifying the process implemented by Groupe BPCE to determine the eligible and aligned nature of the activities of the entities included in the consolidation.

They also involved verifying the information reported pursuant to Article 8 of Regulation (EU) 2020/852, which involves checking:

- the compliance with the rules applicable to the presentation of this information to ensure that it is readable and understandable;
- on the basis of a selection, the absence of material errors, omissions or inconsistencies in the information provided, i.e. information likely to influence the judgement or decisions of users of this information.

Conclusion of the procedures carried out

Based on the procedures we have carried out, we have not identified any material errors, omissions or inconsistencies relating to compliance with the requirements of Article 8 of Regulation (EU) 2020/852.

Emphasis of matters

Without qualifying the conclusion expressed above, we draw your attention to:

- The information in the paragraph "Methodology used" in the note 2.1 "Indicators of the European taxonomy on sustainable activities" which discloses the main methodological assumptions used to assess the alignment of loans granted to individuals
- The information in the paragraph "Assumptions used and existing limitations in the preparation and collection of information" in the note 2.1 "Indicators of the European taxonomy on sustainable activities" which discloses the main existing limitations in the presentation of information, including those concerning the presentation of cash flow information regarding the KPI on off-balance-sheet exposures.

Elements that received particular attention

We concluded that there are no elements that received particular attention to report.

Done at Neuilly-sur-Seine and Paris La Défense, March 21, 2025

The statutory auditors  
*French original signed by*

**PricewaterhouseCoopers Audit**

**Forvis Mazars SA**

Antoine Priollaud

Laurent Tavernier

Laurence Karagulian

Emmanuel Thierry

## 2.3 BPCE Sustainability report

<b>PART 1 - General information</b>	<b>310</b>	<b>PART 3 - Social information</b>	<b>318</b>
<b>1.1 Reporting basis</b>	<b>310</b>	<b>3.1 S1 - Own workforce</b>	<b>318</b>
1.1.1 BP-1 - General basis for the preparation of the sustainability statements	310	3.1.1 SBM-2 - Interests and views of stakeholders	318
1.1.2 BP-2 - Disclosures in relation to specific circumstances	310	3.1.2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model	318
<b>1.2 Strategy</b>	<b>310</b>	3.1.3 Impact, risk and opportunity management	318
1.2.1 SBM-1 - Strategy, business model and value chain	310	3.1.4 Metrics and targets	318
1.2.2 SBM-2 - Interests and views of stakeholders	310	3.1.5 Metric units	318
<b>1.3 Governance</b>	<b>311</b>	<b>3.2 S2 - Workers in the value chain</b>	<b>334</b>
1.3.1 GOV-1 - The role of the administrative, management and supervisory bodies	311	3.2.1 SBM-2 - Interests and views of stakeholders	334
1.3.2 GOV-2 - Information provided to and sustainability matters addressed by the undertaking's administrative, management and supervisory bodies	311	3.2.2 SBM-3 - Material impacts, risks and opportunities and interaction with strategy and business model	334
1.3.3 GOV-3 - Integration of sustainability-related performance in incentive schemes	311	3.2.3 Impact, risk and opportunity management	334
1.3.4 GOV-5 - Risk management and internal controls over sustainability reporting	311	3.2.4 Metrics and targets	334
1.3.5 GOV-4 - Statement on due diligence	311	<b>3.3 S3 - Affected communities</b>	<b>335</b>
<b>1.4 Impact, risk and opportunity management</b>	<b>311</b>	3.3.1 SBM-2 - Interests and views of stakeholders	335
1.4.1 IRO-1 - Description of the processes to identify and assess material impacts, risks and opportunities	311	3.3.2 SBM-3 - Material impacts, risks and opportunities and interaction with strategy and business model	335
1.4.2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model	311	3.3.3 Impact, risk and opportunity management	335
1.4.3 IRO-2 - Disclosure Requirements in ESRS covered by the undertaking's sustainability statements	311	3.3.4 Metrics and targets	335
<b>PART 2 - Environmental information</b>	<b>312</b>	<b>3.4 S4 - Consumers and end-users</b>	<b>336</b>
<b>2.1 Indicators of the European taxonomy on sustainable activities</b>	<b>312</b>	3.4.1 SBM-2 - Interests and views of stakeholders	336
<b>2.2 E1 - Climate change</b>	<b>314</b>	3.4.2 SBM-3 - Material impacts, risks and opportunities and their interaction with strategy and business model	336
2.2.1 Governance	314	3.4.3 Impact, risk and opportunity management	336
2.2.2 Impact, risk and opportunity management	314	3.4.4 Metrics and targets	336
2.2.3 Strategy	314	<b>PART 4 - Governance information</b>	<b>337</b>
2.2.4 Metrics and targets	314	<b>4.1 G1 - BUSINESS CONDUCT</b>	<b>337</b>
		4.1.1 Impact, risk and opportunity management	337
		4.1.2 Metrics and targets	337
		<b>PART 5 - Indicators of the European taxonomy on sustainable activities</b>	<b>338</b>

## Introductory remarks

The following sustainability report is the result of a regulatory obligation imposing a publication on a scope covering only BPCE, which is made up of the central institution of Groupe BPCE, the business lines serving the activities of the Banque Populaire and Caisse d'Epargne networks, Natixis SA, as well as resource pools.

The analysis of the double materiality for the two scopes is identical. The criteria for identifying impacts, risks and opportunities (IRO) and assessing their materiality are the same. The same applies to the definition of policies and action plans.

This is why this report makes references to Groupe BPCE's sustainability report for elements of strategy and editorial content.

This report presents certain quantitative metrics required by the standard, when they are applicable to the BPCE scope.

Where applicable, the reported quantitative metrics are calculated for the BPCE scope. This concerns a majority of the indicators required by the ESRS.

The indicators required by the ESRS that are not applicable to BPCE concern:

- greenhouse gas emission reduction targets: these are calculated solely for Groupe BPCE scope, as an integral part of the transition strategy covering the entire Group scope;
- indicators relating to the G1-3 and G1-4 topics, which are calculated for the scope of Groupe BPCE only.

These items are published in Groupe BPCE's report, which includes the BPCE scope.

# PART 1 - GENERAL INFORMATION

## 1.1 Reporting basis

### 1.1.1 BP-1 - General basis for the preparation of the sustainability statements

See the corresponding section in Groupe BPCE's sustainability report.

### 1.1.2 BP-2 - Disclosures in relation to specific circumstances

#### 1.1.2.1 TIME HORIZONS

See the corresponding section in Groupe BPCE's sustainability report.

#### 1.1.2.2 VALUE CHAIN ESTIMATION

See the corresponding section in Groupe BPCE's sustainability report.

#### 1.1.2.3 SOURCES OF ESTIMATION AND OUTCOME UNCERTAINTY

See the corresponding section in Groupe BPCE's sustainability report.

#### 1.1.2.4 CHANGES IN PREPARATION OR PRESENTATION OF SUSTAINABILITY INFORMATION

See the corresponding section in Groupe BPCE's sustainability report.

#### 1.1.2.5 REPORTING OF ERRORS IN PRIOR PERIODS

See the corresponding section in Groupe BPCE's sustainability report.

#### 1.1.2.6 DISCLOSURES STEMMING FROM OTHER LEGISLATION OR GENERALLY ACCEPTED SUSTAINABILITY REPORTING PRONOUNCEMENTS

See the corresponding section in Groupe BPCE's sustainability report.

#### 1.1.2.7 INCORPORATION BY REFERENCE

See the corresponding section in Groupe BPCE's sustainability report.

## 1.2 Strategy

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

See the corresponding section in Groupe BPCE's sustainability report.

### 1.2.2 SBM-2 - Interests and views of stakeholders

See the corresponding section in Groupe BPCE's sustainability report.

## 1.3 Governance

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

See the corresponding section in Groupe BPCE's sustainability report.

#### 1.3.1.1 COMPOSITION AND DIVERSITY OF BPCE'S MANAGEMENT AND SUPERVISORY BODIES

See the corresponding section in Groupe BPCE's sustainability report.

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

#### 1.3.2.1 SUSTAINABILITY TOPICS ADDRESSED BY THE ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

See the corresponding section in Groupe BPCE's sustainability report.

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

See the corresponding section in Groupe BPCE's sustainability report.

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

See the corresponding section in Groupe BPCE's sustainability report.

### 1.3.5 GOV-4 - Statement on due diligence

See the corresponding section in Groupe BPCE's sustainability report.

## 1.4 Impact, risk and opportunity management

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

See the corresponding section in Groupe BPCE's sustainability report.

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

See the corresponding section in Groupe BPCE's sustainability report.

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

See the corresponding section in Groupe BPCE's sustainability report.

## PART 2 - Environmental information

### 2.1 Indicators of the European taxonomy on sustainable activities

#### Regulatory framework

See the corresponding section in Groupe BPCE's sustainability report.

#### Mandatory GAR

See the corresponding section in Groupe BPCE's sustainability report.

#### Summary of GAR

##### GAR – Summary

At December 31, 2024

	12/31/2024		
	Amount in millions of euros	% of total assets	% of total GAR assets (denominator)
<b>TOTAL ASSETS</b>	<b>831,840</b>	<b>100.00%</b>	
Assets not covered for GAR calculation	347,898	41.82%	
<b>TOTAL GAR ASSETS</b>	<b>483,942</b>	<b>58.18%</b>	<b>100%</b>
Assets excluded from the numerator for GAR calculation (covered in the denominator)	390,492	46.94%	80.69%
<b>GAR – COVERED ASSETS IN BOTH NUMERATOR AND DENOMINATOR: ASSETS SUBJECT TO ELIGIBILITY AND ALIGNMENT ANALYSIS</b>	<b>93,450</b>	<b>11.23%</b>	<b>19.31%</b>
(Turnover basis for CSRD counterparties)			
Of which to taxonomy-relevant sectors (taxonomy-eligible)	29,487		6.09%
<b>Of which environmentally sustainable (taxonomy-aligned)</b>	<b>2,918</b>		<b>0.60%</b>
(CapEx basis for CSRD counterparties)			
Of which to taxonomy-relevant sectors (taxonomy-eligible)	30,295		6.26%
<b>Of which environmentally sustainable (taxonomy-aligned)</b>	<b>3,546</b>		<b>0.73%</b>

#### Detail of GAR – Turnover basis

At December 31, 2024

	12/31/2024				
	in millions of euros			As a % of total exposures	
	Exposures	of which eligible	of which aligned	of which eligible	of which aligned
<b>GAR – COVERED ASSETS IN BOTH NUMERATOR AND DENOMINATOR: ASSETS SUBJECT TO ELIGIBILITY AND ALIGNMENT ANALYSIS</b>	<b>93,450</b>	<b>29,487</b>	<b>2,918</b>	<b>6.09%</b>	<b>0.60%</b>
Of which exposures to:					
• Financial companies subject to CSRD	22,101	16	1	0.00%	0.00%
• Non-financial companies subject to CSRD	21,623	4,034	1,189	0.83%	0.25%
• Households	32,693	24,503	1,728	5.06%	0.36%
• Local governments financing	17,033	933	0	0.19%	0.00%
• Collateral obtained by taking possession: residential and commercial immovable properties	1	0	0	0.00%	0.00%

## Detail of GAR – CapEx basis

At December 31, 2024

	12/31/2024				
	in millions of euros			As a % of total exposures	
	Exposures	of which eligible	of which aligned	of which eligible	of which aligned
<b>GAR – COVERED ASSETS IN BOTH NUMERATOR AND DENOMINATOR: ASSETS SUBJECT TO ELIGIBILITY AND ALIGNMENT ANALYSIS</b>	<b>93,450</b>	<b>30,295</b>	<b>3,546</b>	<b>6.26%</b>	<b>0.73%</b>
Of which exposures to:					
• Financial companies subject to CSRD	22,101	17	1	0.00%	0.00%
• Non-financial companies subject to CSRD	21,623	4,842	1,818	1.00%	0.38%
• Households	32,693	24,503	1,728	5.06%	0.36%
• Local governments financing	17,033	933	0	0.19%	0.00%
• Collateral obtained by taking possession: residential and commercial immovable properties	1	0	0	0.00%	0.00%

## Off-balance sheet indicators: financial guarantees given and assets under management

See the corresponding section in Groupe BPCE's sustainability report.

### Summary of off-balance sheet KPIs

## Detail of GAR on off-balance sheet exposures - Turnover

At December 31, 2024

	12/31/2024				
	in millions of euros			As a % of total assets	
	Exposures	of which eligible	of which aligned	of which eligible	of which aligned
Financial guarantees	40,363	7,200	2,358	17.84%	5.84%
Assets under management	1,123,850	92,657	9,688	8.24%	0.86%

## Detail of GAR on off-balance sheet exposures - CapEx

At December 31, 2024

	12/31/2024				
	in millions of euros			As a % of total assets	
	Exposures	of which eligible	of which aligned	of which eligible	of which aligned
Financial guarantees	40,363	7,322	2,963	18.14%	7.34%
Assets under management	1,123,850	25,787	7,910	2.29%	0.70%

## Activities related to nuclear energy and fossil gas

See the corresponding section in Groupe BPCE's sustainability report.

### TABLES TO BE PUBLISHED IN ACCORDANCE WITH ARTICLE 8 OF THE TAXONOMY REGULATION

All the tables required by the Taxonomy Regulation in accordance with the template tables applicable to credit institutions in Annex VI of the regulation are presented in Chapter 5 - Tables to be published in accordance with Article 8 of the Taxonomy Regulation.



## **2.2 E1 - Climate change**

### **2.2.1 Governance**

#### **2.2.1.1 [GOV-3] INTEGRATION OF SUSTAINABILITY-RELATED PERFORMANCE IN INCENTIVE SCHEMES**

See the corresponding section in Groupe BPCE's sustainability report.

### **2.2.2 Impact, risk and opportunity management**

#### **2.2.2.1 DISCLOSURE REQUIREMENT RELATED TO ESRS 3 IRO-1 - DESCRIPTION OF PROCESSES TO IDENTIFY AND ASSESS MATERIAL CLIMATE-RELATED IMPACTS, RISKS AND OPPORTUNITIES**

See the corresponding section in Groupe BPCE's sustainability report.

### **2.2.3 Strategy**

#### **2.2.3.1 [E1-1] TRANSITION PLAN FOR CLIMATE CHANGE MITIGATION**

See the corresponding section in Groupe BPCE's sustainability report.

#### **2.2.3.2 DISCLOSURE REQUIREMENT RELATED TO ESRS 2 SBM-3 - MATERIAL IMPACTS, RISKS AND OPPORTUNITIES AND THEIR INTERACTION WITH STRATEGY AND BUSINESS MODEL**

See the corresponding section in Groupe BPCE's sustainability report.

#### **2.2.3.3 [E1-2] POLICIES RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION**

See the corresponding section in Groupe BPCE's sustainability report.

#### **2.2.3.4 [E1-3] ACTIONS AND RESOURCES IN RELATION TO CLIMATE CHANGE POLICIES**

See the corresponding section in Groupe BPCE's sustainability report

### **2.2.4 Metrics and targets**

#### **2.2.4.1 [E1-4] TARGETS RELATED TO CLIMATE CHANGE MITIGATION AND ADAPTATION**

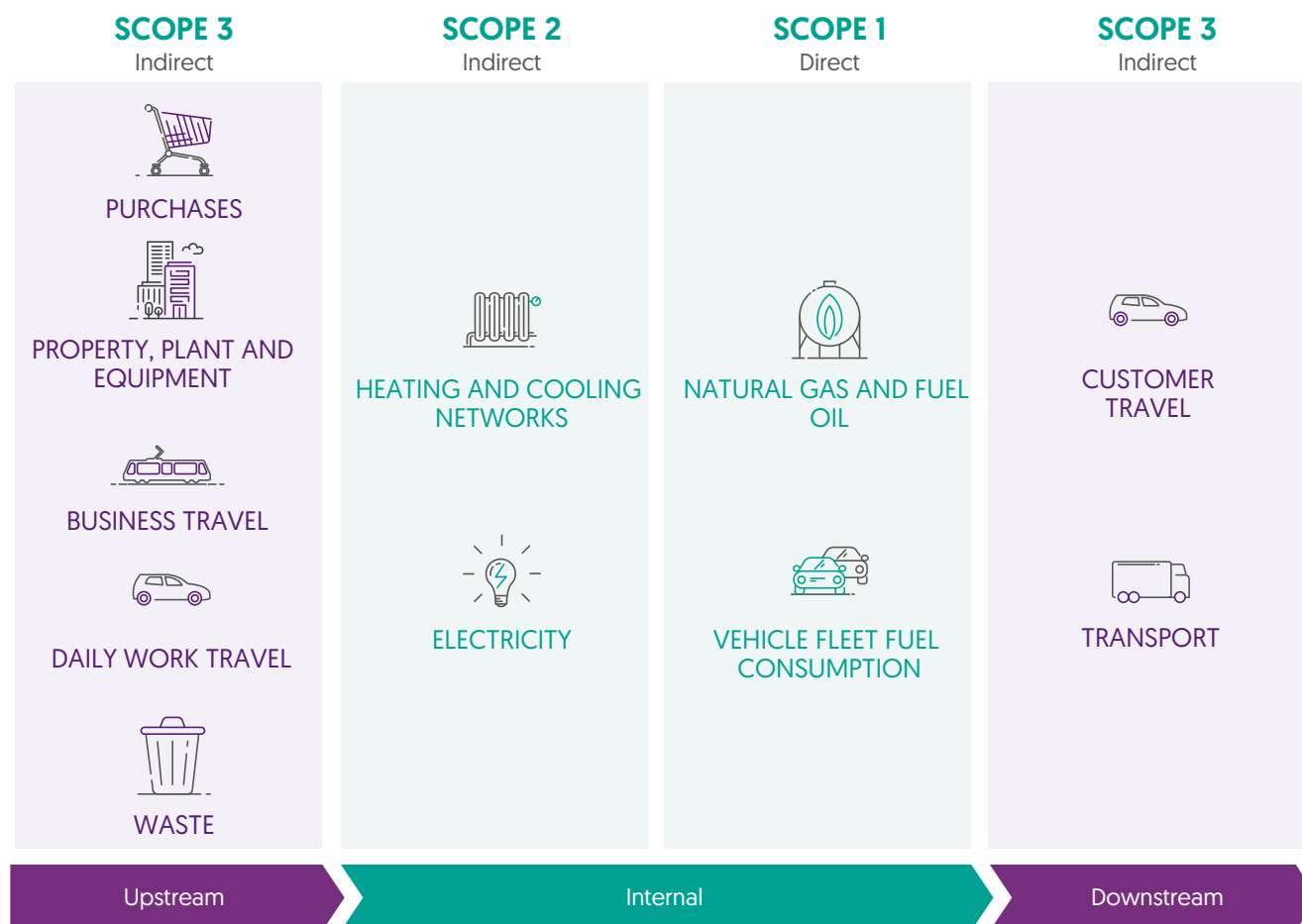
See the corresponding section in Groupe BPCE's sustainability report.

## 2.2.4.2 (E1-6) GROSS SCOPES 1, 2, 3 AND TOTAL GHG EMISSIONS

### Scope 1, 2 and 3 emissions for BPCE

	Historical data		Milestones and target years				
	Reference year	Comparative data (N-1)	N	% N/N-1	2026	2030	Annual target in %/Reference year (2050)
<b>Scope 1 GHG emissions</b>							
Gross Scope 1 GHG emissions - Emissions [tCO <sub>2</sub> eq]	12/31/2024	4,888	4,128	(15.55%)			
Percentage of Scope 1 GHG emissions resulting from regulated emission trading schemes (in %)	12/31/2024	0%	0%				
<b>Scope 2 GHG emissions</b>							
Gross Scope 2 GHG emissions (location-based) [tCO <sub>2</sub> eq]	12/31/2024	4,154	4,203	1.19%			
Gross Scope 2 GHG emissions (market-based) [tCO <sub>2</sub> eq]	12/31/2024	843	734	(12.90%)			
<b>Significant Scope 3 GHG emissions</b>							
Total gross indirect Scope 3 GHG emissions [tCO <sub>2</sub> eq]	12/31/2024	160,714	164,097	2.11%			
1 Goods and services purchased	12/31/2024	112,828	114,712	1.67%			
[Optional subcategory: Cloud Computing & Data Center Services]	12/31/2024	-	-				
2 Capital goods	12/31/2024	23,236	22,329	(3.90%)			
3 Activities in the fuel and energy sectors (not included in Scopes 1 and 2)	12/31/2024	3,614	3,699	2.33%			
4 Upstream transport and distribution	12/31/2024	-	-				
5 Waste generated during operations	12/31/2024	752	942	25.24%			
6 Business travel	12/31/2024	5,628	5,606	(0.40%)			
7 Employee commuting	12/31/2024	9,293	10,883	17.10%			
8 Upstream leased assets	12/31/2024	-	-				
9 Forwarding	12/31/2024	5,362	5,928	10.54%			
10 Processing of products sold	12/31/2024	-	-				
11 Use of products sold	12/31/2024	-	-				
12 End-of-life treatment of products sold	12/31/2024	-	-				
13 Downstream leased assets	12/31/2024	-	-				
14 Franchises	12/31/2024	-	-				
<b>Total Own footprint emissions</b>							
Own footprint GHG emissions (location-based) (tCO <sub>2</sub> eq)	12/31/2024	169,756	172,428	1.57%			
Own footprint GHG emissions (market-based) (tCO <sub>2</sub> eq)	12/31/2024	166,445	168,959	1.51%			
<b>Portfolio emissions</b>							
15 Investments (Banking)	12/31/2024	65,348,460	66,833,271	2.27 %			
15 Investments (Insurance)	12/31/2024	14,409,074	14,341,729	(0.47%)			
<b>Total GHG emissions</b>							
Total GHG emissions (location-based) (tCO <sub>2</sub> eq)	12/31/2024	79 927 290	81 347 428	2%			
Total GHG emissions (market-based) (tCO <sub>2</sub> eq)	12/31/2024	79 923 979	81 343 959	2%)			

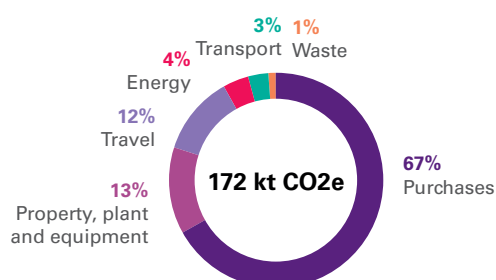
## Scope of the calculated greenhouse gas (GHG) emissions



### FOCUS ON THE OWN FOOTPRINT

#### Scope

GHG emissions related to the own footprint include all Scope 1, 2 and several Scope 3 categories.



#### Calculation methodology

Two amounts are presented at the end of table AR48, which cover the specific scope of the own footprint:

- total own footprint emissions (with Scope 2 emissions calculated using the location-based method);
- total own footprint emissions (with Scope 2 emissions calculated using the market-based method).

The emissions are calculated for each of the items presented in Table AR48 according to the breakdown of the GHG Protocol items into the 3 emission scopes.

The methodology applied to property, plant and equipment is based on the principles of French regulations concerning the preparation of a greenhouse gas report (BEGES V5), which meets the regulatory requirements set out in Article L. 229-25 of the French Environment Code. This methodology is also consistent with ISO 14064-1:2018. More specifically, the calculation of emissions associated with fixed assets is based on the collection of data from the inventories of the various fleets (IT equipment, real estate, vehicles, etc.) and on the application of amortization coefficients making it possible to distribute the emissions over the useful life of the assets concerned.

Work will be carried out in the coming months to enable Groupe BPCE to also calculate its carbon footprint according to the methodological principles of the GHG Protocol, *i.e.* by accounting for all emissions associated with the manufacture of capitalized assets during the year of acquisition.

As specified in the paragraph "Actions and resources" (E1-3), Groupe BPCE has refined the measurement of its purchases in 2024, by detailing the measurement on 16 categories of purchases instead of two previously and by allocating more precise emission factors to each category. This greater degree of precision shows a significant increase in emissions for this item. As a result, two calculations were carried out in 2024: a calculation of the carbon footprint using the old methodology, in order to measure the achievement of the objectives set over the 2019-2024 period, and a second calculation with the new methodology, in order to follow the 2023-2026 reduction trajectory (see details of changes in the measurement of purchases in E1-3).

**Scope limitation**

The scope of calculation of BPCE's own footprint covers 26 entities whose permanent contracts (CDI) represent 72% of the

Group's employees with permanent contracts. This scope is gradually extended each year.

**In response to the E1-6 disclosure requirement [AR 43], BPCE publishes the following mandatory information:**

<b>Gross Scopes 1, 2, 3 and Total GHG emissions</b>	<b>2024</b>
Biogenic CO <sub>2</sub> emissions resulting from the combustion or biodegradation of biomass separately from Scope 1 GHG emissions, but includes emissions of other types of GHG (in particular CH <sub>4</sub> and N <sub>2</sub> O).	0
Breakdown of information by indicating separately the Scope 1 emissions from: <ul style="list-style-type: none"> <li>– the consolidated accounting group (parent company and subsidiaries); and</li> <li>– companies benefiting from investments, such as associates, joint ventures or unconsolidated subsidiaries that are not fully consolidated in the financial statements of the accounting group, as well as contractual agreements that are joint agreements non-structured through an entity (<i>i.e.</i> jointly controlled operations and assets) over which the company exercises operational control.</li> </ul>	0
Breakdown of information by indicating separately the Scope 2 emissions from: <ul style="list-style-type: none"> <li>– the consolidated accounting group (parent company and subsidiaries); and</li> <li>– companies benefiting from investments, such as associates, joint ventures or unconsolidated subsidiaries that are not fully consolidated in the financial statements of the accounting group, as well as contractual agreements that are joint agreements non-structured through an entity (<i>i.e.</i> jointly controlled operations and assets) over which the company exercises operational control.</li> </ul>	0

**MDR-M - EMISSIONS FINANCED BY BPCE - BANKING ACTIVITIES****Scope**

The scope of greenhouse gases related to financing activities (Scope 3 category 15 Investments [Banking]) corresponds to the scope of corporate financing and dedicated financing of the banking book and also includes home loan financing. Home loan financing corresponds to home loans granted to individual customers and to self-employed customers.

**Calculation methodology**

The calculation of the carbon measures financed follows the Partnership for Carbon Accounting Financials (PCAF) methodology in accordance with the recommendations of the GHG Protocol for corporate credit financing (*in its guide "The Global GHG Accounting and Reporting Standard Part A: Financed Emissions" published in 2022*). These measures are based on methodologies known to date and which may change in the future.

The calculation is carried out on the Scope 1, Scope 2 and Scope 3 emissions of financed customers, aligned with the regulatory requirements and scope materiality issues. The sources of carbon data used for corporate financing are mainly based on data suppliers (Carbone 4, CDP, Trucost, MSCI): when the data is not available at the company level, their group's carbon data is used. In the absence of information, sectoral proxies are used:

- For companies or dedicated financing belonging to sectors with good supplier data coverage, the sectoral carbon data are extrapolated.
- For companies related to other sectors, the sectoral proxies provided by PCAF are applied (by NACE code and geographical area). As the coverage by the PCAF proxy is significant (applied to more than [75]% of outstandings) related in particular to exposures to small- and medium-sized companies, the estimated nature of the measures should be highlighted for this segment.
- The carbon measurements used for home loan financing correspond to the carbon emissions related to the use of the building. The data sources are based on Energy Performance Diagnostics (EPDs) when these are available. Otherwise, proxies are used, relying in particular on data from the French Scientific and Technical Center for Building (Centre Scientifique et Technique du Bâtiment - CSTB).

It should be noted that the carbon data used may be one year behind the closing date of the outstandings. The data collected, methods and measurements carried out have not been subject to external verification.

To date and for information purposes, the quality levels of the carbon data used to measure financed emissions at December 31, 2023 and December 31, 2024 are estimated at around four according to the PCAF score. As specified by the PCAF standard, the various carbon data sources used are associated with a quality level ranging from one to five depending on whether they are based on data audited and communicated by the company (corresponding to the best score: 1), or based on industry proxies/ estimates (corresponding to the lowest score: 5).

**MDR-M - EMISSIONS FINANCED BY GROUPE BPCE - INSURANCE ACTIVITIES****Scope**

The scope of greenhouse gases related to insurance activities (Scope 3 category 15 Investments [Insurance]) includes the activities of BPCE Assurances.

**Calculation methodology**

The methodology used to calculate greenhouse gas emissions is aligned with that of the Principal Adverse Impacts indicator (PAI) 1.1 defined by the SFDR regulation. Thus, the gross GHG emissions attributed to investments take into account the Scope 1, 2 and 3 emissions of the companies comprising the portfolios of assets held. The attribution coefficient for a given company corresponds to the value of the investment divided by the total value of this company (Enterprise Value Including Cash [EVIC]).

BPCE Assurances relies on Carbone 4 Finance for the collection of GHG emissions as well as the EVICs of companies in which it invests. In the absence of available information, sectoral proxies are used.

To be consistent with the scope of emissions financed by the banking activity, emissions relating to insurance activities relate exclusively to corporate investments.

In addition, asset management companies are subject to SFDR reporting obligations and/or Article 29 of the Energy Climate Act and disclose information on the financed emissions that they incur through the investments.

As an illustration, Natixis IM has consolidated the GHG emissions calculated according to the PCAF standard for European portfolios of listed assets (excluding sovereigns)<sup>(1)</sup> and relying on a single

data source (MSCI). These emissions amounted to €81 million tCO<sub>2</sub>e at December 31, 2024.

## PART 3 - Social information

### 3.1 S1 - Own workforce

#### 3.1.1 SBM-2 - Interests and views of stakeholders

See the corresponding section in Groupe BPCE's sustainability report.

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

See the corresponding section in Groupe BPCE's sustainability report.

#### 3.1.3 Impact, risk and opportunity management

##### 3.1.3.1 (S1-1) POLICIES RELATED TO OWN WORKFORCE

See the corresponding section in Groupe BPCE's sustainability report.

##### 3.1.3.2 (S1-2) PROCESSES FOR ENGAGING WITH OWN WORKFORCE AND WORKERS' REPRESENTATIVES ABOUT IMPACTS

See the corresponding section in Groupe BPCE's sustainability report.

##### 3.1.3.3 (S1-3) PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR OWN WORKFORCE TO RAISE CONCERNS

See the corresponding section in Groupe BPCE's sustainability report.

##### 3.1.3.4 (S1-4) TAKING ACTION ON MATERIAL IMPACTS ON OWN WORKFORCE, AND APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO OWN WORKFORCE, AND EFFECTIVENESS OF THOSE ACTIONS

See the corresponding section in Groupe BPCE's sustainability report.

#### 3.1.4 Metrics and targets

##### 3.1.4.1 (S1-5) TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES

See the corresponding section in Groupe BPCE's sustainability report.

#### 3.1.5 Metric units

##### 3.1.5.1 GENERAL INTRODUCTION - SCOPE OF APPLICATION

Scope of publication of S1 indicators for the 2024 CSRD :

<sup>(1)</sup> This carbon footprint is consolidated by summing the GHG emissions "attributed" to each position in the portfolio, on companies. The emission allocated corresponds to the carbon emissions [Scope 1, 2 & 3] of the company multiplied by the actual outstanding amount of listed shares or corporate bonds held in the portfolio divided by the value of the company including cash [EVIC].

Some of the Group's entities do not upload their data in the Group HR HRIS, in particular for international entities, which also comply with national legislation imposing heterogeneous requirements in social matters (e.g. minimum wage).

In this context, the Group has chosen a baseline scenario for the entities on which the indicators will be calculated for the CSRD 2025 publication (based on data collected via the Group's Information System and *ad hoc* manual data).

#### **Entities included in the scope of publication of the S1 indicators - for the CSRD 2024:**

All BPCE subsidiaries (specialized financing, asset management, life and non-life insurance, payments, wealth management and wholesale banking), BPCE SA, and the Natixis consolidated scope are included in the S1 reporting scope.

#### **And inclusion of other entities:**

- Banque Palatine;
- Crédit Foncier de France;
- Oney;
- BPCE Life Luxembourg

**Specificities related to BPCE Life Luxembourg scope :** this entity will be excluded from the following indicators due to the unavailability of data in the HR information system: S1-12, S1-14, S1-15 and S1-16. A coverage rate of 100% (for the Insurance division) for the other indicators and 90% (for the Insurance division) for the aforementioned indicators.

**Specificities related to the Oney scope :** some Oney subsidiaries do not have a payroll tool and are not integrated into the Group's HRIS, which makes data collection more complex. Thus, the scope used for the disclosure of the S1 metrics for the 2025 CSRD for Oney is as follows:

- Oney Bank France: 100% of indicators covered;
- Oney international subsidiaries: covered only for some of the S1-6 indicators.

**Specificities relating to the Natixis consolidated scope:** for the 2024 publication, the Natixis scope of coverage was studied indicator by indicator with the use of proxies for some. Data are collected for at least 78% and up to 100% of the own workers in 2024 on the mandatory indicators expected from 2025. Natixis aims to cover 100% of the own workers by 2026. (For more details: see the Natixis CSRD publication - 3.1.3.2 *Introductory remarks on metrics S1-6 to S1-17*).

#### **Entities excluded from the scope:**

- International subsidiaries of BPCE Lease;
- Fintech Digital & Payments (PayPlug Entreprise);
- Pramex International;

#### **Population concerned :**

Population exclusions (fixed-term contracts/work-study/VIE) according to the metrics were made for reasons of data availability and/or the relevance and reliability of the calculations.

### **3.1.5.2 (S1-6) CHARACTERISTICS OF THE UNDERTAKING'S EMPLOYEES**

#### **A. General introduction: definition and transversal methods for S1-6 indicators**

*Preliminary reminder: S1-6 only concerns employees (therefore non-employees are excluded from the scope of the S1-6 indicators).*

#### **Scope**

- for BPCE scope excluding Natixis, see 3.1.5.1 *General introduction*.
- for the Natixis scope, see 3.1.5.14.2 (S1-6) Characteristics of the undertaking's employees – Natixis

Concerning the non-covered scopes, the following actions will be deployed:

- carry out studies to assess the feasibility of collecting unavailable data manually from the IS;
- define the methods for collecting data not currently available.

#### **Definition**

The total number of employees was calculated on the basis of the scope of entities subject to the CSRD and the following definition of employee status :

- permanent internal employees (CDI);
- temporary internal employees (fixed-term contracts - CDD);
- work-study employees;
- VIE.

Note:

- interns were not included in the scope, insofar as in France, interns are not considered as company employees.

#### **Calculation**

- Methodology for calculating the total number of employees based on:
  - a counting of the number of own workers in number of contracts;
  - the number of employees present at the end of the reference period;
  - a closing date at December 31 of the reference year.

## B. Breakdown of own workers:

### Completion of the table based on three fields:

- the “male” and “female” fields: based on the information available in the information system;
- the “not declared” field is the field used in the event of data not available in the information system;
- the “other” field is currently not available in the employee gender self-declaration process, as French legislation does not prescribe the place of such a system.

## Breakdown of own workers by gender

	12/31/2024
Gender	Number of employees
Male	18,010
Female	16,077
Other	
Not declared	
<b>TOTAL SALARIED EMPLOYEES</b>	<b>34,087</b>

## C. Own workers by country

### Scope

Countries in which BPCE has at least 50 employees representing at least 10% of its total number of employees.

The calculation basis for own workers is that applied to the scope of publication of the CSRD.

## Presentation of the number of employees in countries where the company has at least 50 employees representing at least 10% of its total number of employees

	12/31/2024
Country	Number of employees
France	25,206

## D. Employees by type of contract

### Definition

- The total number of employees was calculated based on the scope of entities subject to the CSRD and the following definition of employee status:
  - permanent internal employees (CDI);
  - temporary internal employees (fixed-term contracts - CDD);
  - work-study employees;
  - VIE (for France).

Note:

- Note: BPCE has no employees on non-guaranteed hours, as this type of contract is not included in the Group’s business model. See definition in the introduction. (see. 3.1.5.1.general introduction.)

### Calculation

- for the breakdown by gender: see Section B. S1-6 - Breakdown of own workers.
- the breakdown by contract is detailed in the Section A. General introduction: definition and transversal methods for the metrics S1-6 - Breakdown of own workers;
- publication of the full-time/part-time split on a voluntary basis.
- is considered as full-time, any employee with a contractual FTE of 100%. All others are considered part-time.

Note: work-study students are considered as being part-time employees as they have a specific working time format dedicated to them.



## Presentation of information on employees by type of contract, broken down by gender

	12/31/2024				
	Women	Men	Other <sup>(*)</sup>	Not Communicated	Total
Number of employees	16,077	18,010			34,087
Number of permanent employees	15,027	16,949			31,976
Number of temporary employees	1,050	1,061			2,111
Number of non-guaranteed hours employees					
Number of full-time employees	12,888	15,603			28,491
Number of part-time employees	2,355	1,113			3,468

\* Gender as specified by the employees themselves.

### E. Employees by type of contract, by region

#### Definition

- Definition of the term "Region": BPCE understands the definition of region in the sense of geographical area. The Group distinguishes between four types of regions: **France/Americas/APAC/EMEA (excluding France)**.

#### Calculation

- for the breakdown by gender: see Section B. *Breakdown of own workers*;
- the breakdown by contract is detailed in the Section *General introduction: definition and transversal methods for the metrics S1-6 - Breakdown of own workers*

## Presentation of information on employees by type of contract, broken down by region

	12/31/2024				
	FRANCE	EMEA <sup>(*)</sup>	AMER	APAC	TOTAL
Number of employees	25,110	5,071	2,748	1,158	34,087
Number of permanent employees	23,276	4,877	2,700	1,123	31,976
Number of temporary employees	1,834	194	48	35	2,111
Number of non-guaranteed hours employees					
Number of full-time employees	21,362	4,747	1,321	1,061	28,491
Number of part-time employees	3,268	166	33	1	3,468

\* excluding France.

### F. Total number of employees who left the Group during the reference period

#### Definition

- The indicator presented only concerns permanent (CDI) contracts.

#### Calculation

- the following reasons for departure were used in the calculation of the indicator: contractual terminations, resignations, deaths in the course of employment, dismissals and retirements;
- departures related to internal mobility have not been included in the calculation of the indicator.



# 2,043

TOTAL NUMBER OF EMPLOYEES  
THAT LEFT BPCE DURING THE YEAR

## G. Employee turnover during the reference period:

Two indicators are published:

- departure rate;
- turnover rate.

### Definition

The calculation is based on permanent employees present at the end of 2023.

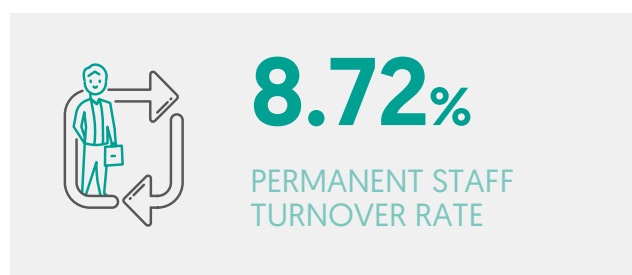
Note: Fixed-term contracts, work-study employees and VIE employees have been excluded from the calculation of the turnover rate, as their presence in the Group is by definition temporary.

### Calculation

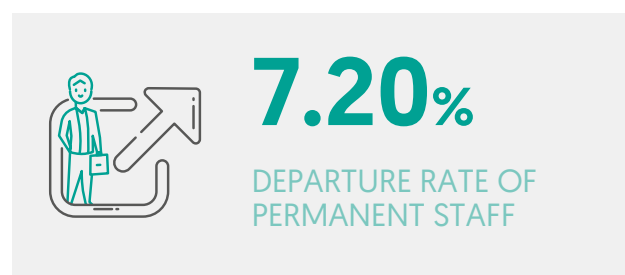
**departure rate:** 
$$\frac{\text{number of permanent contract departures over the reference period}}{\text{number of employees on permanent contracts at December 31 of reference year Y-1}}$$

**turnover rate:** 
$$\frac{(\text{number of permanent contract hires over the reference period} + \text{number of permanent contract departures during the reference period})/2}{\text{number of employees on permanent contracts at December 31 of reference year Y-1}}$$

## Percentage of permanent staff turnover



## Departure rate of permanent staff



## H. Reconciliation between the own workers mentioned in Section “3.1.4.2 (S1-6) Characteristics of the undertaking’s employees” and the most representative workforce in the financial statements

The Group Human Resources division relies on a notion of number of contracts and not FTE<sup>(1)</sup>, it is therefore not relevant to reconcile the FTEs with the financial statements for the 2024 reference year, as the latter are not comparable.

## 3.1.5.3 (S1-7) CHARACTERISTICS OF NON-EMPLOYEES IN THE UNDERTAKING’S OWN WORKFORCE

In accordance with the transitional application measure provided for by the regulations, this indicator is not published for the 2024 reference year.

The action plan for future publications is as follows:

- define the notion of “non-salaried employee” and identify the populations concerned based on the standard;
- list the companies for which the data can be collected *via* the tools (Group employee reference framework);
- BPCE will collect the number of non-salaried employees manually and in declarative form, before integration by the companies in the RPG tool<sup>(2)</sup>.

## 3.1.5.4 (S1-8) COLLECTIVE BARGAINING COVERAGE AND SOCIAL DIALOGUE

### A. General introduction

- In the France scope, regulations require that all employees meeting the definition criteria in Section S1-6 - *Characteristics of the undertaking’s employees* be covered by a collective agreement and by a social dialog/employee representation ;
- for the Group scope excluding Natixis, see 3.1.5.1 *General introduction*.
- for the Natixis scope, see 3.1.5.14.3 (S1-8) Collective bargaining coverage and social dialogue – Natixis;
- employees: the employees covered by a collective agreement are the fixed-term contracts (CDD), permanent contracts (CDI), work-study students.

The Group indicates in which countries of the European Economic Area (EEA) it employs a significant number of employees (*i.e.* at least 50 employees representing at least 10% of the total number of employees).

[1] Full-time equivalent.

[2] Group employee reference framework.

## B. Percentage of all employees covered by collective bargaining agreements

Collective conventions, company agreements or any other form of agreement negotiated between an employer, a group of employers or one or more employers' organizations, on the one hand, and one or more trade unions or, in their absence, employee representatives elected in accordance with national laws and regulations, on the other hand, shall be considered as "collective bargaining agreements".



- The percentage of employees covered by collective agreements is calculated using the following formulas:

$$100 \times \frac{\text{Number of employees covered by collective bargaining agreements}}{\text{total number of employees}}$$

## C. Social dialog coverage rate & workplace representation

- To calculate the required information, the Group indicates in which of the EEA countries it employs a significant number of employees (*i.e.* at least 50 employees representing at least 10% of the total number of employees) and indicates the percentage of employees by country and by establishment, that have employee representation. The notion of "establishment" includes any place of operations where the company carries out an economic activity on a non-temporary basis with human resources and goods.

$$100 \times \frac{\text{Number of employees working in establishments in which employees are represented by representatives}}{\text{number of employees}}$$

## D. Percentage of employees covered by a collective agreement (outside the EU)

### Definition

The employees covered by a collective agreement are the fixed-term contracts (CDD), permanent contracts (CDI), work-study students.

## Declaration template on collective bargaining coverage and social dialog

Coverage rate	12/31/2024	
	Collective bargaining coverage	
	Employees - EEA (for countries > 50 employees representing > 10% of total employees)	Employees - non-EEA (estimate for regions with > 50 employees representing > 10% of total employees)
Social dialogue		
Workplace representation (EEA only) (for countries with > 50 employees representing > 10% of total employees)		
0-19%		
20-39%		
40-59%		
60-79%		
80-100%	France	France

### 3.1.5.5 (S1-9) DIVERSITY METRICS

#### Scope:

- for the Group scope excluding Natixis, see 3.1.5.1 General introduction.
- for the Natixis scope, see 3.1.5.14.4 (S1-9) Diversity metrics.

#### Definition:

Senior management metric:

- Senior management means employees:
  - who are entrusted with responsibilities for which the importance implies a great deal of independence in the organization of their schedule;
  - who are empowered to make decisions on a largely autonomous basis;
  - who receive pay within the highest levels of pay systems applied in their company or establishment.

Breakdown of employees by age group metric:

- Taken into account in the calculation of the indicators of fixed-term contracts (CDD), permanent contracts (CDI), work-study and VIE.

#### Calculation:

Breakdown by gender at senior management level in number and percentage:

$$\text{\% of women in senior management} = \frac{\text{number of women in senior management}}{\text{number of employees in senior management}}$$

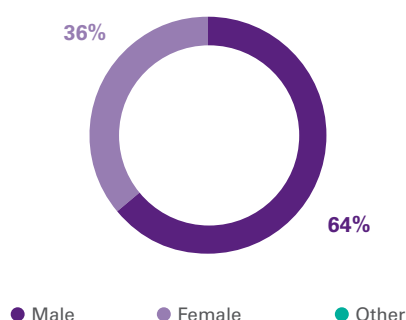
$$\text{\% of men in senior management} = \frac{\text{number of men in senior management}}{\text{number of employees in senior management}}$$

Breakdown of employees by age group:

$$\frac{\text{number of employees by age group}}{\text{total number of employees (au sens de l'indicateur S1-6)}}$$

- Breakdown by age group:
  - under 30;
  - between 30 and 50 years;
  - 50 years and over.

#### Breakdown by gender at senior management level



## Breakdown of employees by age group and percentage - Own workers

Age groups	12/31/2024	
	Number of employees (own workers)	%
< 30 years	5,820	17.07
> 30 and < 50 years	18,184	53.35
> 50 years	10,051	29.49
Not reported	32	0.09
<b>TOTAL SALARIED EMPLOYEES</b>	<b>34,087</b>	<b>100</b>

**3.1.5.6 (S1-10) ADEQUATE WAGES**

- for the Group scope excluding Natixis, see 3.1.5.1 General introduction;
- for the Natixis scope, see 3.1.5.14.5 (S1-10) Adequate wages – Natixis.

All Group employees receive an adequate wage in accordance with the applicable benchmarks. The adequate wage refers to the minimum social wages set by legislation or collective bargaining or applicable benchmarks.

**3.1.5.7 (S1-11) SOCIAL PROTECTION**

[No small-group narrative: refer via explanatory note on the group report].

**3.1.5.8 (S1-12) PERSONS WITH DISABILITIES****Scope**

- for the Group scope excluding Natixis, see 3.1.5.1 General introduction.
- for the Natixis scope, refer to 3.1.5.14.6 (S1-12) Persons with disabilities – Natixis.

**Definition**

- number of employees with disabilities as of December 31 of the reference year.
- in order to maintain consistency between this metric and the other metrics published under the CSRD, the “own workers” data is to be considered as registered workforce (number of contracts) and not in FTE. The types of contract to be taken into account are those of S1-6 (permanent [CDI], fixed-term [CDD], work-study students, VIE).

**Calculation**

- Calculation formula: 
$$\frac{\text{Own workers registered with disabilities at December 31 of the reference year}}{\text{total own workers (at December 31 of the reference year)}}$$

Percentage of employees with disabilities in 2024 within the meaning of the CSRD in France and International scope: 4.58%.

**3.1.5.9 (S1-13) TRAINING AND SKILLS DEVELOPMENT METRICS****Performance assessment****Scope**

- for the Group scope excluding Natixis, see 3.1.5.1 General introduction.
- for the Natixis scope, see 3.1.5.14.7 (S1-13) Training and skills development metrics – Natixis.

**Definition**

- All performance, career development and professional appraisal interviews must be taken into account.

**Calculation**

- Population: permanent contracts (CDI).

- Calculation formula: 
$$\frac{\text{workforce registered with disabilities at December 31 of the reference year}}{\text{total workforce (as at December 31 of the reference year)}}$$

## Breakdown by gender of employees who participated in regular performance and career development reviews

Gender	12/31/2024	
	Number of assessments	%
Male	14,460	94.27
Female	12,652	92.76
Other*		
Not declared		
<b>TOTAL SALARIED EMPLOYEES</b>	<b>27,112</b>	<b>93.56</b>

\* Gender as specified by the employees themselves.

### Training hours completed in 2024

#### Scope

- For the Group scope excluding Natixis, see 3.1.5.1 *General introduction*.
- For the Natixis scope, see Natixis CSR publication - 3.1.3.10 (S1-13) *Training and skills development metrics*.

#### Definition

- The calculation is made on the basis of training hours completed during the reference year, including training not completed.

#### Calculation

- Population: fixed-term contracts (CDD), permanent contracts (CDI), work-study students and VIE.

- Calculation formula: 
$$\frac{\text{number of training hours completed in the reference year}}{\text{total number of employees as of December 31 of the reference year}}$$

## Average number of training hours by type of contract and by gender

	12/31/2024			
	Women	Men	Other <sup>(*)</sup>	Not Communicated
Average number of training hours	18	18		
Permanent employees	19	18		
Temporary employees	13	13		
Non-guaranteed hours employees				

\*Gender as specified by the employees themselves.

## 3.1.5.10 (S1-14) HEALTH AND SAFETY METRICS

### A. Health and Safety Management System

#### Scope

For the **France scope**: the regulations require that all employees, according to the criteria defined in S1-6, are covered by a health and safety management system. For the **international scope**: data will be collected in accordance with local obligations and/or practices.

- for the Group scope excluding Natixis, see 3.1.5.1 *General introduction*.
- for the Natixis scope, see 3.1.5.14.8 (S1-14) *Health and safety metrics - Natixis*.

#### Calculation

- Population: permanent contracts (CDI), fixed-term contracts (CDD), work-study students, VIE.

- Calculation formula: 
$$\frac{\text{number of employees covered by the health and safety management system}}{\text{total number of employees}}$$

- Percentage of own workers covered by the health and safety management system based on legal requirements and/or recognized standards or guidelines.



# 99.77%

## EMPLOYEE HEALTH AND SAFETY MANAGEMENT SYSTEM COVERAGE RATE

### B. Work-related accident frequency rate

#### Scope

- for the Group scope excluding Natixis, see 3.1.5.1. *General introduction*.
- for the Natixis scope, see 3.1.5.14.8 (S1-14) *Health and safety metrics - Natixis*.

#### Definition

The indicator used relates to the frequency rate of workplace accidents:

- the notion of “days lost” is interpreted as “days of absence” linked to work stoppage due to workplace/commuting accidents;
- the Group measures and collects data related to workplace and commuting accidents recognized by the social security;
- however, for occupational illnesses, BPCE is not in a position to collect similar data.

#### Calculation

- Population: permanent contracts (CDI), fixed-term contracts (CDD).
- The calculation of the indicator excludes:
  - data on occupational illnesses (not available BPCE);
  - absences and accidents of non-salaried workers (in accordance with the publication deadline granted by the standard).
- The indicator used for the workplace accident rate is the frequency rate of workplace accidents involving permanent (CDI) and fixed-term (CDD) contracts. The formula for calculating the frequency rate, according to INSEE, is as follows:

$$\frac{\text{number of accidents with lost time}}{\text{hours worked} \times 1,000,000}$$
  

$$\frac{\text{the number of days of absence due to workplace commuting accidents is to be considered in number of calendar days}}$$

### Occupational health and safety

	12/31/2024
Number of fatalities due to work-related accidents or illnesses	2
Number of work-related accidents over the period	246
Work-related accident rate (in %)	5.14
Number of days lost due to work-related accidents	6,747

### C. Regarding the health and safety indicators that we will not report, we are planning the following action plan:

#### Limitation on published information:

The quantitative information required by the CSRD standard is not published in Groupe BPCE’s CSRD sustainability report, given the unavailability of data.

#### Action plan:

- determine a common definition of the term “occupational illness”;
- list the companies for which the data can be collected *via* the information systems;
- list the scopes on which the data can be collected manually (if unavailable in the tools);
- define data collection methods.



### 3.1.5.11 (S1-15) WORK-LIFE BALANCE METRICS

**Scope**

- For the Group scope excluding Natixis, see 3.1.5.1. *General introduction*.
- for Natixis, see 3.1.5.14.9 (S1-15) Work-life balance – Natixis

**Definition**

- The concept of family leave takes into account the following arrangements:
  - maternity leave;
  - paternity leave;
  - parental leave;
  - caregiver leave provided for by legislation or collective agreements.
- Population: permanent contracts (CDI)/fixed-term contracts (CDD)/work-study students/VIE.

**Calculation**

**“% of employees entitled to family leave”**

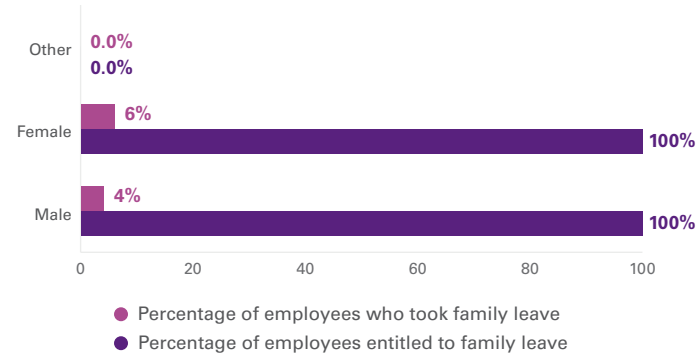
- Calculation formula:  $\frac{\text{number of employees eligible for family leave}}{\text{total number of employees}}$

**“% of employees concerned who took such leave, with a breakdown by gender”**

- Calculation formula:  $\frac{\text{Number of employees taking family leave}}{\text{number of eligible employees}}$



**BREAKDOWN BY GENDER OF THE PERCENTAGE OF EMPLOYEES ENTITLED TO AND HAVING TAKEN FAMILY LEAVE**



### 3.1.5.12 (S1-16) REMUNERATION METRICS (PAY GAP AND TOTAL REMUNERATION)

#### Gender pay gap metric

##### Scope

- for the Group scope excluding Natixis, see 3.1.5.1. *General introduction*.
- for the Natixis scope, see 3.1.5.14.10 (S1-16) Remuneration metrics (pay gap and total remuneration) – Natixis.

##### Definition

- The consolidated population includes own workers on permanent contracts (CDI) who are present and paid at full rate throughout the reference year excluding:
  - corporate representatives;
  - employees on fixed-term contracts (CDD);
  - temporary workers;
  - work-study employees;
  - expatriate French employees;
  - people without an employment contract and employees on long-term illness (ALD).
- Fixed wage and variable pay **are taken into account**.
- **Elements taken into account in the fixed wage**: theoretical full-time annual fixed wage + fixed annual duty allowance, if applicable, for the reference year.
- **Elements taken into account in the variable pay**:
  - BPCE excluding Natixis: value-sharing bonus paid in the reference year + performance bonus or any individual bonus + variable pay paid in the reference year;
  - Natixis: variable pay awarded in respect of the previous year (including deferred portions) + exceptional bonus awarded if applicable.

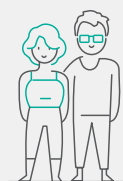
**Calculation:** 
$$\frac{\text{Average gross annual remuneration of male employees} - \text{average gross annual remuneration of female employees}}{\text{average gross remuneration of male employees}} \times 100$$

As the way in which the data is presented is different for Natixis, two distinct metrics are presented:



# 18.99%

GENDER PAY GAP WITHIN  
THE BPCE SCOPE  
EXCLUDING NATIXIS



# 34.10%

GENDER PAY GAP  
BETWEEN MEN AND  
WOMEN AT NATIXIS

## Annual total remuneration metric

### Scope

- for the Group scope excluding Natixis, see 3.1.5.1. *General introduction*.
- for the Natixis scope, see 3.1.5.14.10 (S1-16) *Remuneration metrics (pay gap and total remuneration - Natixis)*.

### Definition

- The consolidated population includes own workers on permanent contracts (CDI) who are present and paid at full rate throughout the reference year excluding:
  - corporate representatives;
  - employees on fixed-term contracts (CDD);
  - temporary workers;
  - work-study employees;
  - expatriate French employees;
  - people without an employment contract and employees on long-term illness (ALD).
- Fixed wage and variable pay **are taken into account**.
- **Elements taken into account in the fixed wage**: theoretical full-time annual fixed wage + fixed annual duty allowance, if applicable, for the reference year.
- **Elements taken into account in the variable pay**:
  - BPCE excluding Natixis: value-sharing bonus paid in the reference year + performance bonus or any individual bonus + variable pay paid in the reference year;
  - Natixis: variable pay awarded in respect of the previous year (including deferred portions) + exceptional bonus awarded if applicable.

### Calculation

- **Annual total remuneration ratio metric**: 
$$\frac{\text{annual total remuneration for the highest-paid person in the company}}{\text{median level of annual total remuneration excluding the highest-paid individual}}$$
  - If the maximum annual total pay is the same for several employees, then they are excluded from the denominator in the calculation presented above (median level of annual total pay (excluding the highest-paid individual)).

The ratio of total annual remuneration between the highest-paid employee and the median of other employees is 90.6 in 2024.

The ratio of total annual remuneration is established based on the scope of the BPCE Group, on the basis of gross remuneration, without neutralizing the differences in living standards between the countries in which the Group operates. Indeed, salary practices also reflect the economic conditions specific to each country, as well as market practices specific to the various business lines present in the Groupe BPCE. Therefore total annual remuneration ratio, therefore, incorporates very diverse local realities in terms of labor markets and living standards.

## 3.1.5.13 (S1-17) INCIDENTS, COMPLAINTS AND SEVERE HUMAN RIGHTS IMPACTS

### Limitation on published information:

Given the multitude of channels for reporting alerts, BPCE will not be able to provide an exhaustive response to this metric and proposes to include it in the next fiscal year through the action plan mentioned below.

### Action plan to publish metrics in future publications:

- Bring together the relevant contacts (Compliance, diversity & harassment officer, labor & legal relations).
- Agree on a common definition on the terms expected in the metrics: incidents of discrimination, harassment, complaints, violation of social factors and human rights, serious human rights issues and incidents for employees.
- Identify whistleblowing channels such as Group alert tools, dedicated local email address, harassment or diversity contact, emergency number, listening unit.

### 3.1.5.14 ANNEX - NATIXIS SCOPE

#### 3.1.5.14.1 General Introduction to metrics S1-6 to S1-17

The following scopes are cited throughout the methods defining each metric:

- ▶ **Managed scope:** companies forming part of Natixis and its subsidiaries, at least 50% owned directly or indirectly, and for which individual data is available in the global Human Resources Information Systems (HRIS).
- ▶ **Other entities of the AWM division:** companies owned directly or indirectly at least 50% worldwide and for which individual data is not available in the Global HR Information Systems. Two of these companies (DNCA Finance France, Natixis US Advisors) were subject to manual collection for this first disclosure. We will refer to them as “AWM entities with manual collection” in the rest of this disclosure.
- ▶ **CIB M&A stores:** companies owned directly or indirectly at least 50% worldwide and for which individual data is not available in Global HR Information Systems (Peter J. Solomon/Azure Capital Limited/Vermillion Partners Limited/Fenchurch Advisory Partners/Natixis Partners Espana/Natixis Partners).
- ▶ **Scope of financial investments:** Natixis Algérie

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

##### • Breakdown of own workers by gender

- ▶ **Scope of coverage:**
  - France & International managed scope
  - Other entities of the AWM France & International division
  - Scope of financial investments
- ▶ **Use of proxies:**

Proxies were calculated based on the own workers of entities in the “Other Natixis entities” scope, which is collected at the end of the year.

A proxy is calculated to obtain the percentage distribution of men and women: at the end of the year, the entities communicate information on their own workers (permanent, fixed-term, young jobs), when available. A proportion of male/female is calculated based on this file with regards to the M/F breakdown of own workers for year Y-1.

##### • Own workers by country

- ▶ **Scope of coverage**
  - France & International managed scope
  - Other entities of the AWM France & International division

##### • Employees by type of contract, by gender

- ▶ **Scope of coverage**
  - France & International managed scope
  - Other entities of the AWM France & International division
  - Scope of financial investments
- ▶ **Use of proxies:**

A proxy is calculated to obtain the breakdown of men and women as a percentage: at the end of the year, the entities communicate information on their own workers (permanent, fixed-term, youth employment), when available. A proportion of Men/Women is calculated based on this file with regards to the M/F breakdown of their own workers for year N-1.

##### • Employees by type of contract, by region

- ▶ **Scope of coverage:**
  - France & International managed scope
  - Other entities of the AWM France & International division
  - Scope of financial investments

##### • Total number of employees who left the Group during the reference period and employee turnover during the reference period

- ▶ **Scope of coverage:**
  - France & International managed scope
  - AWM entities with manual collection
  - Scope of financial investments

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

► **Scope of coverage**

- France managed scope
- International managed scope: entities with the largest own workforce
- AWM entities with manual collection
- Scope of financial investments

### 3.1.5.14.4 [S1-9] Diversity metrics - Natixis

• **Senior management**

► **Scope of coverage:**

- France managed scope

• **Breakdown of employees by age group:**

► **Scope of coverage:**

- France & International managed scope
- Other entities of the AWM France & International division
- Scope of financial investments

► **Use of proxies:**

A proxy is calculated to obtain the percentage breakdown of men and women: at the end of the year, the entities communicate their own workers (permanent, fixed-term, young jobs) where the information is available. A proportion of male/female is calculated on the basis of this file with regard to the M/F breakdown of the own workers for year Y-1.

### 3.1.5.14.5 [S1-10] Adequate wages - Natixis

► **Scope of coverage:**

- France & International managed scope;
- AWM entities with manual collection.

### 3.1.5.14.6 [S1-12] Persons with disabilities - Natixis

► **Scope of coverage:**

- France managed scope (in first year of disclosure).

Note: from the second year of disclosure, the metric will be published at the level of the World scope.

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

• **Performance assessment**

► **Scope of coverage:**

- France & International managed scope
- Scope of financial investments

• **Training hours completed in 2024**

► **Scope of coverage:**

- France managed scope

#### 3.1.5.14.8 (S1-14) Health and safety metrics - Natixis

- **Health and Safety Management System**

- ▶ **Scope of coverage:**

- France managed scope
- International managed scope: entities with the largest number of own workers
- AWM entities with manual collection
- Scope of financial investments

- **Work-related accident frequency rate**

- ▶ **Scope of coverage:**

- France managed scope
- International managed scope: entities with the largest number of own workers
- AWM entities with manual collection
- Scope of financial investments

#### 3.1.5.14.9 (S1-15) Work-life balance metrics - Natixis

- ▶ **Scope of coverage:**

- France managed scope

#### 3.1.5.14.10 (S1-16) Pay metrics (pay gap and total remuneration) - Natixis

- ▶ **Scope of coverage:**

- France & International managed scope
- AWM entities with manual collection
- Scope of financial investments

## **3.2 S2 - Workers in the value chain**

### **3.2.1 SBM-2 - Interests and views of stakeholders**

See the corresponding section in Groupe BPCE's sustainability report.

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

See the corresponding section in Groupe BPCE's sustainability report.

### **3.2.3 Impact, risk and opportunity management**

#### **3.2.3.1 (S2-1) POLICIES RELATED TO VALUE CHAIN WORKERS**

See the corresponding section in Groupe BPCE's sustainability report.

#### **3.2.3.2 (S2-2) PROCESSES FOR ENGAGING WITH VALUE CHAIN WORKERS ABOUT IMPACTS**

See the corresponding section in Groupe BPCE's sustainability report.

#### **3.2.3.3 (S2-3) PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR VALUE CHAIN WORKERS TO RAISE CONCERNS**

See the corresponding section in Groupe BPCE's sustainability report.

#### **3.2.3.4 (S2-4) TAKING ACTION ON MATERIAL IMPACTS ON VALUE CHAIN WORKERS, AND APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO VALUE CHAIN WORKERS, AND EFFECTIVENESS OF THOSE ACTIONS**

See the corresponding section in Groupe BPCE's sustainability report.

### **3.2.4 Metrics and targets**

#### **3.2.4.1 (S2-5) TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES**

See the corresponding section in Groupe BPCE's sustainability report.



### **3.3 S3 - Affected communities**

#### **3.3.1 SBM-2 - Interests and views of stakeholders**

See the corresponding section in Groupe BPCE's sustainability report.

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

See the corresponding section in Groupe BPCE's sustainability report.

#### **3.3.3 Impact, risk and opportunity management**

##### **3.3.3.1 FINANCING THE ECONOMY AND REGIONAL PLAYERS IN FRANCE**

See the corresponding section in Groupe BPCE's sustainability report.

##### **3.3.3.2 FINANCING THE ECONOMY AND REGIONAL PLAYERS - GLOBAL BUSINESS LINES**

See the corresponding section in Groupe BPCE's sustainability report.

#### **3.3.4 Metrics and targets**

##### **3.3.4.1 FINANCING THE ECONOMY AND REGIONAL PLAYERS IN FRANCE**

See the corresponding section in Groupe BPCE's sustainability report.

##### **3.3.4.2 FINANCING THE ECONOMY AND REGIONAL PLAYERS - GLOBAL BUSINESS LINES**

See the corresponding section in Groupe BPCE's sustainability report.

## **3.4 S4 - Consumers and end-users**

### **3.4.1 SBM-2 - Interests and views of stakeholders**

See the corresponding section in Groupe BPCE's sustainability report.

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

See the corresponding section in Groupe BPCE's sustainability report.

### **3.4.3 Impact, risk and opportunity management**

See the corresponding section in Groupe BPCE's sustainability report.

#### **3.4.3.1 [S4-1] POLICIES RELATED TO CONSUMERS AND END-USERS**

See the corresponding section in Groupe BPCE's sustainability report.

#### **3.4.3.2 [S4-2] PROCESSES FOR ENGAGING WITH CONSUMERS AND END-USERS ABOUT IMPACTS**

See the corresponding section in Groupe BPCE's sustainability report.

#### **3.4.3.3 [S4-3] PROCESSES TO REMEDIATE NEGATIVE IMPACTS AND CHANNELS FOR CONSUMERS AND END-USERS TO RAISE CONCERNS**

See the corresponding section in Groupe BPCE's sustainability report.

#### **3.4.3.4 [S4-4] TAKING ACTION ON MATERIAL IMPACTS ON CONSUMERS AND END-USERS, AND APPROACHES TO MANAGING MATERIAL RISKS AND PURSUING MATERIAL OPPORTUNITIES RELATED TO CONSUMERS AND END-USERS, AND EFFECTIVENESS OF THOSE ACTIONS**

See the corresponding section in Groupe BPCE's sustainability report.

### **3.4.4 Metrics and targets**

#### **3.4.4.1 [S4-5] TARGETS RELATED TO MANAGING MATERIAL NEGATIVE IMPACTS, ADVANCING POSITIVE IMPACTS, AND MANAGING MATERIAL RISKS AND OPPORTUNITIES**

See the corresponding section in Groupe BPCE's sustainability report.

## PART 4 - Governance information

### 4.1 G1 - BUSINESS CONDUCT

#### 4.1.1 Impact, risk and opportunity management

##### 4.1.1.1 GOV-1 - THE ROLE OF THE ADMINISTRATIVE, MANAGEMENT AND SUPERVISORY BODIES

See the corresponding section in Groupe BPCE's sustainability report.

##### 4.1.1.2 (IRO-1) DESCRIPTION OF THE PROCESSES TO IDENTIFY AND ASSESS MATERIAL IMPACTS, RISKS AND OPPORTUNITIES

See the corresponding section in Groupe BPCE's sustainability report.

##### 4.1.1.3 (G1-1) CORPORATE CULTURE AND BUSINESS CONDUCT POLICIES

See the corresponding section in Groupe BPCE's sustainability report.

##### 4.1.1.4 (G1-2) MANAGEMENT OF RELATIONSHIPS WITH SUPPLIERS

See the corresponding section in Groupe BPCE's sustainability report.

##### 4.1.1.5 (G1-3) PREVENTION AND DETECTION OF CORRUPTION AND BRIBERY

See the corresponding section in Groupe BPCE's sustainability report.

#### 4.1.2 Metrics and targets

##### 4.1.2.1 (G1-4) CONFIRMED INCIDENTS OF CORRUPTION OR BRIBERY

See the corresponding section in Groupe BPCE's sustainability report.

##### 4.1.2.2 (G1-6) PAYMENT PRACTICES

BPCE undertakes to comply with regulatory payment terms, in accordance with the legal definition, which stipulates a period of 60 days from the date of receipt of the goods or performance of the services. In 2024, 94.3% of payments (by amount) met this commitment.

In addition, BPCE complies with the policy implemented by the Group to pay suppliers within 30 days (from the date on which the contractual or statutory payment period begins to run), and the average payment period complies with this requirement, and amounts to 27.38 days.

Finally, there are no ongoing legal proceedings concerning late payments.

##### Background information on the published indicators (MDR-M):

*The average payment term for invoices paid in 2024 includes all invoices paid between January 1 and December 31, 2024, regardless of their date of issue. Expense claims are not taken into account in this analysis.*

*The payment term is calculated as the difference between the issue date (i.e. not from the date of receipt or recognition) and the settlement date.*

*Several indicators resulting from this analysis are monitored on a quarterly basis, among which the most significant are: the average payment term (expressed in days) and the total amount of invoices paid after 60 days.*

*The objective is to achieve the lowest possible values for these two indicators, and thus comply with the regulations in force.*

##### LIMITATION ON PUBLISHED INFORMATION:

The indicator "description of the company's standard payment terms (in number of days) by major supplier category and the percentage of payments made within these terms", corresponding to the publication requirement of paragraph 33b of DR G1-6 of the CSRD standard is not published. BPCE is not in a position to publish this indicator for the 2024 reference year, given the unavailability of data.

An action plan will be put in place to meet the disclosure requirement.

## PART 5 - INDICATORS OF THE EUROPEAN TAXONOMY ON SUSTAINABLE ACTIVITIES

It should be noted that for the Petit Groupe BPCE, we do not have the taxonomy data for 2023. As a result, we failed to publish the corresponding columns, which are empty.

### Template 0 - Summary of KPIs to be disclosed by credit institutions under Article 8 Taxonomy Regulation

		Total environmentally sustainable assets	KPI****	KPI*****	% coverage (over total assets)***	% of asset excluded from the GAR (Article 7 (2) and (3) and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7 (1) and Section 1.2.4 of Annex V)
Main KPI	Green asset ratio (GAR) stock	2,918	0.60%	0.73%	58.18%	46.94%	41.82%
Additional KPIs		Total environmentally sustainable activities	KPI	KPI	% coverage (over total assets)	% of asset excluded from the GAR (Article 7 (2) and (3) and Section 1.1.2 of Annex V)	% of assets excluded from the denominator of the GAR (Article 7 (1) and Section 1.2.4 of Annex V)
	GAR (flow)	453	1.15%	1.67%	83.91%	58.39%	16.09%
	Trading book*						
	Financial guarantees	2,358	5.84%	7.34%			
	Assets under management	9,688	0.86%	0.70%			
	Fees and commissions received**						

\* For credit institutions not fulfilling the conditions of Article 94 (1) or Article 325a (1) of the CRR.

\*\* Fees and commissions on services other than loans and asset management.

Institutions shall provide forward-looking information for these KPIs, in particular on the targets concerned, and relevant explanations of the method applied.

\*\*\* Percentage of assets covered by the KPI, compared to total banking assets.

\*\*\*\* Based on the KPI of the counterparty's turnover.

\*\*\*\*\* Based on the KPI of the counterparty's CapEx, except for general lending activities, for which the turnover KPI is used.

## Template 1 - Assets for the calculation of GAR (Turnover basis)

	a	b	c	d	e	f	g	h	i	j	k	l	m	n
	12/31/2024													
	Total [gross] carrying amount	Climate change mitigation (CCM)					Climate change adaptation (CCA)			Water and marine resources (WMR)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)			Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy- aligned)					Of which environmentally sustainable (Taxonomy- aligned)				Of which environmentally sustainable (Taxonomy- aligned)			
			Of which use of proceeds	Of which transitional	Of which enabling			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling	
in millions of euros														
GAR – Covered assets in both numerator and denominator														
Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation	93,450	29,487	2,918											
1 Financial companies	22,101	16	1											
3 Credit institutions	5,883	0	(0)											
4 Loans and advances	1,397	0	(0)											
5 Debt securities, including specific use of proceeds (UoP)	3,633	(0)	(0)											
6 Equity instruments	853													
7 Other financial companies	16,217	16	1											
8 of which investment firms														
9 Loans and advances														
10 Debt securities, including specific use of proceeds (UoP)														
11 Equity instruments														
12 of which management companies														
13 Loans and advances														
14 Debt securities, including specific use of proceeds (UoP)														
15 Equity instruments														
16 of which insurance undertakings	7,042	-	-											
17 Loans and advances	2,233	-	-											
18 Debt securities, including specific use of proceeds (UoP)														
19 Equity instruments	4,809	-	-											
20 Non-financial companies	21,623	4,034	1,189											
21 Loans and advances	19,912	3,786	1,132											
22 Debt securities, including specific use of proceeds (UoP)	1,227	248	58											
23 Equity instruments	483													
24 Households	32,693	24,503	1,728											
of which loans collateralized by residential immovable property	24,472	24,472	1,728											
26 of which building renovation loans	30	30	-											
27 of which motor vehicle loans	1	1	-											
28 Local governments financing	17,033	933	-											
29 Housing financing	933	933	-											
30 Other local government financing	16,100	-	-											
31 Collateral obtained by taking possession: residential and commercial immovable properties	1	-	-											
Assets excluded from the numerator for GAR calculation (covered in the denominator)	390,492													
33 Financial and Non-financial companies	361,325													
34 SMEs and non-financial companies (other than SMEs) not subject to CSRD disclosure obligations	312,472													
35 Loans and advances	310,319													
36 of which loans collateralized by commercial immovable property	5,848													
37 of which building renovation loans	0													
38 Debt securities	2,153													
39 Equity instruments	-													
40 Third country counterparties not subject to CSRD disclosure obligations	48,852													
41 Loans and advances	44,466													

	a	b	c	d	e	f	g	h	i	j	k	l	m	n
	12/31/2024													
	Total [gross] carrying amount	Climate change mitigation (CCM)				Climate change adaptation (CCA)				Water and marine resources (WMR)				
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
		Of which use of proceeds	Of which transitional	Of which enabling		Of which use of proceeds	Of which enabling		Of which use of proceeds	Of which enabling		Of which use of proceeds	Of which enabling	
in millions of euros														
42 Debt securities	3,229													
43 Equity instruments	1,158													
44 Derivatives	4,570													
45 On demand interbank loans	5,260													
46 Cash and cash equivalents	32													
47 Other categories of assets (e.g. goodwill, commodities, etc.)	19,305													
48 TOTAL GAR ASSETS	483,942	29,487	2,918											
49 Assets not covered for GAR calculation	347,898													
50 Central governments and supranational issuers	12,068													
51 Central banks exposure	121,832													
52 Trading book	213,998													
53 TOTAL ASSETS	831,840	29,487	2,918											
Off-balance sheet exposures - Undertakings subject to CSRD disclosure obligations														
54 Financial guarantees	40,363	7,200	2,358											
55 Assets under management	1,123,850	92,657	9,688											
56 Of which debt securities	444,052	32,019	4,578											
57 Of which equity instruments	101,845	60,637	5,110											

1. This template shall include information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates (NFC), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments/municipalities (house financing).

2. The following accounting categories of financial assets should be considered: 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, and real estate collaterals obtained by credit institutions by taking possession in exchange in of cancellation of debts.

3. Banks with non-EU subsidiary should provide this information separately for exposures towards non-EU counterparties. For non-EU exposures, while there are additional challenges in terms of absence of common disclosure requirements and methodology, as the EU taxonomy and the NFRD apply only at EU level, given the relevance of these exposures for those credit institutions with non-EU subsidiaries, these institutions should disclose a separate GAR for non-EU exposures, on a best effort basis, in the form of estimates and ranges, using proxies, and explaining the assumptions, caveats and limitations.

4. For motor vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure.

	o	p	q	r	s	t	u	v	w	x	z	aa
	12/31/2024											
	Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
	Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
		Of which use of proceeds		Of which enabling		Of which use of proceeds		Of which enabling		Of which use of proceeds		Of which enabling
in millions of euros												
<b>GAR – Covered assets in both numerator and denominator</b>												
<b>Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation</b>												
<b>1</b>												
<b>2 Financial companies</b>												
3 Credit institutions												
4 Loans and advances												
5 Debt securities, including specific use of proceeds (UoP)												
6 Equity instruments												
7 Other financial companies												
8 of which investment firms												
9 Loans and advances												
10 Debt securities, including specific use of proceeds (UoP)												
11 Equity instruments												
12 of which management companies												
13 Loans and advances												
14 Debt securities, including specific use of proceeds (UoP)												
15 Equity instruments												
16 of which insurance undertakings												
17 Loans and advances												
18 Debt securities, including specific use of proceeds (UoP)												
19 Equity instruments												
<b>20 Non-financial companies</b>												
21 Loans and advances												
22 Debt securities, including specific use of proceeds (UoP)												
23 Equity instruments												
<b>24 Households</b>												
25 of which loans collateralized by residential immovable property												
26 of which building renovation loans												
27 of which motor vehicle loans												
<b>28 Local governments financing</b>												
29 Housing financing												
<b>30 Other local government financing</b>												
<b>31 Collateral obtained by taking possession: residential and commercial immovable properties</b>												
<b>32 Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>												
33 Financial and Non-financial companies												
34 SMEs and non-financial companies (other than SMEs) not subject to CSRD disclosure obligations												
35 Loans and advances												
36 of which loans collateralized by commercial immovable property												
37 of which building renovation loans												
38 Debt securities												
39 Equity instruments												
40 Third country counterparties not subject to CSRD disclosure obligations												
41 Loans and advances												
42 Debt securities												
43 Equity instruments												
<b>44 Derivatives</b>												
<b>45 On demand interbank loans</b>												
<b>46 Cash and cash equivalents</b>												
<b>47 Other categories of assets (e.g. goodwill, commodities, etc.)</b>												
<b>48 TOTAL GAR ASSETS</b>												



	o	p	q	r	s	t	u	v	w	x	z	aa
	12/31/2024											
	Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
	Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
		Of which use of proceeds		Of which enabling		Of which use of proceeds		Of which enabling		Of which use of proceeds		Of which enabling
in millions of euros												
49 Assets not covered for GAR calculation												
50 Central governments and supranational issuers												
51 Central banks exposure												
52 Trading book												
53 TOTAL ASSETS												
Off-balance sheet exposures - Undertakings subject to CSRD disclosure obligations												
54 Financial guarantees												
55 Assets under management												
56 Of which debt securities												
57 Of which equity instruments												

1. This template shall include information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates (NFC), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments/municipalities (house financing).

2. The following accounting categories of financial assets should be considered: 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, and real estate collaterals obtained by credit institutions by taking possession in exchange in of cancellation of debts.

3. Banks with non-EU subsidiary should provide this information separately for exposures towards non-EU counterparties. For non-EU exposures, while there are additional challenges in terms of absence of common disclosure requirements and methodology, as the EU taxonomy and the NFRD apply only at EU level, given the relevance of these exposures for those credit institutions with non-EU subsidiaries, these institutions should disclose a separate GAR for non-EU exposures, on a best effort basis, in the form of estimates and ranges, using proxies, and explaining the assumptions, caveats and limitations.

4. For motor vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure.

in millions of euros

	ab	ac	ad	ae	af
	12/312024				
	TOTAL (CCM + CCA + WMR + CE + PRP + BIO)				
			Of which environmentally sustainable (Taxonomy-aligned)		
			Of which use of proceeds	Of which transitional	Of which enabling
<b>GAR – Covered assets in both numerator and denominator</b>					
<b>1 Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation</b>	<b>29,487</b>	<b>2,918</b>			
<b>2 financial companies</b>	<b>16</b>	<b>1</b>			
3 Credit institutions	0	(0)			
4 Loans and advances	0	(0)			
5 Debt securities, including specific use of proceeds (UoP)	(0)	(0)			
6 Equity instruments					
7 Other financial companies	16	1			
8 of which investment firms					
9 Loans and advances					
10 Debt securities, including specific use of proceeds (UoP)					
11 Equity instruments					
12 of which management companies					
13 Loans and advances					
14 Debt securities, including specific use of proceeds (UoP)					
15 Equity instruments					
16 of which insurance undertakings	-	-			
17 Loans and advances	-	-			
18 Debt securities, including specific use of proceeds (UoP)					
19 Equity instruments	-	-			
<b>20 Non-financial companies</b>	<b>4,034</b>	<b>1,189</b>			
21 Loans and advances	3,786	1,132			
22 Debt securities, including specific use of proceeds (UoP)	248	58			
23 Equity instruments					
<b>24 Households</b>	<b>24,503</b>	<b>1,728</b>			
25 of which loans collateralized by residential immovable property	24,472	1,728			
26 of which building renovation loans	30	-			
27 of which motor vehicle loans	1	-			
<b>28 Local governments financing</b>	<b>933</b>	<b>-</b>			
29 Housing financing	933	-			
<b>30 Other local government financing</b>	<b>-</b>	<b>-</b>			
<b>31 Collateral obtained by taking possession: residential and commercial immovable properties</b>	<b>-</b>	<b>-</b>			
<b>32 Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>					
33 Financial and Non-financial companies					
34 SMEs and non-financial companies (other than SMEs) not subject to CSRD disclosure obligations					
35 Loans and advances					
36 of which loans collateralized by commercial immovable property					
37 of which building renovation loans					
38 Debt securities					
39 Equity instruments					
40 Third country counterparties not subject to CSRD disclosure obligations					
41 Loans and advances					
42 Debt securities					
43 Equity instruments					
<b>44 Derivatives</b>					
<b>45 On demand interbank loans</b>					
<b>46 Cash and cash equivalents</b>					
<b>47 Other categories of assets (e.g. goodwill, commodities, etc.)</b>					
<b>48 TOTAL GAR ASSETS</b>	<b>29,487</b>	<b>2,918</b>			
<b>49 Assets not covered for GAR calculation</b>					
<b>50 Central governments and supranational issuers</b>					
<b>51 Central banks exposure</b>					
52 Trading book					
<b>53 TOTAL ASSETS</b>	<b>29,487</b>	<b>2,918</b>			

		ab	ac	ad	ae	af
		12/312024				
		TOTAL (CCM + CCA + WMR + CE + PRP + BIO)				
		Of which environmentally sustainable (Taxonomy-aligned)				
			Of which use of proceeds	Of which transitional	Of which enabling	
in millions of euros						
Off-balance sheet exposures - Undertakings subject to CSRD disclosure obligations						
54	Financial guarantees	7,200	2,358			
55	Assets under management	92,657	9,688			
56	Of which debt securities	32,019	4,578			
57	Of which equity instruments	60,637	5,110			

1. This template shall include information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates (NFC), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments/municipalities (house financing).

2. The following accounting categories of financial assets should be considered: 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, and real estate collaterals obtained by credit institutions by taking possession in exchange in of cancellation of debts.

3. Banks with non-EU subsidiary should provide this information separately for exposures towards non-EU counterparties. For non-EU exposures, while there are additional challenges in terms of absence of common disclosure requirements and methodology, as the EU taxonomy and the NFRD apply only at EU level, given the relevance of these exposures for those credit institutions with non-EU subsidiaries, these institutions should disclose a separate GAR for non-EU exposures, on a best effort basis, in the form of estimates and ranges, using proxies, and explaining the assumptions, caveats and limitations.

4. For motor vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure.

## Template 1 - Assets for the calculation of GAR (Capex basis)

	a	b	c	d	e	f	g	h	i	j	k	l	m	n
	12/31/2024													
	Total [gross] carrying amount	Climate change mitigation (CCM)					Climate change adaptation (CCA)				Water and marine resources (WMR)			
		Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
			Of which environmentally sustainable (Taxonomy- aligned)					Of which environmentally sustainable (Taxonomy- aligned)				Of which environmentally sustainable (Taxonomy- aligned)		
				Of which use of proceeds	Of which transitio nal	Of which enabling		Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling	
in millions of euros														
GAR – Covered assets in both numerator and denominator														
Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation	93,450	30,295	3,546											
1 Financial companies	22,101	17	1											
3 Credit institutions	5,883	0	(0)											
4 Loans and advances	1,397	0	(0)											
5 Debt securities, including specific use of proceeds (UoP)	3,633	(0)	0											
6 Equity instruments	853													
7 Other financial companies	16,217	17	1											
8 of which investment firms														
9 Loans and advances														
10 Debt securities, including specific use of proceeds (UoP)														
11 Equity instruments														
12 of which management companies														
13 Loans and advances														
14 Debt securities, including specific use of proceeds (UoP)														
15 Equity instruments														
16 of which insurance undertakings	7,042	-	-											
17 Loans and advances	2,233	-	-											
18 Debt securities, including specific use of proceeds (UoP)														
19 Equity instruments	4,809	-	-											
20 Non-financial companies	21,623	4,842	1,818											
21 Loans and advances	19,912	4,503	1,690											
22 Debt securities, including specific use of proceeds (UoP)	1,227	339	128											
23 Equity instruments	483													
24 Households	32,693	24,503	1,728											
25 of which loans collateralized by residential immovable property	24,472	24,472	1,728											
26 of which building renovation loans	30	30	-											
27 of which motor vehicle loans	1	1	-											
28 Local governments financing	17,033	933	-											
29 Housing financing	933	933	-											
30 Other local government financing	16,100	-	-											
31 Collateral obtained by taking possession: residential and commercial immovable properties	1	-	-											
32 Assets excluded from the numerator for GAR calculation (covered in the denominator)	390,492													
33 Financial and Non-financial companies	361,325													

	a	b	c	d	e	f	g	h	i	j	k	l	m	n
	12/31/2024													
	Climate change mitigation (CCM)					Climate change adaptation (CCA)				Water and marine resources (WMR)				
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)					Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				
	Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				
	Total [gross] carrying amount		Of which use of proceeds	Of which transitional	Of which enabling			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling	
<i>in millions of euros</i>														
SMEs and non-financial companies (other than SMEs) not subject to CSRD disclosure obligations	312,472													
34 Loans and advances	310,319													
36 of which loans collateralized by commercial immovable property	5,848													
37 of which building renovation loans	0													
38 Debt securities	2,153													
39 Equity instruments	-													
40 Third country counterparties not subject to CSRD disclosure obligations	48,852													
41 Loans and advances	44,466													
42 Debt securities	3,229													
43 Equity instruments	1,158													
44 Derivatives	4,570													
45 On demand interbank loans	5,260													
46 Cash and cash equivalents	32													
Other categories of assets (e.g. goodwill, commodities, etc.)	19,305													
47														
48 TOTAL GAR ASSETS	483,942	30,295	3,546											
49 Assets not covered for GAR calculation	347,898													
Central governments and supranational issuers	12,068													
50														
Central banks exposure	121,832													
51														
Trading book	213,998													
52														
53 TOTAL ASSETS	831,840	30,295	3,546											
Off-balance sheet exposures - Undertakings subject to CSRD disclosure obligations														
54 Financial guarantees	40,363	7,322	2,963											
55 Assets under management	1,123,850	25,787	7,910											
56 Of which debt securities	444,052	-	-											
57 Of which equity instruments	101,845	25,787	7,910											

1. This template shall include information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates (NFC), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments/municipalities (house financing).

2. The following accounting categories of financial assets should be considered: 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, and real estate collateral obtained by credit institutions by taking possession in exchange in of cancellation of debts.

3. Banks with non-EU subsidiary should provide this information separately for exposures towards non-EU counterparties. For non-EU exposures, while there are additional challenges in terms of absence of common disclosure requirements and methodology, as the EU taxonomy and the NFRD apply only at EU level, given the relevance of these exposures for those credit institutions with non-EU subsidiaries, these institutions should disclose a separate GAR for non-EU exposures, on a best effort basis, in the form of estimates and ranges, using proxies, and explaining the assumptions, caveats and limitations.

4. For motor vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure.

	o	p	q	r	s	t	u	v	w	x	z	aa
	12/31/2024											
	Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
	Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
		Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling	
in millions of euros												
<b>GAR – Covered assets in both numerator and denominator</b>												
<b>Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation</b>												
<b>1 Financial companies</b>												
3 Credit institutions												
4 Loans and advances												
5 Debt securities, including specific use of proceeds (UoP)												
6 Equity instruments												
7 Other financial companies												
8 of which investment firms												
9 Loans and advances												
10 Debt securities, including specific use of proceeds (UoP)												
11 Equity instruments												
12 of which management companies												
13 Loans and advances												
14 Debt securities, including specific use of proceeds (UoP)												
15 Equity instruments												
16 of which insurance undertakings												
17 Loans and advances												
18 Debt securities, including specific use of proceeds (UoP)												
19 Equity instruments												
<b>20 Non-financial companies</b>												
21 Loans and advances												
22 Debt securities, including specific use of proceeds (UoP)												
23 Equity instruments												
<b>24 Households</b>												
25 of which loans collateralized by residential immovable property												
26 of which building renovation loans												
27 of which motor vehicle loans												
<b>28 Local governments financing</b>												
29 Housing financing												
30 Other local government financing												
<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>												
<b>32 Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>												
<b>33 Financial and Non-financial companies</b>												
34 SMEs and non-financial companies (other than SMEs) not subject to CSRD disclosure obligations												
35 Loans and advances												
36 of which loans collateralized by commercial immovable property												
37 of which building renovation loans												
38 Debt securities												
39 Equity instruments												
40 Third country counterparties not subject to CSRD disclosure obligations												
41 Loans and advances												
42 Debt securities												
43 Equity instruments												
<b>44 Derivatives</b>												
<b>45 On demand interbank loans</b>												
<b>46 Cash and cash equivalents</b>												
<b>47 Other categories of assets (e.g. goodwill, commodities, etc.)</b>												
<b>48 TOTAL GAR ASSETS</b>												

	o	p	q	r	s	t	u	v	w	x	z	aa
	12/31/2024											
	Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
	Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)				Of which towards taxonomy relevant sectors (Taxonomy-eligible)			
	Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally sustainable (Taxonomy-aligned)			
		Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling	
<i>in millions of euros</i>												
<b>49 Assets not covered for GAR calculation</b>												
<b>50 Central governments and supranational issuers</b>												
<b>51 Central banks exposure</b>												
52 Trading book												
<b>53 TOTAL ASSETS</b>												
<b>Off-balance sheet exposures - Undertakings subject to CSRD disclosure obligations</b>												
54 Financial guarantees												
55 Assets under management												
56 Of which debt securities												
57 Of which equity instruments												

1. This template shall include information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates (NFC), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments/municipalities (house financing).
2. The following accounting categories of financial assets should be considered: 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, and real estate collaterals obtained by credit institutions by taking possession in exchange in of cancellation of debts.
3. Banks with non-EU subsidiary should provide this information separately for exposures towards non-EU counterparties. For non-EU exposures, while there are additional challenges in terms of absence of common disclosure requirements and methodology, as the EU taxonomy and the NFRD apply only at EU level, given the relevance of these exposures for those credit institutions with non-EU subsidiaries, these institutions should disclose a separate GAR for non-EU exposures, on a best effort basis, in the form of estimates and ranges, using proxies, and explaining the assumptions, caveats and limitations.
4. For motor vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure.



	ab	ac	ad	ae	af
	12/31/2024				
	TOTAL (CCM + CCA + WMR + CE + PRP + BIO)				
	Of which environmentally sustainable (Taxonomy-aligned)				
			Of which use of proceeds	Of which transitional	Of which enabling
<i>in millions of euros</i>					
<b>GAR – Covered assets in both numerator and denominator</b>					
<b>1 Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation</b>	<b>30,295</b>	<b>3,546</b>			
<b>2 Financial companies</b>	<b>17</b>	<b>1</b>			
3 Credit institutions	0	(0)			
4 Loans and advances	0	(0)			
5 Debt securities, including specific use of proceeds (UoP)	(0)	0			
6 Equity instruments					
7 Other financial companies	17	1			
8 of which investment firms					
9 Loans and advances					
10 Debt securities, including specific use of proceeds (UoP)					
11 Equity instruments					
12 of which management companies					
13 Loans and advances					
14 Debt securities, including specific use of proceeds (UoP)					
15 Equity instruments					
16 of which insurance undertakings	-	-			
17 Loans and advances	-	-			
18 Debt securities, including specific use of proceeds (UoP)					
19 Equity instruments	-	-			
<b>20 Non-financial companies</b>	<b>4,842</b>	<b>1,818</b>			
21 Loans and advances	4,503	1,690			
22 Debt securities, including specific use of proceeds (UoP)	339	128			
23 Equity instruments					
<b>24 Households</b>	<b>24,503</b>	<b>1,728</b>			
25 of which loans collateralized by residential immovable property	24,472	1,728			
26 of which building renovation loans	30	-			
27 of which motor vehicle loans	1	-			
<b>28 Local governments financing</b>	<b>933</b>	<b>-</b>			
29 Housing financing	933	-			
30 Other local government financing	-	-			
<b>31 Collateral obtained by taking possession: residential and commercial immovable properties</b>	<b>-</b>	<b>-</b>			
<b>32 Assets excluded from the numerator for GAR calculation (covered in the denominator)</b>					
<b>33 Financial and Non-financial companies</b>					
34 SMEs and non-financial companies (other than SMEs) not subject to CSRD disclosure obligations					
35 Loans and advances					
36 of which loans collateralized by commercial immovable property					
37 of which building renovation loans					
38 Debt securities					
39 Equity instruments					
40 Third country counterparties not subject to CSRD disclosure obligations					
41 Loans and advances					
42 Debt securities					
43 Equity instruments					
<b>44 Derivatives</b>					
<b>45 On demand interbank loans</b>					
<b>46 Cash and cash equivalents</b>					
<b>47 Other categories of assets (e.g. goodwill, commodities, etc.)</b>					
<b>48 TOTAL GAR ASSETS</b>	<b>30,295</b>	<b>3,546</b>			
<b>49 Assets not covered for GAR calculation</b>					
<b>50 Central governments and supranational issuers</b>					
<b>51 Central banks exposure</b>					
52 Trading book					
<b>53 TOTAL ASSETS</b>	<b>30,295</b>	<b>3,546</b>			

	ab	ac	ad	ae	af
	<b>12/31/2024</b>				
	<b>TOTAL (CCM + CCA + WMR + CE + PRP + BIO)</b>				
	<b>Of which environmentally sustainable (Taxonomy-aligned)</b>				
			<b>Of which use of proceeds</b>	<b>Of which transitional</b>	<b>Of which enabling</b>
<i>in millions of euros</i>					
<b>GAR – Covered assets in both numerator and denominator</b>					
<b>Off-balance sheet exposures - Undertakings subject to CSRD disclosure obligations</b>					
54	Financial guarantees	7,322	2,962		
55	Assets under management	25,787	7,909		
56	Of which debt securities	0	0		
57	Of which equity instruments	25,787	7,909		

1. This template shall include information for loans and advances, debt securities and equity instruments in the banking book, towards financial corporates, non-financial corporates (NFC), including SMEs, households (including residential real estate, house renovation loans and motor vehicle loans only) and local governments/municipalities (house financing).
2. The following accounting categories of financial assets should be considered: 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, and real estate collaterals obtained by credit institutions by taking possession in exchange in of cancellation of debts.
3. Banks with non-EU subsidiary should provide this information separately for exposures towards non-EU counterparties. For non-EU exposures, while there are additional challenges in terms of absence of common disclosure requirements and methodology, as the EU taxonomy and the NFRD apply only at EU level, given the relevance of these exposures for those credit institutions with non-EU subsidiaries, these institutions should disclose a separate GAR for non-EU exposures, on a best effort basis, in the form of estimates and ranges, using proxies, and explaining the assumptions, caveats and limitations.
4. For motor vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure.

## Template 2 - GAR Information by sector (Turnover basis)

Breakdown by sector - NACE 4 digits level (code and label)	a		b		c		d		e		f		g		h		i		j		k		l	
	Climate change mitigation (CCM)				Climate change adaptation (CCA)				Water and marine resources (WMR)															
	Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
1 01.13 - Growing of vegetables, melons, roots and tubers	28	-																						
2 06.10 - Extraction of crude oil	452	1																						
3 06.20 - Natural gas extraction	66	-																						
4 07.10 - Extraction of iron ore	104	-																						
5 07.29 - Mining of other non-ferrous metal ores	724	-																						
6 08.12 - Mining of gravel and sand pits, extraction of clay and kaolin	24	3																						
7 08.91 - Extraction of chemical minerals and mineral fertilizers	5	-																						
8 09.10 - Support activities for hydrocarbon extraction	12	-																						
9 09.90 - Support activities for other mining and quarrying	(0)	0																						
10 10.11 - Meat processing and preservation	30	-																						
11 10.12 - Poultry meat processing and preservation	0	-																						
12 10.20 - Processing and preserving of fish, crustaceans and mollusks	1	-																						
13 10.51 - Dairies and cheese production	76	-																						
14 10.51 - Dairies and cheese production	2	-																						
15 10.61 - Grain processing	0	-																						
16 10.72 - Manufacture of cookies, rusks and pastries	0	-																						
17 10.85 - Manufacture of prepared meals	0	-																						
18 10.89 - Manufacture of other food products n.e.c.	53	-																						
19 11.04 - Production of other non-distilled fermented beverages	4	-																						
20 11.07 - Mineral water and other bottled water and soft drinks industry	59	-																						
21 13.20 - Weaving	11	-																						
22 13.95 - Manufacture of non-wovens, except clothing	(0)	(0)																						
23 14.13 - Manufacture of outerwear	0	-																						
24 15.12 - Manufacture of travel goods, leather goods and saddlery	19	-																						
25 16.10 - Lumber sawing and planing	3	-																						
26 16.21 - Manufacture of veneer and wood panels	0	-																						
27 16.24 - Manufacture of wooden packaging	0	-																						
28 16.29 - Manufacture of miscellaneous wooden articles, manufacture of articles of cork, basketry and straw goods	1	-																						
29 17.12 - Manufacture of paper and paperboard	64	-																						
30 17.21 - Manufacture of corrugated paper and paperboard and of packaging of paper or paperboard	0	0																						
31 17.23 - Manufacture of stationery products	1	-																						
32 17.29 - Manufacture of other paper and paperboard products	0	-																						
33 18.12 - Other printing (commercial)	8	-																						
34 19.20 - Oil refining	147	0																						
35 20.11 - Manufacture of industrial gases	147	1																						
36 20.13 - Manufacture of other basic inorganic chemical products	1	-																						
37 20.14 - Manufacture of other basic organic chemicals	7	(0)																						
38 20.16 - Manufacture of basic plastics	50	0																						
39 20.30 - Manufacture of paints, varnishes, inks and mastics	0	0																						
40 20.41 - Manufacture of soaps, detergents and cleaning products	25	-																						
41 20.42 - Manufacture of perfumes and toilet preparations	1	-																						
42 20.52 - Manufacture of adhesives	0	0																						
43 20.53 - Manufacture of essential oils	5	-																						
44 20.59 - Manufacture of other chemical products n.e.c.	35	-																						
45 21.10 - Manufacturing of basic pharmaceutical products	5	-																						
46 21.20 - Manufacture of pharmaceutical preparations	218	-																						
47 22.11 - Manufacturing and retreading of tires	0	-																						
48 22.19 - Manufacture of other rubber products	0	-																						
49 22.21 - Manufacture of plastic plates, sheets, tubes and profiles	3	0																						
50 22.22 - Manufacture of plastic packaging	0	-																						

		a	b	c	d	e	f	g	h	i	j	k	l
		Climate change mitigation (CCM)		Climate change adaptation (CCA)		Water and marine resources (WMR)							
		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
Breakdown by sector - NACE 4 digits level (code and label)													
51	22.23 - Manufacture of plastic components for construction	1	-										
52	22.29 - Manufacture of other plastic products	0	-										
53	22.29 - Manufacture of other plastic products	0	-										
54	23.13 - Manufacture of hollow glass	4	-										
55	23.51 - Manufacture of cement	31	2										
56	23.61 - Manufacture of concrete products for construction purposes	0	0										
57	23.62 - Manufacture of plaster products for construction purposes	0	-										
58	23.63 - Manufacture of ready-mixed concrete	7	0										
59	23.99 - Manufacture of other non-metallic mineral products	47	1										
60	24.10 - Steel industry	22	-										
61	24.20 - Manufacture of steel tubes, pipes, hollow sections and related fittings	4	-										
62	24.42 - Aluminum metallurgy	109	1										
63	24.44 - Copper metallurgy	97	1										
64	24.45 - Metallurgy of other non-ferrous metals	61	-										
65	24.51 - Cast iron	0	-										
66	25.11 - Manufacture of metal structures and parts of structures	0	0										
67	25.50 - Forging, stamping, powder metallurgy	10	-										
68	25.50 - Forging, stamping, powder metallurgy	0	-										
69	25.61 - Treatment and coating of metals	0	-										
70	25.62 - Machining	0	-										
71	25.62 - Machining	11	0										
72	25.93 - Manufacture of wire products, chain and springs	5	2										
73	25.99 - Manufacture of other metal products n.e.c.	0	-										
74	26.11 - Manufacture of electronic components	121	0										
75	26.12 - Manufacture of assembled electronic boards	2	-										
76	26.20 - Manufacture of computers and peripheral equipment	71	-										
77	26.30 - Manufacture of communication equipment	1	0										
78	26.51 - Manufacture of instruments and appliances for measuring, testing and navigation	0	0										
79	26.80 - Manufacture of magnetic and optical media	4	-										
80	27.11 - Manufacture of electric motors, generators and transformers	0	0										
81	27.12 - Manufacture of electrical distribution and control equipment	152	47										
82	27.20 - Manufacture of primary batteries and accumulators	25	-										
83	27.33 - Manufacture of electrical installation equipment	(0)	(0)										
84	27.40 - Manufacture of electric lighting equipment	1	0										
85	27.51 - Manufacture of household appliances	15	-										
86	28.13 - Manufacture of other pumps and compressors	0	-										
87	28.14 - Manufacture of other valves and fittings	1	-										
88	28.22 - Manufacture of lifting and handling equipment	37	8										
89	28.25 - Manufacture of industrial ventilation and refrigeration equipment	0	-										
90	28.41 - Manufacture of metal forming machinery	0	0										
91	28.91 - Manufacture of machinery for the metal industry	0	-										
92	28.93 - Manufacture of machinery for the food industry	29	-										
93	28.94 - Manufacture of machinery for the textile industry	40	-										
94	28.95 - Manufacture of machinery for the paper and paperboard industries	1	-										
95	29.10 - Manufacture of motor vehicles	145	15										
96	29.20 - Manufacture of coachwork and trailers	0	-										
97	29.32 - Manufacture of other automotive equipment	86	13										
98	30.12 - Construction of pleasure craft	3	0										
99	30.20 - Construction of locomotives and other railway rolling stock	38	2										
100	30.30 - Aeronautical and space construction	225	0										
101	30.92 - Manufacture of bicycles and disabled vehicles	1	-										
102	30.99 - Manufacture of other transport equipment n.e.c.	15	3										
103	31.09 - Manufacture of furniture	1	-										
104	32.50 - Manufacture of medical and dental instruments and supplies	12	-										

Breakdown by sector - NACE 4 digits level (code and label)	a	b	c	d	e	f	g	h	i	j	k	l
	Climate change mitigation (CCM)				Climate change adaptation (CCA)				Water and marine resources (WMR)			
	Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
105 32.50 - Manufacture of medical and dental instruments and supplies	10	-										
106 32.99 - Other manufacturing activities n.e.c.	(0)	(0)										
107 33.12 - Repair of machinery and equipment	26	-										
108 33.16 - Repair and maintenance of aircraft and space vehicles	(0)	-										
109 33.20 - Installation of industrial machinery and equipment	0	0										
110 33.20 - Installation of industrial machinery and equipment	1	-										
111 35.11 - Generation of electricity	1,280	302										
112 35.12 - Transmission of electricity	9	-										
113 35.13 - Distribution of electricity	93	4										
114 35.14 - Electricity wholesale trade	0	0										
115 35.21 - Production of gaseous fuels	36	-										
116 35.22 - Distribution of gaseous fuels through pipelines	34	(0)										
117 35.23 - Sale of gaseous fuels through pipelines	214	12										
118 35.30 - Steam and air conditioning production and supply	4	1										
119 36.00 - Water collection, treatment and supply	4	-										
120 37.00 - Wastewater collection and treatment	2	1										
121 38.11 - Collection of non-hazardous waste	49	34										
122 38.21 - Treatment and disposal of non-hazardous waste	0	0										
123 38.22 - Treatment and disposal of hazardous waste	0	0										
124 38.31 - Dismantling of wrecks	0	0										
125 38.32 - Recovery of sorted waste	48	38										
126 41.10 - Real estate development	56	16										
127 41.10 - Real estate development	69	12										
128 41.10 - Real estate development	88	4										
129 41.10 - Real estate development	77	16										
130 41.20 - Construction of residential and non-residential buildings	4	0										
131 41.20 - Construction of residential and non-residential buildings	18	3										
132 42.11 - Road and motorway construction	75	16										
133 42.12 - Construction of surface and underground railways	26	6										
134 42.13 - Construction of bridges and tunnels	0	0										
135 42.21 - Construction of networks for fluids	4	1										
136 42.22 - Construction of electricity and telecommunications networks	47	1										
137 42.91 - Construction of maritime and river infrastructure	2	0										
138 42.99 - Construction of other civil engineering works n.e.c.	41	2										
139 43.11 - Demolition work	7	1										
140 43.12 - Site preparation work	119	11										
141 43.12 - Site preparation work	8	2										
142 43.21 - Electrical installation	5	3										
143 43.21 - Electrical installation	4	2										
144 43.22 - Plumbing, heating and air conditioning installation	0	0										
145 43.29 - Other installation work	0	-										
146 43.32 - Joinery work	0	0										
147 43.39 - Other finishing work	13	-										
148 43.99 - Other specialized construction work n.e.c.	1	0										
149 43.99 - Other specialized construction work n.e.c.	0	0										
150 45.11 - Sale of cars and light motor vehicles	104	0										
151 45.19 - Sale of other motor vehicles	(0)	(0)										
152 45.31 - Wholesale trade of motor vehicle parts and accessories	38	12										
153 45.32 - Retail trade of automotive equipment	79	-										
154 46.11 - Agents involved in the sale of agricultural commodities, live animals, textile commodities, and semi-finished products	194	-										
155 46.12 - Agents involved in the sale of fuels, metals, minerals and chemical products	518	0										
156 46.14 - Agents involved in the sale of machinery, industrial equipment, ships and aircraft	22	-										
157 46.19 - Agents involved in the sale of miscellaneous goods	0	-										

		a	b	c	d	e	f	g	h	i	j	k	l
		Climate change mitigation (CCM)		Climate change adaptation (CCA)		Water and marine resources (WMR)							
		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
Breakdown by sector - NACE 4 digits level (code and label)													
158	46.19 - Agents involved in the sale of miscellaneous goods	35	0										
159	46.21 - Wholesale trade of cereals, non-manufactured tobacco, seeds and animal feed	71	-										
160	46.31 - Wholesale trade of fruit and vegetables	0	-										
161	46.33 - Wholesale trade of dairy products, eggs, edible oils and fats	0	-										
162	46.34 - Wholesale of beverages	6	-										
163	46.37 - Wholesale trade of coffee, tea, cocoa and spices	31	-										
164	46.39 - Non-specialized wholesale trade of food, beverages and tobacco	4	0										
165	46.41 - Wholesale trade of textiles	0	-										
166	46.45 - Wholesale trade of perfumes and cosmetics	1	-										
167	46.46 - Wholesale trade of pharmaceutical products	46	-										
168	46.49 - Wholesale trade of other household goods	9	-										
169	46.51 - Wholesale trade of computers, computer peripheral equipment and software	12	-										
170	46.52 - Wholesale trade of electronic and telecommunication components and equipment	31	5										
171	46.69 - Wholesale trade of other machinery and equipment	1	-										
172	46.69 - Wholesale trade of other machinery and equipment	4	-										
173	46.71 - Wholesale of fuel and related products	486	3										
174	46.72 - Wholesale trade of minerals and metals	455	-										
175	46.73 - Wholesale trade of timber, construction materials and sanitary equipment	0	-										
176	46.75 - Wholesale trade of chemical products	200	0										
177	46.77 - Wholesale trade of waste and scrap	1	0										
178	46.90 - Non-specialized wholesale trade	11	-										
179	47.11 - Retail trade in non-specialized stores predominantly of foodstuffs	0	0										
180	47.11 - Retail trade in non-specialized stores predominantly of foodstuffs	27	0										
181	47.11 - Retail trade in non-specialized stores predominantly of foodstuffs	5	0										
182	47.11 - Retail trade in non-specialized stores predominantly of foodstuffs	3	0										
183	47.19 - Other retail trade in non-specialized stores	63	-										
184	47.19 - Other retail trade in non-specialized stores	114	4										
185	47.41 - Retail trade of computers, peripheral units and software in specialized stores	35	-										
186	47.54 - Retail trade of household appliances in specialized stores	0	-										
187	47.59 - Retail trade of furniture, lighting equipment and other household items in specialized stores	13	-										
188	47.61 - Retail trade of books in specialized stores	131	-										
189	47.71 - Retail trade of clothing in specialized stores	1	-										
190	47.75 - Retail sale of perfume and beauty products in specialized stores	0	-										
191	47.77 - Retail trade of watches and jewelry in specialized stores	100	-										
192	47.91 - Distance selling	0	-										
193	47.91 - Distance selling	3	-										
194	49.31 - Urban and suburban passenger transport	1	-										
195	49.39 - Other passenger land transport n.e.c.	9	-										
196	49.39 - Other passenger land transport n.e.c.	6	-										
197	49.41 - Freight transport by road	1	0										
198	49.41 - Freight transport by road	2	0										
199	49.50 - Transport via pipelines	171	1										
200	50.10 - Maritime and coastal passenger transport	3	1										
201	50.20 - Maritime and coastal freight transport	114	1										
202	51.10 - Passenger air transport	169	-										
203	52.10 - Warehousing and storage	(0)	(0)										
204	52.10 - Warehousing and storage	55	5										
205	52.21 - Services incidental to land transport	33	3										

Breakdown by sector - NACE 4 digits level (code and label)		a	b	c	d	e	f	g	h	i	j	k	l
		Climate change mitigation (CCM)				Climate change adaptation (CCA)				Water and marine resources (WMR)			
		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
206	52.23 - Services incidental to air transport	5	0										
207	52.24 - Handling	0	-										
208	52.29 - Other services incidental to transport	14	0										
209	55.10 - Hotels and similar accommodation	217	0										
210	55.20 - Tourist accommodation and other short-term accommodation	12	2										
211	56.10 - Restaurants and mobile food services	8	-										
212	56.10 - Restaurants and mobile food services	0	-										
213	56.29 - Other food services	(0)	-										
214	58.11 - Book publishing	101	-										
215	58.19 - Other publishing activities	4	-										
216	58.21 - Publishing of electronic games	42	-										
217	58.29 - Publishing of other software	4	0										
218	58.29 - Publishing of other software	3	-										
219	59.11 - Motion picture, video and television program production	443	5										
220	59.11 - Motion picture, video and television program production	13	-										
221	59.20 - Sound recording and music publishing	75	-										
222	60.20 - Television programming and broadcasting	8	1										
223	61.10 - Fixed-line telecommunications	569	0										
224	61.20 - Cordless telecommunications	28	0										
225	61.30 - Satellite telecommunications	261	0										
226	61.90 - Other telecommunications activities	569	0										
227	62.01 - Computer programming	3	0										
228	62.02 - IT consultancy	75	0										
229	62.02 - IT consultancy	0	0										
230	62.03 - IT facilities management	11	0										
231	62.09 - Other IT activities	200	1										
232	63.11 - Data processing, hosting and related activities	117	-										
233	64.19 - Other monetary intermediation	0	0										
234	64.20 - Holding company activities	1,142	55										
235	64.30 - Investment funds and similar financial entities	270	0										
236	64.19 - Leasing	0	-										
237	64.92 - Other credit distribution	167	0										
238	64.99 - Other financial service activities, except insurance and pension funding, n.e.c.	1,297	8										
239	65.11 - Life insurance	(0)	-										
240	65.12 - Other insurance	(0)	-										
241	65.20 - Reinsurance	0	-										
242	65.30 - Pension funds	12	5										
243	66.12 - Brokerage of securities and commodities	119	-										
244	66.19 - Other activities auxiliary to financial services, except insurance and pension funding	128	-										
245	66.19 - Other activities auxiliary to financial services, except insurance and pension funding	290	2										
246	66.22 - Activities of insurance agents and brokers	0	-										
247	66.30 - Fund management	434	2										
248	68.10 - Activities of real estate dealers	151	17										
249	68.20 - Rental and operation of own or leased real estate	174	16										
250	68.20 - Rental and operation of own or leased real estate	1,558	227										
251	68.31 - Real estate agencies	4	1										
252	68.32 - Property management	44	1										
253	69.20 - Accounting activities	75	5										
254	70.10 - Activities of head offices	488	64										
255	70.22 - Business and other management advice	358	61										
256	71.12 - Engineering activities	125	71										
257	71.20 - Technical control and analysis activities	0	0										



Breakdown by sector - NACE 4 digits level (code and label)	a	b	c	d	e	f	g	h	i	j	k	l
	Climate change mitigation (CCM)				Climate change adaptation (CCA)				Water and marine resources (WMR)			
	Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
258 72.11 - Research and development in biotechnology	2	(0)										
259 72.19 - Research and development in other physical and natural sciences	139	1										
260 73.11 - Activities of advertising agencies	69	-										
261 73.12 - Media advertising services	(0)	(0)										
262 74.10 - Specialized design activities	0	0										
263 74.20 - Photographic activities	1	-										
264 74.90 - Other professional, scientific and technical activities n.e.c.	5	1										
265 77.11 - Rental and leasing of cars and light motor vehicles	220	19										
266 77.12 - Truck rental and leasing	17	0										
267 77.21 - Rental and leasing of leisure and sporting goods	2	1										
268 77.29 - Rental and leasing of other personal and household goods	29	-										
269 77.33 - Rental and leasing of office machinery and equipment	0	-										
270 77.35 - Rental and leasing of air transport equipment	808	-										
271 77.39 - Rental and leasing of other machinery, equipment and physical assets n.e.c.	8	-										
272 77.40 - Leasing of intellectual property and similar products, excluding copyrighted works	159	-										
273 78.20 - Activities of temporary employment agencies	0	-										
274 78.30 - Other provision of human resources	6	(0)										
275 79.11 - Travel agency activities	30	-										
276 80.10 - Private security activities	0	-										
277 81.21 - General cleaning of buildings	0	-										
278 82.11 - Combined office administrative services	0	-										
279 82.19 - Copying, document preparation and other specialized office support activities	3	-										
280 82.92 - Packaging activities	1	0										
281 82.99 - Other business support activities n.e.c.	69	(0)										
282 85.20 - Primary education	8	-										
283 85.59 - Miscellaneous education	0	-										
284 85.59 - Miscellaneous education	0	-										
285 86.10 - Hospital activities	17	0										
286 86.21 - Activity of general practitioners	2	-										
287 86.22 - Specialist physician activity	9	-										
288 87.10 - Residential care	137	0										
289 88.10 - Social action without housing for the elderly and the disabled	0	-										
290 92.00 - Gambling activities	14	-										
291 93.21 - Activities of amusement parks and theme parks	2	-										
292 93.29 - Other recreational and leisure activities	43	-										
293 NACE code not identified	483	-										

1. In this template, credit institutions provide information on the exposures of the banking book to sectors covered by the taxonomy (level 4 of NACE sectors), using the relevant NACE codes for the counterparty's main activity.

2. The attachment of the counterparty to a NACE sector is based exclusively on the nature of the direct counterparty. The classification of exposures jointly concerning more than one debtor is based on the characteristics of the debtor that was the most relevant, or the most significant, for the authorization of the exposure by the institution. The breakdown by NACE code of the exposures incurred jointly depends on the characteristics of the most relevant or significant debtor. The information is published by the institutions by NACE code with the level of detail required in the template.

		m	n	o	p	q	r	s	t	u	v	w	x
		Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
Breakdown by sector - NACE 4 digits level (code and label)													
1	01.13 - Growing of vegetables, melons, roots and tubers												
2	06.10 - Extraction of crude oil												
3	06.20 - Natural gas extraction												
4	07.10 - Extraction of iron ore												
5	07.29 - Mining of other non-ferrous metal ores												
6	08.12 - Mining of gravel and sand pits, extraction of clay and kaolin												
7	08.91 - Extraction of chemical minerals and mineral fertilizers												
8	09.10 - Support activities for hydrocarbon extraction												
9	09.90 - Support activities for other mining and quarrying												
10	10.11 - Meat processing and preservation												
11	10.12 - Poultry meat processing and preservation												
12	10.20 - Processing and preserving of fish, crustaceans and mollusks												
13	10.51 - Dairies and cheese production												
14	10.51 - Dairies and cheese production												
15	10.61 - Grain processing												
16	10.72 - Manufacture of cookies, rusks and pastries												
17	10.85 - Manufacture of prepared meals												
18	10.89 - Manufacture of other food products n.e.c.												
19	11.04 - Production of other non-distilled fermented beverages												
20	11.07 - Mineral water and other bottled water and soft drinks industry												
21	13.20 - Weaving												
22	13.95 - Manufacture of non-wovens, except clothing												
23	14.13 - Manufacture of outerwear												
24	15.12 - Manufacture of travel goods, leather goods and saddlery												
25	16.10 - Lumber sawing and planning												
26	16.21 - Manufacture of veneer and wood panels												
27	16.24 - Manufacture of wooden packaging												
28	16.29 - Manufacture of miscellaneous wooden articles, manufacture of articles of cork, basketry and straw goods												
29	17.12 - Manufacture of paper and paperboard												
30	17.21 - Manufacture of corrugated paper and paperboard and of packaging of paper or paperboard												
31	17.23 - Manufacture of stationery products												
32	17.29 - Manufacture of other paper and paperboard products												
33	18.12 - Other printing (commercial)												
34	19.20 - Oil refining												
35	20.11 - Manufacture of industrial gases												
36	20.13 - Manufacture of other basic inorganic chemical products												
37	20.14 - Manufacture of other basic organic chemicals												
38	20.16 - Manufacture of basic plastics												
39	20.30 - Manufacture of paints, varnishes, inks and mastics												
40	20.41 - Manufacture of soaps, detergents and cleaning products												
41	20.42 - Manufacture of perfumes and toilet preparations												
42	20.52 - Manufacture of adhesives												
43	20.53 - Manufacture of essential oils												
44	20.59 - Manufacture of other chemical products n.e.c.												
45	21.10 - Manufacturing of basic pharmaceutical products												
46	21.20 - Manufacture of pharmaceutical preparations												
47	22.11 - Manufacturing and retreading of tires												
48	22.19 - Manufacture of other rubber products												
49	22.21 - Manufacture of plastic plates, sheets, tubes and profiles												
50	22.22 - Manufacture of plastic packaging												
51	22.23 - Manufacture of plastic components for construction												
52	22.29 - Manufacture of other plastic products												

		m	n	o	p	q	r	s	t	u	v	w	x
		Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
Breakdown by sector - NACE 4 digits level (code and label)													
53	22.29 - Manufacture of other plastic products												
54	23.13 - Manufacture of hollow glass												
55	23.51 - Manufacture of cement												
56	23.61 - Manufacture of concrete products for construction purposes												
57	23.62 - Manufacture of plaster products for construction purposes												
58	23.63 - Manufacture of ready-mixed concrete												
59	23.99 - Manufacture of other non-metallic mineral products												
60	24.10 - Steel industry												
61	24.20 - Manufacture of steel tubes, pipes, hollow sections and related fittings												
62	24.42 - Aluminum metallurgy												
63	24.44 - Copper metallurgy												
64	24.45 - Metallurgy of other non-ferrous metals												
65	24.51 - Cast iron												
66	25.11 - Manufacture of metal structures and parts of structures												
67	25.50 - Forging, stamping, powder metallurgy												
68	25.50 - Forging, stamping, powder metallurgy												
69	25.61 - Treatment and coating of metals												
70	25.62 - Machining												
71	25.62 - Machining												
72	25.93 - Manufacture of wire products, chain and springs												
73	25.99 - Manufacture of other metal products n.e.c.												
74	26.11 - Manufacture of electronic components												
75	26.12 - Manufacture of assembled electronic boards												
76	26.20 - Manufacture of computers and peripheral equipment												
77	26.30 - Manufacture of communication equipment												
78	26.51 - Manufacture of instruments and appliances for measuring, testing and navigation												
79	26.80 - Manufacture of magnetic and optical media												
80	27.11 - Manufacture of electric motors, generators and transformers												
81	27.12 - Manufacture of electrical distribution and control equipment												
82	27.20 - Manufacture of primary batteries and accumulators												
83	27.33 - Manufacture of electrical installation equipment												
84	27.40 - Manufacture of electric lighting equipment												
85	27.51 - Manufacture of household appliances												
86	28.13 - Manufacture of other pumps and compressors												
87	28.14 - Manufacture of other valves and fittings												
88	28.22 - Manufacture of lifting and handling equipment												
89	28.25 - Manufacture of industrial ventilation and refrigeration equipment												
90	28.41 - Manufacture of metal forming machinery												
91	28.91 - Manufacture of machinery for the metal industry												
92	28.93 - Manufacture of machinery for the food industry												
93	28.94 - Manufacture of machinery for the textile industry												
94	28.95 - Manufacture of machinery for the paper and paperboard industries												
95	29.10 - Manufacture of motor vehicles												
96	29.20 - Manufacture of coachwork and trailers												
97	29.32 - Manufacture of other automotive equipment												
98	30.12 - Construction of pleasure craft												
99	30.20 - Construction of locomotives and other railway rolling stock												
100	30.30 - Aeronautical and space construction												
101	30.92 - Manufacture of bicycles and disabled vehicles												
102	30.99 - Manufacture of other transport equipment n.e.c.												
103	31.09 - Manufacture of furniture												
104	32.50 - Manufacture of medical and dental instruments and supplies												
105	32.50 - Manufacture of medical and dental instruments and supplies												

		m	n	o	p	q	r	s	t	u	v	w	x
		Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
Breakdown by sector - NACE 4 digits level (code and label)													
106	32.99 - Other manufacturing activities n.e.c.												
107	33.12 - Repair of machinery and equipment												
108	33.16 - Repair and maintenance of aircraft and space vehicles												
109	33.20 - Installation of industrial machinery and equipment												
110	33.20 - Installation of industrial machinery and equipment												
111	35.11 - Generation of electricity												
112	35.12 - Transmission of electricity												
113	35.13 - Distribution of electricity												
114	35.14 - Electricity wholesale trade												
115	35.21 - Production of gaseous fuels												
116	35.22 - Distribution of gaseous fuels through pipelines												
117	35.23 - Sale of gaseous fuels through pipelines												
118	35.30 - Steam and air conditioning production and supply												
119	36.00 - Water collection, treatment and supply												
120	37.00 - Wastewater collection and treatment												
121	38.11 - Collection of non-hazardous waste												
122	38.21 - Treatment and disposal of non-hazardous waste												
123	38.22 - Treatment and disposal of hazardous waste												
124	38.31 - Dismantling of wrecks												
125	38.32 - Recovery of sorted waste												
126	41.10 - Real estate development												
127	41.10 - Real estate development												
128	41.10 - Real estate development												
129	41.10 - Real estate development												
130	41.20 - Construction of residential and non-residential buildings												
131	41.20 - Construction of residential and non-residential buildings												
132	42.11 - Road and motorway construction												
133	42.12 - Construction of surface and underground railways												
134	42.13 - Construction of bridges and tunnels												
135	42.21 - Construction of networks for fluids												
136	42.22 - Construction of electricity and telecommunications networks												
137	42.91 - Construction of maritime and river infrastructure												
138	42.99 - Construction of other civil engineering works n.e.c.												
139	43.11 - Demolition work												
140	43.12 - Site preparation work												
141	43.12 - Site preparation work												
142	43.21 - Electrical installation												
143	43.21 - Electrical installation												
144	43.22 - Plumbing, heating and air conditioning installation												
145	43.29 - Other installation work												
146	43.32 - Joinery work												
147	43.39 - Other finishing work												
148	43.99 - Other specialized construction work n.e.c.												
149	43.99 - Other specialized construction work n.e.c.												
150	45.11 - Sale of cars and light motor vehicles												
151	45.19 - Sale of other motor vehicles												
152	45.31 - Wholesale trade of motor vehicle parts and accessories												
153	45.32 - Retail trade of automotive equipment												
154	46.11 - Agents involved in the sale of agricultural commodities, live animals, textile commodities, and semi-finished products												
155	46.12 - Agents involved in the sale of fuels, metals, minerals and chemical products												
156	46.14 - Agents involved in the sale of machinery, industrial equipment, ships and aircraft												
157	46.19 - Agents involved in the sale of miscellaneous goods												
158	46.19 - Agents involved in the sale of miscellaneous goods												

	m	n	o	p	q	r	s	t	u	v	w	x
	Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
	Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
Breakdown by sector - NACE 4 digits level (code and label)												
159 46.21 - Wholesale trade of cereals, non-manufactured tobacco, seeds and animal feed												
160 46.31 - Wholesale trade of fruit and vegetables												
161 46.33 - Wholesale trade of dairy products, eggs, edible oils and fats												
162 46.34 - Wholesale of beverages												
163 46.37 - Wholesale trade of coffee, tea, cocoa and spices												
164 46.39 - Non-specialized wholesale trade of food, beverages and tobacco												
165 46.41 - Wholesale trade of textiles												
166 46.45 - Wholesale trade of perfumes and cosmetics												
167 46.46 - Wholesale trade of pharmaceutical products												
168 46.49 - Wholesale trade of other household goods												
169 46.51 - Wholesale trade of computers, computer peripheral equipment and software												
170 46.52 - Wholesale trade of electronic and telecommunication components and equipment												
171 46.69 - Wholesale trade of other machinery and equipment												
172 46.69 - Wholesale trade of other machinery and equipment												
173 46.71 - Wholesale of fuel and related products												
174 46.72 - Wholesale trade of minerals and metals												
175 46.73 - Wholesale trade of timber, construction materials and sanitary equipment												
176 46.75 - Wholesale trade of chemical products												
177 46.77 - Wholesale trade of waste and scrap												
178 46.90 - Non-specialized wholesale trade												
179 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs												
180 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs												
181 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs												
182 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs												
183 47.19 - Other retail trade in non-specialized stores												
184 47.19 - Other retail trade in non-specialized stores												
185 47.41 - Retail trade of computers, peripheral units and software in specialized stores												
186 47.54 - Retail trade of household appliances in specialized stores												
187 47.59 - Retail trade of furniture, lighting equipment and other household items in specialized stores												
188 47.61 - Retail trade of books in specialized stores												
189 47.71 - Retail trade of clothing in specialized stores												
190 47.75 - Retail sale of perfume and beauty products in specialized stores												
191 47.77 - Retail trade of watches and jewelry in specialized stores												
192 47.91 - Distance selling												
193 47.91 - Distance selling												
194 49.31 - Urban and suburban passenger transport												
195 49.39 - Other passenger land transport n.e.c.												
196 49.39 - Other passenger land transport n.e.c.												
197 49.41 - Freight transport by road												
198 49.41 - Freight transport by road												
199 49.50 - Transport via pipelines												
200 50.10 - Maritime and coastal passenger transport												
201 50.20 - Maritime and coastal freight transport												
202 51.10 - Passenger air transport												
203 52.10 - Warehousing and storage												
204 52.10 - Warehousing and storage												
205 52.21 - Services incidental to land transport												
206 52.23 - Services incidental to air transport												

		m	n	o	p	q	r	s	t	u	v	w	x
		Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
Breakdown by sector - NACE 4 digits level (code and label)													
207	52.24 - Handling												
208	52.29 - Other services incidental to transport												
209	55.10 - Hotels and similar accommodation												
210	55.20 - Tourist accommodation and other short-term accommodation												
211	56.10 - Restaurants and mobile food services												
212	56.10 - Restaurants and mobile food services												
213	56.29 - Other food services												
214	58.11 - Book publishing												
215	58.19 - Other publishing activities												
216	58.21 - Publishing of electronic games												
217	58.29 - Publishing of other software												
218	58.29 - Publishing of other software												
219	59.11 - Motion picture, video and television program production												
220	59.11 - Motion picture, video and television program production												
221	59.20 - Sound recording and music publishing												
222	60.20 - Television programming and broadcasting												
223	61.10 - Fixed-line telecommunications												
224	61.20 - Cordless telecommunications												
225	61.30 - Satellite telecommunications												
226	61.90 - Other telecommunications activities												
227	62.01 - Computer programming												
228	62.02 - IT consultancy												
229	62.02 - IT consultancy												
230	62.03 - IT facilities management												
231	62.09 - Other IT activities												
232	63.11 - Data processing, hosting and related activities												
233	64.19 - Other monetary intermediation												
234	64.20 - Holding company activities												
235	64.30 - Investment funds and similar financial entities												
236	64.19 - Leasing												
237	64.92 - Other credit distribution												
238	64.99 - Other financial service activities, except insurance and pension funding, n.e.c.												
239	65.11 - Life insurance												
240	65.12 - Other insurance												
241	65.20 - Reinsurance												
242	65.30 - Pension funds												
243	66.12 - Brokerage of securities and commodities												
244	66.19 - Other activities auxiliary to financial services, except insurance and pension funding												
245	66.19 - Other activities auxiliary to financial services, except insurance and pension funding												
246	66.22 - Activities of insurance agents and brokers												
247	66.30 - Fund management												
248	68.10 - Activities of real estate dealers												
249	68.20 - Rental and operation of own or leased real estate												
250	68.20 - Rental and operation of own or leased real estate												
251	68.31 - Real estate agencies												
252	68.32 - Property management												
253	69.20 - Accounting activities												
254	70.10 - Activities of head offices												
255	70.22 - Business and other management advice												
256	71.12 - Engineering activities												
257	71.20 - Technical control and analysis activities												
258	72.11 - Research and development in biotechnology												
259	72.19 - Research and development in other physical and natural sciences												

		m	n	o	p	q	r	s	t	u	v	w	x
		Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD		Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD	
		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount		(Gross) carrying amount	
		in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
Breakdown by sector - NACE 4 digits level (code and label)													
260	73.11 - Activities of advertising agencies												
261	73.12 - Media advertising services												
262	74.10 - Specialized design activities												
263	74.20 - Photographic activities												
264	74.90 - Other professional, scientific and technical activities n.e.c.												
265	77.11 - Rental and leasing of cars and light motor vehicles												
266	77.12 - Truck rental and leasing												
267	77.21 - Rental and leasing of leisure and sporting goods												
268	77.29 - Rental and leasing of other personal and household goods												
269	77.33 - Rental and leasing of office machinery and equipment												
270	77.35 - Rental and leasing of air transport equipment												
271	77.39 - Rental and leasing of other machinery, equipment and physical assets n.e.c.												
272	77.40 - Leasing of intellectual property and similar products, excluding copyrighted works												
273	78.20 - Activities of temporary employment agencies												
274	78.30 - Other provision of human resources												
275	79.11 - Travel agency activities												
276	80.10 - Private security activities												
277	81.21 - General cleaning of buildings												
278	82.11 - Combined office administrative services												
279	82.19 - Copying, document preparation and other specialized office support activities												
280	82.92 - Packaging activities												
281	82.99 - Other business support activities n.e.c.												
282	85.20 - Primary education												
283	85.59 - Miscellaneous education												
284	85.59 - Miscellaneous education												
285	86.10 - Hospital activities												
286	86.21 - Activity of general practitioners												
287	86.22 - Specialist physician activity												
288	87.10 - Residential care												
289	88.10 - Social action without housing for the elderly and the disabled												
290	92.00 - Gambling activities												
291	93.21 - Activities of amusement parks and theme parks												
292	93.29 - Other recreational and leisure activities												
293	NACE code not identified												

1. In this template, credit institutions provide information on the exposures of the banking book to sectors covered by the taxonomy (level 4 of NACE sectors), using the relevant NACE codes for the counterparty's main activity.

2. The attachment of the counterparty to a NACE sector is based exclusively on the nature of the direct counterparty. The classification of exposures jointly concerning more than one debtor is based on the characteristics of the debtor that was the most relevant, or the most significant, for the authorization of the exposure by the institution. The breakdown by NACE code of the exposures incurred jointly depends on the characteristics of the most relevant or significant debtor. The information is published by the institutions by NACE code with the level of detail required in the template.

Breakdown by sector - NACE 4 digits level (code and label)	y	z	aa	ab
	TOTAL (CCM + CCA + WMR + CE + PRP + BIO)			
	Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount	
	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
1 01.13 - Growing of vegetables, melons, roots and tubers	28	-		
2 06.10 - Extraction of crude oil	452	1		
3 06.20 - Natural gas extraction	66	-		
4 07.10 - Extraction of iron ore	104	-		
5 07.29 - Mining of other non-ferrous metal ores	724	-		
6 08.12 - Mining of gravel and sand pits, extraction of clay and kaolin	24	3		
7 08.91 - Extraction of chemical minerals and mineral fertilizers	5	-		
8 09.10 - Support activities for hydrocarbon extraction	12	-		
9 09.90 - Support activities for other mining and quarrying	(0)	0		
10 10.11 - Meat processing and preservation	30	-		
11 10.12 - Poultry meat processing and preservation	0	-		
12 10.20 - Processing and preserving of fish, crustaceans and mollusks	1	-		
13 10.51 - Dairies and cheese production	76	-		
14 10.51 - Dairies and cheese production	2	-		
15 10.61 - Grain processing	0	-		
16 10.72 - Manufacture of cookies, rusks and pastries	0	-		
17 10.85 - Manufacture of prepared meals	0	-		
18 10.89 - Manufacture of other food products n.e.c.	53	-		
19 11.04 - Production of other non-distilled fermented beverages	4	-		
20 11.07 - Mineral water and other bottled water and soft drinks industry	59	-		
21 13.20 - Weaving	11	-		
22 13.95 - Manufacture of non-wovens, except clothing	(0)	(0)		
23 14.13 - Manufacture of outerwear	0	-		
24 15.12 - Manufacture of travel goods, leather goods and saddlery	19	-		
25 16.10 - Lumber sawing and planning	3	-		
26 16.21 - Manufacture of veneer and wood panels	0	-		
27 16.24 - Manufacture of wooden packaging	0	-		
28 16.29 - Manufacture of miscellaneous wooden articles, manufacture of articles of cork, basketry and straw goods	1	-		
29 17.12 - Manufacture of paper and paperboard	64	-		
30 17.21 - Manufacture of corrugated paper and paperboard and of packaging of paper or paperboard	0	0		
31 17.23 - Manufacture of stationery products	1	-		
32 17.29 - Manufacture of other paper and paperboard products	0	-		
33 18.12 - Other printing (commercial)	8	-		
34 19.20 - Oil refining	147	0		
35 20.11 - Manufacture of industrial gases	147	1		
36 20.13 - Manufacture of other basic inorganic chemical products	1	-		
37 20.14 - Manufacture of other basic organic chemicals	7	(0)		
38 20.16 - Manufacture of basic plastics	50	0		
39 20.30 - Manufacture of paints, varnishes, inks and mastics	0	0		
40 20.41 - Manufacture of soaps, detergents and cleaning products	25	-		
41 20.42 - Manufacture of perfumes and toilet preparations	1	-		
42 20.52 - Manufacture of adhesives	0	0		
43 20.53 - Manufacture of essential oils	5	-		
44 20.59 - Manufacture of other chemical products n.e.c.	35	-		
45 21.10 - Manufacturing of basic pharmaceutical products	5	-		
46 21.20 - Manufacture of pharmaceutical preparations	218	-		
47 22.11 - Manufacturing and retreading of tires	0	-		
48 22.19 - Manufacture of other rubber products	0	-		
49 22.21 - Manufacture of plastic plates, sheets, tubes and profiles	3	0		
50 22.22 - Manufacture of plastic packaging	0	-		
51 22.23 - Manufacture of plastic components for construction	1	-		
52 22.29 - Manufacture of other plastic products	0	-		
53 22.29 - Manufacture of other plastic products	0	-		
54 23.13 - Manufacture of hollow glass	4	-		
55 23.51 - Manufacture of cement	31	2		
56 23.61 - Manufacture of concrete products for construction purposes	0	0		
57 23.62 - Manufacture of plaster products for construction purposes	0	-		
58 23.63 - Manufacture of ready-mixed concrete	7	0		
59 23.99 - Manufacture of other non-metallic mineral products	47	1		
60 24.10 - Steel industry	22	-		



Breakdown by sector - NACE 4 digits level (code and label)	y	z	aa	ab
	TOTAL (CCM + CCA + WMR + CE + PRP + BIO)			
	Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount	
	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
61 24.20 - Manufacture of steel tubes, pipes, hollow sections and related fittings	4	-		
62 24.42 - Aluminum metallurgy	109	1		
63 24.44 - Copper metallurgy	97	1		
64 24.45 - Metallurgy of other non-ferrous metals	61	-		
65 24.51 - Cast iron	0	-		
66 25.11 - Manufacture of metal structures and parts of structures	0	0		
67 25.50 - Forging, stamping, powder metallurgy	10	-		
68 25.50 - Forging, stamping, powder metallurgy	0	-		
69 25.61 - Treatment and coating of metals	0	-		
70 25.62 - Machining	0	-		
71 25.62 - Machining	11	0		
72 25.93 - Manufacture of wire products, chain and springs	5	2		
73 25.99 - Manufacture of other metal products n.e.c.	0	-		
74 26.11 - Manufacture of electronic components	121	0		
75 26.12 - Manufacture of assembled electronic boards	2	-		
76 26.20 - Manufacture of computers and peripheral equipment	71	-		
77 26.30 - Manufacture of communication equipment	1	0		
78 26.51 - Manufacture of instruments and appliances for measuring, testing and navigation	0	0		
79 26.80 - Manufacture of magnetic and optical media	4	-		
80 27.11 - Manufacture of electric motors, generators and transformers	0	0		
81 27.12 - Manufacture of electrical distribution and control equipment	152	47		
82 27.20 - Manufacture of primary batteries and accumulators	25	-		
83 27.33 - Manufacture of electrical installation equipment	(0)	(0)		
84 27.40 - Manufacture of electric lighting equipment	1	0		
85 27.51 - Manufacture of household appliances	15	-		
86 28.13 - Manufacture of other pumps and compressors	0	-		
87 28.14 - Manufacture of other valves and fittings	1	-		
88 28.22 - Manufacture of lifting and handling equipment	37	8		
89 28.25 - Manufacture of industrial ventilation and refrigeration equipment	0	-		
90 28.41 - Manufacture of metal forming machinery	0	0		
91 28.91 - Manufacture of machinery for the metal industry	0	-		
92 28.93 - Manufacture of machinery for the food industry	29	-		
93 28.94 - Manufacture of machinery for the textile industry	40	-		
94 28.95 - Manufacture of machinery for the paper and paperboard industries	1	-		
95 29.10 - Manufacture of motor vehicles	145	15		
96 29.20 - Manufacture of coachwork and trailers	0	-		
97 29.32 - Manufacture of other automotive equipment	86	13		
98 30.12 - Construction of pleasure craft	3	0		
99 30.20 - Construction of locomotives and other railway rolling stock	38	2		
100 30.30 - Aeronautical and space construction	225	0		
101 30.92 - Manufacture of bicycles and disabled vehicles	1	-		
102 30.99 - Manufacture of other transport equipment n.e.c.	15	3		
103 31.09 - Manufacture of furniture	1	-		
104 32.50 - Manufacture of medical and dental instruments and supplies	12	-		
105 32.50 - Manufacture of medical and dental instruments and supplies	10	-		
106 32.99 - Other manufacturing activities n.e.c.	(0)	(0)		
107 33.12 - Repair of machinery and equipment	26	-		
108 33.16 - Repair and maintenance of aircraft and space vehicles	(0)	-		
109 33.20 - Installation of industrial machinery and equipment	0	0		
110 33.20 - Installation of industrial machinery and equipment	1	-		
111 35.11 - Generation of electricity	1,280	302		
112 35.12 - Transmission of electricity	9	-		
113 35.13 - Distribution of electricity	93	4		
114 35.14 - Electricity wholesale trade	0	0		
115 35.21 - Production of gaseous fuels	36	-		
116 35.22 - Distribution of gaseous fuels through pipelines	34	(0)		
117 35.23 - Sale of gaseous fuels through pipelines	214	12		
118 35.30 - Steam and air conditioning production and supply	4	1		
119 36.00 - Water collection, treatment and supply	4	-		
120 37.00 - Wastewater collection and treatment	2	1		

	y	z	aa	ab
	TOTAL (CCM + CCA + WMR + CE + PRP + BIO)			
	Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount	
		Of which environmentally sustainable (CCM)		Of which environmentally sustainable (CCM)
Breakdown by sector - NACE 4 digits level (code and label)	in millions of euros		in millions of euros	
121 38.11 - Collection of non-hazardous waste	49	34		
122 38.21 - Treatment and disposal of non-hazardous waste	0	0		
123 38.22 - Treatment and disposal of hazardous waste	0	0		
124 38.31 - Dismantling of wrecks	0	0		
125 38.32 - Recovery of sorted waste	48	38		
126 41.10 - Real estate development	56	16		
127 41.10 - Real estate development	69	12		
128 41.10 - Real estate development	88	4		
129 41.10 - Real estate development	77	16		
130 41.20 - Construction of residential and non-residential buildings	4	0		
131 41.20 - Construction of residential and non-residential buildings	18	3		
132 42.11 - Road and motorway construction	75	16		
133 42.12 - Construction of surface and underground railways	26	6		
134 42.13 - Construction of bridges and tunnels	0	0		
135 42.21 - Construction of networks for fluids	4	1		
136 42.22 - Construction of electricity and telecommunications networks	47	1		
137 42.91 - Construction of maritime and river infrastructure	2	0		
138 42.99 - Construction of other civil engineering works n.e.c.	41	2		
139 43.11 - Demolition work	7	1		
140 43.12 - Site preparation work	119	11		
141 43.12 - Site preparation work	8	2		
142 43.21 - Electrical installation	5	3		
143 43.21 - Electrical installation	4	2		
144 43.22 - Plumbing, heating and air conditioning installation	0	0		
145 43.29 - Other installation work	0	-		
146 43.32 - Joinery work	0	0		
147 43.39 - Other finishing work	13	-		
148 43.99 - Other specialized construction work n.e.c.	1	0		
149 43.99 - Other specialized construction work n.e.c.	0	0		
150 45.11 - Sale of cars and light motor vehicles	104	0		
151 45.19 - Sale of other motor vehicles	(0)	(0)		
152 45.31 - Wholesale trade of motor vehicle parts and accessories	38	12		
153 45.32 - Retail trade of automotive equipment	79	-		
154 46.11 - Agents involved in the sale of agricultural commodities, live animals, textile commodities, and semi-finished products	194	-		
155 46.12 - Agents involved in the sale of fuels, metals, minerals and chemical products	518	0		
156 46.14 - Agents involved in the sale of machinery, industrial equipment, ships and aircraft	22	-		
157 46.19 - Agents involved in the sale of miscellaneous goods	0	-		
158 46.19 - Agents involved in the sale of miscellaneous goods	35	0		
159 46.21 - Wholesale trade of cereals, non-manufactured tobacco, seeds and animal feed	71	-		
160 46.31 - Wholesale trade of fruit and vegetables	0	-		
161 46.33 - Wholesale trade of dairy products, eggs, edible oils and fats	0	-		
162 46.34 - Wholesale of beverages	6	-		
163 46.37 - Wholesale trade of coffee, tea, cocoa and spices	31	-		
164 46.39 - Non-specialized wholesale trade of food, beverages and tobacco	4	0		
165 46.41 - Wholesale trade of textiles	0	-		
166 46.45 - Wholesale trade of perfumes and cosmetics	1	-		
167 46.46 - Wholesale trade of pharmaceutical products	46	-		
168 46.49 - Wholesale trade of other household goods	9	-		
169 46.51 - Wholesale trade of computers, computer peripheral equipment and software	12	-		
170 46.52 - Wholesale trade of electronic and telecommunication components and equipment	31	5		
171 46.69 - Wholesale trade of other machinery and equipment	1	-		
172 46.69 - Wholesale trade of other machinery and equipment	4	-		
173 46.71 - Wholesale of fuel and related products	486	3		
174 46.72 - Wholesale trade of minerals and metals	455	-		
175 46.73 - Wholesale trade of timber, construction materials and sanitary equipment	0	-		
176 46.75 - Wholesale trade of chemical products	200	0		
177 46.77 - Wholesale trade of waste and scrap	1	0		
178 46.90 - Non-specialized wholesale trade	11	-		
179 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs	0	0		
180 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs	27	0		

	y	z	aa	ab
	TOTAL (CCM + CCA + WMR + CE + PRP + BIO)			
	Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount	
Breakdown by sector - NACE 4 digits level (code and label)	in millions of euros	Of which environmentally sustainable (CCM)	in millions of euros	Of which environmentally sustainable (CCM)
181 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs	5	0		
182 47.11 - Retail trade in non-specialized stores predominantly of foodstuffs	3	0		
183 47.19 - Other retail trade in non-specialized stores	63	-		
184 47.19 - Other retail trade in non-specialized stores	114	4		
185 47.41 - Retail trade of computers, peripheral units and software in specialized stores	35	-		
186 47.54 - Retail trade of household appliances in specialized stores	0	-		
187 47.59 - Retail trade of furniture, lighting equipment and other household items in specialized stores	13	-		
188 47.61 - Retail trade of books in specialized stores	131	-		
189 47.71 - Retail trade of clothing in specialized stores	1	-		
190 47.75 - Retail sale of perfume and beauty products in specialized stores	0	-		
191 47.77 - Retail trade of watches and jewelry in specialized stores	100	-		
192 47.91 - Distance selling	0	-		
193 47.91 - Distance selling	3	-		
194 49.31 - Urban and suburban passenger transport	1	-		
195 49.39 - Other passenger land transport n.e.c.	9	-		
196 49.39 - Other passenger land transport n.e.c.	6	-		
197 49.41 - Freight transport by road	1	0		
198 49.41 - Freight transport by road	2	0		
199 49.50 - Transport via pipelines	171	1		
200 50.10 - Maritime and coastal passenger transport	3	1		
201 50.20 - Maritime and coastal freight transport	114	1		
202 51.10 - Passenger air transport	169	-		
203 52.10 - Warehousing and storage	(0)	(0)		
204 52.10 - Warehousing and storage	55	5		
205 52.21 - Services incidental to land transport	33	3		
206 52.23 - Services incidental to air transport	5	0		
207 52.24 - Handling	0	-		
208 52.29 - Other services incidental to transport	14	0		
209 55.10 - Hotels and similar accommodation	217	0		
210 55.20 - Tourist accommodation and other short-term accommodation	12	2		
211 56.10 - Restaurants and mobile food services	8	-		
212 56.10 - Restaurants and mobile food services	0	-		
213 56.29 - Other food services	(0)	-		
214 58.11 - Book publishing	101	-		
215 58.19 - Other publishing activities	4	-		
216 58.21 - Publishing of electronic games	42	-		
217 58.29 - Publishing of other software	4	0		
218 58.29 - Publishing of other software	3	-		
219 59.11 - Motion picture, video and television program production	443	5		
220 59.11 - Motion picture, video and television program production	13	-		
221 59.20 - Sound recording and music publishing	75	-		
222 60.20 - Television programming and broadcasting	8	1		
223 61.10 - Fixed-line telecommunications	569	0		
224 61.20 - Cordless telecommunications	28	0		
225 61.30 - Satellite telecommunications	261	0		
226 61.90 - Other telecommunications activities	569	0		
227 62.01 - Computer programming	3	0		
228 62.02 - IT consultancy	75	0		
229 62.02 - IT consultancy	0	0		
230 62.03 - IT facilities management	11	0		
231 62.09 - Other IT activities	200	1		
232 63.11 - Data processing, hosting and related activities	117	-		
233 64.19 - Other monetary intermediation	0	0		
234 64.20 - Holding company activities	1,142	55		
235 64.30 - Investment funds and similar financial entities	270	0		
236 64.19 - Leasing	0	-		
237 64.92 - Other credit distribution	167	0		
238 64.99 - Other financial service activities, except insurance and pension funding, n.e.c.	1,297	8		

	y	z	aa	ab
	TOTAL (CCM + CCA + WMR + CE + PRP + BIO)			
	Non-financial companies (subject to CSRD)		SMEs and other non-financial companies not subject to CSRD	
	(Gross) carrying amount		(Gross) carrying amount	
		Of which environmentally sustainable (CCM)		Of which environmentally sustainable (CCM)
Breakdown by sector - NACE 4 digits level (code and label)	in millions of euros		in millions of euros	
239 65.11 - Life insurance	(0)	-		
240 65.12 - Other insurance	(0)	-		
241 65.20 - Reinsurance	0	-		
242 65.30 - Pension funds	12	5		
243 66.12 - Brokerage of securities and commodities	119	-		
244 66.19 - Other activities auxiliary to financial services, except insurance and pension funding	128	-		
245 66.19 - Other activities auxiliary to financial services, except insurance and pension funding	290	2		
246 66.22 - Activities of insurance agents and brokers	0	-		
247 66.30 - Fund management	434	2		
248 68.10 - Activities of real estate dealers	151	17		
249 68.20 - Rental and operation of own or leased real estate	174	16		
250 68.20 - Rental and operation of own or leased real estate	1,558	227		
251 68.31 - Real estate agencies	4	1		
252 68.32 - Property management	44	1		
253 69.20 - Accounting activities	75	5		
254 70.10 - Activities of head offices	488	64		
255 70.22 - Business and other management advice	358	61		
256 71.12 - Engineering activities	125	71		
257 71.20 - Technical control and analysis activities	0	0		
258 72.11 - Research and development in biotechnology	2	(0)		
259 72.19 - Research and development in other physical and natural sciences	139	1		
260 73.11 - Activities of advertising agencies	69	-		
261 73.12 - Media advertising services	(0)	(0)		
262 74.10 - Specialized design activities	0	0		
263 74.20 - Photographic activities	1	-		
264 74.90 - Other professional, scientific and technical activities n.e.c.	5	1		
265 77.11 - Rental and leasing of cars and light motor vehicles	220	19		
266 77.12 - Truck rental and leasing	17	0		
267 77.21 - Rental and leasing of leisure and sporting goods	2	1		
268 77.29 - Rental and leasing of other personal and household goods	29	-		
269 77.33 - Rental and leasing of office machinery and equipment	0	-		
270 77.35 - Rental and leasing of air transport equipment	808	-		
271 77.39 - Rental and leasing of other machinery, equipment and physical assets n.e.c.	8	-		
272 77.40 - Leasing of intellectual property and similar products, excluding copyrighted works	159	-		
273 78.20 - Activities of temporary employment agencies	0	-		
274 78.30 - Other provision of human resources	6	(0)		
275 79.11 - Travel agency activities	30	-		
276 80.10 - Private security activities	0	-		
277 81.21 - General cleaning of buildings	0	-		
278 82.11 - Combined office administrative services	0	-		
279 82.19 - Copying, document preparation and other specialized office support activities	3	-		
280 82.92 - Packaging activities	1	0		
281 82.99 - Other business support activities n.e.c.	69	(0)		
282 85.20 - Primary education	8	-		
283 85.59 - Miscellaneous education	0	-		
284 85.59 - Miscellaneous education	0	-		
285 86.10 - Hospital activities	17	0		
286 86.21 - Activity of general practitioners	2	-		
287 86.22 - Specialist physician activity	9	-		
288 87.10 - Residential care	137	0		
289 88.10 - Social action without housing for the elderly and the disabled	0	-		
290 92.00 - Gambling activities	14	-		
291 93.21 - Activities of amusement parks and theme parks	2	-		
292 93.29 - Other recreational and leisure activities	43	-		
293 NACE code not identified	483	-		

1. In this template, credit institutions provide information on the exposures of the banking book to sectors covered by the taxonomy (level 4 of NACE sectors), using the relevant NACE codes for the counterparty's main activity.

2. The attachment of the counterparty to a NACE sector is based exclusively on the nature of the direct counterparty. The classification of exposures jointly concerning more than one debtor is based on the characteristics of the debtor that was the most relevant, or the most significant, for the authorization of the exposure by the institution. The breakdown by NACE code of the exposures incurred jointly depends on the characteristics of the most relevant or significant debtor. The information is published by the institutions by NACE code with the level of detail required in the template.

## Template 3 - GAR KPI stock (Turnover basis)

	a	b	c	d	e	f	g	h	i	j	k	l	m
	12/31/2024												
	Climate change mitigation (CCM)					Climate change adaptation (CCA)				Water and marine resources (WMR)			
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
% (compared to total covered assets in the denominator)		Of which use of proceeds	Of which transitional	Of which enabling			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling	
<b>GAR – Covered assets in both numerator and denominator</b>													
<b>Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation</b>	<b>31.55%</b>	<b>3.12%</b>											
<b>1 Financial companies</b>	<b>0.07%</b>	<b>0.00%</b>											
3 Credit institutions	0.00%	(0.00%)											
4 Loans and advances	0.00%	(0.00%)											
5 Debt securities, including specific use of proceeds (UoP)	(0.00%)	(0.00%)											
6 Equity instruments													
7 Other financial companies	0.10%	0.00%											
8 of which investment firms													
9 Loans and advances													
10 Debt securities, including specific use of proceeds (UoP)													
11 Equity instruments													
12 of which management companies													
13 Loans and advances													
14 Debt securities, including specific use of proceeds (UoP)													
15 Equity instruments													
16 of which insurance undertakings	0.00%	0.00%											
17 Loans and advances	0.00%	0.00%											
18 Debt securities, including specific use of proceeds (UoP)													
19 Equity instruments	0.00%	0.00%											
<b>20 Non-financial companies</b>	<b>18.66%</b>	<b>5.50%</b>											
21 Loans and advances	19.01%	5.68%											
22 Debt securities, including specific use of proceeds (UoP)	20.23%	4.70%											
23 Equity instruments													
<b>24 Households</b>	<b>74.95%</b>	<b>5.28%</b>											
25 of which loans collateralized by residential immovable property	100.00%	7.06%											
26 of which building renovation loans	100.00%	0.00%											
27 of which motor vehicle loans	100.00%	0.00%											
<b>28 Local governments financing</b>	<b>5.48%</b>	<b>0.00%</b>											
29 Housing financing	100.00%	0.00%											
30 Other local government financing	0.00%	0.00%											
<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	<b>0.00%</b>	<b>0.00%</b>											
<b>31</b>	<b>0.00%</b>	<b>0.00%</b>											
<b>32 TOTAL GAR ASSETS</b>	<b>6.09%</b>	<b>0.60%</b>											

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Information on the GAR (green asset ratio of "eligible" activities) shall be accompanied with information on the proportion of total assets covered by the GAR.

3. Credit institutions can, in addition to the information included in this template, show the proportion of assets funding taxonomy relevant sectors that are environmentally sustainable (Taxonomy-aligned). This information would enrich the information on the KPI on environmentally sustainable assets compared to total covered assets.

4. Credit institutions shall duplicate this template for the information based on income received and CapEx.

	n	o	p	q	r	s	t	u	v	w	x	z
	12/31/2024											
	Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling
% (compared to total covered assets in the denominator)												
GAR – Covered assets in both numerator and denominator												
Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation												
1 financial companies												
3 Credit institutions												
4 Loans and advances												
5 Debt securities, including specific use of proceeds (UoP)												
6 Equity instruments												
7 Other financial companies												
8 of which investment firms												
9 Loans and advances												
10 Debt securities, including specific use of proceeds (UoP)												
11 Equity instruments												
12 of which management companies												
13 Loans and advances												
14 Debt securities, including specific use of proceeds (UoP)												
15 Equity instruments												
16 of which insurance undertakings												
17 Loans and advances												
18 Debt securities, including specific use of proceeds (UoP)												
19 Equity instruments												
20 Non-financial companies												
21 Loans and advances												
22 Debt securities, including specific use of proceeds (UoP)												
23 Equity instruments												
24 Households												
25 of which loans collateralized by residential immovable property												
26 of which building renovation loans												
27 of which motor vehicle loans												
28 Local governments financing												
29 Housing financing												
30 Other local government financing												
Collateral obtained by taking possession: residential and commercial immovable properties												
31												
32 TOTAL GAR ASSETS												

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Information on the GAR (green asset ratio of "eligible" activities) shall be accompanied with information on the proportion of total assets covered by the GAR.

3. Credit institutions can, in addition to the information included in this template, show the proportion of assets funding taxonomy relevant sectors that are environmentally sustainable (Taxonomy-aligned). This information would enrich the information on the KPI on environmentally sustainable assets compared to total covered assets.

4. Credit institutions shall duplicate this template for the information based on income received and CapEx.

	aa	ab	ac	ad	ae	af
	12/31/2024					
	TOTAL (CCM + CCA + WMR + CE + PRP + BIO)					
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					
			Of which use of proceeds	Of which transitional	Of which enabling	Share of total assets covered
% (compared to total covered assets in the denominator)						
GAR – COVERED ASSETS IN BOTH NUMERATOR AND DENOMINATOR						
<b>1</b>	<b>Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation</b>	<b>31.55%</b>	<b>3.12%</b>			<b>11.23%</b>
<b>2</b>	<b>Financial companies</b>	<b>0.07%</b>	<b>0.00%</b>			<b>2.66%</b>
3	Credit institutions	0.00%	(0.00%)			0.71%
<b>4</b>	<b>Loans and advances</b>	<b>0.00%</b>	<b>(0.00%)</b>			<b>0.17%</b>
5	Debt securities, including specific use of proceeds (UoP)	(0.00%)	(0.00%)			0.44%
<b>6</b>	<b>Equity instruments</b>					<b>0.10%</b>
7	Other financial companies	0.10%	0.00%			1.95%
8	of which investment firms					
9	Loans and advances					
10	Debt securities, including specific use of proceeds (UoP)					
11	Equity instruments					
12	of which management companies					
13	Loans and advances					
14	Debt securities, including specific use of proceeds (UoP)					
15	Equity instruments					
16	of which insurance undertakings	0.00%	0.00%			0.85%
17	Loans and advances	0.00%	0.00%			0.27%
18	Debt securities, including specific use of proceeds (UoP)					
19	Equity instruments	0.00%	0.00%			0.58%
<b>20</b>	<b>Non-financial companies</b>	<b>18.66%</b>	<b>5.50%</b>			<b>2.60%</b>
21	Loans and advances	19.01%	5.68%			2.39%
22	Debt securities, including specific use of proceeds (UoP)	20.23%	4.70%			0.15%
23	Equity instruments					0.06%
<b>24</b>	<b>Households</b>	<b>74.95%</b>	<b>5.28%</b>			<b>3.93%</b>
25	of which loans collateralized by residential immovable property	100.00%	7.06%			2.94%
26	of which building renovation loans	100.00%	0.00%			0.00%
27	of which motor vehicle loans					
<b>28</b>	<b>Local governments financing</b>	<b>5.48%</b>	<b>0.00%</b>			<b>2.05%</b>
29	Housing financing	100.00%	0.00%			0.11%
30	Other local government financing	0.00%	0.00%			1.94%
<b>31</b>	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	<b>0.00%</b>	<b>0.00%</b>			<b>0.00%</b>
<b>32</b>	<b>TOTAL GAR ASSETS</b>	<b>6.09%</b>	<b>0.60%</b>			<b>58.18%</b>

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Information on the GAR (green asset ratio of "eligible" activities) shall be accompanied with information on the proportion of total assets covered by the GAR.

3. Credit institutions can, in addition to the information included in this template, show the proportion of assets funding taxonomy relevant sectors that are environmentally sustainable (Taxonomy-aligned). This information would enrich the information on the KPI on environmentally sustainable assets compared to total covered assets.

4. Credit institutions shall duplicate this template for the information based on income received and CapEx.

## Template 3 - GAR KPI stock (CapEx basis)

	a	b	c	d	e	f	g	h	i	j	k	l	m
	12/31/2024												
	Climate change mitigation (CCM)					Climate change adaptation (CCA)				Water and marine resources (WMR)			
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which use of proceeds	Of which transitional	Of which enabling			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling
% (compared to total covered assets in the denominator)													
<b>GAR – Covered assets in both numerator and denominator</b>													
<b>Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation</b>													
<b>1</b>	<b>32.42%</b>	<b>3.79%</b>											
<b>2 Financial companies</b>	<b>0.08%</b>	<b>0.00%</b>											
3 Credit institutions	0.00%	(0.00%)											
4 Loans and advances	0.00%	(0.00%)											
5 Debt securities, including specific use of proceeds (UoP)	(0.00%)	0.00%											
6 Equity instruments													
7 Other financial companies	0.10%	0.01%											
8 of which investment firms													
9 Loans and advances													
10 Debt securities, including specific use of proceeds (UoP)													
11 Equity instruments													
12 of which management companies													
13 Loans and advances													
14 Debt securities, including specific use of proceeds (UoP)													
15 Equity instruments													
16 of which insurance undertakings	0.00%	0.00%											
17 Loans and advances	0.00%	0.00%											
18 Debt securities, including specific use of proceeds (UoP)													
19 Equity instruments	0.00%	0.00%											
<b>20 Non-financial companies</b>	<b>22.39%</b>	<b>8.41%</b>											
21 Loans and advances	22.61%	8.49%											
22 Debt securities, including specific use of proceeds (UoP)	27.65%	10.42%											
23 Equity instruments													
<b>24 Households</b>	<b>74.95%</b>	<b>5.28%</b>											
25 of which loans collateralized by residential immovable property	100.00%	7.06%											
26 of which building renovation loans	100.00%	0.00%											
27 of which motor vehicle loans	100.00%	0.00%											
<b>28 Local governments financing</b>	<b>5.48%</b>	<b>0.00%</b>											
29 Housing financing	100.00%	0.00%											
30 Other local government financing	0.00%	0.00%											
<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>													
<b>31</b>	<b>0.00%</b>	<b>0.00%</b>											
<b>32 TOTAL GAR ASSETS</b>	<b>6.26%</b>	<b>0.73%</b>											

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Information on the GAR (green asset ratio of "eligible" activities) shall be accompanied with information on the proportion of total assets covered by the GAR

3. Credit institutions can, in addition to the information included in this template, show the proportion of assets funding taxonomy relevant sectors that are environmentally sustainable (Taxonomy-aligned). This information would enrich the information on the KPI on environmentally sustainable assets compared to total covered assets

4. Credit institutions shall duplicate this template for the information based on income received and CapEx.



	n	o	p	q	r	s	t	u	v	w	x	z
	12/31/2024											
	Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling	
<b>% (compared to total covered assets in the denominator)</b>												
<b>GAR – Covered assets in both numerator and denominator</b>												
<b>Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation</b>												
<b>1 Financial companies</b>												
3 Credit institutions												
4 Loans and advances												
5 Debt securities, including specific use of proceeds (UoP)												
6 Equity instruments												
7 Other financial companies												
8 of which investment firms												
9 Loans and advances												
10 Debt securities, including specific use of proceeds (UoP)												
11 Equity instruments												
12 of which management companies												
13 Loans and advances												
14 Debt securities, including specific use of proceeds (UoP)												
15 Equity instruments												
16 of which insurance undertakings												
17 Loans and advances												
18 Debt securities, including specific use of proceeds (UoP)												
19 Equity instruments												
<b>20 Non-financial companies</b>												
21 Loans and advances												
22 Debt securities, including specific use of proceeds (UoP)												
23 Equity instruments												
<b>24 Households</b>												
25 of which loans collateralized by residential immovable property												
26 of which building renovation loans												
27 of which motor vehicle loans												
<b>28 Local governments financing</b>												
29 Housing financing												
30 Other local government financing												
<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>												
<b>31</b>												
<b>32 TOTAL GAR ASSETS</b>												

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Information on the GAR (green asset ratio of "eligible" activities) shall be accompanied with information on the proportion of total assets covered by the GAR.

3. Credit institutions can, in addition to the information included in this template, show the proportion of assets funding taxonomy relevant sectors that are environmentally sustainable (Taxonomy-aligned). This information would enrich the information on the KPI on environmentally sustainable assets compared to total covered assets.

4. Credit institutions shall duplicate this template for the information based on income received and CapEx.

	aa	ab	ac	ad	ae	af
	12/31/2024					
	TOTAL (CCM + CCA + WMR + CE + PRP + BIO)					
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Share of total assets covered
			Of which use of proceeds	Of which transitional	Of which enabling	
% (compared to total covered assets in the denominator)						
<b>GAR – Covered assets in both numerator and denominator</b>						
<b>1 Loans and advances, debt securities and equity instruments held for purposes other than sale and eligible for the GAR calculation</b>	<b>32.42%</b>	<b>3.79%</b>				<b>11.23%</b>
<b>2 Financial companies</b>	<b>0.08%</b>	<b>0.00%</b>				<b>2.66%</b>
3 Credit institutions	0.00%	(0.00%)				0.71%
4 Loans and advances	0.00%	(0.00%)				0.17%
5 Debt securities, including specific use of proceeds (UoP)	(0.00%)	0.00%				0.44%
6 Equity instruments						0.10%
7 Other financial companies	0.10%	0.01%				1.95%
8 of which investment firms						
9 Loans and advances						
10 Debt securities, including specific use of proceeds (UoP)						
11 Equity instruments						
12 of which management companies						
13 Loans and advances						
14 Debt securities, including specific use of proceeds (UoP)						
15 Equity instruments						
16 of which insurance undertakings	0.00%	0.00%				0.85%
17 Loans and advances	0.00%	0.00%				0.27%
18 Debt securities, including specific use of proceeds (UoP)						
19 Equity instruments	0.00%	0.00%				0.58%
<b>20 Non-financial companies</b>	<b>22.39%</b>	<b>8.41%</b>				<b>2.60%</b>
21 Loans and advances	22.61%	8.49%				2.39%
22 Debt securities, including specific use of proceeds (UoP)	27.65%	10.42%				0.15%
23 Equity instruments						0.06%
<b>24 Households</b>	<b>74.95%</b>	<b>5.28%</b>				<b>3.93%</b>
25 of which loans collateralized by residential immovable property	100.00%	7.06%				2.94%
26 of which building renovation loans	100.00%	0.00%				0.00%
27 of which motor vehicle loans						
<b>28 Local governments financing</b>	<b>5.48%</b>	<b>0.00%</b>				<b>2.05%</b>
29 Housing financing	100.00%	0.00%				0.11%
30 Other local government financing	0.00%	0.00%				1.94%
<b>31 Collateral obtained by taking possession: residential and commercial immovable properties</b>	<b>0.00%</b>	<b>0.00%</b>				<b>0.00%</b>
<b>32 TOTAL GAR ASSETS</b>	<b>6.26%</b>	<b>0.73%</b>				<b>58.18%</b>

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Information on the GAR (green asset ratio of "eligible" activities) shall be accompanied with information on the proportion of total assets covered by the GAR.

3. Credit institutions can, in addition to the information included in this template, show the proportion of assets funding taxonomy relevant sectors that are environmentally sustainable (Taxonomy-aligned). This information would enrich the information on the KPI on environmentally sustainable assets compared to total covered assets.

4. Credit institutions shall duplicate this template for the information based on income received and CapEx.

## Template 4 – GAR KPIs flows (Turnover basis)

	a	b	c	d	e	f	g	h	i	j	k	l	m
	12/31/2024												
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
% (compared to flow of total eligible assets)			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling
<b>GAR - Covered assets in both numerator and denominator</b>													
<b>1 Loans and advances, debt securities and equity instruments not HTF eligible for GAR calculation</b>	<b>11.52%</b>	<b>3.79%</b>											
<b>2 Financial companies</b>	<b>1.75%</b>	<b>0.15%</b>											
3 Credit institutions	0.00%	0.00%											
4 Loans and advances	0.00%	0.00%											
5 Debt securities, including UoP	0.00%	0.00%											
6 Equity instruments													
7 Other financial companies	3.38%	0.28%											
8 of which investment firms													
9 Loans and advances													
10 Debt securities, including UoP													
11 Equity instruments													
12 of which management companies													
13 Loans and advances													
14 Debt securities, including UoP													
15 Equity instruments													
16 of which insurance undertakings	0.00%	0.00%											
17 Loans and advances	0.00%	0.00%											
18 Debt securities, including UoP													
19 Equity instruments	0.00%	0.00%											
<b>20 Non-financial companies</b>	<b>21.63%</b>	<b>9.23%</b>											
21 Loans and advances	19.81%	9.75%											
22 Debt securities, including UoP	42.54%	3.18%											
23 Equity instruments													
<b>24 Households</b>	<b>91.99%</b>	<b>7.10%</b>											
25 of which loans collateralised by residential immovable property	100.00%	7.76%											
26 of which building renovation loans	0.00%	0.00%											
27 of which motor vehicle loans	100.00%	0.00%											
<b>28 Local governments financing</b>	<b>2.04%</b>	<b>0.00%</b>											
29 Housing financing	100.00%	0.00%											
30 Other local government financing	0.00%	0.00%											
<b>31 Collateral obtained by taking possession: residential and commercial immovable properties</b>	<b>0.00%</b>	<b>0.00%</b>											
<b>32 TOTAL GAR ASSETS</b>	<b>3.50%</b>	<b>1.15%</b>											

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Credit institutions shall duplicate this template for the information based on income received and CapEx.

	n	o	p	q	r	s	t	u	v	w	x	z
	12/31/2024											
	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
% (compared to flow of total eligible assets)												
<b>GAR - Covered assets in both numerator and denominator</b>												
<b>1 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation</b>												
<b>2 Financial companies</b>												
3 Credit institutions												
4 Loans and advances												
5 Debt securities, including UoP												
6 Equity instruments												
7 Other financial companies												
8 of which investment firms												
9 Loans and advances												
10 Debt securities, including UoP												
11 Equity instruments												
12 of which management companies												
13 Loans and advances												
14 Debt securities, including UoP												
15 Equity instruments												
16 of which insurance undertakings												
17 Loans and advances												
18 Debt securities, including UoP												
19 Equity instruments												
<b>20 Non-financial companies</b>												
21 Loans and advances												
22 Debt securities, including UoP												
23 Equity instruments												
<b>24 Households</b>												
25 of which loans collateralised by residential immovable property												
26 of which building renovation loans												
27 of which motor vehicle loans												
<b>28 Local governments financing</b>												
29 Housing financing												
30 Other local government financing												
<b>31 Collateral obtained by taking possession: residential and commercial immovable properties</b>												
<b>32 TOTAL GAR ASSETS</b>												

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.  
2. Credit institutions shall duplicate this template for the information based on income received and CapEx.

	aa	ab	ac	ad	ae	af
	<b>TOTAL (CCM + CCA + WTR + CE + PPC + BIO)</b>					
	<b>Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)</b>					
		<b>Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)</b>			<b>Proportion of total new assets covered</b>	
			<b>Of which Use of Proceeds</b>	<b>Of which transitional</b>		
				<b>Of which enabling</b>		
<b>% (compared to flow of total eligible assets)</b>						
<b>GAR - Covered assets in both numerator and denominator</b>						
<b>1</b>	<b>Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation</b>	<b>11.52%</b>	<b>3.79%</b>			<b>25.52%</b>
<b>2</b>	<b>Financial companies</b>	<b>1.75%</b>	<b>0.15%</b>			<b>9.73%</b>
3	Credit institutions	0.00%	0.00%			4.69%
4	Loans and advances	0.00%	0.00%			3.21%
5	Debt securities, including UoP	0.00%	0.00%			1.47%
6	Equity instruments					
7	Other financial companies	3.38%	0.28%			5.04%
8	of which investment firms					
9	Loans and advances					
10	Debt securities, including UoP					
11	Equity instruments					
12	of which management companies					
13	Loans and advances					
14	Debt securities, including UoP					
15	Equity instruments					
16	of which insurance undertakings	0.00%	0.00%			0.65%
17	Loans and advances	0.00%	0.00%			0.65%
18	Debt securities, including UoP					
19	Equity instruments	0.00%	0.00%			0.00%
<b>20</b>	<b>Non-financial companies</b>	<b>21.63%</b>	<b>9.23%</b>			<b>9.90%</b>
21	Loans and advances	19.81%	9.75%			9.11%
22	Debt securities, including UoP	42.54%	3.18%			0.79%
23	Equity instruments					
<b>24</b>	<b>Households</b>	<b>91.99%</b>	<b>7.10%</b>			<b>0.56%</b>
25	of which loans collateralised by residential immovable property	100.00%	7.76%			0.52%
26	of which building renovation loans	0.00%	0.00%			0.00%
27	of which motor vehicle loans	100.00%	0.00%			0.00%
<b>28</b>	<b>Local governments financing</b>	<b>2.04%</b>	<b>0.00%</b>			<b>5.32%</b>
29	Housing financing	100.00%	0.00%			0.11%
30	Other local government financing	0.00%	0.00%			5.21%
<b>31</b>	<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>	<b>0.00%</b>	<b>0.00%</b>			<b>0.00%</b>
<b>32</b>	<b>TOTAL GAR ASSETS</b>	<b>3.50%</b>	<b>1.15%</b>			<b>83.91%</b>

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Credit institutions shall duplicate this template for the information based on income received and CapEx.

## Template 4 – GAR KPIs flows (Capex basis)

	a	b	c	d	e	f	g	h	i	j	k	l	m
	12/31/2024												
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				Water and marine resources (WTR)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
% (compared to flow of total eligible assets)		Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
<b>GAR - Covered assets in both numerator and denominator</b>													
<b>1 Loans and advances, debt securities and equity instruments not HTF eligible for GAR calculation</b>	<b>13.63%</b>	<b>5.50%</b>											
<b>2 Financial companies</b>	<b>1.59%</b>	<b>0.44%</b>											
3 Credit institutions	0.00%	0.00%											
4 Loans and advances	0.00%	0.00%											
5 Debt securities, including UoP	0.00%	0.00%											
6 Equity instruments													
7 Other financial companies	3.08%	0.84%											
8 of which investment firms													
9 Loans and advances													
10 Debt securities, including UoP													
11 Equity instruments													
12 of which management companies													
13 Loans and advances													
14 Debt securities, including UoP													
15 Equity instruments													
16 of which insurance undertakings	0.00%	0.00%											
17 Loans and advances	0.00%	0.00%											
18 Debt securities, including UoP													
19 Equity instruments	0.00%	0.00%											
<b>20 Non-financial companies</b>	<b>27.23%</b>	<b>13.35%</b>											
21 Loans and advances	26.01%	14.12%											
22 Debt securities, including UoP	41.30%	4.44%											
23 Equity instruments													
<b>24 Households</b>	<b>91.99%</b>	<b>7.10%</b>											
25 of which loans collateralised by residential immovable property	100.00%	7.76%											
26 of which building renovation loans	0.00%	0.00%											
27 of which motor vehicle loans	100.00%	0.00%											
<b>28 Local governments financing</b>	<b>2.04%</b>	<b>0.00%</b>											
29 Housing financing	100.00%	0.00%											
30 Other local government financing	0.00%	0.00%											
<b>31 Collateral obtained by taking possession: residential and commercial immovable properties</b>	<b>0.00%</b>	<b>0.00%</b>											
<b>32 TOTAL GAR ASSETS</b>	<b>4.14%</b>	<b>1.67%</b>											

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Credit institutions shall duplicate this template for the information based on income received and CapEx.

	n	o	p	q	r	s	t	u	v	w	x	z
	12/31/2024											
	Circular economy (CE)				Pollution (PPC)				Biodiversity and Ecosystems (BIO)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which enabling	
% (compared to flow of total eligible assets)												
<b>GAR - Covered assets in both numerator and denominator</b>												
<b>1 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation</b>												
<b>2 Financial companies</b>												
3 Credit institutions												
4 Loans and advances												
5 Debt securities, including UoP												
6 Equity instruments												
7 Other financial companies												
8 of which investment firms												
9 Loans and advances												
10 Debt securities, including UoP												
11 Equity instruments												
12 of which management companies												
13 Loans and advances												
14 Debt securities, including UoP												
15 Equity instruments												
16 of which insurance undertakings												
17 Loans and advances												
18 Debt securities, including UoP												
19 Equity instruments												
<b>20 Non-financial companies</b>												
21 Loans and advances												
22 Debt securities, including UoP												
23 Equity instruments												
<b>24 Households</b>												
25 of which loans collateralised by residential immovable property												
26 of which building renovation loans												
27 of which motor vehicle loans												
<b>28 Local governments financing</b>												
29 Housing financing												
30 Other local government financing												
<b>Collateral obtained by taking possession: residential and commercial immovable properties</b>												
<b>31</b>												
<b>32 TOTAL GAR ASSETS</b>												

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Credit institutions shall duplicate this template for the information based on income received and CapEx.

	aa	ab	ac	ad	ae	af
	TOTAL (CCM + CCA + WTR + CE + PPC + BIO)					
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					
	Proportion of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Proportion of total new assets covered	
			Of which Use of Proceeds	Of which transitional	Of which enabling	
% (compared to flow of total eligible assets)						
GAR - Covered assets in both numerator and denominator						
1 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	13.63%	5.50%				25.52%
2 Financial companies	1.59%	0.44%				9.73%
3 Credit institutions	0.00%	0.00%				4.69%
4 Loans and advances	0.00%	0.00%				3.21%
5 Debt securities, including UoP	0.00%	0.00%				1.47%
6 Equity instruments						
7 Other financial companies	3.08%	0.84%				5.04%
8 of which investment firms						
9 Loans and advances						
10 Debt securities, including UoP						
11 Equity instruments						
12 of which management companies						
13 Loans and advances						
14 Debt securities, including UoP						
15 Equity instruments						
16 of which insurance undertakings	0.00%	0.00%				0.65%
17 Loans and advances	0.00%	0.00%				0.65%
18 Debt securities, including UoP						
19 Equity instruments	0.00%	0.00%				0.00%
20 Non-financial companies	27.23%	13.35%				9.90%
21 Loans and advances	26.01%	14.12%				9.11%
22 Debt securities, including UoP	41.30%	4.44%				0.79%
23 Equity instruments						
24 Households	91.99%	7.10%				0.56%
25 of which loans collateralised by residential immovable property	100.00%	7.76%				0.52%
26 of which building renovation loans	0.00%	0.00%				0.00%
27 of which motor vehicle loans	100.00%	0.00%				0.00%
28 Local governments financing	2.04%	0.00%				5.32%
29 Housing financing	100.00%	0.00%				0.11%
30 Other local government financing	0.00%	0.00%				5.21%
31 Collateral obtained by taking possession: residential and commercial immovable properties	0.00%	0.00%				0.00%
32 TOTAL GAR ASSETS	4.14%	1.67%				83.91%

1. The institution shall disclose in this template the GAR KPIs on stock of loans calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Credit institutions shall duplicate this template for the information based on income received and CapEx.



## Template 5 - KPI off-balance sheet exposures (Turnover basis)

	a	b	c	d	e	f	g	h	i	j	k	l	m
	12/31/2024												
	Climate change mitigation (CCM)					Climate change adaptation (CCA)					Water and marine resources (WMR)		
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)					Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)		
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)					Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)		
		Of which use of proceeds	Of which transitional	Of which enabling			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling	
% (relative to total eligible off-balance sheet assets)													
1 Financial guarantees (FinGuar KPI)	17.84%	5.84%											
2 Assets under management (AuM KPI)	8.24%	0.86%											

	n	o	p	q	r	s	t	u	v	w	x	z
	12/31/2024											
	Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
		Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling			Of which use of proceeds	Of which enabling	
% (relative to total eligible off-balance sheet assets)												
1 Financial guarantees (FinGuar KPI)												
2 Assets under management (AuM KPI)												

	aa	ab	ac	ad	ae
	TOTAL (CCM + CCA + WMR + CE + PRP + BIO)				
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
	Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
		Of which use of proceeds	Of which transitional	Of which enabling	
% (relative to total eligible off-balance sheet assets)					
1 Financial guarantees (FinGuar KPI)	17.84%	5.84%			
2 Assets under management (AuM KPI)	8.24%	0.86%			

1. The institution shall disclose in this model the KPIs of its off-balance sheet exposures (financial guarantees and assets under management) calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Institutions shall duplicate this model to disclose KPIs relating to stocks and flows for off-balance sheet exposures.

## Template 5 - KPI off-balance sheet exposures (CapEx basis)

		a	b	c	d	e	f	g	h	i	j	k	l	m
		12/31/2024												
		Climate change mitigation (CCM)				Climate change adaptation (CCA)				Water and marine resources (WMR)				
		Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
			Of which use of proceeds	Of which transitional	Of which enabling		Of which use of proceeds	Of which transitional	Of which enabling		Of which use of proceeds	Of which transitional	Of which enabling	
%(relative to total eligible off-balance sheet assets)														
1	Financial guarantees (FinGuar KPI)	18.14%	7.34%											
2	Assets under management (AuM KPI)	2.29%	0.70%											

		n	o	p	q	r	s	t	u	v	w	x	z
		12/31/2024											
		Circular economy (CE)				Pollution (PRP)				Biodiversity and ecosystems (BIO)			
		Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)			
		Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)			
			Of which use of proceeds	Of which transitional	Of which enabling		Of which use of proceeds	Of which transitional	Of which enabling		Of which use of proceeds	Of which transitional	Of which enabling
%(relative to total eligible off-balance sheet assets)													
1	Financial guarantees (FinGuar KPI)												
2	Assets under management (AuM KPI)												

		aa	ab	ac	ad	ae
		TOTAL (CCM + CCA + WMR + CE + PRP + BIO)				
		Share of total covered assets funding taxonomy relevant sectors (Taxonomy-eligible)				
		Share of total covered assets funding taxonomy relevant sectors (Taxonomy-aligned)				
			Of which use of proceeds	Of which transitional	Of which enabling	
%(relative to total eligible off-balance sheet assets)						
1	Financial guarantees (FinGuar KPI)	18.14%	7.34%			
2	Assets under management (AuM KPI)	2.29%	0.70%			

1. The institution shall disclose in this model the KPIs of its off-balance sheet exposures (financial guarantees and assets under management) calculated based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.

2. Institutions shall duplicate this model to disclose KPIs relating to stocks and flows for off-balance sheet exposures.

## Nuclear and fossil gas - Template 1 - Activities related to nuclear energy and fossil gas

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

## Nuclear and fossil gas - Template 2 - Taxonomy-aligned economic activities [denominator] - [Turnover basis]

Row	Economic activities	Amount and proportion (information must be presented in monetary amounts and percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(0)	0%	(0)	0%	(0)	0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(0)	0%	(0)	0%	(0)	0%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	137	0%	137	0%	(0)	0%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(0)	0%	(0)	0%	(0)	0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(0)	0%	(0)	0%	(0)	0%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	(0)	0%	(0)	0%	(0)	0%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	<b>2,781</b>	<b>1%</b>	<b>2,781</b>	<b>1%</b>	<b>(0)</b>	<b>0%</b>
8.	<b>Total applicable KPI</b>	<b>483,942</b>	<b>1%</b>	<b>483,942</b>	<b>1%</b>		

## Nuclear and fossil gas - Template 2 - Taxonomy-aligned economic activities (denominator) - (CapEx basis)

Row	Economic activities	Amount and proportion (information must be presented in monetary amounts and percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0%	-	0%	-	0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	20	0%	20	0%	-	0%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	111	0%	111	0%	-	0%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	4	0%	4	0%	-	0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	1	0%	1	0%	-	0%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0%	-	0%	-	0%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	<b>3,410</b>	<b>1%</b>	<b>3,410</b>	<b>1%</b>	<b>-</b>	<b>0%</b>
8.	<b>Total applicable KPI</b>	<b>483,942</b>	<b>1%</b>	<b>483,942</b>	<b>1%</b>	<b>483,942</b>	<b>0%</b>

## Nuclear and fossil gas - Template 3 - Taxonomy-aligned economic activities (numerator) - (Turnover basis)

Row	Economic activities	Amount and proportion (information must be presented in monetary amounts and percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	0%	-	0%	-	0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	0%	-	0%	-	0%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	244	8%	244	8%	-	0%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	0%	-	0%	-	0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	0%	-	0%	-	0%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	0%	-	0%	-	0%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	<b>2 674</b>	<b>92%</b>	<b>2 674</b>	<b>92%</b>	<b>-</b>	<b>0%</b>
8.	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	<b>2 918</b>	<b>100%</b>	<b>2 918</b>	<b>100%</b>	<b>-</b>	<b>0%</b>

## Nuclear and fossil gas - Template 3 - Taxonomy-aligned economic activities (numerator) - [CapEx basis]

Row	Economic activities	Amount and proportion (information must be presented in monetary amounts and percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	0%	-	0%	-	0%
2.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	30	1%	30	1%	-	0%
3.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	172	5%	172	5%	-	0%
4.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	4	0%	4	0%	-	0%
5.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	2	0%	2	0%	-	0%
6.	Amount and proportion of taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the numerator of the applicable KPI	-	0%	-	0%	-	0%
7.	<b>Amount and proportion of other taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the numerator of the applicable KPI</b>	<b>3,338</b>	<b>94%</b>	<b>3,338</b>	<b>94%</b>	<b>-</b>	<b>0%</b>
8.	<b>Total amount and proportion of taxonomy-aligned economic activities in the numerator of the applicable KPI</b>	<b>3,546</b>	<b>100%</b>	<b>3,546</b>	<b>100%</b>	<b>-</b>	<b>0%</b>

## Nuclear and fossil gas - Template 4 - Taxonomy-eligible but not taxonomy-aligned economic activities - [Turnover basis]

Row	Economic activities	Amount and proportion (information must be presented in monetary amounts and percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0%	-	0%	-	0%
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 2021/2139 in the denominator of the applicable KPI	-	0%	-	0%	-	0%
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 2021/2139 in the denominator of the applicable KPI	-	0%	-	0%	-	0%
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 2021/2139 in the denominator of the applicable KPI	28	0%	28	0%	-	0%
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 2021/2139 in the denominator of the applicable KPI	3	0%	3	0%	-	0%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0%	-	0%	-	0%
7.	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	<b>26 538</b>	<b>100%</b>	<b>26 538</b>	<b>100%</b>	<b>--</b>	<b>0%</b>
8.	<b>Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI</b>	<b>26 569</b>	<b>100%</b>	<b>26 569</b>	<b>100%</b>	<b>-</b>	<b>0%</b>

## Nuclear and fossil gas - Template 4 - Taxonomy-eligible but not taxonomy-aligned economic activities - [CapEx basis]

Row	Economic activities	Amount and proportion (information must be presented in monetary amounts and percentages)					
		CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0%	-	0%	-	0%
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 2021/2139 in the denominator of the applicable KPI	-	0%	-	0%	--	0%
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 2021/2139 in the denominator of the applicable KPI	-	0%	-	0%	--	0%
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 2021/2139 in the denominator of the applicable KPI	13	0%	13	0%	--	0%
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 2021/2139 in the denominator of the applicable KPI	2	0%	2	0%	--	0%
6.	Amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0%	-	0%	-	0%
7.	<b>Amount and proportion of other taxonomy-eligible but not taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	<b>26,734</b>	<b>100%</b>	<b>26,734</b>	<b>100%</b>	<b>-</b>	<b>0%</b>
8.	<b>Total amount and proportion of taxonomy-eligible but not taxonomy-aligned economic activities in the denominator of the applicable KPI</b>	<b>26,749</b>	<b>100%</b>	<b>26,749</b>	<b>100%</b>	<b>-</b>	<b>0%</b>



## Nuclear and fossil gas - Template 5 - Taxonomy non-eligible economic activities - (Turnover basis)

Row	Economic activities	Amount	Percentage
1.	Amount and proportion of the economic activity referred to in line 1 of Template 1 that is not eligible for taxonomy, 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%
2.	Amount and proportion of the economic activity referred to in line 2 of Template 1 that is not eligible for taxonomy, 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%
3.	Amount and proportion of the economic activity referred to in line 3 of Template 1 that is not eligible for taxonomy, in accordance with Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139, in the denominator of the applicable KPI	15	0%
4.	Amount and proportion of the economic activity referred to in line 4 of Template 1 that is not eligible for taxonomy, 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%
5.	Amount and proportion of the economic activity referred to in line 5 of Template 1 that is not eligible for taxonomy, 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%
6.	Amount and proportion of the economic activity referred to in line 6 of Template 1 that is not eligible for taxonomy, 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%
7.	<b>Amount and proportion of other taxonomy non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	<b>454 440</b>	<b>100%</b>
8.	<b>Total amount and total proportion of economic activities not eligible for taxonomy in the denominator of the applicable KPI</b>	<b>454 455</b>	<b>100%</b>

## Nuclear and fossil gas - Template 5 - Taxonomy non-eligible economic activities - (CapEx basis)

Row	Economic activities	Amount	Percentage
1.	Amount and proportion of the economic activity referred to in line 1 of Template 1 that is not eligible for taxonomy, 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%
2.	Amount and proportion of the economic activity referred to in line 2 of Template 1 that is not eligible for taxonomy, in accordance with Section 4.27 of Annexes I and II to Delegated Regulation (EU) 2021/2139, in the denominator of the applicable KPI	116	0%
3.	Amount and proportion of the economic activity referred to in line 3 of Template 1 that is not eligible for taxonomy, in accordance with Section 4.28 of Annexes I and II to Delegated Regulation (EU) 2021/2139, in the denominator of the applicable KPI	10	0%
4.	Amount and proportion of the economic activity referred to in line 4 of Template 1 that is not eligible for taxonomy, 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%
5.	Amount and proportion of the economic activity referred to in line 5 of Template 1 that is not eligible for taxonomy, 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%
6.	Amount and proportion of the economic activity referred to in line 6 of Template 1 that is not eligible for taxonomy, 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%
7.	<b>Amount and proportion of other taxonomy non-eligible economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI</b>	<b>453,520</b>	<b>100%</b>
8.	<b>Total amount and total proportion of economic activities not eligible for taxonomy in the denominator of the applicable KPI</b>	<b>453,647</b>	<b>100%</b>

## 2.4 Statutory Auditors' report on the BPCE sustainability report

### Report on the certification of sustainability information and verification of the disclosure requirements under Article 8 of Regulation (EU) 2020/852

#### Year ended December 31, 2024

*This is a translation into English of the statutory auditors' report on the certification of sustainability information and verification of the disclosure requirements under Article 8 of Regulation (EU) 2020/852 of the Company issued in French and it is provided solely for the convenience of English speaking users.*

*This report should be read in conjunction with, and construed in accordance with, French law and the H2A guidelines on "Limited assurance engagement - Certification of sustainability reporting and verification of disclosure requirements set out in Article 8 of Regulation (EU) 2020/852".*

To the General Assembly

#### BPCE

7, promenade Germaine Sablon

75013 PARIS

This report is issued in our capacity as statutory auditors of BPCE group. It covers the sustainability information and the information required by Article 8 of Regulation (EU) 2020/852, relating to the year ended December 31, 2024 and included in section 2.3 "BPCE Sustainability report" in the chapter 2 of the universal registration document (below "BPCE Sustainability report").

Pursuant to Article L. 233-28-4 of the French Commercial Code, BPCE is required to include the above mentioned information in a separate section of the group management report. This information has been prepared in the context of the first time application of the aforementioned articles, a context characterized by uncertainties regarding the interpretation of the laws and regulations, the use of significant estimates, the absence of established practices and frameworks in particular for the double-materiality assessment, and an evolving internal control system. It enables an understanding of the impact of the activity of the group on sustainability matters, as well as the way in which these matters influence the development of the business of the group, its performance and position. Sustainability matters include environmental, social and corporate governance matters.

Pursuant to Article L.821-54 paragraph II of the aforementioned Code our responsibility is to carry out the procedures necessary to issue a conclusion, expressing limited assurance, on:

- compliance with the sustainability reporting standards adopted pursuant to Article 29 b of Directive (EU) 2013/34 of the European Parliament and of the Council of 14 December 2022 (hereinafter ESRS for European Sustainability Reporting Standards) of the process implemented by BPCE to determine the information reported, and compliance with the requirement to consult the social and economic committee provided for in the sixth paragraph of Article L. 2312-17 of the French Labour Code;
- compliance of the sustainability information included in BPCE Sustainability report included the group management report with the requirements of Article L. 233-28-4 of the French Commercial Code, including ESRS; and
- compliance with the reporting requirements set out in Article 8 of Regulation (EU) 2020/852.

This engagement is carried out in compliance with the ethical rules, including independence, and quality control rules prescribed by the French Commercial Code.

It is also governed by the H2A guidelines on "Limited assurance engagement - Certification of sustainability reporting and verification of disclosure requirements set out in Article 8 of Regulation (EU) 2020/852".

In the three separate sections of the report that follow, we present, for each of the sections of our engagement, the nature of the procedures that we carried out, the conclusions that we drew from these procedures and, in support of these conclusions, the elements to which we paid particular attention and the procedures that we carried out with regard to these elements. We draw your attention to the fact that we do not express a conclusion on any of these elements taken individually and that the procedures described should be considered in the overall context of the formation of the conclusions issued in respect of each of the three sections of our engagement.

Finally, where deemed necessary to draw your attention to one or more disclosures of sustainability information provided by BPCE in the BPCE Sustainability report, we have included an emphasis of matter paragraph hereafter.

#### Limits of our engagement

As the purpose of our engagement is to express limited assurance, the nature (choice of techniques), extent (scope) and timing of the procedures are less than those required to obtain reasonable assurance.

Furthermore, this engagement does not provide guarantee regarding the viability or the quality of the management of BPCE, in particular it does not provide an assessment, of the relevance of the choices made by BPCE in terms of action plans, targets, policies, scenario analyses and transition plans, which would go beyond compliance with the ESRS reporting requirements.

It does, however, allow us to express conclusions regarding the entity's process for determining the sustainability information to be reported, the sustainability information itself, and the information reported pursuant to Article 8 of Regulation (EU) 2020/852, as to the absence of identification or, on the contrary, the identification of errors, omissions or inconsistencies of such importance that they would be likely to influence the decisions that readers of the information subject to this engagement might make.

Any comparative information that would be included in the group management report are not covered by our engagement.

**Compliance with the ESRS of the process implemented by BPCE to determine the information reported, and compliance with the requirement to consult the social and economic committee provided for in the sixth paragraph of Article L. 2312-17 of the French Labour Code**

Nature of procedures carried out

Our procedures consisted in verifying that:

- the process defined and implemented by BPCE has enabled it, in accordance with the ESRS, to identify and assess its impacts, risks and opportunities related to sustainability matters, and to identify the material impacts, risks and opportunities, that lead to the publication of information disclosed in the BPCE Sustainability report, and
- the information provided on this process also complies with the ESRS.

We also checked the compliance with the requirement to consult the social and economic committee.

Conclusion of the procedures carried out

On the basis of the procedures we have carried out, we have not identified any material errors, omissions or inconsistencies regarding the compliance of the process implemented by BPCE with the ESRS.

Concerning the consultation of the social and economic committee provided for in the sixth paragraph of Article L. 2312-17 of the French Labour Code we inform you that as of the date of this report, this consultation has not yet been held.

Emphasis of matter

Without qualifying the conclusion expressed above, we draw your attention to the information provided in:

- the paragraph "Introductory remarks" of the BPCE Sustainability report, which recalls the existence of two scopes for publishing sustainability information (BPCE and Groupe BPCE) and the reasons why the sustainability report for the BPCE scope refers to the sustainability report of the Groupe BPCE scope, as well as the modalities of these references, and specifies that the double materiality analysis for these two scopes is identical.
- paragraph 1.1.2.3 "Sources of estimation and outcome uncertainty" which refers to the corresponding section in the Groupe BPCE Sustainability report, for which we make the same observation as for the Groupe BPCE scope, concerning the uncertainty and limitations related to the methodologies used to perform the double materiality analysis regarding the thematic standards E2, E3, E4, and E5 (pollution, aquatic and marine resources, biodiversity and ecosystems, and resource use and circular economy) for the year 2024.

Elements that received particular attention

We set out below the elements that have been the subject of particular attention in relation to our assessment of compliance with the ESRS of the process implemented by BPCE to determine the information reported.

- Concerning the identification of stakeholders

Information on the identification of stakeholders is set out in section 1.2.2 SBM-2 - Interests and views of stakeholders of the BPCE Sustainability report.

We interviewed management and others within the entity as appropriate and inspected available documentation.

We also assessed the consistency of the primary stakeholders identified by BPCE in view of the nature of its activities and its geographical location, taking into account its business relationships, its cooperative dimension and value chain

- Concerning the identification of impacts, risks and opportunities

Information on the identification of impacts, risks and opportunities is provided in section 1.4.1 "IRO-1 - Description of the processes to identify and assess material impacts, risks and opportunities" of the BPCE Sustainability report.

We obtained an understanding of the process implemented by BPCE to identify actual or potential impacts – both negative and positive – risks and opportunities (IROs), in relation to the sustainability matters mentioned in paragraph AR 16 of ESRS 1, "Application requirements", and where applicable, those specific to BPCE, as presented in the above cited note.

In particular, we assessed the approach taken by BPCE to determine its impacts and dependencies, which may be a source of risks or opportunities, including the dialogue undertaken, where appropriate, with stakeholders.

We obtained an understanding of the group's mapping of identified IROs, including a description of their distribution within the group's own operations and its value chain, as well as their time horizon (short, medium or long term), and assessed the consistency of this mapping with our knowledge of BPCE group and, where applicable, with the risk analyses conducted by BPCE.

- Concerning the assessment of impact materiality and financial materiality

Information on the assessment of impact materiality and financial materiality is provided in section 1.4.1 "IRO-1 - Description of the processes to identify and assess material impacts, risks and opportunities" of the BPCE Sustainability report.

Through interviews with management and inspection of available documentation, we obtained an understanding of the process implemented by the entity to assess impact materiality and financial materiality, and assessed its compliance with the criteria defined in ESRS 1.

In particular, we assessed the way in which BPCE established and applied the materiality criteria defined in ESRS 1, including those relating to the setting of thresholds, in order to determine the following material information reported:

- metrics relating to material IROs identified in accordance with the relevant ESRS standards;
- entity-specific disclosures.

**Compliance of the sustainability information included in BPCE Sustainability report with the requirements of Article L.233-28-4 of the French Commercial Code, including the ESRS**

Nature of procedures carried out

Our procedures consisted in verifying that, in accordance with legal and regulatory requirements, including the ESRS:

- the disclosures provided enable an understanding of the general basis for the preparation and governance of the sustainability information included in BPCE Sustainability report, including the basis for determining the information relating to the value chain and the exemptions from disclosures used;
- the presentation of this information ensures its readability and understandability;
- the scope chosen by BPCE for providing this information is appropriate; and
- on the basis of a selection, based on our analysis of the risks of non-compliance of the information provided and the expectations of users, that this information does not contain any material errors, omissions or inconsistencies, i.e. that are likely to influence the judgement or decisions of users of this information.

Conclusion of the procedures carried out

Based on the procedures we have carried out, we have not identified material errors, omissions or inconsistencies regarding the compliance of the sustainability information included in BPCE Sustainability report, with the requirements of Article L.233-28-4 of the French Commercial Code, including the ESRS.

Emphasis of matter

Without qualifying the conclusion expressed above, and in connection with the statement made above regarding the paragraph "Introductory remarks" concerning the scope of publication of sustainability information for BPCE and Groupe BPCE, we draw your attention to:

- the paragraph "Introductory remarks", which specifies that the greenhouse gas emission reduction targets are calculated only for the Groupe BPCE scope, as an integral part of the transition strategy covering the entire group scope; paragraph 2.2.4.2 "(E1-6) gross scopes 1, 2, 3 and total ghg emissions" which outlines the calculation of financed emissions related to the value chain (category 15 of scope 3 according to the *GHG protocol*) as well as the limitations related to data availability, assumptions used, and methodologies applied to determine estimates related to decarbonization targets and the greenhouse gas emissions balance.

Elements that received particular attention

- Information provided in application of the standards relating to general requirements and general disclosure (ESRS 1 – Climate change)

We set out below the elements that have been the subject of particular attention in relation to our assessment of compliance with the ESRS of the following information disclosed in the paragraphs 2.2.3.1 "(E1-1) Transition plan for climate change mitigation" and 2.2.4 "Metrics and targets".

With regard to the information published on the greenhouse gas emissions (ESRS E1-6), as mentioned in the paragraph 2.2.4.2 "(E1-6) Gross scopes 1, 2, 3 and total ghg emissions", our work consisted primarily of:

- obtaining an understanding of the process, methods, frames, data and estimates used by BPCE to prepare the information (including procedures and internal control);
- with regard to Scope 3 emissions (categories 1, 2 and 6) regarding BPCE own operations:
  - assessing the appropriateness of the emission factors used and the calculation of the related conversions, taking into account the uncertainty inherent in the state of scientific or economic knowledge and the quality of the external data;
  - reconciling physical data, on a sample basis, to the underlying data used to draw up the greenhouse gas emissions assessment and tracing to supporting documents
- with regard to financed emissions (scope 3, category 15 of *GHG Protocol*):
  - Understanding the scope of covered assets as described and assess its justification in regard of the applicable framework;
  - Verifying that the base used for computing financed emissions corresponds to the scope of covered assets as described in note 2.2.4.2 and reconciling it with the consolidated general balance
  - assessing the appropriateness of the method for determining estimates, including the sectoral proxies chosen;
  - verifying the accuracy of the calculations used to prepare this information on a sample basis.

## Compliance with the reporting requirements set out in Article 8 of Regulation (EU) 2020/852

### Nature of procedures carried out

Our procedures consisted in verifying the process implemented by BPCE to determine the eligible and aligned nature of the activities of the entities included in the consolidation.

They also involved verifying the information reported pursuant to Article 8 of Regulation (EU) 2020/852, which involves checking:

- the compliance with the rules applicable to the presentation of this information to ensure that it is readable and understandable;
- on the basis of a selection, the absence of material errors, omissions or inconsistencies in the information provided, i.e. information likely to influence the judgement or decisions of users of this information.

### Conclusion of the procedures carried out

Based on the procedures we have carried out, we have not identified any material errors, omissions or inconsistencies relating to compliance with the requirements of Article 8 of Regulation (EU) 2020/852.

### Emphasis of matters

Without qualifying the conclusion expressed above, and in connection with the statement made above regarding the paragraph "Introductory remarks" concerning the scope of publication of sustainability information for BPCE and Groupe BPCE, we draw your attention to the information in paragraph 2.1 "Indicators of the European taxonomy on sustainable activities" of the BPCE Sustainability report, which refers to sections 2.1 and 5 "Indicators of the European taxonomy on sustainable activities" of the Groupe BPCE Sustainability Report, for which we make the same statements as for the Groupe BPCE scope, regarding:

- the main methodological assumptions used to assess the alignment of loans granted to individuals;
- the main existing limitations in the presentation of information, including those concerning the presentation of cash flow information regarding the KPI on off-balance-sheet exposures.

### Elements that received particular attention

We concluded that there are no elements that received particular attention to report.

Done at Neuilly-sur-Seine and Paris La Défense, March 21, 2025

The statutory auditors  
*French original signed by*

**PricewaterhouseCoopers Audit**

**Forvis Mazars SA**

Antoine Priollaud

Laurent Tavernier

Laurence Karagulian

Emmanuel Thierry

