



Non-Financial Reporting Directive (NFRD) Report

For the financial year ending 31 December 2024

Banking Circle S.A.

bankingcircle.com



Contents

Contents	2
Message from the CFO	4
About the report	5
PART I. GENERAL INFORMATION	6
1. BCSA's purpose and mission	6
2. Business model and ESG approach	6
2.1 Business model	6
2.2 Approach to ESG	6
3. Double Materiality Assessment	8
3.1 DMA results	8
3.2 Looking ahead	9
PART II. ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) PERFORMANCE	9
1. Governance	9
1.1 Governance Framework	9
1.1.1 Suitability assessment of the Management Body and Key Function Holders	10
1.1.2 Remuneration	
1.1.3 Policies and procedures	10
1.2 Impacts, Risks, and Opportunities	11
1.3 Metrics	12
1.4 Governance areas	12
1.4.1 Data Security	12
1.4.2 Anti-Bribery and Corruption (ABC)	12
1.5 Initiatives in 2024	13
1.6 Looking forward	14
2. Environment	14
2.1 Environmental Framework	14
2.1.1 Environment in BCSA ESG Policy	14
2.1.2 CSSF Circular 21/773 Assessment	15
2.2 Impacts, Risks, and Opportunities	16
2.3 Metrics	16
2.3.1 GHG emissions	17
2.3.2 Employee Commuting	
2.3.3 Energy Consumption	
2.4 Environmental areas	19
2.4.1 EU Taxonomy	19
2.5 Initiatives in 2024	19



2.6 Looking forward	20
3. Social	21
3.1 Social Framework	.21
3.2 Impacts, Risks, and Opportunities	.21
3.3 Metrics	.21
3.3.1 Social	.21
3.3.2 Diversity, Equality, and Inclusion	.22
3.4 Social areas	.26
3.4.1 Corporate Social Responsibility	26
3.4.2 Diversity and Inclusion	26
3.4.3 Human Rights	.27
3.5 Initiatives in 2024	.28
3.6 Looking forward	.29
Appendices	.30
Appendix 1 - GHG emissions scope 3 categories	.30
Appendix 2 - GHG emissions Methodology	.31
	22
Appendix 3 – Energy consumption	. 32
Appendix 3 – Energy consumption Appendix 4 - EU Taxonomy	
Appendix 4 - EU Taxonomy 0. Summary of KPIs to be disclosed by credit institutions under Article 8 of the EU Taxonomy Regulation	. 33 1
Appendix 4 - EU Taxonomy	. 33 n . 33
Appendix 4 - EU Taxonomy O. Summary of KPIs to be disclosed by credit institutions under Article 8 of the EU Taxonomy Regulation	. 33 n . 33 . 34
Appendix 4 - EU Taxonomy O. Summary of KPIs to be disclosed by credit institutions under Article 8 of the EU Taxonomy Regulation 1a. Assets for the calculation of GAR based on turnover	. 33 n . 33 . 34 . 37
Appendix 4 - EU Taxonomy O. Summary of KPIs to be disclosed by credit institutions under Article 8 of the EU Taxonomy Regulation 1a. Assets for the calculation of GAR based on turnover 1b. Assets for the calculation of GAR based on CAPEX	. 33 n . 33 . 34 . 37 . 41
Appendix 4 - EU Taxonomy O. Summary of KPIs to be disclosed by credit institutions under Article 8 of the EU Taxonomy Regulation 1a. Assets for the calculation of GAR based on turnover 1b. Assets for the calculation of GAR based on CAPEX 2a. GAR sector information based on turnover	. 33 n . 33 . 34 . 37 . 41 . 51
Appendix 4 - EU Taxonomy 0. Summary of KPIs to be disclosed by credit institutions under Article 8 of the EU Taxonomy Regulation 1a. Assets for the calculation of GAR based on turnover 1b. Assets for the calculation of GAR based on CAPEX 2a. GAR sector information based on turnover 2b. GAR sector information based on CAPEX	. 33 n . 33 . 34 . 37 . 41 . 51 . 61
Appendix 4 - EU Taxonomy 0. Summary of KPIs to be disclosed by credit institutions under Article 8 of the EU Taxonomy Regulation 1a. Assets for the calculation of GAR based on turnover 1b. Assets for the calculation of GAR based on CAPEX 2a. GAR sector information based on turnover 2b. GAR sector information based on CAPEX 3a. GAR KPI stock based on turnover	. 33 n . 33 . 34 . 37 . 41 . 51 . 61
Appendix 4 - EU Taxonomy 0. Summary of KPIs to be disclosed by credit institutions under Article 8 of the EU Taxonomy Regulation 1a. Assets for the calculation of GAR based on turnover 1b. Assets for the calculation of GAR based on CAPEX 2a. GAR sector information based on turnover 2b. GAR sector information based on CAPEX 3a. GAR KPI stock based on turnover 3b. GAR KPI stock based on CAPEX	.33 n .33 .34 .37 .41 .51 .61 .63
Appendix 4 - EU Taxonomy 0. Summary of KPIs to be disclosed by credit institutions under Article 8 of the EU Taxonomy Regulation 1a. Assets for the calculation of GAR based on turnover 1b. Assets for the calculation of GAR based on CAPEX 2a. GAR sector information based on turnover 2b. GAR sector information based on CAPEX 3a. GAR KPI stock based on turnover 3b. GAR KPI stock based on CAPEX 4a. GAR KPI flow based on turnover	. 33 n . 33 . 34 . 37 . 41 . 51 . 61 . 63 . 65 . 66
Appendix 4 - EU Taxonomy 0. Summary of KPIs to be disclosed by credit institutions under Article 8 of the EU Taxonomy Regulation 1a. Assets for the calculation of GAR based on turnover 1b. Assets for the calculation of GAR based on CAPEX 2a. GAR sector information based on turnover 2b. GAR sector information based on CAPEX 3a. GAR KPI stock based on turnover 3b. GAR KPI stock based on CAPEX 4a. GAR KPI flow based on turnover 4b. GAR KPI flow based on CAPEX	.33 .33 .34 .37 .41 .51 .61 .63 .65 .66
Appendix 4 - EU Taxonomy	.33 .33 .34 .37 .41 .51 .63 .65 .66 .67
Appendix 4 - EU Taxonomy 0. Summary of KPIs to be disclosed by credit institutions under Article 8 of the EU Taxonomy Regulation 1a. Assets for the calculation of GAR based on turnover 1b. Assets for the calculation of GAR based on CAPEX 2a. GAR sector information based on turnover 2b. GAR sector information based on CAPEX 3a. GAR KPI stock based on turnover 3b. GAR KPI stock based on CAPEX 4a. GAR KPI flow based on turnover 4b. GAR KPI flow based on CAPEX 5a. KPI off-balance sheet exposures based on CAPEX	.33 .33 .34 .37 .41 .51 .61 .63 .65 .66 .67 .68

Message from the CFO

ESG responsible, member of Authorised Management:

At Banking Circle, we recognise that long-term success is built not only on financial performance but also on our ability to create value for all stakeholders—our employees, customers, communities, and the environment. This Non-Financial Reporting Directive (NFRD) report reflects our ongoing commitment to transparency, sustainability, and ethical governance.

In 2024, we continued to integrate environmental, social, and governance (ESG) considerations into our core business strategy and processes.

This report outlines our performance, activities, and ambitions in key areas such as climate action, human rights, employee well-being, and anti-corruption practices. It also describes how we are preparing to ensure that our reporting evolves with regulatory expectations and stakeholder needs.

Michael Hansen, CFO



About the report

This Non-Financial Reporting Statement has been prepared in accordance with the requirements of Directive 2014/95/EU of the European Parliament and of the Council, commonly referred to as the Non-Financial Reporting Directive ("NFRD"), as transposed into Luxembourgish regulation.

As a public-interest entity with more than 500 employees, NFRD requires Banking Circle S.A. ("BCSA", "the Bank"), to disclose relevant information relating to environmental, social and employee matters, respect for human rights, anti-corruption and bribery issues, and diversity on company boards.

This report presents an overview of the policies, outcomes, risks, and performance indicators associated with these areas, providing stakeholders with transparent insight into BCSA's non-financial impacts and how they are managed.

This statement supplements the BCSA Financial Report for 2024 and covers the operations and initiatives of the Bank and, where applicable, its branches and subsidiaries.¹

Standards

This report has been drafted in accordance with EC Guidelines on non-financial reporting (2017), EC Supplement on reporting climate-related information (2019), and European common enforcement priorities for 2019 annual financial reports (2019).

The report covers the period for the financial year ending 31 December 2024² and has been approved by the Board of Directors on 25 June 2025.

Regulatory Framework in Luxembourg

In addition to requirements of the NFRD, BCSA is subject to complying with the following regulations:

- EU Global Human Rights Sanction Regime (2020/1998/EU)
- Diversity on Management bodies (Luxembourg Law on Financial Services, EBA/GL/2021/06)
- CSSF Circular 21/773 on the Management of Climate-related and Environmental Risks
- Modern Slavery Act 2015 (UK)
- The EU Taxonomy Regulation (2020/852/EU)
- Green House Gas protocol³
- EC Guidelines on non-financial reporting (2017)⁴
- EC Supplement on reporting climate-related information (2019)
- ESMA European common enforcement priorities for 2018 annual financial reports (2018)⁵
- ESMA European common enforcement priorities for 2019 annual financial reports (2019)⁶

³ <u>https://ghgprotocol.org/</u>

¹ In cases where data for subsidiaries or branches is not included, it will be noted in the specific section.

 $^{^{\}rm 2}$ The financial year of 2024 covering the period from January 1st, 2024, to December 31st, 2024.

⁴ EC guidelines and supplement on non-financial reporting

⁵ ESMA European common enforcement priorities 2018

⁶ ESMA European common enforcement priorities 2019



PART I. GENERAL INFORMATION

1. BCSA's purpose and mission

The Banks's value proposition enables a fast and cost-effective way for the clients to make and receive local and cross border payments. BCSA's clients can access clearing mechanisms / payment methods being accompanied by a wide range of local pay-out and collection capabilities. The Bank's mission remains at its forefront, to deliver a multisided platform utilising new technology and network to provide core banking services.

2. Business model and ESG approach

BCSA offers next generation treasury and liquidity management services. The Bank offers cuttingedge physical and virtual accounts in multiple currencies. The Products and Services include Accounts, Payments, Foreign Exchange, Treasury Management, Agency Banking, and Correspondent Banking.

BCSA's significant customer groups are Non-Bank Financial Institutions (NBFIs), Banks, and Corporates.

2.1 Business model

The Bank is a global scale financial utility supporting the payment service propositions of its clients and their customers. It offers business-to-business payment solutions which have been specifically created to meet the needs of businesses who trade globally. These clients consist of a wide spectrum of financial institutions (including card acquirers, payment service providers (PSPs), alternative payment method providers and FX payment providers). The Bank's clients provide business activities qualifying as payment services and thus in turn qualifying as financial customers.

The Bank is directly and indirectly participating in various payment clearing schemes and to provide clearing – in the context of payments – and is the core service of the Bank's business model. This is done by providing clients with access to a global account infrastructure where they can perform local payments in different currencies globally and have local accounts in many parts of the world thus using the clearing mechanisms as if it were a direct member. Moreover, the Bank provides access to clearing mechanisms including Single Euro Payments Area (SEPA), TIPS, RTGS, Faster Payments, Clearing House and Payment Service (CHAPS), and via the usage of SWIFT. Simultaneously providing a sophisticated reconciliation process e.g. inflows from both Payment Service Providers and credit card schemes are collected on the same accounts and reconciled conveniently before settling to merchants. The Bank's business activities cover payments, currency conversions (FX), as well as deposit accounts. These activities form the Bank's core business lines.

2.2 Approach to ESG

BCSA recognises that operating in financial services involves exposure to ESG risks. While these cannot be fully eliminated, the Bank aims to manage them proactively. Materialisation of ESG risks can have reputational, regulatory, and financial consequences and the Bank views ESG risk management as a component of the long-term resilience.



2.2.1 ESG Policy

During 2024, the Bank established an Environmental, Social, and Governance (ESG) Policy. The Policy was approved by the Board of Directors on 8 January 2025, and it applies to the Bank, including its branches and subsidiaries. The Bank's ESG Policy sets out the commitments, principles, and overall responsibilities regarding the identification, measurement, assessment, monitoring, and management of ESG matters, and aligns with the relevant regulatory requirements.

The ESG Policy forms part of BCSA's Risk Management Framework, as well as high-level principles for risk identification, management, mitigation, and reporting. It sets out the overarching principles and Risk Appetite Statements that must be integrated in the Bank's processes in managing ESG risk in its various activities.

2.2.2 Implementation of ESG Policy

The implementation of the ESG policy started in 2024. The core processes where changes were being made include Credit & Treasury Process, Third Party Risk Management, Client on-boarding, and Product Approval Processes. The changes are expected to be fully rolled out over the course of 2025.

2.2.2.1 Credit & Treasury Process

The Bank has integrated ESG considerations into its credit and counterparty risk assessments to identify and mitigate potential environmental, social and governance related risks. BCSA leverages on risk scores extracted from credit rating agencies to ensure its sufficiently covered. This forms part of its internal approval processes and are reviewed as part of the periodic credit reviews.

2.2.2.2 Third Party Risk Management Process

The Supplier Code of Conduct (SCoC) was established to ensure the Third-Party Risk Management process aligns with the ESG Policy. The SCoC requests all suppliers to acknowledge and adhere to its content. If a supplier is unable to sign the Code of Conduct, the Bank will actively engage with the supplier to understand where they might face challenges in meeting the BCSA SCoC.

The Bank will not automatically reject onboarding of new suppliers or off-board existing suppliers due to non-adherence to the Code of Conduct. Rather, the approach is to work with the suppliers and encourage them to strive to meet these standards over time. However, repeated failure or intentional negligence in meeting these standards may result in termination of the relationship.

The Bank will avoid establishing business relationships with stakeholders that do not have any intention to meet the Bank's standards.

The Bank shall monitor the ESG profile of suppliers by applying internal risk scoring based on answers provided within the due diligence process, this process will be reviewed on a periodic basis, based on the supplier's criticality and categorisation.

2.242.2.3 Client Onboarding Process

Targeted ESG related questions have been integrated to the client onboarding and due diligence process and will be fully rolled out in 2025. These questions are then assessed and risk scored to provide the Bank with insight into how its client portfolio is impacted by ESG. The Bank will ensure



that new and existing clients are aligned with its sustainability standards and reflect similar business practices. All clients will be assessed as to whether they meet the Bank's minimum ESG standards before initiating any business relationship.

Clients not initially meeting ESG standards will receive guidance to improve alignment. Consistent non-compliance or failure to meet these standards may result in the reassessment of the relation-ship, including potential termination of the relationship.

The Bank shall monitor the ESG profile of clients by applying internal risk scoring based on answers provided in the due diligence processes; this process is reviewed on a periodic basis, based on the clients' categorisation.

2.2.2.4 Product Approval Process

The Bank considers ESG risks as part of the development and approval for any new product and as part of the periodic risk review process.

3. Double Materiality Assessment

In the summer of 2024, the Bank carried out the first Double Materiality Assessment ("DMA") in accordance with the ESRS guidelines. Since the EU Omnibus package launched in February 2025, the Bank is no longer in scope of the first wave of CSR Directive reporting obligations. While Double Materiality is not a mandatory concept for NFRD reporting, BCSA decided to consider the DMA results as the basis for the 2024 reporting.

Prior to defining the DMA, BCSA engaged with an external company to ensure expertise in the area. Furthermore, resources were allocated from different departments of the Bank including Finance, Risk, Governance, Compliance, People, and Marketing.

The purpose of the Double Materiality Assessment was to evaluate all relevant and material ESG topics, and the Impacts, Risks, and Opportunities as well as the financial effects of these.

3.1 DMA results

The assessment showed a high impact on the Social and Governance topics. On the social elements, it was concluded that BCSA would have a positive impact by continuing to focus the work on own workforce but also by ensuring the social aspects are incorporated in the value chain with suppliers and clients.⁷

The materiality assessment also concluded that BCSA should continue to focus on good business conduct, both internally and towards its clients and partners.⁸

⁷ For further details, see Part II, 2 Social.

⁸ For further details, see Part II, 1. Governance.



The table below summarises the outcome of the materiality per topic, as well as the combined DMA result. Only the Very high and High materiality topics are considered material for BCSA.

Materiality legend			
Very highly material			
Highly material			
Medium material			
Low materiality			

Double Materiality Assessment Results		Assessment		
Торіс	Subtopic	Impact	Financial	DMA result
	Climate change adaptation			
Climate change	Climate change mitigation			
chinate change	Sustainability goals			
	Energy			
Circular economy	Waste			
Own workforce and workers	Working Conditions			
in the value chain	Equal treatment and opportunities for all			
in the value chain	Other work-related rights			
Consumers and end- users	Security of services for partners and clients			
consumers and end- users	Social inclusion of partners and/or clients			
	Corporate culture			
Business Conduct	Business Etichs			
Business conduct	Prevention and detection of corruption and bribery			
	Data Security			

3.2 Looking ahead

The Bank believes that the results from the DMA are reliable in the short- (<1Y) and medium term (1-5Y)⁹. That said, the Bank foresees the need to enhance transparency and demonstrate a more robust assessment process in the longer term.

PART II. ENVIRONMENTAL, SOCIAL AND GOVERNANCE (ESG) PERFORMANCE

1. Governance

1.1 Governance Framework

The management bodies of the Bank are constituted of the Board of Directors, management body in its supervisory function and the Executive Committee, management body in its executive function, with support from the relevant sub-committees.

⁹ The Bank recognises that while the results seem plausible for the short to medium term, the regulatory and market sentiment could change rapidly, thus the Bank undertakes the materially assessment accordingly and on at least biennial basis to ensure the results are constantly reflecting the most accurate picture.



Please refer to the Pillar 3¹⁰ Report, for a detailed description of the organisation, the Board of Directors, and Executive & Operational committees, which is publicly available on the BCSA website.

1.1.1 Suitability assessment of the Management Body and Key Function Holders

BCSA has defined a Suitability Assessment Policy the primary objective of which is to ensure suitability of members of both the Board of Directors and the Authorised Management as well as the key functions holders both when they are initially appointed but also on an ongoing basis. Suitability assessment ensures the management body is collectively diverse, experienced, and knowledgeable.

Suitability Policy governs the elements of the requirements for the position, recruitment, initial and ongoing assessment of skills, as well as the notification to and approval from (where applicable) of the Supervisory Authority.

1.1.2 Remuneration

BCSA has a Remuneration Policy in place which sets out the remuneration practices and procedures applicable to the Bank. The Policy promotes sound and effective risk management, through measures that do not induce excessive risk taking. Furthermore, it ensures alignment with, and support of, BCSA's corporate culture and values, as well as with its long-term interests, including environmental, social, and governance risks.¹¹

1.1.3 Policies and procedures

BCSA has a robust policy framework in place. While an ESG Policy has been put in place and will be fully implemented during 2025, several other policies have been updated to incorporate ESG topics as listed in the below table:

ESG Policy	Remuneration Policy
Supplier Code of Conduct	Suitability Assessment Policy
Anti Bribery and Corruption (ABC) Policy	Employee Handbooks
AML&CTF Policy	Code of Conduct
AML&CTF Risk Appetite Policy	Whistleblowing Policy
Privacy Protection Policy	Diversity, Equity and inclusion
Risk Appetite Policy	Modern Slavery Act Statement

Scope and Maintenance of Policies

BCSA's Policies are applicable to all members of staff of BCSA, including the employees of the branches and subsidiaries, and external personnel acting on behalf of the Bank, e.g. directors, employees, working students, consultants, and contractors.

¹⁰ Please note the Pillar 3 disclosure is made at the parent level - Moneyball BidCo S.a.r.l. - of BCSA

¹¹ Detailed description of Remuneration in BCSA can be found in the Pillar 3 Report.



As a rule, all BCSA Policies shall be followed by each legal entity as a minimum standard in the absence of any or stricter local requirements concerning the topic of the individual Policy.

It is the responsibility of each manager within the Bank to ensure that all Policies are known and adhered to within his/her respective area of responsibility.

Each Policy is reviewed at least on an annual basis or when any significant change occurs, including changes in relevant laws or regulations, and is subject to approval of the Board of Directors of BCSA.

All Policies are available to all employees via internal communication channels.

1.2 Impacts, Risks, and Opportunities

BCSA is committed to maintain high standards of ethics, integrity, and accountability, and maintain a robust governance structure to oversee its integration of ESG risks, including climate and social risks, into the risk management framework in compliance with the EBA guidelines. Strong governance practices are central to the Bank's operations, ensuring integrity, accountability, and alignment with stakeholder expectations. The governance risk appetite reflects the importance of transparency and ethical conduct, the Bank has zero appetite for unethical practices, including corruption, bribery, and data breaches.

Furthermore, the Bank ensures its stakeholders, including third-party suppliers and clients, meet the standards and ambitions as described in the SCoC (from 2025) and on-boarding criteria.

Impacts

The Bank's Impact assessment highlighted that strong governance practices are essential for an ethical business conduct and stakeholder trust. One key finding was that strengthening BCSA's existing policies, e.g. Anti Bribery and Corruption Policy, can have a positive material impact, particularly in building a culture of integrity across all levels of the organisation.

Risks

The Financial materiality assessment confirmed that a robust governance and data security framework is important in reducing risk exposure. Effective governance reduces the likelihood of costly incidents related to non-compliance, data breaches, or unethical conduct.

The Financial impact of lapse in ethical conduct is measured through the monetary amount lost because of legal proceedings associated with fraud, insider trading, anti-trust, anticompetitive behaviour, market manipulation, malpractice, or other related financial industry laws or regulations. BCSA adheres to internal guidelines to avoid this through its operational conduct.

Opportunities

Continuous improvement of the data governance practices is considered an opportunity. Accurate and well-managed data can support better decision-making, enhance operational efficiency, and reduce compliance risk.



1.3 Metrics

Anti-corruption	KPI (2024)	KPI (Target)
% employees who have completed training on anti-corruption	100%	100%
% employees to complete yearly AML training	100%	100%
Number of convictions for violation of anti-corruption and anti- bribery laws	0	0
Number of fines for violation of anti-corruption and anti- bribery laws	0	0
Number of confirmed incidents in which own workers were dismissed or disciplined for corruption or bribery-related incidents	0	0

1.4 Governance areas

1.4.1 Data Security

BCSA maintains a comprehensive, dynamic, and robust privacy protection framework under the control of a designated Data Protection Officer to ensure compliance with all legal obligations pertaining to data privacy across all jurisdictions where the organisation operates.

Full details are provided in the Bank's privacy notice and maintained in the Privacy Policy.

1.4.2 Anti-Bribery and Corruption (ABC)

It is of utmost importance to the Bank that there is a clear anti-bribery and corruption awareness throughout the organisation. This is done through mandatory yearly training courses, applicable to all employees, and by reviewing the policies at least on annual basis and making them available to all staff on the intranet.

ABC Policy Statement

All employees have the responsibility to actively avoid and prevent incidents of bribery involving BCSA, its employees, and any persons or organisations associated with or acting on behalf of BCSA.

Commercial considerations shall never be permitted to take precedence over BCSA's anti-bribery and corruption commitments.

BCSA also takes into consideration ABC standards with respect to onboarding and maintaining of client relationships. In accordance with the Policy on AML and CTF, BCSA has developed a Country Risk Matrix to classify the risk of money laundering and terrorist financing regarding payments to and from territories.

How BCSA prevents, detects, and addresses allegations or incidents of corruption or bribery:

- By requesting all employees to complete a mandatory training on annual basis, and
- By providing gift/hospitality reminders on regularly basis.



Impact of Anti-bribery and Corruption Policy

The approach is risk based and subject to objective standards using the following indexes:

- EEA (European Economic Area) countries and equivalent third countries
- FATF (Financial Action Task Force) list of non-cooperative jurisdictions and improving jurisdictions
- EU Commission's list of high-risk third countries
- UK's list of high-risk countries
- Corruption Perceptions Index of Transparency International
- EU's and OFAC's (Office of Foreign Assets Control) list of sanctioned countries
- The Basel AML Index
- The FFP's Fragile States Index
- Financial Secrecy Index of TJN
- The OECD's (Organisation for Economic Co-operation and Development) Tax Transparency Index

The use of these indexes is intended to create a balanced assessment of risks involving money laundering, terrorist financing, tax evasion, corruption, and general risks associated with fragile countries.

Risks associated with bribery or corruption

Risk: Failure to detect and protect against bribery and corruption in relation to employees, associated parties and client base (i.e., by receiving or demanding payments or gifts in exchange for preferential treatment, the acceptance of gifts meant to influence third parties).

Consequences: Corruption scandals can severely damage the Bank's reputation, leading to loss of trust among clients, partners, and stakeholders. This can result in decreased business opportunities, loss of contracts, and difficulties in attracting new clients or investors.

Risk mitigation measures: BCSA has policies and procedures in place for how much gift and entertainment can be received from clients and vice versa. In addition, bribery of civil servants is illegal and in the UK the UK Bribery Act is broader in scope. As consequence if BCSA or one of its employees is associated with bribery or corruption, and BCSA are seen not to have any effective framework in place, the Bank could potentially be penalised/fined.

1.5 Initiatives in 2024

During 2024, the Bank implemented a comprehensive strategy to comply with the Digital Operational Resilience Act (DORA) including a root and branch review of the ICT Risk Framework, supporting processes and documentation resulting in significant re-alignment and convergence. In addition, BCSA was successfully attained the ISO27001 security standard.

For 2024, the Bank has improved its data collection process as going more towards automatic collection. Part of this is done with better registration in the Bank's ERP systems and local responsibilities for data collection. This has also contributed to improved calculations of CO2 emissions.



1.6 Looking forward

In 2025, the key focus for BCSA will be to continue executing on the implementation of the ESG topics elaborated on the Bank's policies, with key focus on ensuring compliance with all local laws and regulations, especially in relation to the AML, anti-corruption, and anti-bribery topics.

Initiative	Implemented by
Enhance existing policies and strengthen internal processes, where necessary	On-going
Implementation of targeted ESG related questions integrated to the client onboarding, the prod- uct approval, credit-, Third Party Risk Management- and due diligence processes	2025
Continue to align with the regulatory framework and ESG reporting requirements, for example CSRD implementation if/when relevant for Banking Circle S.A.	2027

2. Environment

The materiality of Climate change is considered *low or immaterial* for BCSA, supported by the Bank's low direct environmental impact, and the nature of stakeholder concerns that prioritise financial and governance-related disclosures over specific environmental ones. The Double Materiality Assessment completed in 2024, as well as the Assessment of CSSF 21/773, supports this conclusion.

While BCSA does rely on third-party providers for cloud infrastructure and related services, its supplier risk management processes ensure that partners comply with regulatory and operational standards.¹² This reduces the likelihood of material environmental risks arising from external service providers. During 2025, the Bank will further improve the registration and reporting on this.

In 2024, the Bank has strengthened its focus on the environmental areas and will continuously be developing its framework to facilitate the implementation of Environmental commitments.

2.1 Environmental Framework

BCSA has an Environment, Social and Governance Policy, which captures environment and climate related risks. The Bank is in the process of implementing the Environmental aspects as part of the below policies and Internal guidelines related to managing the impacts, risks, and opportunities. The most significant supporting policies and procedures are the Code of Conduct, Risk Appetite Policy, and Supplier Code of Conduct.

2.1.1 Environment in BCSA ESG Policy

BCSA's ESG Policy sets out the Bank's commitment to Climate and Environmental Risks.

The Bank's commitment to sustainability is central to its mission to promote responsible operations, financial inclusion, and long-term value creation for its stakeholders.

¹² <u>Supplier-Code-of-Conduct.pdf</u> and <u>ISO27001-Certificate.pdf</u>.



The Bank acknowledges that environmental risks, while not currently material to its core business operations, may pose long-term challenges to its strategy. The risk appetite for environmental factors reflects a commitment to compliance, operational sustainability, and proactive risk management.

The Bank must ensure that climate related risks are considered as part of its core processes¹³, including but not limited to credit and counterparty risk assessments, treasury processes, third party risk management, product approvals, and client onboarding. This will ensure that the risks are managed and monitored.

Our Commitments

The Bank maintains its commitment to comply with environmental regulations across its jurisdictions and will ensure it adheres to the applicable laws.

The Bank strives to reduce risks associated with its environmental footprint, aiming to identify and implement improvements in operations where feasible.

This includes any acute and chronic risks that could disrupt economic activities or impact business value, and mitigation measures shall be adopted to minimise vulnerability.

The Bank strives to reduce the risks for systemic changes related to climate transition, provided these risks align with strategic opportunities for long-term sustainability and growth.

2.1.2 CSSF Circular 21/773 Assessment

In alignment with CSSF 21/773, BCSA conducted an assessment to determine the materiality of ESG risks within its existing risk universe. This assessment aimed to integrate ESG considerations into the Bank's established Risk Management Framework.

The Bank utilised its existing risk management tools—such as its risk matrix and methodology—to evaluate ESG risks in relation to traditional risk categories, including credit, market, liquidity, and operational risks. This approach ensured that the ESG risk assessment was not conducted in isolation but embedded within the broader risk governance structure and assessed using the same metrics as the other risks, giving account for the Bank's risk appetite.

The Bank's materiality determination followed a structured risk-based approach by mapping ESG related risks to risks in the Bank's risk universe, ensuring a direct link between ESG factors and financial or operational impact. Using the established risk assessment methodology, this measured significance of ESG risks through likelihood and impact scoring, like the Bank's traditional risk assessments.

The Bank documented the ESG risk assessment process, providing justifications for materiality determinations and conclusions, and thus also supports regulatory compliance and internal decisionmaking.

¹³ ESG requirements, as set out in the Bank's policy, will become operational in 2025.



2.2 Impacts, Risks, and Opportunities

The Bank has minimal direct exposure to physical climate risks, given the absence of own physical data centres. The Bank's primary exposure stems from indirect risks through its value chain.

The Bank primarily serves financial institutions and payment service providers, which typically have lower direct environmental risk exposure compared to other sectors. However, the Bank acknowledges that its clients' environmental practices and industry exposures could introduce indirect risks. In other parts of the value chain, the indirect risk is also through the Bank's suppliers. Future risk assessments will place greater emphasis on evaluating these indirect exposures within the value chain to ensure a comprehensive understanding of potential impacts.

Transition Risk

Transition Risk is primarily focused on the possible financial loss that can result, directly or indirectly, from the process of adjustment towards a lower-carbon and more environmentally sustainable economy. This could occur through an abrupt adoption of climate and environmental policies, technological progress or changes in market sentiment (i.e. future capital impacts), regulatory changes, changes in client requirements, and/or impacts of partners, and preferences for which the Bank has not foreseen or catered for (i.e. changes in Third Party and Client preferences). That said, BCSA has embedded changes into its core processes to address the key risk categories with a lens focused on the transitional risks for each of these areas.

Physical Climate Risk

The most prominent financial impact of a changing climate, including more frequent extreme weather events and gradual changes in climate, as well as of environmental degradation, such as air, water, and land pollution, water stress, etc, is in the chronic form i.e. meaning permanent deterioration in ESG target achievement with lasting adverse effects on its economic activities. This could include the risk that damage to property or reduced productivity, or indirectly lead to subsequent events, such as the disruption of supply chains. The latter would be the biggest concern for BCSA. That said, over the reporting period, BCSA has embedded changes to its core processes to address the key risk categories with a lens focused on the physical risks for each of these areas.

2.3 Metrics

BCSA's environmental metrics cover energy usage and GHG emissions for scope 1,2, and 3.

BCSA is currently not able to determine the amount of waste produced in its locations. However, as the waste produced is mainly in the category of "household waste", this is not currently considered a major issue. The Bank is also taking reasonable action to sort and recycle waste in all its locations.



2.3.1 GHG emissions

Sources and categories

Scope 1 Direct emissions	Scope 2 Indirect (Energy)	Scope 3 Indirect (Other)
	Consumption of purchased electric power and heat steam: Electricity, District Heating, Electric cars	Purchased goods & Services
		Fuel & Energy-Related Activities
Mobile combustion: Diesel, Gasoline, Hybrid		Business travel
		Employee Commuting
		Third Party Provider

Scope 1 consists of BCSA's direct emissions. In 2024, the emissions consist of emissions of the company cars.¹⁴ The Bank does not have other direct emissions, e.g. from production.

Scope 2 consists of BCSA's indirect emissions from energy usage. In 2024, the emissions consist of emissions from the consumption of purchased or acquired electricity and district heating. This includes energy used in the offices, energy used for company owned electric cars, and district heating in the Danish office premises.

Scope 3¹⁵ consists of BCSA's indirect emissions from other categories than energy. In 2024, the emissions consist of emissions from purchased goods & services, fuel- and energy-related activities (not included in scope 1 or scope 2), business travel (including hotel stays, rental cars, taxis, flights), employee commuting, and emissions of the Bank's biggest third-party provider.¹⁶

Methodology

BCSA's GHG emissions are calculated by an external provider. The Bank provided data either activity based (usage) or spend based (costs). The GHG emissions were calculated in line with the requirements of the GHG Protocol¹⁷ which is the industry recognised standard for calculating GHG emissions.

Total GHG emissions

In 2024, BCSA improved the data collection for calculating the GHG emissions.

¹⁴ Company owned cars or long-term leased vehicles where the Bank carries the costs

 $^{^{\}rm 15}$ See appendix 1 for GHG emission categories

 $^{^{\}rm 16}$ See appendix 2 for methodology on GHG emissions

¹⁷ <u>GHG Protocol</u> was developed by the World Business Council for Sustainable Development (WBCSD) in collaboration with the World Resources Institute (WRI)



The GHG emissions for FY24 are calculated based on more precise and complete data which means the data is not comparable to previous years.

Metrics (2024)	Value FY24
GHG emissions – Scope 1 (tons CO ₂ e)	12
GHG emissions – Scope 2 Market Based (tons CO2e)	126,7
GHG emissions – Scope 2 Location Based (tons CO2e)	133,1
GHG emissions – Scope 3 (tons CO2e)	2447 ¹⁸
Total GHG emissions (Scope 1, 2 and 3) (tons CO_2e)	2592
Total GHG emissions (Scope 1, 2 and 3) (tons CO_2e) per employee (total of 657 employees)	3,95

2.3.2 Employee Commuting

BCSA conducted an internal survey on employee commuting patterns and means of transportation in 2024 which was send to 10% of the workforce¹⁹ in the beginning of 2025. The sample was chosen so it represents the geographical set-up of the Bank and is representative of the whole workforce.

The results are disclosed in the table below. Based on the survey 82,41% of the Bank's employees commute to work by public transport, on foot or by bike. Less than 10% are commuting using a diesel or petrol-based car.

GHG emissions from the Employee Commuting are part of total scope 3 GHG emissions.

Means of Transportation for Commuting 2024	Percentage
By car (diesel)	3,97%
By car (petrol)	5,28%
By car (electric)	5,66%
By car (hybrid)	2,68%
Public transport	74,78%
On foot or by bike	7,63%

2.3.3 Energy Consumption²⁰

Electricity ²¹	Value FY24
Total energy consumption (MWh)	409,2
Total energy consumption from renewable sources (MWh)	169,7
% Energy consumption from renewable sources (MWh)	41%

¹⁸ Scope 3 emissions include data from external data provider + emissions from third party provider

 $^{^{19}}$ HR department chose 10% of the workforce which is representative for the entire organisation

 $^{^{\}rm 20}$ For more details of Energy Consumption, see Appendix 3 1 Energy Consumption

²¹ In 2024, the energy usage is reported for the following offices: Luxembourg, Liechtenstein, Denmark, Germany (Munich), Germany (Regensburg), UK and Singapore. The Australian office is a shared office set-up with net-zero emissions, and it was not possible to collect the exact energy use for the Bank's activities.



Heating	Value FY24
Total district heating consumption (MWh) ²²	530
Total district heating consumption per employee in CPH Office (MWh) ²³	1,62

2.4 Environmental areas

2.4.1 EU Taxonomy

By being subject to the Non-Financial Reporting Directive (NFRD), the Bank must disclose information related to the EU Taxonomy in its non-financial reports.

The EU Taxonomy Regulation provides a common framework for classification of environmentally sustainable economic activities, which can assist companies in reporting their alignment with sustainable practices in accordance with the NFRD requirements.

For more information and reporting in accordance with the taxonomy framework, see appendix 4.

EU Taxonomy eligibility analysis

Financial Activities	Status as per 31/12/2024	Note
Loans and advances activities	Not eligible	BCSA does not offer traditional lending and has per 31/12/2024 no loans and advances other than to credit institutions, which are considered out of the eligibility scope defined by the EU Taxonomy.
Investments	Not eligible	BCSA mainly invests in government bonds which are considered out of the eligibility scope defined by the EU Taxonomy. As per the EU Taxonomy Navigator, intra-group investments are not considered as potential eligible activity.
Fees and commissions	Not eligible	As mentioned in the EU Taxonomy delegated act, as of January 2026, credit institu- tions will be required to provide alignment of their trading book, and fees & commis- sions for non-banking activities. As of now, BCSA's fees and commissions are considered out of scope.

2.5 Initiatives in 2024

The Bank recycles in all its locations and encourages the employees to bring forward initiatives that can lower consumption or minimise waste. In 2024, the Bank's initiatives included:

- Reduction in the use of plastic bags.
- Change of the office set-up in the Bank's offices in London and Luxembourg. The old monitors were either granted to employees for home offices or given to charity.
- The Bank planted trees as a part of the employees' Christmas gifts.

²² Only separate district heating in the Danish office.

²³ Danish office had a total of 328 employees at end of 2024



Integration of Climate and Environmental considerations into the product approval process

In 2024, BCSA entered a new market by the issuance of the Eurite stable coin (EURI) under MiCAR ²⁴, as part of the product approval, it was risk assessed to have a low environmental impact.

The blockchain technology (ETH, BSC), selected for the initial issuance of EURI, uses a Proof of Stake and Proof of Stake Authority consensus mechanism for transaction verification.

Proof of stake (PoS) is a consensus mechanism used in blockchain networks as an alternative to proof of work (PoW). PoS relies on validators holding a certain amount of cryptocurrency to secure the network and validate transactions, as opposed to the energy-intensive mining process used in PoW.

Compared to PoW, PoS has a much lower environmental impact²⁵. PoW requires miners to solve complex mathematical problems using large amounts of computational power, which consumes a significant amount of electricity. This has led to concerns about the environmental impact of PoW, as it contributes to greenhouse gas emissions and climate change.

In contrast, PoS requires much less energy to operate, as validators are not required to perform complex calculations. This means that the environmental impact of PoS is significantly lower than that of PoW. Additionally, some PoS networks have implemented various sustainability measures, such as using renewable energy sources or carbon offsets, to further reduce their environmental impact.

2.6 Looking forward

As the ESG framework continues to evolve, the Bank acknowledges that it is still learning about its environmental impact and associated risks.

Although the current assessment identifies environmental factors as non-material, the Bank is committed to refining its approach to align with the dynamic nature of climate-related risks and regulations. BCSA remains committed to proactively identifying climate-related activities that could influence future materiality considerations. This includes refining risk assessments, adapting governance structures, and continuously monitoring regulatory developments to ensure alignment with evolving sustainability expectations.

Initiative	Time frame
The Bank will purchase renewable energy for its UK office	From 2025
The Bank will work on adapting initiatives to lower energy consumption throughout the organisa- tion during 2025	From 2025
The Bank will improve its data collection for GHG emissions	From 2025

²⁴ Markets in Crypto-Assets Regulation (MiCA).

²⁵ As argued in among others: What Is Difference Between PoW and PoS In Detail? \rightarrow Question



3. Social

3.1 Social Framework

Social risks form part of BCSA's wider business and include focus on equality, social integration, and diversity matters. These are managed through the various policies already in existence, as well as the Bank's Employee Handbooks and Code of Conduct.

3.2 Impacts, Risks, and Opportunities

Social factors are material to the Bank's business and integral to fostering a sustainable, inclusive, and ethical operating environment. The risk appetite prioritises equity, ethical practices, and is overall focused on stakeholder alignment. The Bank is committed to continue to invest in its workforce and ensure staff are supported, both in personal and career ambitions, within the HR policies, including its Diversity and Inclusion (DEI) Policy.

The result from the Impact assessment highlighted a positive material impact on the implementation of the current DEI Policy as well as continuous initiatives to promote equal treatment and opportunities for all employees.

In general, the Impact assessment confirms that all initiatives, that the Bank currently is implementing and future implementations for all work-related rights both for BCSA's own employees and for workers in the value chain, are material with a positive impact.

BCSA has a continuous high focus on securing its services for partners and clients by further improving the aspects such as cybersecurity measures, fraud prevention, and maintaining the confidentiality and integrity of transactions. This is the backbone of the Bank's business and the trust it has built with its clients.

The Impact assessment also showed a positive material impact if BCSA would consider providing services for all demographic groups, support for underserved geographical areas, and to promote financial inclusion. BCSA will enter the demographic areas that align with its business model but not engage in business with a charity like purpose.

Even though BCSA acknowledges the importance of continuously working and improving in these areas, none of the social risks or opportunities were assessed to have a material financial impact.

3.3 Metrics

3.3.1 Social

BCSA employees

In end of year 2024, BCSA had a total of 657 employees across all locations. The Bank continuously works on having a good environment for its employees for the benefit of the well-being among its



colleagues. The Bank ensures that its employees always can raise their concerns either to management or anonymously through its whistleblowing channel²⁶.

Employee survey

The Bank conducts the employee engagement survey on an annual basis to ensure it get information on, and can assess, the general state as voiced by its employees. The Bank has once again seen a slight increase in the overall score, which has moved from a score of 7.9 to 8.0²⁷ on a 1-10 scale. This increase continues a trend of increased satisfaction over the past three years as the Bank continues to be slightly above the Industry Benchmark.

The Bank's overall Employee Net Promoter Score (eNPS)²⁸ for 2024 is 42.0 which is also above the Industry Benchmark of 23. The high eNPS indicates that the Bank has a satisfied and loyal workforce in a positive workplace culture with highly engaged employees who act as promoters for BCSA as employer.

Reporting time	Employee Net Promotor Score	Satisfaction Score	Industry Benchmark FY24 ²⁹	
Feb/23	-	7.7	Employee Net Promotor Score (eNPS)	23
Feb/24	37.0	7.9	Satisfaction score (Engagement)	7.8
Feb/25	42.0	8.0		

The average employment time for the Bank's employees at the end of 2024 is 32 months (2,7 years).

3.3.2 Diversity, Equality, and Inclusion

BCSA follows its commitments laid out in its DE&I Policy by monitoring certain central indicators related to Diversity, Equality, and Inclusion.

Overall, Gender split			
Year	Female	Male	Other
2023	37%	63%	0%
2024	37%	63%	0%

The overall gender split of the Bank, across all the seniority levels, is shown in the table.

Diversity of Management

When the gender split is considered for managers, the representation is slightly tilted towards higher number of men in the management positions. However, it is to be noted that considering the higher overall percentage of male workforce across the seniority levels the representation of wom-

- Promoters (score 9-10): Highly engaged and satisfied employees.
- Passives (score 7-8): Moderately satisfied but not enthusiastic.
- Detractors (score 0-6): Unhappy employees who may negatively impact the company's reputation.

²⁶ This is informed via information on the intranet – webpage and in the yearly mandatory training.

²⁷ The employee satisfactory survey was launched in January 2025 and results were launched in February 2025.

²⁸ The eNPS is calculated by subtracting the percentage of Detractors from the percentage of Promoters

Survey Question: Employees are asked, "On a scale of 0 to 10, how likely are you to recommend the organisation as a place to work?"

Scoring: Based on their responses, employees are categorised into three groups:

²⁹ The Benchmark is provided by the Employee Survey Vendor. It is an "industry benchmark," meaning measurements that the Employee Survey Vendor has conducted for companies within the banking/finance sector globally, based on surveys their customers conduct.



en/other is more or less aligned and women make 32% of all managers of the Bank compared to 37% of the whole workforce.

Gender split - Overall Management level			
Year	Female	Male	Other
2024	32%	68%	0%

The statistics slightly change when gender diversity is considered on C-suite³⁰ level.

C-suite (FTE) employees		
Year	2024	2023
Total number of C-suite (FTE) employees	15	15
Number of women C-suite (FTE) employees	2	3
% women in C-suite positions	13%	20%
% men in C-suite positions	87%	80%
% other in C-suite positions	0%	0%

Males also hold more of the Executive level positions, both on the level Authorised Management and the Board of Directors. The below table details the current composition of the Authorised Management and Board of directors of BCSA.³¹

Metrics BCSA		
Year	2024	2023
Total number of employees in Authorised Management	3	3
% women/other in Authorised Management	0%	0%
Total number of Board of Directors	4	4
% independent members of Board of directors (target min 1 member)	50% (25%)	50% (25%)
Board members responsible for ESG matters	1	1
% women/other in Board of directors	25%	25%

For the Bank's subsidiaries, the statistics are as follows:

Liechtenstein (Bank) Subsidiary 2024	Metrics
Total number of employees in Executive Management	3
% women/other in Executive Management	67%
Total number of Board of Directors	4
% independent members of Board of directors	25%
% women/other in Board of directors	0%

³⁰ C-suite employees are those employees who report directly to Authorised Management or are Authorised Managers (3 in 2024).

³¹ These statistics do not include the numbers for the subsidiaries of BCSA.



Australia and Singapore (Payment Institutions) subsidiaries 2024	AU ³²	SG ³³
Total number of Directors	2	2
% women/other of Directors	0%	0%

Promotions

Promotions of both genders follow the same percentual split that the overall split on managerial level.

Gender split – Promotions				
Year	Female	Male	Other	
2024	31%	69%	0%	

New Hires and Leavers

The Bank sees on its external applicants in 2024, that it has a split of 62,4% men, 36,4% women, and 1,2% unknown³⁴ who apply for an open position with BCSA. The number of female applicants rose from 2023 when the split was 70% men and 30% women. In 2024 Bank increased its efforts and initiatives in the area, e.g. by ensuring the job ads to be gender neutral.

In 2024, there was a slight increase in number of women hired.

New joiners %			Leave	rs %			
Year	Female	Male	Other	Year	Female	Male	Other
2023	35%	65%	0%	2024	36%	64%	0%
2024	37%	63%	0%				

In 2024, the Bank's voluntary turnover on a 12-month rolling scale was 7,20%.

Internal hiring

BCSA has an established internal procedure which outlines specific guidance and expectations on internal hiring and mobility. The Bank wants to cater for internal growth and career opportunities across the organisation and engages employees in seeking new career opportunities internally.

Diverse cultural and educational background and age split

The Bank aims to have a broad range of employees in relation to age and education, which is reflected in the Bank's Overall Age Split and the Educational Level of employees. The Bank will always hire the best candidate for the position, though in some cases, experience surpasses educational level, in other cases it is the opposite.

Age Split FY24		
Age	%	
<30	25.0	
30-50	66.8	
>50	8.2	

³² Australian entity has a payment institution license.

³³ Singaporean entity has payment institution license since April 2025 and therefore not required to have local Authorised management. ³⁴ Unknown applicants are those who does not wish to disclose their gender, identify as something else than male/female or a few who



BCSA is proud to have a truly diverse workforce with employees from all around the world. At the end of the year 2024, the Bank's had employees from 58 different nationalities, the most common nationalities being 1. Danish, 2. British, and 3. Indian.³⁵



Top 10 nationalities



³⁵ Considering Copenhagen office is the biggest office with 358 employees and London office on a 2nd place with 170 employees, 1st and 2nd place were as expected.



3.4 Social areas

3.4.1 Corporate Social Responsibility

In BCSA's Code of Conduct Policy, the Bank describes its due diligence related to Corporate Social Responsibility and respect of human rights.

BCSA strives to be a good and reliable corporate citizen and contribute to a sustainable development. BCSA supports universally recognised human rights and is accountable for ethical and environmental issues within the business. BCSA seeks to contribute to sustainable economic growth, avoiding any unnecessary negative impact on the environment.

BCSA has been engaged in the OPU program³⁶ for almost 10 years. The Bank is not only proud of offering this program that gives young people engaging in this an opportunity to work and live abroad in their first year after high school – the Bank has certainly experienced that this is a mutual win-win. The OPU's are employed in the Bank's Luxembourg and Munich locations.

Beside this, the Bank has hired student assistants at its locations in Germany, UK, and Denmark.

3.4.2 Diversity and Inclusion

Diversity and Inclusion Policy

BCSA is committed to encourage and promote equality, diversity, and inclusion in the workplace and will create and support a working environment free of bullying, harassment, victimisation, and discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all employees are recognised and valued.

BCSA is committed to recruiting, promoting, and compensating employees based on merit and performance only. Equal opportunity for all employees and applicants is deemed critical to successful recruitment and career development. The Bank consequently strives to develop an organisation where employees with different background, knowledge, experience, perspective, and belief can all realise their full potential. Hence, the Bank ensures that the language in its job adverts is genderneutral and strive for balanced shortlists and interview panels also regarding internal promotion and succession planning to promote gender diversity on management levels and across the organisation.

The Bank expect all BCSA leaders to be role modelling inclusive leadership behaviours by being committed to building diverse teams of complementary strengths, valuing diverse perspectives and creating a psychologically safe space where all employees can contribute fully and feel free to speak up.

All staff should understand that they can be held liable for acts of bullying, harassment, victimisation, and unlawful discrimination, in the course of their employment, against fellow employees, customers, suppliers, and the public. Such acts will be dealt with as misconduct, and appropriate action

³⁶ The OPU program originates from Denmark ("Oplæring I Udlandet"/Stay abroad) and is for young people that wishes to use a gap year after high school on living, studying and working abroad.



will be taken and managed by the People Department in accordance with internal processes and procedures.

Particularly serious complaints could amount to gross misconduct and lead to dismissal without notice.

BCSA will make sure that opportunities for training, development, and progress are available to all employees, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation.

DEI risks

As a Bank, with +650 employees and a presence in multiple jurisdictions, social and diversity risks are inherently high.

Employees are looking for a workplace where they are treated fairly and there is a diverse group of people - and for each employee to feel respected, acknowledged, able to perform to the highest level of their abilities and to bring their whole self to work.

3.4.3 Human Rights

As a credit institution, BCSA is mainly exposed to indirect risks in relation to Human Rights; discrimination, equality, and labour rights violations are identified as the key industry risks relevant for BCSA.

By adopting the UK Modern Slavery Act, BCSA is strengthening its position regarding the management of these risks, and BCSA adheres to the UK Modern Slavery Act in all its locations. The Act requires the disclosure by organisations, of the steps taken to prevent modern slavery and human trafficking from occurring in their own operations and in their supply chains and to reflect a drive to eradicate modern slavery in commercial organisations.³⁷

BCSA operates in an industry where the risk of modern slavery is mitigated by controls in place at onboarding and employee's awareness in line with the nature of the products and the services consumed. Nevertheless, the Bank recognises the prevalence of modern slavery and the importance of taking the necessary steps to combat it.

BCSA has a zero-tolerance approach to all forms of modern slavery and human trafficking, including ensuring there is no modern slavery or human trafficking in its supply chains, and thrives to ensure that BCSA:

- will not knowingly support and/or do business with suppliers who are involved in slavery.
- remains committed to continue improving the way it detects and addresses modern slavery risks.
- will continue its commitment to working with not just colleagues but also its suppliers, clients, and other stakeholders to continue to drive change and avoid modern slavery.

³⁷ For BCSA's Annual Modern Slavery Statement see BCSA website: Modern Slavery Act Statement



Furthermore, BCSA has developed internal training and awareness regarding modern slavery and is, for the next financial year, committed to further enhance existing policies and strengthen internal processes, where necessary.

Respect of Human Rights in the value chain

Suppliers are expected to uphold BCSA's commitment to ethical business practices and the protection of human rights throughout their operations. This includes:

- **Prohibition of Forced and Child Labor**: Suppliers must not engage in practices such as forced labour, bonded labour, or child labour, and must comply with applicable child labour laws.
- Non-Discrimination and Inclusive Practices: Suppliers must ensure a respectful workplace, free from discrimination and harassment, and provide equal opportunities regardless of gender, race, religion, or other protected characteristics.
- Fair Wages and Working Conditions: Suppliers must comply with laws governing wages, working hours, and occupational health and safety, ensuring a safe environment for employees.
- Health and Safety Standards: Suppliers must prioritise employee health and safety by complying with applicable regulations and implementing robust safety measures to prevent accidents and ensure well-being.

Human Rights Metrics

Human Rights Metrics	2024
Number of severe human rights issues and incidents connected to own workforce	0
Amount of material fines, penalties, and compensation for damages as result of violations regarding so- cial and human rights factors	0
Amount of material fines, penalties, and compensation for severe human rights issues and incidents con- nected to own workforce	0
Number of incidents of discrimination	0

3.5 Initiatives in 2024

The Bank has committees in place that come up with initiatives to create a good working environment for the Bank's employees. These include:

- Locally appointed responsible for employee Health and Safety employees (In 2024, BCSA reported 0 work-related injuries).
- Fire safety and first aid training available for all employees.
- Several volunteer-run social clubs, e.g. running, walking, and biking clubs.
- Social committees that arrange social events at each location.



3.6 Looking forward

Initiatives – Social, DE&I, and Human Rights areas	Implemented by
Reporting on Pay Transparency	Latest by 2027
Ensuring respect of human rights in the value chain	2025
BCSA's Diversity & Inclusion group will continue to deliver on DE&I initiatives across the organisa- tion by facilitating various events throughout the year.	On-going
Enhance existing policies and strengthen internal processes, where necessary	On-going
Implementation of targeted ESG related questions integrated to the client onboarding and due diligence process	2025



Appendices

Appendix 1 - GHG emissions scope 3 categories

#	Scope 3 Activity Type	Sources	Reported 2024
1	Purchased Goods & Services	All upstream (cradle-to-gate) emissions of purchased goods and services	Yes
2	Capital Goods	All upstream (cradle-to-gate) emissions of capital goods	N/A
3	Fuel & Energy- Related Activities	All upstream (cradle-to-gate) emissions of purchased fuels and energy (from raw material extraction up to the point of, but excluding, combustion, including T&D losses	Yes
4	Upstream transport	The scope 1 & 2 emissions of transportation and distribution providers that occur during use of vehicles and facilities (e.g., from energy use)	N/A
5	Waste generated in operations	The scope 1 & 2 emissions of waste management suppliers that occur during disposal or treatment	N/A
6	Business travel	The scope 1 & 2 emissions of transportation carriers that occur during use of vehi- cles (e.g., from energy use) for transportation of employees for business purposes	Yes
7	Employee com- muting	The scope 1 & 2 emissions of transportation of employees between their homes and their worksites	Yes
8	Upstream leased assets	The scope 1 & 2 emissions from the operation of leased assets that are not already included in scope 1 & 2	N/A
9	Downstream transport	The emissions from transportation and distribution of sold products in vehicles and facilities not owned or controlled by BCSA	N/A
10	Processing of sold products	All emissions from processing of sold intermediate products by third parties (e.g., manufacturers) subsequent to sale by BCSA	N/A
11	Use of sold products	The direct use-phase emissions of sold products over their expected lifetime (i.e., the scope 1 and scope 2 emissions of end users that occur from the use of prod- ucts that directly consume energy (fuels or electricity) during use; - fuels and feedstocks - GHGs	N/A
12	End-of-life treatment of sold products	The scope 1 & 2 emissions of waste management companies that occur during disposal or treatment of sold products	N/A
13	Downstream leased assets	The scope 1 & 2 emissions from the operation of leased assets that are owned or controlled by BCSA and leased to other entities that are not already included in scope 1 & 2	N/A
14	Franchises	The scope 1 & 2 emissions from the operation of franchises not included in scope 1 & 2	N/A
15	Investments	The scope 1 & 2 emissions from investments not included in scope 1 & 2	N/A



Appendix 2 - GHG emissions Methodology

GHG emissions – Scope 1

Scope 1 GHG emissions						
Location	tion Category Method for calculation					
Luxembourg	Company Cars	Activity based (Type of cars and km driven for corporate use)				
Germany	Company Cars	Spend based (Type of cars and amount spent)				

GHG emissions – Scope 2

All data provided for the calculation of scope 2 emissions is activity-based data which means it is calculated based on the actual energy usage and not costs spend on energy.

Scope 2 GHG emissions						
Location	Category	Method for calculation				
Luxembourg	Company Cars (Electric)	Type of cars and km driven for corporate use				
Denmark	District Heating	Activity based = kWh				
All locations	Energy Usage	Activity based = kWh				

GHG emissions – Scope 3

Scope 3 GHG emissions: C1 Purchased Goods & Services									
Location	Category	Method for calculation							
Denmark, Germany, Luxembourg, England	Emissions from the production of products purchased or ac- quired by BCSA in 2024. Prod- ucts include both goods (tangi- ble products) and services (in- tangible products).	Spend based (Costs spend by vendor). The vendors from each location were allocated a NAICS code. Then the total costs (in Euro) for each NAICS codes were calculated. Last- ly, the costs were converted to US dollars using the USD closing rate against EUR used in the 2024 Financial Statement which is 1.03885.							

Scope 3 GHG emissions: C6 Business travel								
Location	Category Method for calculation							
All locations	Flights	Activity based, Km, class, category (Short, medium, long haul)						
All locations	Taxi Spend based (Country and amount spent)							
All locations	Hotel	Activity based (Nights spent)						
Luxembourg	Car rental	Spend based (The country the car was rented and the amount spent)						

Scope 3 GHG emissions: C7 Employee Commuting										
Location	Category	Method for calculation								
All locations	Emissions from the transporta- tion of employees between their homes and their worksites.	Activity based (Means of Transportation for Commuting & Number of Employees & Commuting Distance as Inputs). BCSA conducted an internal survey on employee commuting patterns and means of transportation which was send to 10% of the Bank's workforce and managed to get 90% response rate. The Bank's HR department chose 10% of the workforce which is rep- resentative for the entire organisation.								



Scope 3 GHG emissions: Other							
Location	Category	Method for calculation					
All locations	Biggest third-party provider	Supplier based. GHG emissions calculated directly by the supplier.					

Appendix 3 – Energy consumption

Location	Energy label	Energy usage
Liechtenstein		50% renewable energy
Singapore		0% green energy as this is not com- mon in to have in Singapore
Australia	The office is a WeWork style set up, which is called The Hub Wynyard. They are carbon neutral certified and are a certi- fied B Corp organisation	
Germany (Regensburg)		100% green energy
Germany (Munich)	The Bank has no Energy label or Energy certificate for its office in Germany because the building is a Denkmalschutz, a protected monument.	100% green energy
Denmark	The building has Energy label A2010, which is one of the highest energy labels that can be achieved in Denmark. This indicates that the office meets the strictest energy require- ments and is more energy efficient than buildings with lower energy labels. Buildings with energy label A2010 have a low- er energy consumption and a better indoor climate.	100% green energy
Luxembourg	The Energy Performance and Thermal insulation class is H. This is primarily because the building was built before 1966.	100% green energy
England		The Bank has moved to a new location which doesn't have renewable energy in 2024



Appendix 4 - EU Taxonomy

Year 2024		Total environmentally sustainable assets (millions)	KPI Turnover(%)	KPI CAPEX (%)	% coverage (over total assets)	% of assets included from the numerator of 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	0	0	0	0	0	0
		Total environmentally			% coverage	% of assets included from the numerator of the GAR (article 7(2) and	% of assets excluded from the denominator of the GAR (Article 7(1)
Year 2024		sustainable assets (millions)	KPI Turnover(%)	KPI CAPEX (%)	(over total assets)	(3) and section 1.1.2 of Annex V)	and section 1.2.4 of Annex V)
Year 2024 Additional KPIs	GAR (Flow)*			крі сарех (%) О			
	GAR (Flow)* Trading book Financial guarantees	(millions)	Turnover(%)		assets)	Annex V)	Annex V)
	Trading book Financial	(millions)	Turnover(%)		assets)	Annex V)	Annex V)

0. Summary of KPIs to be disclosed by credit institutions under Article 8 of the EU Taxonomy Regulation

* For credit institutions that do not meet the conditions of Article 94(1) of the CRR or the conditions set out in Article 325a(1) of the CRR

** Fee and commissions income from services other than lending and AuM

Institutions shall disclose forward-looking information for this KPIs, including information in terms of targets, together with relevant explanations on the methodology applied.

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

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

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



1a. Assets for the calculation of GAR based on turnover

		31/12/2024													
]	[Climate	Change Mi	tigation (CCM))	C	limate Cha	ange Adaptatio	n (CCA)		1	TOTAL (CCM	+ CCA)	
		Of which towards Taxonomy-relevant (Taxonomy-eligible)				ectors	Of whic	Of which towards Taxonomy-relevant sectors (Taxonomy-eligible)							
	Total Gross Carrying amount		Of wh		mentally sust omy-aligned)	ainable			environmental (Taxonomy-alig			Of wh		mentally sust my-aligned)	ainable
				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 transitional	Of which enabling
GAR- Covered assets in both numerator and denominator															
1															
Loans and advances, debt securities and equity instruments not HfT															
eligible for GAR Calculation	12.466.108						-				-				
2 Financial undertakings 3 Credit institutions	11.210.125 11.210.125						-				-				
4 Loans and advances, debt securities and equity instruments not HfT	11.210.125						-								
eligible for GAR Calculation															
5 Debt securities, including UoP															
6 Equity Instruments	11.210.125														
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 Joans 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															

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 subsidiaries 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 more vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure.



	31/12/2024														
		Climate Change Mitigation (CCM) Climate Change Adaptation							n (CCA)	TOTAL (CCM + CCA)					
		Of which towards Taxonomy-relevant sectors (Taxonomy-eligible)							Taxonomy-rele nomy-eligible)						
	Total Gross Carrying amount		Of which environmentally sustainable (Taxonomy-aligned)					Of which environmentally sustainable (Taxonomy-aligned)			ſ	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 enabling
GAR- Covered assets in both numerator and denominator															
20 Non-financial undertakings	1.255.983						-				-				
21 Loans and advances															
22 Debt securities, including UoP															
23 Equity Instruments	1.225.983														
24 Households															
²⁵ of which loans collateralised by residential immovable property															
26 of which building renovations 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: residentialand comercial immovable properties															
32 Assets excluded from the numerator for GAR calculation (covered in															
the denominator)	373.197.371						-				-				
33 Financial and Non-financial undertakings	215.353.883						-				-				
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure															
obligations	215.353.883						-				-				
35 Loans and advances															
36															1
of which loans and collateralised by commercial immovable property															
37 of which building renovations loans														<u> </u>	
38 Debt securities	215.353.883														
39 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 subsidiaries 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 more vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure.



	31/12/2024														
	[Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				TOTAL (CCM + CCA)				
		Of which towards Taxonomy-relevant sectors (Taxonomy-eligible)					Of which towards Taxonomy-relevant sectors (Taxonomy-eligible)								
	Total Gross Carrying amount		Of which environmentally sustainable (Taxonomy-aligned)				Of which environmentally (Taxonomy-align					Of which environmentally sustain (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	transitional	Of which enabling
GAR- Covered assets in both numerator and denominator															
40 Non-EU country counterparties not subject to NFRD disclosure obligations							-				-				
⁴¹ Loans and advances															
42 Debts Securities															
43 Equity instruments															
44 Derivatives							-				-				
45 On demand interbank loans															
46 Cash and cash-related assets	157.843.488														
47 Other categories of assets (e.g. Goodwill, commodities etc.)															
48 Total GAR assets	385.663.479										-				
49	3.945.134.034														
Assets not covered for GAR calculation 50 Central governments and Supranational issuers	1.630.852.211														
51 Central governments and supranational issuers	2.202.793.437														
52 Trading book	2.202.733.437														
53 Total assets	4.330.797.513						-								
Off-balance sheet exposures - Undertakings subject to NFRD disclo									·						
54 Financial guarantees															
55 Assets under managament	6.075.399.566													, 	-
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 subsidiaries 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 more vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure.


1b. Assets for the calculation of GAR based on CAPEX

							31/	/12/2024							
			Climate	Change Miti	gation (CCN	1)	Clima	ate Chang	e Adaptatior	n (CCA)		Т	OTAL (CCM ·	+ CCA)	
		Of which t	towards 1	Taxonomy-rele eligible		(Taxonomy-	Of which		axonomy-relev omy-eligible)	ant sectors					
	Total Gross Carrying amount		Of w	hich environm (Taxonon	ientally susta ny-aligned)	inable		1	hich environm able (Taxonom			Of w	hich environm (Taxonom	entally sustai ny-aligned)	inable
				Of which Use of Proceeds		Of which enabling			Of which Use of Proceeds				Of which Use of Proceeds	Of which transitional	Of which enabling
GAR- Covered assets in both numerato	r and denominator														
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR Calculation	12.466.108						-				_				
2 Financial undertakings	11.210.125						-				-				~
3 Credit institutions	11.210.125						-				-				
4 Loans and advances, debt securities and equity instruments not HfT eligible for GAR Calculation															
5 Debt securities, including UoP															
6 Equity Instruments	11.210.125														
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															

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 subsidiaries 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 more vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure.



							31/	/12/2024							
			Climate	Change Mit	igation (CCN	1)	Clima	ate Chang	e Adaptatior	n (CCA)		Т	OTAL (CCM +	CCA)	
		Of which t	towards T	axonomy-rele eligible	evant sectors)	(Taxonomy-	Of which		axonomy-relev omy-eligible)	ant sectors					
	Total Gross Carrying amount	[Of wh		nentally susta ny-aligned)	inable		1	hich environm able (Taxonom			Of w	hich environme (Taxonom	entally sustai y-aligned)	nable
				Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	1			Of which Use of Proceeds	1	Of which enabling
GAR- Covered assets in both numerato	or and denominator														
18 Debt securities, including UoP															
19 Equity Instruments															
20 Non-financial undertakings	1.255.983						-				-				
21 Loans and advances															
22 Debt securities, including UoP															
23 Equity Instruments	1.255.983														
24 Households															
25 of which loans collateralised by residential immovable property															
26 of which building renovations 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: residentialand comercial immovable properties															
32 Assets excluded from the numerator for GAR calculation (covered in the denominator)	373.197.371						-				-				
33															
Financial and Non-financial undertakings	215.353.883						-								

- 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 subsidiaries 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 more vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure.



							31/	/12/2024							
			Climate	Change Mit	igation (CCN	1)	Clima	ate Chang	e Adaptatior	n (CCA)		Т	OTAL (CCM +	+ CCA)	
		Of which	towards 1	laxonomy-rele eligible		(Taxonomy-	Of which		xonomy-relev my-eligible)	ant sectors					
	Total Gross Carrying amount		Of w	hich environn (Taxonon	nentally susta ny-aligned)	inable			nich environme ble (Taxonom			Of w	hich environm (Taxonom	entally sustai iy-aligned)	nable
				Of which Use of Proceeds		Of which enabling			Of which Use of Proceeds	1			Of which Use of Proceeds	Of which transitional	Of which enabling
GAR- Covered assets in both numerato	r and denominator														
34 SMEs and NFCs (other than SMEs) not subject to NFRD disclosure obligations	215.353.883						-				-				
35 Loans and advances															
36 of which loans and collateralised by commercial immovable property															
³⁷ of which building renovations loans															
38 Debt securities	215.353.883														
39 Equity instruments															
40 subject to NFRD disclosure obligations															
41 Loans and advances															
42 Debts Securities															
43 Equity instruments															
44 Derivatives		-					-								
45 On demand interbank loans															
46 Cash and cash-related assets	157.843.488														

- 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 subsidiaries 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 more vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure.



		1	1	1	1	31/	/12/2024	1			1	1	1	
		Clin	nate Change Mit	igation (CCN	M)	-		ge Adaptation	n (CCA)		Т	OTAL (CCM ·	+ CCA)	
		Of which towa	rds Taxonomy-rel eligible		(Taxonomy-	Of which		axonomy-relev omy-eligible)	ant sectors					
	Total Gross Carrying amount		Of which environr (Taxonor	nentally susta my-aligned)	ainable		1	hich environm able (Taxonom			Of w	hich environm (Taxonom	ientally susta ny-aligned)	inable
			Of which Use of Proceeds	Of which transitional	Of which enabling			Of which Use of Proceeds	1			Of which Use of Proceeds	of which transitional	Of which enabling
GAR- Covered assets in both numerato 47 Other categories of assets (e.g. Goodwill,	r and denominator													
commodities etc.)														
48 Total GAR assets	385.663.479													
49 Assets not covered for GAR calculation	3.945.134.034													
50 Central governments and Supranational issuers	1.630.852.211													
51 Central banks exposure	2.202.793.437													
52 Trading book														
53 Total assets	4.330.797.513					-				-				
Off-balance sheet exposures - Undertaking	s subject to NFRD d	isclosure oblig	ations											
54 Financial guarantees														
⁵⁵ Assets under managament	6.075.399.566													
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 subsidiaries 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 more vehicle loans, institutions shall only include those exposures generated after the date of application of the disclosure.



2a. GAR sector information based on turnover

			Climate	Change	Mitig	gation (CCN	vI)		Climate C	hange A	Adapt	ation (CC	:A)			Total (C	CM+CO	CA)	
			financial Co subject to N	FRD		subject to N	IFRD		financial Co subject to Ni			and othe subject to l		No	n-financial subject to	Corporates o NFRD	SMEs	and other N to NF	IFC not subject RD
	Breakdown by sector- NACE 4 digits level (Code and label)	(Gro	ss) Carrying	Amount	(Gros	ss) Carrying	Amount	(Gros	s) Carrying A	mount	(Gros	s) Carrying	Amount	(Gros	s) Carrying	Amount	(Gross) Carrying A	mount
			Of wh environm sustainabl	entally		Of wh environm sustainab	entally		Of wh environm sustainab	entally			hich nentally ble (CCA)		enviro	which nmentally Je (CCM+ CCA)		enviro	which onmentally ole (CCM+CCA)
1	01.47 - Raising Poultry																		
2	02.10 - Silviculture and other forestry activities																		
3	03.21 - Marine aquaculture																		
4	06.10 - Extraction of crude petroleum																		
5	08.12 - Operation of gravel and sand pits, mining of clays and kaolin																		
6	08.99 - Other mining and quarrying n.e.c.																		
7	09.10 - Support activities of petroleum and natural gas extraction																		
8	10.12 - Processings and preserving of poultry meat																		
9	10.13 - Production of meat and poultry meat products																		
10	10.61 - Manuafacture of grain mill products																		
11	10.71 - Manufacture of bread, manufacture of fresh pastry goods and cakes																		
12	10.85 - Manufacture of prepared meals and dishes																		
13	10.89 - Manufacture of other food products n.e.c.																		
14	10.91 - Manufacture of prepared feeds for farm animals																		
15	11.01 - Distilling, rectifying and blending of spirits																		
	11.05 - Manufacture of beer																		
17	11.07 - Manufacture of soft drinks, production of mineral waters and other bottled waters																		
18	13.92 - Manufacture of made-up textile articles, except apparel																		
19	13.96 - Manufacture of other technical and industrial textiles																		
20	16.10 - Sawmilling and planing of wood																		
21	16.23 - Manufacture of other builders' carpentry and joinery																		
22	16.29 - Manufacture of other products of wood, manufacture of articles of cork, straw and plaiting materials																		
	17.12 - Manufacture of paper and paperboard																		
24	17.22 - Manufacture of household and sanitary goods and of toilet requisites																		
25	17.29 - Manufacture of other articles of paper and paperboard																		

1. Credit institutions shall disclose in this template information on exposures in the banking book towards those sectors covered by the Taxonomy (NACE sectors 4 levels of detail), using the relevant NACE Codes on the basis of the principal activity of the counterparty.



			Climate Change	Miti	gation (CCN	1)		Climate C	hange A	Adapt	tation (CC/	4)			Total (C	CM+C	CA)	
			financial Corporates subject to NFRD	SM	Es and other subject to N			inancial Cor subject to NF			s and other subject to N		No	on-financial subject to	Corporates NFRD	SMEs	and other N to NFF	FC not subject
	Breakdown by sector- NACE 4 digits level (Code and label)	(Gros	ss) Carrying Amount	(Gro	ss) Carrying A	mount	(Gros	s) Carrying A	mount	(Gros	s) Carrying	Amount	(Gros	s) Carrying /	Amount	(Gross	s) Carrying A	mount
			Of which environmentally sustainable (CCM)		Of wh environm sustainab	entally		Of wh environm sustainab	entally		Of wh environm sustainab	entally		enviro	which nmentally le (CCM+ CCA)		enviro	which nmentally Ie (CCM+CCA)
26	18.11 - Printing of newspapers																	
27	18.12 - Other printing																	
28	19.20 - Manufacture of refined petroleum products																	
29	20.13 - Manufacture of other inorganic basic chemicals																	
30	20.14 - Manufacture of other organic basic chemicals																	
31	20.20 - Manufacture of pesticides and other agrochemical products																	
32	20.59 - Manufacture of other chemical products n.e.c																	
33	21.20 - Manufacture of pharmaceutical preparations																	
34	22.11 - Manufacture of rubber tyres and tubes, retreading and rebuilding of rubber tyres																	
35	22.21 - Manufacture of plastic plates, sheets, tubes and profiles																	
36	22.22 - Manufacture of plastic packing goods																	
37	22.29 - Manufacture of other plastic products																	
38	23.51 - Manufacture of cement																	
39	23.99 - Manufacture of other non-metallic mineral products n.e.c.																	
40	24.10 - Manufacture of basic iron and steel and of ferro- alloys																	
41	24.20 - Manufacture of tubes, pipes, hollow profiles and related fittings, of steel																	
42	24.42 - Aluminium production																	
43	24.44 - Copper production																	
44	24.51 - Casting of iron																	
45	25.11 - Manufacture of metal structures and parts of structures																	
46	25.12 - Manufacture of doors and windows of metal																	
47	25.21 - Manufacture of central heating radiators and boilers																	
48	25.40 - Manufacture of weapons and ammunition																	
49	25.61 - Treatment and coating of metals																	
50	25.62 - Machining																	



			Climate	Change	Mitig	ation (CCN	Л)		Climate C	hange A	Adapt	ation (CCA)			Total (C	CM+C	CA)	
			financial Co subject to N			s and other subject to N			financial Co subject to Ni			s and other I subject to NF		No	n-financial subject to		SMEs	and other N to NF	IFC not subject RD
	Breakdown by sector- NACE 4 digits level (Code and label)	(Gro	ss) Carrying /	Amount	(Gros	s) Carrying	Amount	(Gros	s) Carrying A	mount	(Gros	s) Carrying A	mount	(Gros	s) Carrying A	Amount	(Gross	;) Carrying A	mount
			Of wh environm sustainabl	entally		Of wh environm sustainab	entally		Of wh environm sustainab	entally		Of whi environme sustainabl	entally		enviror	which nmentally le (CCM+ CCA)		enviro	which onmentally ble (CCM+CCA)
51	25.73 - Manufacture of tools																		
52	25.93 - Manufacture of wire products, chain and springs																		
53	25.94 - Manufacture of fasteners and screw machine products																		
54	25.99 - Manufacture of other fabricated metal products n.e.c																		
55	26.11 - Manufacture of electronic components																		
56	26.12 - Manufacture of loaded electronic boards																		
57	26.20 - Manufacture of computers and peripheral equipment																		
58	26.30 - Manufacture of communication equipment																		
59	26.51 - Manufacture of instruments and appliances for measuring, testing and navigation																		
60	26.60 - Manufacture of irradiation, electromedical and electrotherapeutic equipment																		
61	27.11 - Manufacture of electric motors, generators and transformers																		
62	27.12 - Manufacture of electricity distribution and control apparatus																		
63	27.31 - Manufacture of fibre optic cables																		
64	27.32 - Manufacture of other electronic and electric wires and cables																		
65	27.40 - Manufacture of electric lighting equipment																		
66	27.51 - Manufacture of electric domestic appliances																		
67	27.90 - Manufacture of other electrical equipment																		
68	28.11 - Manufacture of engines and turbines, except aircraft, vehicle and cycle engines																		
69	28.13 - Manufacture of other pumps and compressors																		
70	28.21 - Manufacture of ovens, furnaces and furnace burners																		
71	28.22 - Manufacture of lifting and handling equipment																		
72	28.24 - Manufacture of power driven hand tools																		
73	28.25 - Manufacture of non-domestic cooling and ventilation equipment																		
74	28.29 - Manufacture of other general-purpose machinery n.e.c.																		
75	28.30 - Manufacture of agricultural and forestry machinery	,																	



			Climate	Change	Mitig	ation (CC	VI)		Climate C	hange A	Adapt	ation (CCA	A)			Total (C	CM+C	CA)	
			financial Co subject to N			s and othe subject to f			financial Co subject to Ni			s and other subject to N		No	n-financial subject to		SMEs	and other N to NF	IFC not subject RD
	Breakdown by sector- NACE 4 digits level (Code and label)	(Gros	s) Carrying	Amount	(Gros	s) Carrying	Amount	(Gros	s) Carrying A	mount	(Gros	s) Carrying	Amount	(Gros	s) Carrying A	Amount	(Gross	s) Carrying A	mount
			Of wh environm sustainab	entally		Of wi environn sustainat	entally		Of wh environm sustainab	entally		Of wh environm sustainab	entally		enviro	which nmentally Ie (CCM+ CCA)		enviro	which nmentally ple (CCM+CCA)
76	28.91 - Manufacture of machinery for metallurgy																		
77	28.92 - Manufacture of machinery for mining, quarrying and construction																		
78	28.93 - Manufacture of machinery for food, beverage and tobacco processing																		
79	28.94 - Manufacture of machinery for textile, apparel and leather production																		
80	28.95 - Manufacture of machinery for paper and paperboard production																		
81	28.99 - Manufacture of other special-purpose machinery n.e.c.																		
82	29.10 - Manufacture of motor vehicles																		
83	29.20 - Manufacture of bodies (coachwork) for motor vehicles, manufacture of trailers and semi-trailers																		
84	29.32 - Manufacture of other parts and accessories for motor vehicles																		
85	30.11 - Building of ships and floating structures																		
86	31.01 - Manufacture of office and shop furniture																		
87	31.02 - Manufacture of kitchen furniture																		
88	31.09 - Manufacture of other furniture																		
89	32.50 - Manufacture of medical and dental instruments and supplies																		
90	32.99 - Other manufacturing n.e.c.																		
91	33.12 - Repair of machinery																		
92	33.20 - Installation of industrial machinery and equipment																		
93	35.11 - Production of electricity																		
94	35.13 - Distribution of electricity																		
95	35.22 - Distribution of gaseous fuels through mains																		
96	35.30 - Steam and air conditioning supply																		
97	37.00 - Sewerage																		
98	38.11 - Collection of non hazardous waste																		
99	38.12 - Collection of hazardous waste																		
100	38.22 - Treatment and disposal of hazardous waste																		



			Climate	Change	Mitig	ation (CCI	VI)		Climate (Change A	Adapt	tation (CCA	()			Total (C	CM+C	CA)	
			financial Co subject to N			s and other			financial Co subject to N			s and other subject to N		No	on-financial subject to		SMEs	and other N to NF	IFC not subject RD
	Breakdown by sector- NACE 4 digits level (Code and label)	(Gros	ss) Carrying	Amount	(Gros	s) Carrying	Amount	(Gros	s) Carrying A	Amount	(Gros	s) Carrying	Amount	(Gros	s) Carrying A	Amount	(Gross	;) Carrying A	mount
			Of wh environm sustainab	entally		Of wi environn sustainat	nentally		Of wh environm sustainab	entally		Of wh environm sustainab	entally		enviror	which nmentally le (CCM+ CCA)		enviro	which nmentally ble (CCM+CCA)
101	38.32 - Recovery of sorted materials																		
102	41.10 - Development of building projects																		
103	41.20 - Construction of residential and non-residential buildings																		
104	42.11 - Construction of roads and motorways																		
105	42.12 - Construction of railways and underground railways																		
106	42.21 - Construction of utility projects for fluids																		
107	42.22 - Construction of utility projects for electricity and telecommunications																		
108	42.99 - Construction of other civil engineering projects n.e.c.																		
109	43.11 - Demolition																		
110	43.12 - Site preparation																		
111	43.21 - Electrical installation																		
112	43.22 - Plumbing, heat and air conditioning installation																		
113	43.29 - Other construction installation																		
114	43.31 - Plastering																		
115	43.32 - Joinery installation																		
116	43.33 - Floor and wall covering																		
117	43.91 - Roofing activities																		
118	43.99 - Other specialised construction activities n.e.c.																		
119	45.11 - Sale of cars and light motor vehicles																		
120	45.19 - Sale of other motor vehicles																		
121	45.31 - Wholesale trade of motor vehicle parts and accessories																		
122	45.32 - Retail trade of motor vehicle parts and accessories																		
123	46.13 - Agents involved in the sale of timber and building materials																		
124	46.14 - Agents involved in the sale of machinery, industrial equipment, ships and aircraft																		
125	46.17 - Agents involved in the sale of food, beverages and tobacco																		



			Climate Change	e Miti	tigation (CCM)			Climate C	hange A	Adapt	ation (CCA	()			Total (C	CM+C	CA)	
			financial Corporates subject to NFRD	s SM	MEs and other NI subject to NFR			financial Cor subject to NF			s and other subject to N		No	n-financial subject to	Corporates NFRD	SMEs	and other N to NF	IFC not subject RD
	Breakdown by sector- NACE 4 digits level (Code and label)	(Gros	ss) Carrying Amount	(Gro	oss) Carrying Am	nount	(Gros	s) Carrying A	mount	(Gros	s) Carrying /	Amount	(Gros	s) Carrying /	Amount	(Gross	;) Carrying A	mount
			Of which environmentally sustainable (CCM)		Of which environmen sustainable	ntally		Of wh environm sustainabl	entally		Of wh environm sustainab	entally		enviro	which nmentally Ie (CCM+ CCA)		enviro	which nmentally ble (CCM+CCA)
126	46.19 - Agents involved in the sale of a variety of goods																	
127	46.21 - Wholesale of grain, unmanufactured tobacco, seeds and animal feeds																	
128	46.34 - Wholesale of beverages																	
129	46.36 - Wholesale of sugar and chocolate and sugar confectionery																	
130	46.39 - Non-specialised wholesale of food, beverages and tobacco																	
131	46.42 - Wholesale of clothing and footwear																	
132	46.43 - Wholesale of electrical household appliances																	
133	46.44 - Wholesale of china and glassware and cleaning materials																	
134	46.45 - Wholesale of perfume and cosmetics																	
135	46.46 - Wholesale of pharmaceutical goods																	
136	46.47 - Wholesale of furniture, carpets and lighting equipment																	
137	46.48 - Wholesale of watches and jewellery																	
138	46.49 - Wholesale of other household goods																	
139	46.51 - Wholesale of computers, computer peripheral equipment and software																	
140	46.52 - Wholesale of electronic and telecommunications equipment and parts																	
141	46.62 - Wholesale of machine tools																	
142	46.63 - Wholesale of mining, construction and civil engineering machinery																	
143	46.65 - Wholesale of office furniture																	
144	46.66 - Wholesale of other office machinery and equipment																	
145	46.69 - Wholesale of other machinery and equipment																	
146	46.71 - Wholesale of solid, liquid and gaseous fuels and related products																	
147	46.72 - Wholesale of metals and metal ores																	
148	46.73 - Wholesale of wood, construction materials and sanitary equipment																	
149	46.74 - Wholesale of hardware, plumbing and heating equipment and supplies																	
150	46.75 - Wholesale of chemical products																	



			Climate	Change	Mitig	gation (CCI	VI)		Climate (hange A	Adapt	ation (CC	A)			Total (C	CM+C	CA)	
			financial Co subject to N			s and other subject to f			financial Co subject to N			s and other subject to N		No	on-financial subject to		SMEs	and other N to NF	IFC not subject RD
	Breakdown by sector- NACE 4 digits level (Code and label)	(Gros	ss) Carrying	Amount	(Gros	ss) Carrying	Amount	(Gros	s) Carrying A	Amount	(Gros	s) Carrying	Amount	(Gros	s) Carrying A	mount	(Gross	s) Carrying A	mount
			Of wh environm sustainab	entally		Of wi environn sustainat	nentally		Of wh environm sustainab	entally		Of wi environn sustainat	nentally		enviror	which Imentally Ie (CCM+ CCA)		enviro	which onmentally ble (CCM+CCA)
151	46.76 - Wholesale of other intermediate products																		
152	46.90 - Non-specialised wholesale trade																		
153	47.11 - Retail sale in non-specialised stores with food, beverages or tobacco predominating																		
154	47.19 - Other retail sale in non-specialised stores																		
155	47.30 - Retail sale of automotive fuel in specialised stores																		
100	47.41 - Retail sale of computers, peripheral units and software in specialised stores																		
157	47.51 - Retail sale of textiles in specialised stores																		
1200	47.52 - Retail sale of hardware, paints and glass in specialised stores																		
159	47.71 - Retail sale of clothing in specialised stores																		
1100	47.76 - Retail sale of flowers, plants, seeds, fertilisers, pet animals and pet food in specialised stores																		
161	47.78 - Other retail sale of new goods in specialised stores																		
162	47.91 - Retail sale via mail order houses or via Internet																		
163	49.32 - Taxi operation																		
164	49.41 - Freight transport by road																		
165	49.42 - Removal services																		
166	50.10 - Sea and coastal passenger water transport																		
167	50.20 - Sea and coastal freight water transport																		
168	51.10 - Passenger air transport																		
169	51.21 - Freight air transport																		
170	52.10 - Warehousing and storage																		
11/1	52.22 - Service activities incidental to water transportation																		
172	52.23 - Service activities incidental to air transportation																		
173	52.24 - Cargo handling																		
174	52.29 - Other transportation support activities																		
175	53.10 - Postal activities under universal service obligation																		



			Climate Change	Miti	gation (CCN	/1)		Climate C	hange A	Adapt	ation (CCA	4)			Total (C	CM+C	CA)	
			financial Corporates subject to NFRD	SM	Es and other subject to N			financial Co subject to Nf			and other subject to N		No	n-financial subject to		SMEs	and other N to NFI	IFC not subject RD
	Breakdown by sector- NACE 4 digits level (Code and label)	(Gro	ss) Carrying Amount	(Gro	ss) Carrying A	Amount	(Gros	s) Carrying A	mount	(Gros	s) Carrying	Amount	(Gros	s) Carrying A	Amount	(Gross	s) Carrying A	mount
			Of which environmentally sustainable (CCM)		Of wh environm sustainabl	entally		Of wh environm sustainab	entally		Of wh environm sustainab	entally		enviror	which nmentally le (CCM+ CCA)		enviro	which nmentally ble (CCM+CCA)
176	53.20 - Other postal and courier activities																	
177	56.10 - Restaurants and mobile food service activities																	
178	56.29 - Other food service activities																	
179	58.11 - Book publishing																	
180	58.13 - Publishing of newspapers																	
181	58.14 - Publishing of journals and periodicals																	
182	58.29 - Other software publishing																	
183	59.11 - Motion picture, video and television programme production activities																	
184	59.13 - Motion picture, video and television programme distribution activities																	
185	59.20 - Sound recording and music publishing activities																	
186	60.20 - Television programming and broadcasting activities																	
187	61.10 - Wired telecommunications activities																	
188	61.20 - Wireless telecommunications activities																	
189	61.90 - Other telecommunications activities																	
190	62.01 - Computer programming activities																	
191	62.02 - Computer consultancy activities																	
192	62.03 - Computer facilities management activities																	
193	62.09 - Other information technology and computer service activities																	
194	63.11 - Data processing, hosting and related activities																	
195	63.12 - Web portals																	
196	64.20 - Activities of holding companies																	
197	64.30 - Trusts, funds and similar financial entities																	
198	64.99 - Other financial service activities, except insurance and pension funding n.e.c.																	
199	66.12 - Security and commodity contracts brokerage																	
200	66.19 - Other activities auxiliary to financial services, except insurance and pension funding																	

^{1.} Credit institutions shall disclose in this template information on exposures in the banking book towards those sectors covered by the Taxonomy (NACE sectors 4 levels of detail), using the relevant NACE Codes on the basis of the principal activity of the counterparty.

^{2.} The counterparty NACE sector allocation shall be based exclusively on the nature of the immediate counterparty. The classification of the exposures incurred jointly by more than one obligor shall be done on the basis of the characteristics of the obligor that was the more relevant, disaggregation required in the template.



			Climate	Change	Miti	gation (CCI	Л)		Climate 0	hange A	Adapt	ation (CC	A)		1	Total (C	CM+C	CA)	
			financial Co subject to N			Es and other subject to N			financial Co subject to N			s and other subject to N		No	on-financial subject to	•	SMEs	and other I to NF	NFC not subject RD
	Breakdown by sector- NACE 4 digits level (Code and label)	(Gros	ss) Carrying	Amount	(Gros	ss) Carrying	Amount	(Gros	s) Carrying A	Mount	(Gros	s) Carrying	Amount	(Gros	s) Carrying A	Amount	(Gross	s) Carrying A	mount
			Of wh environm sustainab	entally		Of wh environm sustainab	entally		Of wh environm sustainab	entally		Of wi environn sustainal	nentally		enviror	which nmentally Ie (CCM+ CCA)		enviro	f which onmentally ble (CCM+CCA)
201	66.30 - Fund management activities																		
202	68.10 - Buying and selling of own real estate																		
203	68.20 - Renting and operating of own or leased real estate																		
204	68.31 - Real estate agencies																		
205	69.20 - Accounting, bookkeeping and auditing activities, tax consultancy																		
206	70.10 - Activities of head offices																		
207	70.22 - Business and other management consultancy activities																		
208	71.11 - Architectural activities																		
209	71.12 - Engineering activities and related technical consultancy																		
210	72.19 - Other research and experimental development on natural sciences and engineering																		
211	72.20 - Research and experimental development on social sciences and humanities																		
212	73.11 - Advertising agencies																		
213	73.20 - Market research and public opinion polling																		
214	74.10 - Specialised design activities																		
215	74.90 - Other professional, scientific and technical activities n.e.c.																		
216	77.11 - Renting and leasing of cars and light motor vehicles																		
217	77.32 - Renting and leasing of construction and civil engineering machinery and equipment																		
218	77.39 - Renting and leasing of other machinery, equipment and tangible goods n.e.c.																		
219	78.10 - Activities of employment placement agencies																		
220	78.20 - Temporary employment agency activities																		
221	80.10 - Private security activities																		
222	80.20 - Security systems service activities																		
223	81.10 - Combined facilities support activities																		-
224	81.21 - General cleaning of buildings																		
225	81.22 - Other building and industrial cleaning activities																		



			Climate Change	Miti	igation (CCM)			Climate C	hange A	Adapt	ation (CCA	()			Total (C	CM+C	CA)	
		Non	financial Corporates subject to NFRD	SM	Es and other NF(subject to NFRE			inancial Co subject to Nf			s and other l subject to Nf		No	n-financial subject to		SMEs	and other N to NFI	FC not subject RD
	Breakdown by sector- NACE 4 digits level (Code and label)	(Gro	ss) Carrying Amount	(Gro	oss) Carrying Amo	ount	(Gros	s) Carrying A	mount	(Gros	s) Carrying A	Amount	(Gros	s) Carrying A	mount	(Gross	;) Carrying A	mount
			Of which environmentally sustainable (CCM)		Of which environment sustainable (ally		Of wh environm sustainab	entally		Of wh environm sustainabl	entally		enviror	which Imentally Ie (CCM+ CCA)		enviro	which nmentally Jle (CCM+CCA)
226	81.29 - Other cleaning activities																	
227	82.11 - Combined office administrative service activities																	
228	82.20 - Activities of call centres																	
229	82.91 - Activities of collection agencies and credit bureaus																	
230	82.99 - Other business support service activities n.e.c.																	
231	85.31 - General secondary education																	
232	85.41 - Post-secondary non tertiary education																	
233	85.42 - Tertiary education																	
234	85.52 - Cultural education																	
235	85.59 - Other education n.e.c.																	
236	86.21 - General medical practice activities																	
237	86.22 - Specialist medical practice activities																	
238	86.90 - Other human health activities																	
239	87.10 - Residential nursing care activities																	
240	87.30 - Residential care activities for the elderly and disabled																	
241	88.10 - Social work activities without accommodation for the elderly and disabled																	
242	88.99 - Other social work activities without accommodation n.e.c.																	
243	90.02 - Support activities to performing arts																	
244	93.12 - Activities of sport clubs																	
245	93.13 - Fitness facilities																	
246	93.21 - Activities of amusement parks and theme parks																	
247	94.12 - Activities of professional membership organisations																	
248	95.12 - Repair of communication equipment																	
249	96.01 - Washing and (dry-) cleaning of textile and fur products																	
250	96.09 - Other personal service activities n.e.c.																	

^{1.} Credit institutions shall disclose in this template information on exposures in the banking book towards those sectors covered by the Taxonomy (NACE sectors 4 levels of detail), using the relevant NACE Codes on the basis of the principal activity of the counterparty.

^{2.} The counterparty NACE sector allocation shall be based exclusively on the nature of the immediate counterparty. The classification of the exposures incurred jointly by more than one obligor shall be done on the basis of the characteristics of the obligor that was the more relevant, disaggregation required in the template.



2b. GAR sector information based on CAPEX

			Climate	e Change	Mitigat	tion (CCM))		Climate	Change /	Adaptati	ion (CCA)				Total (CCN	I+CCA)		
			financial Co subject to Ni			s and other subject to N			financial Co subject to Ni	•		and other N ubject to NFI		Non-fin	ancial Corp to NFR	orates subject D		and other N ubject to NF	
	Breakdown by sector- NACE 4 digits level (Code and label)	(Gross)	Carrying An	nount	(Gross)	Carrying Ar	nount	(Gross)	Carrying Am	nount	(Gross)	Carrying Am	ount	(Gross)	Carrying Am	ount	(Gross)	Carrying Am	ount
			Of wł environn sustainat	nentally			hich mentally ble (CCM)		Of w environn sustainal	nentally		Of wh environm sustainab	entally		enviro	which nmentally Ie (CCM+ CCA)		Of wh environm sustair (CCM+	nentally nable
1	01.47 - Raising Poultry																		
2	02.10 - Silviculture and other forestry activities																		
3	03.21 - Marine aquaculture																		
4	06.10 - Extraction of crude petroleum																		
5	08.12 - Operation of gravel and sand pits, mining of clays and kaolin																		
6	08.99 - Other mining and quarrying n.e.c.																		
7	09.10 - Support activities of petroleum and natural gas extraction																		
8	10.12 - Processings and preserving of poultry meat																		
9	10.13 - Production of meat and poultry meat products																		
10	10.61 - Manuafacture of grain mill products																		
11	10.71 - Manufacture of bread, manufacture of fresh pastry goods and cakes																		
12	10.85 - Manufacture of prepared meals and dishes																		
13	10.89 - Manufacture of other food products n.e.c.																		
14	10.91 - Manufacture of prepared feeds for farm animals																		
15	11.01 - Distilling, rectifying and blending of spirits																		
16	11.05 - Manufacture of beer																		
17	11.07 - Manufacture of soft drinks, production of																		
	mineral waters and other bottled waters																		
18	13.92 - Manufacture of made-up textile articles, except apparel																		
19	13.96 - Manufacture of other technical and industrial textiles																		
20	16.10 - Sawmilling and planing of wood																		
21	16.23 - Manufacture of other builders' carpentry and joinery																		
22	16.29 - Manufacture of other products of wood, manufacture of articles of cork, straw and plaiting materials																		
23	17.12 - Manufacture of paper and paperboard																		
24	17.22 - Manufacture of household and sanitary goods and of toilet requisites																		
25	17.29 - Manufacture of other articles of paper and paperboard																		

1. Credit institutions shall disclose in this template information on exposures in the banking book towards those sectors covered by the Taxonomy (NACE sectors 4 levels of detail), using the relevant NACE Codes on the basis of the principal activity of the counterparty.



			Climate Change	Mitigat	tion (CCM)			Climate	Change /	Adaptati	on (CCA)				Total (CCN	I+CCA)		
			financial Corporates subject to NFRD	SME	s and other subject to N	NFC not		financial Co subject to Ni	rporates	SMEs	and other N ubject to NFF		Non-fin	nancial Corp to NF	porates subject		and other N ubject to NF	
	Breakdown by sector- NACE 4 digits level (Code and label)	(Gross) Carrying Amount	(Gross)) Carrying An	nount	(Gross)	Carrying Am	ount	(Gross) (Carrying Amo	ount	(Gross)	Carrying Ar	nount	(Gross)	Carrying Am	ount
			Of which environmentally sustainable (CCM)		Of w environr sustainal	mentally		Of w environn sustainal	nentally		Of wh environm sustainab	entally		envir	f which onmentally ble (CCM+ CCA)		Of wh environm sustain (CCM+0	nentally nable
26	18.11 - Printing of newspapers																	
27	18.12 - Other printing																	
28	19.20 - Manufacture of refined petroleum products																	
29	20.13 - Manufacture of other inorganic basic chemicals																	
30	20.14 - Manufacture of other organic basic chemicals																	
31	20.20 - Manufacture of pesticides and other agrochemical products																	
32	20.59 - Manufacture of other chemical products n.e.c																	
33	21.20 - Manufacture of pharmaceutical preparations																	
34	22.11 - Manufacture of rubber tyres and tubes, retreading and rebuilding of rubber tyres																	
35	22.21 - Manufacture of plastic plates, sheets, tubes and profiles																	
36	22.22 - Manufacture of plastic packing goods																	
37	22.29 - Manufacture of other plastic products																	
38	23.51 - Manufacture of cement																	
39	23.99 - Manufacture of other non-metallic mineral products n.e.c.																	
40	24.10 - Manufacture of basic iron and steel and of ferro-alloys																	
41	24.20 - Manufacture of tubes, pipes, hollow profiles and related fittings, of steel																	
42	24.42 - Aluminium production																	
43	24.44 - Copper production																	
44	24.51 - Casting of iron																	
45	25.11 - Manufacture of metal structures and parts of structures																	
46	25.12 - Manufacture of doors and windows of metal																	
47	25.21 - Manufacture of central heating radiators and boilers																	
48	25.40 - Manufacture of weapons and ammunition																	
49	25.61 - Treatment and coating of metals																	
50	25.62 - Machining																	



			Climate Change	e Mitiga	tion (CCM)		Climate	Change A	Adaptati	on (CCA)				Total (CCN	(+CCA)		
			financial Corporates subject to NFRD		s and other subject to N			financial Cor subject to Nf			and other N ubject to NFI		Non-fin	ancial Corp to NFR	orates subject D		s and other I subject to Nf	
	Breakdown by sector- NACE 4 digits level (Code and label)	(Gross) Carrying Amount	(Gross) Carrying A	mount	(Gross)	Carrying Am	ount	(Gross) (Carrying Amo	ount	(Gross)	Carrying Am	ount	(Gross)	Carrying Am	nount
			Of which environmentally sustainable (CCM)		environ	/hich mentally ble (CCM)		Of wi environm sustainat	nentally		Of wh environm sustainab	entally		enviro	which nmentally Ile (CCM+ CCA)		Of wi environn sustair (CCM+	mentally inable
51	25.73 - Manufacture of tools																	
52	25.93 - Manufacture of wire products, chain and springs																	
53	25.94 - Manufacture of fasteners and screw machine products																	
54	25.99 - Manufacture of other fabricated metal products n.e.c																	
55	26.11 - Manufacture of electronic components																	
56	26.12 - Manufacture of loaded electronic boards																	
57	26.20 - Manufacture of computers and peripheral equipment																	
58	26.30 - Manufacture of communication equipment																	
59	26.51 - Manufacture of instruments and appliances for																	
	measuring, testing and navigation																	
60	26.60 - Manufacture of irradiation, electromedical and																	
	electrotherapeutic equipment																	
61	27.11 - Manufacture of electric motors, generators and transformers																	
62	27.12 - Manufacture of electricity distribution and control apparatus																	
63	27.31 - Manufacture of fibre optic cables																	
64	27.32 - Manufacture of other electronic and electric wires																	
	and cables																	
65	27.40 - Manufacture of electric lighting equipment																	
66	27.51 - Manufacture of electric domestic appliances																	
67	27.90 - Manufacture of other electrical equipment																	
68	28.11 - Manufacture of engines and turbines, except aircraft, vehicle and cycle engines																	
69	28.13 - Manufacture of other pumps and compressors																	
70	28.21 - Manufacture of ovens, furnaces and furnace burners																	
71	28.22 - Manufacture of lifting and handling equipment																	
72	28.24 - Manufacture of power driven hand tools																	
73	28.25 - Manufacture of non-domestic cooling and ventilation equipment																	
74	28.29 - Manufacture of other general-purpose machinery n.e.c.																	
75	28.30 - Manufacture of agricultural and forestry machinery																	



		Climat	e Change	Mitigat	tion (CCM		Climate	Change A	Adaptati	on (CCA)				Total (CCN	I+CCA)		
		financial Co subject to N	orporates	SME	s and other subject to N	NFC not	inancial Cor subject to NF	porates	SMEs	and other N ubject to NFI		Non-fin	ancial Corp to NFR	orates subject D		and other N ubject to NF	
	Breakdown by sector- NACE 4 digits level (Code and label)) Carrying A			Carrying Ar		Carrying Am			Carrying Ame		(Gross)	Carrying Am	ount		Carrying Am	
		environ	hich mentally ble (CCM)		environ	hich mentally ble (CCM)	Of wh environm sustainat	nentally		Of wh environm sustainab	entally		enviro	which nmentally Ie (CCM+ CCA)		Of wh environm sustair (CCM+	nentally nable
76	28.91 - Manufacture of machinery for metallurgy															(00111	
77	28.92 - Manufacture of machinery for mining, quarrying and construction																
78	28.93 - Manufacture of machinery for food, beverage and tobacco processing																
79	28.94 - Manufacture of machinery for textile, apparel and leather production																
80	28.95 - Manufacture of machinery for paper and paperboard production																
81	28.99 - Manufacture of other special-purpose machinery n.e.c.																
82	29.10 - Manufacture of motor vehicles																
83	29.20 - Manufacture of bodies (coachwork) for motor vehicles, manufacture of trailers and semi-trailers																
84	29.32 - Manufacture of other parts and accessories for motor vehicles																
85	30.11 - Building of ships and floating structures																
86	31.01 - Manufacture of office and shop furniture																
87	31.02 - Manufacture of kitchen furniture																
88	31.09 - Manufacture of other furniture																
89	32.50 - Manufacture of medical and dental instruments and supplies																
90	32.99 - Other manufacturing n.e.c.																
91	33.12 - Repair of machinery																
92	33.20 - Installation of industrial machinery and equipment																
93	35.11 - Production of electricity																
94	35.13 - Distribution of electricity																
95	35.22 - Distribution of gaseous fuels through mains																
96	35.30 - Steam and air conditioning supply																
97	37.00 - Sewerage																
98	38.11 - Collection of non hazardous waste																
99	38.12 - Collection of hazardous waste																
100	38.22 - Treatment and disposal of hazardous waste																



			Climat	e Change	Mitigat	tion (CCM)			Climate	e Change A	Adaptati	on (CCA)				Total (CCN	I+CCA)		
			financial Co subject to N			s and other subject to N			financial Co subject to N	•		and other N ubject to NFI		Non-fir	nancial Corp to NFF	orates subject		and other Nubject to NF	
	Breakdown by sector- NACE 4 digits level (Code and label)	(Gross) Carrying A	mount	(Gross)	Carrying Ar	nount	(Gross)	Carrying An	nount	(Gross) (Carrying Am	ount	(Gross)	Carrying Am	nount	(Gross)	Carrying Am	ount
			environ	/hich mentally ble (CCM)		Of w environ sustaina	mentally		environ	vhich mentally ble (CCA)		Of wh environm sustainab	entally	-	enviro	which onmentally ole (CCM+ CCA)		Of wh environm sustair (CCM+	nentally nable
101	38.32 - Recovery of sorted materials																		
102	41.10 - Development of building projects																		
103	41.20 - Construction of residential and non-residential buildings																		
104	42.11 - Construction of roads and motorways																		
105	42.12 - Construction of railways and underground railways																		
106	42.21 - Construction of utility projects for fluids																		
107	42.22 - Construction of utility projects for electricity and telecommunications																		
108	42.99 - Construction of other civil engineering projects n.e.c.																		
109	43.11 - Demolition																		
110	43.12 - Site preparation																		
111	43.21 - Electrical installation																		
112	43.22 - Plumbing, heat and air conditioning installation																		
113	43.29 - Other construction installation																		
114	43.31 - Plastering																		
115	43.32 - Joinery installation																		
116	43.33 - Floor and wall covering																		
117	43.91 - Roofing activities																		
118	43.99 - Other specialised construction activities n.e.c.																		
119	45.11 - Sale of cars and light motor vehicles																		
120	45.19 - Sale of other motor vehicles																		
121	45.31 - Wholesale trade of motor vehicle parts and accessories																		
122	45.32 - Retail trade of motor vehicle parts and accessories																		
123	46.13 - Agents involved in the sale of timber and building materials																		
124	46.14 - Agents involved in the sale of machinery, industrial equipment, ships and aircraft																		
125	46.17 - Agents involved in the sale of food, beverages and tobacco																		



			Climate	e Change	Mitigat	ion (CCM)			Climate	Change A	Adaptati	on (CCA)				Total (CCN	I+CCA)		
			financial Co subject to N			and other subject to N			financial Cor subject to NF	•		and other N ubject to NF		Non-fin	ancial Corpo to NFR	orates subject D		and other N ubject to NF	
	Breakdown by sector- NACE 4 digits level (Code and label)	(Gross) Carrying Ar	mount	(Gross)	Carrying An	nount	(Gross)	Carrying Am	ount	(Gross) (Carrying Am	ount	(Gross)	Carrying Am	ount	(Gross)	Carrying Am	ount
			Of w environn sustainal	nentally		Of w environr sustainal	nentally		Of wł environm sustainat	entally		Of wh environm sustainab	entally		enviro	which nmentally Ie (CCM+ CCA)		Of wh environm sustair (CCM+	nentally nable
126	46.19 - Agents involved in the sale of a variety of goods																	(
127	46.21 - Wholesale of grain, unmanufactured tobacco, seeds and animal feeds																		
128	46.34 - Wholesale of beverages																		
129	46.36 - Wholesale of sugar and chocolate and sugar confectionery																		
130	46.39 - Non-specialised wholesale of food, beverages and tobacco																		
131	46.42 - Wholesale of clothing and footwear																		
132	46.43 - Wholesale of electrical household appliances																		
133	46.44 - Wholesale of china and glassware and cleaning materials																		
134	46.45 - Wholesale of perfume and cosmetics																		
135	46.46 - Wholesale of pharmaceutical goods																		
136	46.47 - Wholesale of furniture, carpets and lighting equipment																		
137	46.48 - Wholesale of watches and jewellery																		
138	46.49 - Wholesale of other household goods																		
139	46.51 - Wholesale of computers, computer peripheral equipment and software																		
140	46.52 - Wholesale of electronic and telecommunications equipment and parts																		
141	46.62 - Wholesale of machine tools																		
142	46.63 - Wholesale of mining, construction and civil engineering machinery																		
143	46.65 - Wholesale of office furniture																		
144	46.66 - Wholesale of other office machinery and equipment																		
145	46.69 - Wholesale of other machinery and equipment																		
146	46.71 - Wholesale of solid, liquid and gaseous fuels and related products																		
147	46.72 - Wholesale of metals and metal ores																		
148	46.73 - Wholesale of wood, construction materials and sanitary equipment																		
149	46.74 - Wholesale of hardware, plumbing and heating equipment and supplies																		
150	46.75 - Wholesale of chemical products																		



			Climate	Change	Mitigat	ion (CCM)			Climate	Change A	Adaptati	on (CCA)				Total (CCN	I+CCA)		
			financial Cor subject to NF			and other subject to N			financial Cor subject to NF			and other N ubject to NFI		Non-fin	ancial Corp to NFR	orates subject D		and other N ubject to NF	
	Breakdown by sector- NACE 4 digits level (Code and label)	(Gross) Carrying Am	nount	(Gross)	Carrying Ar	nount	(Gross)	Carrying Am	ount	(Gross) (Carrying Am	ount	(Gross)	Carrying Am	ount	(Gross)	Carrying Am	ount
			Of wh environm sustainab	entally		Of w environr sustainal	nentally		Of wh environm sustainab	nentally		Of wh environm sustainab	entally		enviro	which nmentally ole (CCM+ CCA)		Of wh environm sustair (CCM+	nentally nable
151	46.76 - Wholesale of other intermediate products																		
152	46.90 - Non-specialised wholesale trade																		
153	47.11 - Retail sale in non-specialised stores with food, beverages or tobacco predominating																		
154	47.19 - Other retail sale in non-specialised stores																		
155	47.30 - Retail sale of automotive fuel in specialised stores																		
156	47.41 - Retail sale of computers, peripheral units and software in specialised stores																		
157	47.51 - Retail sale of textiles in specialised stores																		
158	47.52 - Retail sale of hardware, paints and glass in specialised stores																		
159	47.71 - Retail sale of clothing in specialised stores																		
160	47.76 - Retail sale of flowers, plants, seeds, fertilisers, pet animals and pet food in specialised stores																		
161	47.78 - Other retail sale of new goods in specialised stores																		
162	47.91 - Retail sale via mail order houses or via Internet																		
163	49.32 - Taxi operation																		
164	49.41 - Freight transport by road																		
165	49.42 - Removal services																		
166	50.10 - Sea and coastal passenger water transport																		
167	50.20 - Sea and coastal freight water transport																		
168	51.10 - Passenger air transport																		
169	51.21 - Freight air transport																		
170	52.10 - Warehousing and storage																		
171	52.22 - Service activities incidental to water transportation																		
172	52.23 - Service activities incidental to air transportation																		
173	52.24 - Cargo handling																		
174	52.29 - Other transportation support activities																		
175	53.10 - Postal activities under universal service obligation																		



			Climat	e Change	Mitigat	ion (CCM)			Climate	Change /	Adaptati	on (CCA)				Total (CCN	I+CCA)		
			financial Co subject to N			and other subject to N			financial Cor subject to NF	•		and other N ubject to NF		Non-fin	ancial Corpo to NFR	orates subject D		and other I ubject to NF	
	Breakdown by sector- NACE 4 digits level (Code and label)	(Gross) Carrying A	mount	(Gross)	Carrying An	nount	(Gross)	Carrying Am	ount	(Gross)	Carrying Am	ount	(Gross)	Carrying Am	ount	(Gross)	Carrying Am	iount
				hich mentally ble (CCM)		Of w environr sustaina	nentally		Of wh environm sustainab	entally		Of wh environm sustainab	entally		enviro	which nmentally Ie (CCM+ CCA)		Of wi environm sustaii (CCM+	nentally nable
176	53.20 - Other postal and courier activities																	(00	
177	56.10 - Restaurants and mobile food service activities																		
178	56.29 - Other food service activities																		
179	58.11 - Book publishing																		
180	58.13 - Publishing of newspapers																		
181	58.14 - Publishing of journals and periodicals																		
182	58.29 - Other software publishing																		
183	59.11 - Motion picture, video and television programme production activities																		
184	59.13 - Motion picture, video and television programme distribution activities																		
185	59.20 - Sound recording and music publishing activities																		
186	60.20 - Television programming and broadcasting activities																		
187	61.10 - Wired telecommunications activities																		
188	61.20 - Wireless telecommunications activities																		
189	61.90 - Other telecommunications activities																		
190	62.01 - Computer programming activities																		
191	62.02 - Computer consultancy activities																		
192	62.03 - Computer facilities management activities																		
193	62.09 - Other information technology and computer service activities																		
194	63.11 - Data processing, hosting and related activities																		
195	63.12 - Web portals																		
196	64.20 - Activities of holding companies																		
197	64.30 - Trusts, funds and similar financial entities																		
198	64.99 - Other financial service activities, except insurance and pension funding n.e.c.																		
199	66.12 - Security and commodity contracts brokerage																		
200	66.19 - Other activities auxiliary to financial services, except insurance and pension funding																		



			Climate	e Change	Mitigat	ion (CCM)			Climate	Change A	daptati	on (CCA)				Total (CCM	I+CCA)		
			financial Co subject to N	rporates	SMEs	and other			inancial Cor subject to NF	porates	SMEs	and other N ubject to NFI		Non-fin	ancial Corpo to NFR	orates subject	SMEs	and other l ubject to Ni	
	Breakdown by sector- NACE 4 digits level (Code and label)	(Gross) Carrying Ar	nount	(Gross)	Carrying An	nount	(Gross)	Carrying Am	ount	(Gross) (Carrying Ame	ount	(Gross)	Carrying Am	ount	(Gross)	Carrying Am	nount
			Of wi environn sustainat	nentally		Of w environn sustainal	nentally		Of wh environm sustainat	nentally		Of wh environm sustainab	entally		enviro	which nmentally le (CCM+ CCA)		environn	hich mentally inable +CCA)
201	66.30 - Fund management activities																	(
202	68.10 - Buying and selling of own real estate																		
203	68.20 - Renting and operating of own or leased real estate																		
204	68.31 - Real estate agencies																		
205	69.20 - Accounting, bookkeeping and auditing activities, tax consultancy																		
206	70.10 - Activities of head offices																		
207	70.22 - Business and other management consultancy activities																		
208	71.11 - Architectural activities																		
209	71.12 - Engineering activities and related technical consultancy																		
210	72.19 - Other research and experimental development on natural sciences and engineering																		
211	72.20 - Research and experimental development on social sciences and humanities																		
212	73.11 - Advertising agencies																		
213	73.20 - Market research and public opinion polling																		
214	74.10 - Specialised design activities																		
215	74.90 - Other professional, scientific and technical activities n.e.c.																		
216	77.11 - Renting and leasing of cars and light motor vehicles																		
217	77.32 - Renting and leasing of construction and civil engineering machinery and equipment																		
218	77.39 - Renting and leasing of other machinery, equipment and tangible goods n.e.c.																		
219	78.10 - Activities of employment placement agencies																		
220	78.20 - Temporary employment agency activities																		
221	80.10 - Private security activities																		
222	80.20 - Security systems service activities																		
223	81.10 - Combined facilities support activities																		
224	81.21 - General cleaning of buildings																		
225	81.22 - Other building and industrial cleaning activities																		



			Climat	e Change	Mitigat	ion (CCM)			Climate	Change A	Adaptati	on (CCA)	1			Total (CCN	1+CCA)		
			financial Co subject to N			s and other subject to N			financial Cor subject to NF			and other N ubject to NF		Non-fin	ancial Corp to NFR	orates subject D		and other f ubject to NF	
	Breakdown by sector- NACE 4 digits level (Code and label)	(Gross) Carrying A	mount	(Gross)	Carrying Ar	nount	(Gross)	Carrying Am	ount	(Gross)	Carrying Am	ount	(Gross)	Carrying Am	ount	(Gross)	Carrying Am	iount
				hich mentally ble (CCM)			hich mentally ble (CCM)		Of wh environm sustainab	entally		Of wł environm sustainat	entally	-	enviro	which nmentally le (CCM+ CCA)		Of wh environm sustair (CCM+	nentally nable
226	81.29 - Other cleaning activities																		
227	82.11 - Combined office administrative service activities																		
228	82.20 - Activities of call centres																		
229	82.91 - Activities of collection agencies and credit bureaus																		
230	82.99 - Other business support service activities n.e.c.																		
231	85.31 - General secondary education																		
232	85.41 - Post-secondary non tertiary education																		
233	85.42 - Tertiary education																		
234	85.52 - Cultural education																		
235	85.59 - Other education n.e.c.																		
236	86.21 - General medical practice activities																		
237	86.22 - Specialist medical practice activities																		
238	86.90 - Other human health activities																		
239	87.10 - Residential nursing care activities																		
240	87.30 - Residential care activities for the elderly and disabled																		
241	88.10 - Social work activities without accommodation for the elderly and disabled																		
242	88.99 - Other social work activities without accommodation n.e.c.																		
243	90.02 - Support activities to performing arts																		
244	93.12 - Activities of sport clubs																		
245	93.13 - Fitness facilities																		
246	93.21 - Activities of amusement parks and theme parks																		
247	94.12 - Activities of professional membership organisations																		
248	95.12 - Repair of communication equipment																		
249	96.01 - Washing and (dry-) cleaning of textile and fur products																		
250	96.09 - Other personal service activities n.e.c.																		

^{3.} Credit institutions shall disclose in this template information on exposures in the banking book towards those sectors covered by the Taxonomy (NACE sectors 4 levels of detail), using the relevant NACE Codes on the basis of the principal activity of the counterparty.

^{4.} The counterparty NACE sector allocation shall be based exclusively on the nature of the immediate counterparty. The classification of the exposures incurred jointly by more than one obligor shall be done on the basis of the characteristics of the obligor that was the more relevant, disaggregation required in the template.



3a. GAR KPI stock based on turnover

									31/12/202	4						
			Climate Cl	hange Miti	gation (CCM)	Climat	e Change	Adaptatio	n (CCA)		то	TAL (CCM +	+ CCA)		
		Proporti			ets funding Ta iomy-eligible			n of total co my-relevant elig		- 1	Proport			ets funding Ta nomy-eligible)		
	%(Compared to total covered assets in the denominator				overed asset ctors (Taxono	-		funding	of total cov Taxonomy- (Taxonomy-	I				covered assets ctors (Taxonor	-	Proportion of total assets covered
				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 transitional	Of which enabling	tovered
	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															
	Credit institutions															
4	Loans and advances, debt securities and equity instruments not HfT eligible for GAR Calculation															
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															

1. 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.



								31/12/202	4			1	1	1	
		Climate Cł	nange Miti	gation (CCM)	Climat	e Change	Adaptatio	n (CCA)		то	TAL (CCM	+ CCA)		
				ets funding Ta omy-eligible	-		my-relevant	overed asse t sectors (Ta ;ible)	- 1	Proporti			ets funding Ta nomy-eligible		
	%(Compared to total covered assets in the denominator			overed asset tors (Taxonor	•		funding	of total cov g Taxonomy- (Taxonomy-	I				covered asset ctors (Taxono		Proportion of total assets covered
			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 transitional	Of which enabling	covered
	GAR- Covered assets in both numerator and denominator														
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 renovations 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: residentialand comercial immovable properties														
32	Total GAR assets														

1. 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.



3b. GAR KPI stock based on CAPEX

									31/12/202	4				1		
			Climate C	hange Miti	gation (CCM)		Climat	e Change	Adaptatio	n (CCA)		то	TAL (CCM	+ CCA)		
		Proporti			ets funding Ta nomy-eligible)			my-relevant	overed asse sectors (Ta ible)	-	Proport			ets funding Ta nomy-eligible)		
	%(Compared to total covered assets in the denominator				covered assets ctors (Taxonon	-		funding	of total cov Taxonomy- (Taxonomy-					covered assets ectors (Taxonon	-	Proportion of total assets
				Of which Use of Proceeds		Of which enabling			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling	covered
	GAR- Covered assets in both numerator and der	nominator														
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, debt securities and equity instruments not HfT eligible for GAR Calculation															
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															

1. 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.



									31/12/202	24						
			Climate C	hange Miti	igation (CCM)	Clima	te Change	Adaptatio	n (CCA)		тс	TAL (CCM	+ CCA)		
		Proporti			ets funding Ta nomy-eligible)			on of total co my-relevant elig			Proport			sets funding Ta nomy-eligible)		
	%(Compared to total covered assets in the denominator				covered assets ctors (Taxonor	-		funding	of total cov Taxonomy (Taxonomy					covered assets ectors <mark>(</mark> Taxonor	-	Proportion of total assets covered
				Of which Use of Proceeds	Of which transitional			Of which Use of Proceeds	Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling		
	GAR- Covered assets in both numerator and der	nominator														
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 renovations 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: residentialand comercial immovable properties															
32	Total GAR assets															

1. 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.



4a. GAR KPI flow based on turnover

								31/12	2/2024						
		Climat	e Change N	litigation (CC	M)	Clin	nate Cha	ange Adapt	ation (CCA)		Т	OTAL (CCN	1 + CCA)		
	Propo	rtion of to	tal covered a	assets funding	Taxonomy-	Propor	tion of to	otal covered	assets funding	Proport	tion of tot	al covered a	ssets funding T	axonomy-	
		relevan	t sectors (Ta	xonomy-eligib	le)	Taxonom	y-releva	nt sectors (Ta	xonomy-eligible)		relevant	sectors (Tax	onomy-eligible	:)	
		Brong	tion of tota	Lowered acce	to funding	1	Propo	ortion of total	covered assets		Brono	tion of total	covered accet	funding	Proportion
%(Compared to flow of total eligible assets)				I covered asse sectors (Taxono			fundin		relevant sectors				covered assets ectors (Taxonor		of total
				-		4		(Taxonomy-					-		new assets
			Of which Use of	Of which transitional	Of which enabling			Of which Use of	Of which enabling			Of which Use of	Of which transitional	Of which enabling	covered
			Proceeds	transitional	enabiling			Proceeds	enabiling			Proceeds	transitional	enabiling	
- Covered assets in both numerator and denominator															
ns and advances, debt securities and equity instruments not HfT eligible for GAR Calculati	on														
ncial undertakings															
lit institutions															
ns and advances, debt securities and equity instruments not HfT eligible for GAR Calculati	on														
t securities, including UoP															
ty Instruments															
er financial corporations															
hich investment firms															
is and advances															
t securities, including UoP															
ty instruments															
hich management companies															
is and advances															
t securities, including UoP															
ty Instruments															
hich insurance undertakings															
ns and advances															
t securities, including UoP															
ty Instruments															
-financial undertakings															
ns and advances															
t securities, including UoP															
ty Instruments															
seholds															
hich loans collateralised by residential immovable property															
hich building renovations loans															
hich motor vehicle loans															
l governments financing															
sing financing															
er local government financing															
ateral obtained by taking possession: residentialand comercial immovable properties															
I GAR assets															

1. Institution shall disclose in this template the GAR KPIs on flow of loans calculated (new loans on a net basis) based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.



4b. GAR KPI flow based on CAPEX

								31/12/2024							
		Climate	Change N	itigation (CC	M)	Clima	te Change	Adaptation	(CCA)		1	TOTAL (CC	M + CCA)		
	Prop			ssets funding			on of total co			Pro	portion	of total cov	ered assets f	unding	
		relevan	t sectors (Ta	xonomy-eligib	le)	Taxono	my-relevant eligi		onomy-	Taxor	nomy-rel	evant secto	ors (Taxonomy	eligible)	Proportion
%(Compared to flow of total eligible assets)		Proporti	on of total o	overed assets	funding			of total cove]			l covered asse		of total
		Taxonomy	relevant se	tors (Taxonon	ny-aligned)		-	onomy-relev onomy-align			laxo		ant sectors (Ta aligned)	axonomy-	new assets
			Of which	Of which	Of which			Of which	Of which				Of which	Of which	covered
			Use of Proceeds	transitional	enabling			Use of Proceeds	enabling			Use of Proceeds	transitional	enabling	
GAR- Covered assets in both numerator and denominator			Floceeus					FIOCEEUS				Floceeus			
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, debt securities and equity instruments not HfT eligible for GAR Calculation															
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 renovations 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: residentialand comercial immovable properties															
32 Total GAR assets															

1. Institution shall disclose in this template the GAR KPIs on flow of loans calculated (new loans on a net basis) based on the data disclosed in template 1, on covered assets, and by applying the formulas proposed in this template.



5a. KPI off-balance sheet exposures based on turnover

	_						31/12	2/2024					
		Climate Ch	nange Miti	gation (CCM))	Climat	e Change	Adaptatio	n (CCA)	то	TAL (CCM +	+ CCA)	
				ets funding Ta nomy-eligible)			my-relevant	overed asse sectors (Ta ible)	- 1			ets funding Ta nomy-eligible)	
	%(Compared to flow of total eligible assets)			overed assets ctors (Taxonon	-		funding	of total cov Taxonomy- (Taxonomy-				overed assets ctors (Taxonon	-
			Of which Use of Proceeds		Of which enabling				Of which enabling		Of which Use of Proceeds	Of which transitional	Of which enabling
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.

5b. KPI off-balance sheet exposures based on CAPEX

	-						31/12	2/2024					
		Climate Cl	nange Miti	gation (CCM)		Climat	e Change	Adaptatior	n (CCA)	то	TAL (CCM +	+ CCA)	
				ets funding Ta nomy-eligible)			my-relevant	overed asset sectors (Ta: ible)	~			ets funding Ta nomy-eligible)	
	%(Compared to flow of total eligible assets)			covered assets ctors (Taxonon	-		funding	of total cov Taxonomy- (Taxonomy-				covered assets ctors (Taxonor	- 1
					Of which enabling				Of which enabling		Of which Use of Proceeds		Of which enabling
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.



5c. KPI off-balance sheet exposures based on turnover

								31/1	2/2024						
			Climate C	hange Mit	igation (CCM)	Clima	te Change	Adaptatio	n (CCA)		то	TAL (CCM	+ CCA)	
		Proport			ets funding Ta nomy-eligible)			my-relevan	overed asse t sectors (Ta gible)	-	Proport			sets funding Ta nomy-eligible)	
	%(Compared to flow of total eligible assets) Financial guarantees (FinGuar KPI)				covered assets ectors (Taxonor	-		fundin	of total cov g Taxonomy- (Taxonomy-					covered assets ectors <mark>(</mark> Taxonor	-
				Of which Use of Proceeds		Of which enabling				Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
1															
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.

5d. KPI off-balance sheet exposures based on CAPEX

								31/12	/2024						
			Climate C	hange Miti	igation (CCM)		Clima	te Change /	Adaptatior	n (CCA)		то	TAL (CCM ·	+ CCA)	
		Proport			ets funding Tax nomy-eligible)			on of total co omy-relevant elig		-	Proport			ets funding Ta nomy-eligible)	
	%(Compared to flow of total eligible assets) Financial guarantees (FinGuar KPI)		-		covered assets ectors (Taxonom	-		funding	of total cov Taxonomy- (Taxonomy-					covered assets ctors (Taxonor	-
					Of which transitional	Of which enabling				Of which enabling			Of which Use of Proceeds	Of which transitional	Of which enabling
1															
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.



6. KPI on fees and commissions income from services other than lending and asset management

			1		1		-	-							-							-		· · · · ·
	a	b	С	d	e	f	g	h	i	j	k	I .	m	n	0	р	q	r	5	t	u	v	w	x
													sure refere											
			-	e Mitigation				aption (CCA)	-		resources (WTR)		ular econo			Pollution (osystems (BIO)			WTR+CE+PP	
		Of which t		nomy-relavan	t sectors (%)			nomy-relavant			conomy-relavant			nomy-relavant			nomy-relavant			nomy-relavant	Of which to		nomy-relavant	sectors (%)
	Total		(laxono	my-aligned)		sectors		my-aligned)	-		iomy-aligned)	sectors	(%) (Taxono		sector		my-aligned)	secto	ors (%) (Taxono		-	(laxonor	ny-aligned)	
	(Million		Of which e	nvironmentall	y sustainable			nvironmentally inable (%)			environmentally ble (%) (Taxonomy-			nvironmentally inable (%)			nvironmentally e (%) (Taxonomy-			environmentally e (%) (Taxonomy-		Ofwh	ich environme	entally
	EUR)		(%)	(Taxonomy-al	igned)			my-aligned)			aligned)			my-aligned)			igned)			ligned)		sustainab	le (%) (Taxonor	my-aligned)
				Ofwhich	Ofwhich	1	(reaction)	Of which	-		Of which enabling		(reaction of	Of which	1		Of which			Of which	-		Ofwhich	Of which
				transitional				enabling						enabling			enabling			enabling			transitional	
					_			_						_			_			-				-
Fees and commission income from NFRD corporates - Services other than lending	19.3m																							
Services towards financial undertakings																								
Credit institutions																								
Other financial undertakings											1									1				
of which investment firms	1	1	1	+				+							<u> </u>	1			1	1	1			
of which management companies																								
of which insurance undertakings								-											-					
								+											+					
Non-financial undertakings Counterparties not subject to NFRD disclosures																								
obligations, including third-country counterparties																								
	z	aa	ab	ac	ad	ae	af	ag	ah	ai	aj	ak	al	am	an	ao	ap	aq	ar	as	at	au	av	aw
					1	1			1		F&C K	PI - Disclos	sure refere	nce date T					1			1	1	
		Clim	nate Chang	e Mitigation	(CCM)	Climate	Change Ad	aption (CCA)	Water ar	d marine	resources (WTR)		ular econo			Pollution (PPC)	Biodive	rsity and Eco	osystems (BIO)	Total	(CCM+CCA-	WTR+CE+PP	C+BIO)
			-	nomy-relavan			-	nomy-relavant			conomy-relavant			nomy-relavant			nomy-relavant			nomy-relavant			omy-relavant	,
		of which t		my-aligned)	1 20012 (70)			my-aligned)			omy-aligned)		(%) (Taxono				my-aligned)		ors (%) (Taxono		of which the		ny-aligned)	200012 (70)
	Total					1	Of which e	nvironmentally	1	Of which	environmentally			nvironmentally	1		nvironmentally		Of which e	nvironmentally	1	_		
	(Million			nvironmentall				inable (%)		1	ole (%) (Taxonomy-			inable (%)			e (%) (Taxonomy-			e (%) (Taxonomy-			ich environme	
	EUR)		(96)	(Taxonomy-al	igned)		(Taxono	my-aligned)			aligned)		(Taxono	my-aligned)			ligned)		а	ligned)		sustainab	le (%) (Taxonor	ny-aligned)
				Ofwhich	Ofwhich	1		Ofwhich	1		Of which enabling			Of which	1		Of which	1		Of which	1			Ofwhich
				transitional	enabling			enabling						enabling			enabling			enabling			transitional	enabling
Fees and commission income from NFRD corporates -			-	-				-							-				-		-			
Services other than lending																								
Services towards financial undertakings																								
Credit institutions																								
Other financial undertakings																								
of which investment firms				1																+				
of which management companies				1																+				
of which insurance undertakings				+																				
Non-financial undertakings	-			-				-	-		+				-					-			-	
Counterparties not subject to NFRD disclosures				+				+																
obligations, including third-country counterparties																								
	-	-																		-				

Note: This value represents only companies where a determination of company classification was possible.

1. Institutions shall disclose in this template information on the percentage (%) of fees and Commission income towards taxonomy relevant sectors and environmentally sustainable (with breakdown for transitional/adaption and enabling activities) compared to total fees and commission income from NFRD corporates for services other than lending and asset management

Disclaimer: This report has been prepared by Banking Circle S.A., a credit institution licensed under Luxembourg law and authorised and regulated by the Commission de Surveillance du Secteur Financier (CSSF). This report has been compiled in accordance with the Non-Financial Reporting Directive (Directive 2014/95/EU) to provide stakeholders with information on our company's environmental, social, and governance (ESG) performance, as well as diversity practices. The information contained in this report is for general informational purposes only.

While Banking Circle has made every effort to ensure the accuracy, completeness, and reliability of the information provided, it makes no representations or warranties of any kind, express or implied, about the completeness, accuracy, reliability, suitability, or availability with respect to the report or the information, products, services, or related graphics contained in the report for any purpose. Any reliance readers place on such information is therefore strictly at their own risk.

In no event will Banking Circle be liable for any loss or damage including without limitation, indirect or consequential loss or damage, or any loss or damage whatsoever arising from loss of data or profits arising out of, or in connection with, the use of this report.

By using this report, readers agree to the terms of this disclaimer.