

ABN AMRO Bank N.V.

Pillar 3 Report Second quarter 2025

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Notes to the reader

This Pillar 3 Report provides the consolidated disclosures of ABN AMRO Bank N.V. required by Capital Requirements Regulation (EU) No 575/2013 on prudential requirements for credit institutions and investment firms (Part Eight) and the final draft Implementing Technical Standards (ITS) on public disclosures by institutions of the information referred to in Titles II and III of Part Eight of Regulation (EU) No 575/2013. The Pillar 3 Report for the second quarter of 2025 includes an update on the quarterly and semi-annually required disclosures, which provide comprehensive information about risk, funding and capital management. The templates included in this Pillar 3 Report have been prepared in accordance with the abovementioned regulations.

Presentation of information

This report is presented in euros (EUR), which is ABN AMRO's functional and presentation currency, rounded to the nearest million (unless otherwise stated). Certain figures in this report may not tally exactly due to rounding. Furthermore, certain percentages in this document have been calculated using rounded figures. The figures presented in this document are not required to be, nor have they been, audited or reviewed by our external auditor. Based on the final draft ITS, this report uses the terms 'risk-weighted assets (RWA)' and 'risk-weighted exposure amount (RWEA)' interchangeably. Similarly, this report may use the terms 'banking book' and 'non-trading book' interchangeably.

On 1 January 2025, Capital Requirements Regulation 3 (CRR3) came into effect, introducing new approaches and concepts in different frameworks (e.g. the output floor, a basic indicator component for operational risk and new approaches for the Credit Valuation Adjustment (CVA) risk for own funds requirements). The European Banking Authority (EBA) has amended the Pillar 3 templates to be consistent with these changes brought by CRR3. As part of these changes, some rows have been removed, and there have been adjustments in the mappings of existing rows, necessitating changes to the comparative figures. The amendments also include the introduction of new rows in templates where comparative figures for previous periods are reported. Because these changes do not apply retrospectively, if such data points did not exist for these previous periods, no comparative figures are reported in these rows. Over time, these comparative figures will again be completed.

Effective Q1 2025, voluntarily disclosed information from prior periods is excluded from the Pillar 3 reports, retaining the comparative figures only in the templates where they are mandatory. Our aim in doing so is to improve the readability of the Pillar 3 report.

Waiver policy (omitting templates and tables)

In accordance with Article 432 of the CRR, ABN AMRO may omit one or more of the required disclosures where the information provided by those disclosures is not regarded as material or is not applicable to its operations. Information in disclosures is regarded as material where its omission or misstatement could change or influence the assessment or decision of a user of that information relying on it for the purpose of making economic decisions.

ABN AMRO shall, in accordance with Article 432 of the CRR, explain the reasons for omitting any information required in the templates and tables included in the final draft ITS.

The following templates have been identified as not applicable to ABN AMRO and therefore are not included in this report:

- The ITS apply a 5% NPE ratio threshold. ABN AMRO is below this 5% threshold and for that reason parts of and/or complete tables for **EU CR2a**, **EU CQ2**, **EU CQ6** and **EU CQ8** are not applicable.
- **EU CR7 – IRB approach – Effect on the RWEA of credit derivatives used as CRM techniques:** ABN AMRO does not typically secure its credit exposure by buying protection via credit derivatives. At present, ABN AMRO does not use credit derivatives to reduce RWEA via credit risk mitigation. ABN AMRO does use its credit derivatives to hedge CVA risk.
- **EU CR10 – Specialised lending and equity exposures under the simple risk-weighted approach:** Templates EU CR10.1 - EU CR10.4 are for specialised lending calculated on the basis of the slotting approach, which is not applied by ABN AMRO. These templates are therefore not applicable to ABN AMRO. Template EU CR10.5 is meant for equity exposures under Articles 133(3) to (6) and 495a(3) CRR. The bank applies the transitional arrangement

from Article 495(1) CRR and currently does not have any equity exposures for which Article 495a(3) is driving the risk weight. All risk weights for equity exposures are currently still based on the risk weights as applied under the simple risk weight approach. Over time, this will change and the risk weights from Article 133(3) to (6) will become applicable. Currently, the bank therefore omits the presentation of template EU CR10.5.

- **EU CCR7 – RWEA flow statements of CCR exposures under the IMM:** ABN AMRO does not use the Internal Model Method (IMM) to measure the EAD for counterparty credit risk exposures. Instead, we apply the Standardised Approach for Counterparty Credit Risk (SA-CCR) to calculate the EAD for derivatives and the Financial Collateral Comprehensive Method (FCCM) for securities financing transactions (CRR 220/222). Therefore, this template is not applicable.
- **EU SEC2 - Securitisation exposures in the trading book:** ABN AMRO does not have any exposure to securitisation positions in its trading book.
- **EU SEC3 – Securitisation exposures in the non-trading book and associated regulatory capital requirements**
- Bank acting as originator or as sponsor: In April 2025 the bank entered into a transaction with the EIB Group (the counterparty being the European Investment Fund) which classifies as a synthetic securitisation, where the bank has the role of originator. However, given that the bank has used the option the CRR provides to fully deduct the retained position from CET1 (instead of applying a 1250% risk weight) based on the EBA's mapping for 'EU SEC3', the template would still be an empty template. For that reason, we continue to omit the presentation of the EU SEC3 template.

Comparative figures for first-time reporting of new or adjusted templates

Comparative figures for first-time reporting of new templates or templates adjusted by the final draft ITS are not required to be disclosed. As a result, narratives of new or adjusted templates might not provide explanations at a detailed level.

Key metrics and overview of RWEA

Highlights

- The regulatory reported CET1 ratio under CRR3 (Basel IV), excluding the net profit for the first and second quarter, was 14.5% as at 30 June 2025 (31 March 2025: 14.4%). In comparison with 31 March 2025, the regulatory reported CET1 ratio increased slightly, mainly due to a decrease in Total Risk Exposure Amount (TREA).
- In the second quarter of 2025, Total Risk Exposure Amount (TREA) decreased by EUR 1.9 billion to EUR 139.8 billion (Q1 2025: EUR 141.7 billion), mostly driven by a reduction of EUR 1.5 billion in credit risk RWEA. This was mainly the result of the wind down of our non-strategic client portfolios in Asset Based Finance – ABF (in line with our strategic ambition), data quality improvements that led to releases of RWEA add-ons and the reduction in RWEA caused by the synthetic securitisation that ABN AMRO entered into with the European Investment Fund – EIF in April. These decreases were partly offset by the risk weighting of the prepayment for HAL (EUR 0.7 billion).
- The regulatory reported total capital decreased slightly to EUR 28.8 billion as at 30 June 2025 (31 March 2025: EUR 29.1 billion), mainly due to a decrease in Tier 2 instruments, which related mainly to the depreciation of the US dollar.
- The regulatory reported leverage ratio decreased to 5.5% as at 30 June 2025 (31 March 2025: 5.6%), mainly due to an increase in exposure measure.
- The consolidated LCR amounted to 144% at the end of June 2025, based on a 12-month rolling average (31 March 2025: 140%).
- The NSFR amounted to 138% at the end of June 2025 (31 March 2025: 136%). The increase was mainly observed in available stable funding from retail deposits.

EU KM1 – Key metrics template

As of 1 January 2025, we report our regulatory capital metrics and risk exposures in line with CRR3 (Basel IV). Comparative figures up to and including 31 December 2024 are reported under CRR2 (Basel III).

The capital ratios and figures disclosed in the Pillar 3 report exclude Q1 and Q2 2025 net profit, whereas the pro-forma capital ratios and figures in the Q2 2025 Quarterly report include 50% of the net profit in line with the existing dividend policy and the practice that was applied for regulatory purposes until 30 June 2024. The comparative capital ratios and figures have not been adjusted for this revised approach as they reflected the applicable regulatory approach at the time.

As at 30 June 2025, the regulatory reported CET1 ratio was 14.5% (31 March 2025: 14.4%). In comparison with Q1 2025, the regulatory reported CET1 ratio increased, mainly due to the decrease in TREA. TREA decreased by EUR 1.9 billion compared with 31 March 2025, mainly reflecting a decrease in credit risk RWEA and to a lesser extent market risk RWEA. This was mainly the result of a decrease in Asset Based Finance and data quality improvements, including improved monitoring and revaluation of collateral. The synthetic securitisation that ABN AMRO entered into with the European Investment Fund further contributed to the decrease. The decrease in credit risk RWEA was partly offset by the risk weighting of the prepayment for HAL. This quarter, the regulatory reported amount of CET1 capital decreased slightly to EUR 20.3 billion (31 March 2025: EUR 20.4 billion). The regulatory reported CET1 capital was not impacted by the EUR 250 million share buyback, which was announced at the publication of the Q2 2025 results. To prevent a double-counting, the bank received approval to add EUR 250 million of interim profit to CET1 capital, which offset the EUR 250 million CET1 capital deduction for the share buyback. All capital ratios were in line with the bank's risk appetite and comfortably above regulatory requirements.

		A	B	C	D	E
		30 June 2025	31 March 2025	31 December 2024	30 September 2024	30 June 2024
(in millions)						
Available own funds (amounts)						
1	Common Equity Tier 1 (CET1) capital	20,321	20,416	20,357	19,915	20,206
2	Tier 1 capital	24,542	24,637	23,831	23,389	22,934
3	Total capital	28,763	29,096	28,477	28,033	27,011
Risk-weighted exposure amounts (RWEA)						
4	Total risk exposure amount	139,789	141,710	140,871	143,822	146,348
4a	Total risk exposure pre-floor	139,789	141,710			
Capital ratios (as % of RWEA)						
5	Common Equity Tier 1 ratio (%)	14.5%	14.4%	14.5%	13.8%	13.8%
5b	Common Equity Tier 1 ratio considering unfloored TREa (%)	14.5%	14.4%			
6	Tier 1 ratio (%)	17.6%	17.4%	16.9%	16.3%	15.7%
6b	Tier 1 ratio considering unfloored TREa (%)	17.6%	17.4%			
7	Total capital ratio (%)	20.6%	20.5%	20.2%	19.5%	18.5%
7b	Total capital ratio considering unfloored TREa (%)	20.6%	20.5%			
Additional own funds requirements to address risks other than the risk of excessive leverage (as % of RWEA)						
EU 7d	Additional own funds requirements to address risks other than the risk of excessive leverage (%)	2.25%	2.25%	2.25%	2.25%	2.25%
EU 7e	- of which to be made up of CET1 capital (percentage points)	1.27%	1.27%	1.27%	1.27%	1.27%
EU 7f	- of which to be made up of Tier 1 capital (percentage points)	1.69%	1.69%	1.69%	1.69%	1.69%
EU 7g	Total SREP own funds requirements (%)	10.25%	10.25%	10.25%	10.25%	10.25%
Combined buffer and overall capital requirement (as % of RWEA)						
8	Capital conservation buffer (%)	2.50%	2.50%	2.50%	2.50%	2.50%
EU 8a	Conservation buffer due to macro-prudential or systemic risk identified at the level of a Member State (%)					
9	Institution specific countercyclical capital buffer (%)	1.74%	1.74%	1.73%	1.73%	1.72%
EU 9a	Systemic risk buffer (%)	0.02%	0.02%			
10	Global Systemically Important Institution buffer (%)					
EU 10a	Other Systemically Important Institution buffer (%)	1.25%	1.25%	1.25%	1.25%	1.25%
11	Combined buffer requirement (%)	5.51%	5.51%	5.48%	5.48%	5.47%
EU 11a	Overall capital requirements (%)	15.76%	15.76%	15.73%	15.73%	15.72%
12	CET1 available after meeting the total SREP own funds requirements (%)	8.77%	8.64%	8.68%	8.11%	7.98%
Leverage ratio						
13	Total exposure measure	448,941	440,170	420,932	436,327	430,460
14	Leverage ratio (%)	5.5%	5.6%	5.7%	5.4%	5.3%
Additional own funds requirements to address risks of excessive leverage (as % of total exposure measure)						
EU 14a	Additional own funds requirements to address the risk of excessive leverage (%)					
EU 14b	- of which to be made up of CET1 capital (percentage points)					
EU 14c	Total SREP leverage ratio requirements (%)	3.0%	3.0%	3.0%	3.0%	3.0%
Leverage ratio buffer and overall leverage ratio requirement (as % of total exposure measure)						
EU 14d	Leverage ratio buffer requirement (%)					
EU 14e	Overall leverage ratio requirement (%)	3.0%	3.0%	3.0%	3.0%	3.0%
Liquidity Coverage Ratio						
15	Total high-quality liquid assets (HQLA) (Weighted value-average)	92,660	89,809	88,486	90,110	91,777
EU 16a	Cash outflows - Total weighted value	96,767	96,209	95,525	95,482	95,783
EU 16b	Cash inflows - Total weighted value	32,521	31,935	31,510	30,805	30,225
16	Total net cash outflows (adjusted value)	64,247	64,274	64,015	64,677	65,558
17	Liquidity coverage ratio (%)	144%	140%	138%	139%	140%
Net Stable Funding Ratio						
18	Total available stable funding	276,560	268,552	264,223	262,125	263,367
19	Total required stable funding	199,908	197,804	193,534	195,423	192,580
20	NSFR ratio (%)	138%	136%	137%	134%	137%

EU KM2 – Key metrics - MREL and, where applicable, G-SII requirement for own funds and eligible liabilities

	A	B	C	D	E	F
	Minimum requirement for own funds and eligible liabilities (MREL)	G-SII Requirement for own funds and eligible liabilities (TLAC)				
(in millions)	30 June 2025	30 June 2025	31 March 2025	31 December 2024	30 September 2024	30 June 2024
Own funds and eligible liabilities, ratios and components						
1 Own funds and eligible liabilities	46,909					
EU-1a Of which own funds and subordinated liabilities	46,390					
2 Total risk exposure amount of the resolution group (TREA)	139,735					
3 Own funds and eligible liabilities as a percentage of TREA (row1/row2)	33.6 %					
EU-3a Of which own funds and subordinated liabilities	33.2 %					
4 Total exposure measure of the resolution group	448,941					
5 Own funds and eligible liabilities as percentage of the total exposure measure	10.4 %					
EU-5a Of which own funds or subordinated liabilities	10.3 %					
6a Does the subordination exemption in Article 72b(4) of the CRR apply? (5% exemption)						
6b Pro-memo item - Aggregate amount of permitted non-subordinated eligible liabilities in-instruments If the subordination discretion as per Article 72b(3) CRR is applied (max 3.5% exemption)						
6c Pro-memo item: If a capped subordination exemption applies under Article 72b (3) CRR, the amount of funding issued that ranks pari passu with excluded liabilities and that is recognised under row 1, divided by funding issued that ranks pari passu with excluded Liabilities and that would be recognised under row 1 if no cap was applied (%)						
Minimum requirement for own funds and eligible liabilities (MREL)						
EU-7 MREL requirement expressed as percentage of the total risk exposure amount	22.9 %					
EU-8 Of which to be met with own funds or subordinated liabilities	16.7 %					
EU-9 MREL requirement expressed as percentage of the total exposure measure	7.3 %					
EU-10 Of which to be met with own funds or subordinated liabilities	7.3 %					

EU OV1 – Overview of total risk exposure amounts

At 30 June 2025 total RWEA decreased by EUR 1.9 billion to EUR 139.8 billion (31 March 2025: EUR 141.7 billion; 31 December 2024: EUR 140.9 billion), primarily due to a EUR 1.5 billion reduction in credit risk RWEA. This was mainly the result of our wind down in ABF, data quality improvements (including improved monitoring and revaluation of collateral) and the synthetic securitisation that ABN AMRO entered into with the EIF. The decrease in credit risk RWEA was partly compensated for by the risk weighting of the prepayment in relation to the acquisition of HAL (EUR 0.7 billion).

Market risk RWEA declined by EUR 0.4 billion to EUR 1.9 billion (31 March 2025: EUR 2.3 billion; 31 December 2024: EUR 2.1 billion), mainly due to position changes. The operational risk RWEA stayed unchanged at EUR 16.3 billion after the annual update of our three-year average operating income in Q1 2025.

	A	B	C
	30 June 2025 ³	31 March 2025	30 June 2025 ³
(in millions)	TREA	TREA	Total own funds requirements
1 Credit risk (excluding CCR)	114,956	116,858	9,196
2 - of which the standardised approach	7,472	7,805	598
3 - of which the Foundation IRB (F-IRB) approach	23,238	23,504	1,859
4 - of which slotting approach			
EU 4a - of which equities under the simple risk-weighted approach	2,655	2,558	212
5 - of which the Advanced IRB (A-IRB) approach ¹	45,013	44,400	3,601
6 Counterparty Credit Risk - CCR	5,992	5,681	479
7 - of which the standardised approach	3,240	2,992	259
8 - of which internal model method (IMM)			
EU 8a - of which exposures to a CCP	580	693	46
9 - of which other CCR	2,172	1,996	174
10 Credit valuation adjustments risk - CVA risk	190	185	15
EU 10a - of which the standardised approach (SA)			
EU 10b - of which the basic approach (F-BA and R-BA)	190	185	15
EU 10c - of which the simplified approach			
15 Settlement risk			
16 Securitisation exposures in the non-trading book (after the cap)	739	358	59
17 - of which SEC-IRBA approach			
18 - of which SEC-ERBA (including IAA)	59	60	5
19 - of which SEC-SA approach	397	297	32
EU 19a - of which 1250% / deduction			
20 Position, foreign exchange and commodities risks (Market risk)²	1,861	2,294	149
21 - of which the Alternative standardised approach (A-SA)			
EU 21a - of which the Simplified standardised approach (S-SA)			
22 - of which Alternative Internal Model Approach (A-IMA)			
EU 22a Large exposures			
23 Reclassifications between the trading and non-trading books			
24 Operational risk	16,335	16,335	1,307
EU 24a Exposures to crypto-assets			
25 Amounts below the thresholds for deduction (subject to 250% risk weight)	953	1,079	76
26 Output floor applied (%)	50%	50%	
27 Floor adjustment (before application of transitional cap)			
28 Floor adjustment (after application of transitional cap)			
29 Total	139,789	141,710	11,183

1. Following EBA's mapping for this template, the amount of which the advanced IRB (A-IRB) approach¹ excludes Equity exposures subject to risk weights and CIU exposures subject to the fall-back approach.

2. Position, foreign exchange and commodities risks (Market risk) are left blank for both the current and previous reporting periods, as the approaches referenced in those lines are not applicable under the methodology currently in use. This is due to the FRTB delay, as a result of which Market Risk own funds requirements are still calculated based on the approaches as existed prior to CRR3.

3. EBA's instruction for row 16 is that it should include RWEAs and Own Funds requirements for Securitisation, meaning that it also includes an RWEA equivalent for the securitisation position that the bank has deducted from CET1. In EBA's instruction, the amount from row 16 is included in the total in row 29. That would however result in a different TREA number than our actual TREA and different from the TREA reported in other templates, which in our view would be confusing for the readers. We therefore only include the RWEA for the securitisation positions that are risk weighted (the amounts presented on rows 18 & 19) in the total in row 29.

EU CMS1 – Comparison of modelled and standardised risk weighted exposure amounts at risk level

Total RWEA reached EUR 139.8 billion in Q2 2025, a reduction of EUR 1.9 billion compared to last quarter (Q1 2025: EUR 141.7 billion). Credit risk RWEA, including counterparty credit risk (CCR) and other RWEA (which consists mostly of self-imposed model-related RWEA add-ons), decreased by EUR 1.5 billion to EUR 121.6 billion as at 30 June 2025 (31 March 2025: EUR 123.1 billion). Market risk RWEA moved to EUR 1.9 billion in Q2 2025 from EUR 2.3 billion in Q1 2025, a reduction of EUR 0.4 billion. The operational risk RWEA stayed unchanged at EUR 16.3 billion.

The participation of the modelled supervisory approaches in the total RWEA increased slightly in the second quarter of 2025 compared to the first quarter of 2025, mostly as a result of the risk weighting of the prepayment for HAL and the growth of our Dutch mortgage portfolio. For credit risk, the use of modelled approaches will over time narrow down to our mortgages, banks and financial institutions loan books once the movement of certain portfolios to the standardised approach (SA) is finalised. For market risk, the migration to the Alternative Standardised Approach (ASA) will occur once the changes from the Fundamental Review of the Trading Book (FRTB) become applicable in the EU. Recently the European Commission adopted a Delegated Act that would postpone these changes to 1 January 2027, making a delay to such date likely.

Our RWEAs calculated using full standardised approach decreased to EUR 169.3 billion as at 30 June 2025 (31 March 2025: EUR 169.6 billion), reflecting the dynamics previously explained for credit risk RWEA. The RWEAs that is the base of the output floor also declined EUR 0.7 billion to EUR 161.2 billion due to model updates. The difference between these two metrics amounts to EUR 8.0 billion and is explained by the inclusion in the 'RWEAs calculated using full standardised approach' of the impact resulting from transitional arrangements that affect the output floor calculation, which will be phased out in 2030.

	A	B	C	D	EU D
	30 June 2025				
	Risk weighted exposure amounts (RWEAs)				
(in millions)	RWEAs for modelled approaches that banks have supervisory approval to use	RWEAs for portfolios where standardised approaches are used	Total actual RWEAs (A + B)	RWEAs calculated using full standardised approach ²	RWEAs that is the base of the output floor
1 Credit risk (excluding counterparty credit risk)	73,730	7,471	81,202	141,473	133,453
2 Counterparty credit risk	2,394	3,598	5,992	7,537	7,537
3 Credit valuation adjustment		190	190	190	190
4 Securitisation exposures in the banking book ¹		456	456	456	456
5 Market risk	1,861		1,861	1,200	1,200
6 Operational risk		16,335	16,335	16,335	16,335
7 Other risk weighted exposure amounts		33,754	33,754	2,072	2,072
8 Total	77,985	61,804	139,789	169,262	161,241

1. It includes the RWEAs securitisation exposures in the banking book calculated with the SA and the ERBA approaches and excludes the RWEA equivalent for the securitisation position that the bank has deducted from CET1.

2. The bank has chosen not to follow the EBA's proposed mapping for this cell. Part of the banks 'other risk weighted exposure amounts' refer to add-ons the bank had already taken for IRB portfolios that are in the process of moving to SA. Following EBA's mapping would therefore result in a double counting of RWEAs, the result of which would be that the total in row 8 would not be an accurate number for the TREA at end of the output floor transitional period.

EU CMS2 – Comparison of modelled and standardised risk weighted exposure amounts for credit risk at asset class level

The table below discloses the breakdown by asset classes of our credit risk RWEA excluding CCR (which is presented in the first row of the CMS1 template). This metric increased by EUR 0.9 billion to EUR 81.2 billion in Q2 2025 (Q1 2025: EUR 80.3 billion), mainly due to the growth of our mortgage loan book and the impact of the risk weighting of the prepayment in relation to the acquisition of HAL, partly compensated for by the decrease in ABF.

Corporates and ‘mortgages on immovable property and ADC exposures’ continued to be the largest contributors to the credit risk RWEA excluding CCR in Q2 2025 (43.8% and 34.3%, respectively). The RWEA for these two portfolios is calculated mostly with modelled approaches; however, this will change over time for corporate exposures once the migration of certain portfolios to the SA has been completed.

The credit risk ‘RWEA calculated using the full standardised approach’ and the credit risk ‘RWEAs that is the base of the output floor’ increased by EUR 1.0 billion and EUR 0.5 billion, respectively, at the end of Q2 2025. These increases reflect the portfolio dynamics abovementioned. The difference between these two metrics (EUR 8.0 billion) is due to the transitional agreements that apply to the calculation of the output floor.

	A	B	C	D	EU D
	30 June 2025				
	Risk weighted exposure amounts (RWEAs)				
(in millions)	RWEAs for modelled approaches that institutions have supervisory approval to use	RWEAs for column (A) if re-computed using the standardised approach	Total actual RWEAs	RWEAs calculated using full standardised approach	RWEAs that is the base of the output floor
1 Central governments and central banks			479	479	479
EU 1a Regional governments or local authorities					
EU 1b Public sector entities	10	4	19	13	13
EU 1c Categorised as Multilateral Development Banks in SA					
EU 1d Categorised as International organisations in SA					
2 Institutions	662	1,733	882	1,507	1,507
3 Equity	3,198	1,166	3,198	1,166	1,166
5 Corporates	32,092	40,733	35,590	52,252	44,231
5.1 - of which F-IRB is applied	21,893	29,144	21,893	35,306	29,144
5.2 - of which A-IRB is applied	28,825	40,865	28,825	42,724	40,865
EU 5a - of which Corporates - General	26,386	31,528	29,884	37,502	31,528
EU 5b - of which Corporates - Specialised lending	5,706	9,206	5,706	11,252	9,206
EU 5c - of which Corporates - Purchased receivables	1,088	2,725	1,088	2,824	2,725
6 Retail	800	1,569	2,703	3,472	3,472
6.1 - of which Retail - Qualifying revolving	106	258	106	258	258
EU 6.1a - of which Retail - Purchased receivables					
EU 6.1b - of which Retail - Other	693	1,311	2,596	3,214	3,214
6.2 - of which Retail - Secured by residential real estate		47,121		47,121	47,121
EU 7a Categorised as secured by immovable properties and ADC exposures in SA	26,918	72,414	27,866	73,363	73,363
EU 7b Collective investment undertakings (CIU)	591	348	593	350	350
EU 7c Categorised as exposures in default in SA	5,434	4,239	5,631	4,436	4,436
EU 7d Categorised as subordinated debt exposures in SA	1,099	1,048	1,126	1,075	1,075
EU 7e Categorised as covered bonds in SA	340	542	340	542	542
EU 7f Categorised as claims on institutions and corporates with a short-term credit assessment in SA	306	349	306	349	349
8 Other non-credit obligation assets	2,281	2,281	2,468	2,468	2,468
9 Total	73,730	126,428	81,202	141,473	133,453

Own funds

EU CC1 – Composition of regulatory own funds

Developments impacting capital ratios

As of 1 January 2025, we report our regulatory capital metrics and risk exposures in line with CRR3 (Basel IV). Comparative figures up to and including 31 December 2024 are reported under CRR2 (Basel III).

On 30 June 2025, the regulatory reported Common Equity Tier 1 (CET1), Tier 1 and total capital ratios were 14.5%, 17.6% and 20.6% respectively (31 December 2024: 14.5%, 16.9% and 20.2% respectively). In comparison with 31 December 2024, the CET1 capital ratio increased slightly, mainly due to a decrease in TREA. The EUR 1.1 billion decrease in TREA mainly reflects an increase in credit risk RWEA and operational risk RWEA, partly offset by a decrease in market risk RWEA. All capital ratios were in line with the bank's risk appetite and comfortably above regulatory requirements.

The maximum distributable amount (MDA) trigger level as at 30 June 2025 increased to 11.3% (31 December 2024: 11.2%), resulting in an MDA buffer of 3.2% above the MDA trigger level.

The ECB has notified ABN AMRO, as part of the 2025 Supervisory Review and Evaluation Process (SREP), of the preliminary outcome regarding its capital requirements for 2026. The Pillar 2 requirement is proposed to increase by 0.35% to 2.60% (from 2.25%), of which 0.20% should be filled by CET1 capital. The increase of the Pillar 2 requirement mainly covers ABN AMRO's exposure to interest-only mortgages. This would result in an MDA trigger level of 11.5% as of 1 January 2026. The impact on our capital framework will be evaluated and communicated at our Capital Markets Day.

(in millions)	A		B
	30 June 2025		Source ¹
Common Equity Tier 1 (CET1) capital: instruments and reserves			
1 Capital instruments and the related share premium accounts	12,682		
- of which shares	12,682		CC2-33 & CC2-34
2 Retained earnings	9,636		
3 Accumulated other comprehensive income (and other reserves)	-283		CC2-36
EU-3a Funds for general banking risk			
4 Amount of qualifying items referred to in Art. 484 (3) and the related share premium accounts subject to phase-out from CET1			
5 Minority interests (amount allowed in consolidated CET1)			
EU-5a Independently reviewed interim profits net of any foreseeable charge or dividend	250		
6 Common Equity Tier 1 (CET1) capital before regulatory adjustments	22,285		
Common Equity Tier 1 (CET1) capital: regulatory adjustments			
7 Additional value adjustments (-)	-79		
8 Intangible assets (net of related tax liability) (-)	-287		CC2-15
10 Deferred tax assets that rely on future profitability excluding those arising from temporary differences (net of related tax liability where the conditions in Art. 38 (3) CRR are met) (-)	-40		
11 Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	-138		
12 Negative amounts resulting from the calculation of expected loss amounts	-443		
13 Any increase in equity that results from securitised assets (-)			
14 Gains or losses on liabilities valued at fair value resulting from changes in own credit standing	1		
15 Defined-benefit pension fund assets (-)	-3		
16 Direct, indirect and synthetic holdings by an institution of own CET1 instruments (-)	-280		
17 Direct, indirect and synthetic holdings of the CET1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (-)			
18 Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (-)			
19 Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (-)			
EU-20a Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative	-23		
EU-20b - of which qualifying holdings outside the financial sector (-)			
EU-20c - of which securitisation positions (-)	-23		
EU-20d - of which free deliveries (-)			
21 Deferred tax assets arising from temporary differences (amount above 10% threshold, net of related tax liability where the conditions in Art. 38 (3) CRR are met) (-)			
22 Amount exceeding the 17.65% threshold (-)			
23 - of which direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities			
25 - of which deferred tax assets arising from temporary differences			
EU-25a Losses for the current financial year (-)			
EU-25b Foreseeable tax charges relating to CET1 items except where the institution suitably adjusts the amount of CET1 items insofar as such tax charges reduce the amount up to which those items may be used to cover risks or losses (-)			
27 Qualifying AT1 deductions that exceed the AT1 items of the institution (-)			
27a Other regulatory adjustments to CET1 capital	-671		
28 Total regulatory adjustments to Common Equity Tier 1 (CET1)	-1,963		
29 Common Equity Tier 1 (CET1) capital	20,321		

1. Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation.

(in millions)	A	B
	30 June 2025	Source ¹
Additional Tier 1 (AT1) capital: instruments		
30 Capital instruments and the related share premium accounts	4,225	CC2-37
31 - of which classified as equity under applicable accounting standards	4,225	
32 - of which classified as liabilities under applicable accounting standards		
33 Amount of qualifying items referred to in Art. 484 (4) CRR and the related share premium accounts subject to phase-out from AT1 as described in Art. 486 (3) CRR		
EU-33a Amount of qualifying items referred to in Art. 494a(1) CRR subject to phase-out from AT1		
EU-33b Amount of qualifying items referred to in Art. 494b(1) CRR subject to phase-out from AT1		
34 Qualifying Tier 1 capital included in consolidated AT1 capital (including minority interests not included in row 5) issued by subsidiaries and held by third parties		
35 - of which instruments issued by subsidiaries subject to phase-out		
36 Additional Tier 1 (AT1) capital before regulatory adjustments	4,225	
Additional Tier 1 (AT1) capital: regulatory adjustments		
37 Direct, indirect and synthetic holdings by an institution of own AT1 instruments (-)	-5	
38 Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (-)		
39 Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (-)		
40 Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (-)		
42 Qualifying T2 deductions that exceed the T2 items of the institution (-)		
42a Other regulatory adjustments to AT1 capital		
43 Total regulatory adjustments to Additional Tier 1 (AT1) capital	-5	
44 Additional Tier 1 (AT1) capital	4,220	
45 Tier 1 capital (T1 = CET1 + AT1)	24,542	
Tier 2 (T2) capital: instruments		
46 Capital instruments and the related share premium accounts	4,252	CC2-27
47 Amount of qualifying items referred to in Art. 484 (5) CRR and the related share premium accounts subject to phase-out from T2 as described in Art. 486(4) CRR		
EU-47a Amount of qualifying items referred to in Art. 494a (2) CRR subject to phase-out from T2		
EU-47b Amount of qualifying items referred to in Art. 494b (2) CRR subject to phase-out from T2		
48 Qualifying own funds instruments included in consolidated T2 capital (including minority interests and AT1 instruments not included in rows 5 or 34) issued by subsidiaries and held by third parties		
49 - of which instruments issued by subsidiaries subject to phase-out		
50 Credit risk adjustments		
51 Tier 2 (T2) capital before regulatory adjustments	4,252	
Tier 2 (T2) capital: regulatory adjustments		
52 Direct, indirect and synthetic holdings by an institution of own T2 instruments and subordinated loans (-)	-30	
53 Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (-)		
54 Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (-)		
55 Direct, indirect and synthetic holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions)(-)		
EU-56a Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (-)		
EU-56b Other regulatory adjustments to T2 capital		
57 Total regulatory adjustments to Tier 2 (T2) capital	-30	
58 Tier 2 (T2) capital	4,222	
59 Total capital (TC = T1 + T2)	28,763	
60 Total risk exposure amount	139,789	

1. Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation

(in millions)		A	B
		30 June 2025	Source ¹
	Capital ratios and requirements including buffers		
61	Common Equity Tier 1 (as a % of total risk exposure amount)	14.5 %	
62	Tier 1 (as a % of total risk exposure amount)	17.6 %	
63	Total capital (as a % of total risk exposure amount)	20.6 %	
64	Institution CET1 overall capital requirement (CET1 requirement in accordance with Art. 92 (1) CRR, plus additional CET1 requirement which the institution is required to hold in accordance with point (a) of Art. 104(1) CRD, plus combined buffer requirement in accordance with Art. 128(6) CRD) expressed as a % of risk exposure amount)	11.26 %	
65	- of which capital conservation buffer requirement	2.50 %	
66	- of which countercyclical buffer requirement	1.74 %	
67	- of which systemic risk buffer requirement	0.02 %	
EU-67a	- of which G-SII or O-SII buffer	1.25 %	
EU-67b	- of which additional own funds requirements to address the risks other than the risk of excessive leverage	1.27 %	
68	Common Equity Tier 1 available to meet buffers (as a % of risk exposure amount)	8.77 %	
	Amounts below the thresholds for deduction (before risk weighting)		
72	Direct and indirect holdings of own funds and eligible liabilities of financial sector entities where the institution does not have a significant investment in those entities (amount below 10% threshold and net of eligible short positions)	334	
73	Direct and indirect holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount below 17.65% threshold and net of eligible short positions)	217	
75	Deferred tax assets arising from temporary differences (amount below 17.65% threshold, net of related tax liability where the conditions in Art. 38 (3) CRR are met)	164	
	Applicable caps on the inclusion of provisions in Tier 2		
76	Credit risk adjustments included in T2 in respect of exposures subject to Standardised Approach (prior to the application of the cap)		
77	Cap on inclusion of credit risk adjustments in T2 under Standardised Approach	132	
78	Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)		
79	Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	457	
	Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 - 1 Jan 2022)		
80	Current cap on CET1 instruments subject to phase-out arrangements		
81	Amount excluded from CET1 due to cap (excess over cap after redemptions and maturities)		
82	Current cap on AT1 instruments subject to phase-out arrangements		
83	Amount excluded from AT1 due to cap (excess over cap after redemptions and maturities)		
84	Current cap on T2 instruments subject to phase-out arrangements		
85	Amount excluded from T2 due to cap (excess over cap after redemptions and maturities)		

1. Source based on reference numbers/letters of the balance sheet under the regulatory scope of consolidation

EU CC2 – Reconciliation of regulatory own funds to balance sheet in the audited financial statements

	A	B	C
	30 June 2025		
	Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference
(in millions)	As at period end	As at period end	
Assets¹			
1 Cash and balances at central banks	46,811	46,811	
2 Financial assets held for trading	2,961	2,961	
3 Derivatives	4,214	4,214	
4 Financial investments	50,236	50,195	
5 Securities financing	36,247	36,247	
6 Loans and advances banks	3,526	3,851	
7 Residential mortgages	154,574	154,574	
8 Consumer loans	7,838	7,838	
9 Corporate loans	88,804	88,804	
10 Other loans and advances customers	7,293	7,294	
11 Equity-accounted investments	216	306	
12 Property and equipment	1,048	1,047	
13 Goodwill and other intangible assets	292	292	
14 Assets held for sale	1	1	
15 Tax assets	169	168	CC1-8
16 Other assets	9,692	9,692	
17 Total assets	413,922	414,295	
Liabilities¹			
18 Financial liabilities held for trading	1,703	1,703	
19 Derivatives	2,891	2,891	
20 Securities financing	16,263	16,263	
21 Due to banks	7,109	7,109	
22 Current account	93,627	93,648	
23 Demand deposits	122,662	122,662	
24 Time deposits	51,064	51,424	
25 Other due to customers	970	970	
26 Issued debt	77,328	77,328	
27 Subordinated liabilities	6,271	6,271	CC1-46
28 Provisions	558	554	
29 Liabilities held for sale			
30 Tax liabilities	99	98	
31 Other liabilities	5,892	5,890	
32 Total liabilities	386,436	386,809	
Shareholders' equity¹			
33 Share capital	833	833	CC1-1
34 Share premium	11,849	11,849	CC1-1
35 Other reserves (incl. retained earnings/profit for the period)	10,861	10,861	CC1-2
36 Accumulated other comprehensive income	-283	-283	CC1-3 & CC1-8
37 AT1 capital securities	4,223	4,223	CC1-36
38 Equity attributable to owners of the parent company	27,483	27,483	
39 Equity attributable to non-controlling interests	3	3	
40 Total equity	27,486	27,486	

1. Breakdown by asset, liability and equity classes according to the balance sheet in the published financial statements

Countercyclical capital buffer

The countercyclical capital buffer (CCyB) is part of a set of macroprudential instruments designed to help counter procyclicality in the financial system. The instrument entails that capital is accumulated when cyclical systemic risk is expected to rise. This capital serves as a buffer to increase the resilience of the banking sector during periods of stress, when losses materialise. The buffer will help maintain the supply of credit and dampen a downswing in the financial cycle. The CCyB can also help dampen excessive credit growth during an upswing in the financial cycle. The CCyB is equivalent to the weighted average of the buffers in place in jurisdictions in which banks have credit and market risk exposures.

EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical capital buffer

The table below contains an overview of the exposure distribution for the most relevant countries (whose own funds requirements weight is greater than 1.00% and/or countercyclical buffer rate is greater than 0.00%).

	A	B	C	D	E	F
					30 June 2025	
	General credit exposures		Relevant credit exposures - Market risk		Securitisation exposures - Exposure value for non-trading book	Total exposure value
(in millions)	Exposure value under the SA	Exposure value under the IRB	Sum of long and short position of trading book exposures for SA	Value of trading book exposures for internal models		
Country						
Australia	17	7		1		25
Belgium	209	3,644		12		3,865
Bulgaria		1				1
Chile		138				138
Croatia						1
Cyprus		72				72
Czech Republic	1	11		2		13
France	753	7,228		9		7,989
Germany	1,011	5,109		12		6,133
Denmark	16	97		10		123
Estonia		1				1
Hong Kong	1	96				97
Hungary		7				7
Iceland						
Ireland	4	460		1		465
Korea		2				2
Latvia						
Lithuania						
Luxembourg	6	3,444		2		3,452
Netherlands	6,467	231,228		98		237,792
Norway	84	1,120		1		1,206
Romania		11				11
Sweden		942		5		947
Slovakia		19				19
Slovenia	5	1				6
United Kingdom	1,072	8,533		10		9,615
United States	701	1,007		2		1,710
Other countries	915	8,937		20		9,872
Total	11,265	272,114		184		283,563

	G	H	I	J	K	L	M
					30 June 2025		
	Own fund requirements				RWEA	Own funds requirements weights (%)	Countercyclical buffer rate (%)
(in millions)	Relevant credit risk exposures - Credit risk	Relevant credit exposures - Market risk	Relevant credit exposures - Securitisation positions in the non-trading book	Total			
Country							
Australia	14			14	177	0.15%	1.00%
Belgium	189	4		193	2,412	2.00%	1.00%
Bulgaria					1	0.00%	2.00%
Chile	3			3	41	0.03%	0.50%
Croatia					1	0.00%	1.50%
Cyprus	4			4	54	0.04%	1.00%
Czech Republic	1	1		2	20	0.02%	1.25%
France	428	1		429	5,365	4.45%	1.00%
Germany	309	4		313	3,914	3.25%	0.75%
Denmark	10	3		13	161	0.13%	2.50%
Estonia						0.00%	1.50%
Hong Kong	8			8	94	0.08%	0.50%
Hungary					4	0.00%	0.50%
Iceland					1	0.00%	2.50%
Ireland	31			31	389	0.32%	1.50%
Korea	1			1	7	0.01%	1.00%
Latvia					2	0.00%	1.00%
Lithuania						0.00%	1.00%
Luxembourg	159	1		160	2,000	1.66%	0.50%
Netherlands	7,306	19		7,325	91,563	75.92%	2.00%
Norway	50			50	630	0.52%	2.50%
Romania	1			1	16	0.01%	1.00%
Sweden	43			43	533	0.44%	2.00%
Slovakia	2			2	20	0.02%	1.50%
Slovenia				1	9	0.01%	1.00%
United Kingdom	433	7		440	5,495	4.56%	2.00%
United States	177	2		179	2,238	1.86%	0.00%
Other countries	431	6		437	5,464	4.53%	0.00%
Total	9,600	48		9,649	120,610	100.00%	

EU CCyB2 – Amount of institution-specific countercyclical capital buffer

The institution-specific countercyclical capital buffer requirement increased slightly from 31 December 2024 to 30 June 2025, mainly due to the increase in exposures in the Netherlands.

(in millions)	30 June 2025
1 Total risk exposure amount	139,789
2 Institution specific countercyclical capital buffer rate	1.740%
3 Institution specific countercyclical capital buffer requirement	2,432

Leverage ratio

EU LR1 – LRSum: Summary reconciliation of accounting assets and leverage ratio exposures

(in millions)		A 30 June 2025
1	Total assets as per published financial statements	413,922
2	Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	373
3	Adjustment for securitised exposures that meet the operational requirements for the recognition of risk transference	
4	Adjustment for temporary exemption of exposures to central banks (if applicable)	
5	Adjustment for fiduciary assets recognised on the balance sheet pursuant to the applicable accounting framework but excluded from the total exposure measure in accordance with point (i) of point (i) of Art. 429a(1) CRR	
6	Adjustment for regular-way purchases and sales of financial assets subject to trade date accounting	-2,701
7	Adjustment for eligible cash pooling transactions	
8	Adjustments for derivative financial instruments	5,389
9	Adjustments for securities financing transactions (SFTs)	2,124
10	Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of off-balance sheet exposures)	29,063
11	Adjustment for prudent valuation adjustments and specific and general provisions which have reduced Tier 1 capital	
EU-11a	Adjustment for exposures excluded from the total exposure measure in accordance with point (c) of Art. 429a(1) CRR	
EU-11b	Adjustment for exposures excluded from the total exposure measure in accordance with point (j) of Art. 429a(1) CRR	
12	Other adjustments	771
13	Total exposure amount	448,941

EU LR3 – LRSpl: Split-up of on-balance sheet exposures (excluding derivatives, SFTs and exempted exposures)

(in millions)		A 30 June 2025
EU-1	Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures)	369,004
EU-2	Of which: Trading book exposures	2,961
EU-3	Of which: Banking book exposures	366,043
EU-4	- of which covered bonds	5,214
EU-5	- of which exposures treated as sovereigns	89,739
EU-6	- of which exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	92
EU-7	- of which institutions	7,216
EU-8	- of which secured by mortgages of immovable properties	184,464
EU-9	- of which retail exposures	6,155
EU-10	- of which corporates	59,540
EU-11	- of which exposures in default	5,136
EU-12	- of which other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	8,487

EU LR2 – LRCom: Leverage ratio common disclosure

The Capital Requirements Regulation (CRR) includes a non-risk-based and binding leverage ratio. The regulatory reported leverage ratio decreased to 5.5% as at 30 June 2025 (31 December 2024: 5.7%). This was primarily due to the increase in exposure measure in the first half of 2025, which is related to a seasonal pattern that is observed every year. This was partly offset by the increase in Tier 1 capital. The reported leverage ratio remained well above the 3.0% requirement.

	A	B
(in millions)	30 June 2025	31 December 2024
On-balance sheet exposures (excluding derivatives and SFTs)		
1 On-balance sheet items (excluding derivatives, SFTs, but including collateral)	371,071	354,443
2 Gross-up for derivatives collateral provided where deducted from the balance sheet assets pursuant to the applicable accounting framework		
3 (Deductions of receivables assets for cash variation margin provided in derivatives transactions)	-1,227	-708
4 (Adjustment for securities received under securities financing transactions that are recognised as an asset)		
5 (General credit risk adjustments to on-balance sheet items)		
6 (Asset amounts deducted in determining Tier 1 capital)	-1,338	-1,367
7 Total on-balance sheet exposures (excluding derivatives and SFTs)	368,505	352,367
Derivative exposures		
8 Replacement cost associated with SA-CCR derivatives transactions (i.e. net of eligible cash variation margin)	5,657	5,386
EU-8a Derogation for derivatives: replacement costs contribution under the simplified standardised approach		
9 Add-on amounts for potential future exposure associated with SA-CCR derivatives transactions	7,346	9,010
EU-9a Derogation for derivatives: Potential future exposure contribution under the simplified standardised approach		
EU-9b Exposure determined under Original Exposure Method		
10 (Exempted CCP leg of client-cleared trade exposures) (SA-CCR)	-3,400	-5,388
EU-10a (Exempted CCP leg of client-cleared trade exposures) (simplified standardised approach)		
EU-10b (Exempted CCP leg of client-cleared trade exposures) (Original Exposure Method)		
11 Adjusted effective notional amount of written credit derivatives		
12 (Adjusted effective notional offsets and add-on deductions for written credit derivatives)		
13 Total derivatives exposures	9,603	9,008
Securities financing transaction (SFT) exposures		
14 Gross SFT assets (with no recognition of netting), after adjusting for sales accounting transactions	41,275	32,192
15 (Netted amounts of cash payables and cash receivables of gross SFT assets)	-5,028	-5,203
16 Counterparty credit risk exposure for SFT assets	2,124	2,238
EU-16a Derogation for SFTs: Counterparty credit risk exposure in accordance with Art. 429e(5) and 222 CRR		
17 Agent transaction exposures		
EU-17a (Exempted CCP leg of client-cleared SFT exposure)		
18 Total securities financing transaction exposures	38,372	29,227
Other off-balance sheet exposures		
19 Off-balance sheet exposures at gross notional amount	91,485	97,673
20 (Adjustments for conversion to credit equivalent amounts)	-62,423	-66,648
21 (General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)		
22 Off-balance sheet exposures	29,063	31,025

(in millions)		A	B
		30 June 2025	31 December 2024
Excluded exposures			
EU-22a	(Exposures excluded from the leverage ratio total exposure measure in accordance with point (c) of Art. 429a(1) CRR)		
EU-22b	(Exposures exempted in accordance with point (j) of Art. 429a (1) CRR (on- and off-balance sheet))		
EU-22c	(Excluded exposures of public development banks (or units) - Public sector investments)		
EU-22d	(Excluded exposures of public development banks (or units) - Promotional loans)		
EU-22e	(Excluded passing-through promotional loan exposures by non-public development banks (or units))		
EU-22f	(Excluded guaranteed parts of exposures arising from export credits)	-839	-695
EU-22g	(Excluded excess collateral deposited at triparty agents)		
EU-22h	(Excluded CSD related services of CSD/institutions in accordance with point (o) of Art. 429a(1) CRR)		
EU-22i	(Excluded CSD related services of designated institutions in accordance with point (p) of Art. 429a(1) CRR)		
EU-22j	(Reduction of the exposure value of pre-financing or intermediate loans)		
EU-22k	(Excluded exposures to shareholders according to Article 429a (1), point (da) CRR)		
EU-22l	(Exposures deducted in accordance with point (q) of Article 429a(1) CRR)		
EU-22m	(Total exempted exposures)	-839	-695
Capital and total exposure measure			
23	Tier 1 capital	24,542	23,831
24	Total exposure measure¹	448,941	420,932
Leverage ratio			
25	Leverage ratio	5.5 %	5.7%
EU-25	Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	5.5 %	5.7%
25a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves)	5.5 %	5.7%
26	Regulatory minimum leverage ratio requirement (%)	3.0 %	3.0%
EU-26a	Additional own funds requirements to address the risk of excessive leverage (%)		
EU-26b	- of which to be made up of CET1 capital (percentage points)		
27	Leverage ratio buffer requirement (%)		
EU-27a	Overall leverage ratio requirement (%)	3.0 %	3.0%
Choice on transitional arrangements and relevant exposures			
EU-27b	Choice on transitional arrangements for the definition of the capital measure		
Disclosure of mean values			
28	Mean of daily values of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	36,958	35,955
29	Quarter-end value of gross SFT assets, after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables	36,247	26,989
30	Total exposure measure (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	449,652	429,898
30a	Total exposure measure (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	449,652	429,898
31	Leverage ratio (including the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	5.5 %	5.5%
31a	Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)	5.5 %	5.5%

1. The total presented in row 24 includes additional leverage ratio exposure amount in accordance with Article 3 CRR. This was something EBA added in the underlying supervisory reporting templates but which EBA has not yet mapped in the corresponding Pillar III leverage ratio disclosures.

Liquidity requirements

EU LIQ1 – Quantitative information of LCR

	A	B	C	D	E	F	G	H
	Total unweighted value (average)				Total weighted value (average)			
	30 June 2025	31 March 2025	31 December 2024	30 September 2024	30 June 2025	31 March 2025	31 December 2024	30 September 2024
	Data points used in the calculation of averages				Data points used in the calculation of averages			
(in millions)	12	12	12	12	12	12	12	12
High-quality liquid assets (HQLA)								
1 Total high-quality liquid assets					92,660	89,809	88,486	90,110
Cash - outflows								
2 Retail deposits and deposits from small business customers, of which:	150,016	148,932	148,225	147,202	10,991	10,833	10,717	10,609
3 <i>Stable deposits</i>	89,188	88,662	88,260	88,107	4,459	4,433	4,413	4,405
4 <i>Less stable deposits</i>	47,723	46,611	45,918	45,265	6,259	6,138	6,050	5,951
5 Unsecured wholesale funding	110,901	109,155	107,458	108,195	58,393	57,763	56,812	56,500
6 <i>Operational deposits (all counterparties) and deposits in networks of cooperative banks</i>	24,305	23,628	24,055	27,591	6,065	5,896	6,004	6,887
7 <i>Non-operational deposits (all counterparties)</i>	82,090	81,389	79,456	76,632	47,822	47,730	46,861	45,640
8 <i>Unsecured debt</i>	4,506	4,137	3,947	3,973	4,506	4,137	3,947	3,973
9 Secured wholesale funding					3,899	4,021	4,150	4,430
10 Additional requirements	57,598	57,994	57,925	57,487	14,179	14,354	14,441	14,655
11 <i>Outflows related to derivative exposures and other collateral requirements</i>	11,218	11,573	11,358	10,915	7,577	7,745	7,803	7,863
12 <i>Outflows related to loss of funding on debt products</i>		1	17	150		1	17	150
13 <i>Credit and liquidity facilities</i>	46,380	46,419	46,550	46,422	6,602	6,608	6,621	6,642
14 Other contractual funding obligations	10,538	10,578	10,601	10,194	7,507	7,511	7,590	7,316
15 Other contingent funding obligations	41,418	41,507	41,515	41,668	1,800	1,727	1,815	1,972
16 Total cash outflows					96,767	96,209	95,525	95,482
Cash - inflows								
17 Secured lending (e.g. reverse repos)	36,313	35,191	33,601	33,289	14,130	13,845	13,118	13,118
18 Inflows from fully performing exposures	17,024	16,944	17,373	16,872	14,370	14,188	14,589	14,070
19 Other cash inflows	12,986	12,579	12,202	11,565	4,021	3,901	3,804	3,617
EU-19a (Difference between total weighted inflows and total weighted outflows arising from transactions in third countries where there are transfer restrictions or which are denominated in non-convertible currencies)								
EU-19b (Excess inflows from a related specialised credit institution)								
20 Total cash inflows	66,322	64,713	63,176	61,726	32,521	31,935	31,510	30,805
EU-20a <i>Fully exempt inflows</i>								
EU-20b <i>Inflows subject to 90% cap</i>								
EU-20c <i>Inflows subject to 75% cap</i>	59,376	57,953	56,461	55,297	32,521	31,935	31,510	30,805
Total adjusted value								
EU-21 Liquidity buffer					92,660	89,809	88,486	90,110
22 Total net cash outflows					64,247	64,274	64,015	64,677
23 Liquidity coverage ratio					144%	140%	138%	139%

EU LIQB – Qualitative information on LCR which complements template EU LIQ1

The consolidated LCR amounted to 144% at the end of June 2025, based on a 12-month rolling average (31 March 2025: 140%).

Concentration of funding and liquidity sources

Liquidity risks are mitigated by maintaining a sufficiently large liquidity buffer and a stable and diversified funding mix to safeguard access to liquidity at any time. Client deposits are the main source of funding, which is well diversified across client units Personal & Business Banking, Wealth Management and Corporate Banking. The remainder of the funding is raised through various long-term wholesale funding instruments. Short-term wholesale funding is raised via commercial paper and certificates of deposit programmes and is complemented by short-term deposits from professional counterparties.

Composition of the liquidity buffer

Cash at central banks and government bonds are the main components of the liquidity buffer. Retained notes are also an important source of ECB-eligible collateral, but are not LCR-eligible. The liquidity buffer (excluding retained notes) at 30 June 2025 amounted to EUR 92.7 billion, based on a 12-month rolling average (31 March 2025: EUR 89.8 billion). The increase was mainly observed in cash at central banks.

Derivative exposures and potential collateral calls

To manage liquidity risk related to derivative exposures and potential collateral calls, the bank has an adequate pool of collateral at its disposal, which is managed proactively in accordance with its collateral management framework. This enables the bank to secure payment traffic with the central bank, meet margin calls for financial markets transactions (e.g. derivatives, securities financing and clearing) and manage the liquidity buffer within the approved risk appetite.

Currency mismatch in the LCR

Liquidity risk management focuses on significant currencies, being the euro and the US dollar. The composition of the liquidity buffer reflects this focus. The buffer consists primarily of cash and securities in euros and secondarily in US dollars. Internal risk metrics and monitoring are in place to ensure that the currency distribution of the liquid assets is consistent with the currency distribution of the net liquidity outflows.

Other items

The EU LIQ1 template is focused on the consolidated LCR. The bank also monitors, reports and when necessary steers the LCR for subsidiaries (taking into account local regulations) and other regulatory scopes.

EU LIQ2 – Net Stable Funding Ratio

The NSFR amounted to 138% at the end of June 2025 (31 March 2025: 136%). The increase was mainly observed in available stable funding from retail deposits.

	A	B	C	D	E
					30 June 2025
	Unweighted value by residual maturity				Weighted value
(in millions)	No maturity	< 6 months	6 months to < 1 year	≥ 1 year	
Available stable funding (ASF) Items					
1 Capital items and instruments	24,985	2,293	841	4,130	29,116
2 Own funds	24,985	1,012	136	3,973	28,958
3 Other capital instruments		1,280	705	157	157
4 Retail deposits		145,946	2,864	5,416	144,051
5 Stable deposits		93,129	1,011	1,732	91,165
6 Less stable deposits		52,817	1,852	3,683	52,886
7 Wholesale funding:		151,509	9,528	54,958	102,279
8 Operational deposits		21,096			10,548
9 Other wholesale funding		130,413	9,528	54,958	91,731
10 Interdependent liabilities		2,972			
11 Other liabilities:	232	11,981	391	919	1,114
12 NSFR derivative liabilities	232				
13 All other liabilities and capital instruments not included in the above categories		11,981	391	919	1,114
14 Total available stable funding (ASF)					276,560
Required stable funding (RSF) Items					
15 Total high-quality liquid assets (HQLA)					711
EU-15a Assets encumbered for a residual maturity of ≥1 year in a cover pool		34	39	33,813	28,803
16 Deposits held at other financial institutions for operational purposes		891			446
17 Performing loans and securities:		70,109	11,382	180,419	148,032
18 Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		15,891	1,427		714
19 Performing securities financing transactions with financial customers collateralised by other assets and loans and advances to financial institutions		36,263	4,211	3,998	8,824
20 Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs ¹		14,319	5,378	50,068	52,248
21 - of which with a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk ¹		733	172	791	967
22 Performing residential mortgages ¹		133	307	123,449	83,161
23 - of which with a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk ¹		120	277	109,953	71,668
24 - of which other loans and securities that are not in default and do not qualify as HQLA, including exchange-traded equities and trade finance on-balance sheet products		3,503	59	2,904	3,086
25 Interdependent assets		2,972			
26 Other assets:		25,214	335	7,302	17,529
27 Physical traded commodities				5	4
28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		9,423			8,009
29 NSFR derivative assets		1,007			1,007
30 NSFR derivative liabilities before deduction of variation margin posted		1,894			95
31 All other assets not included in the above categories		12,891	335	7,297	8,414
32 Off-balance sheet items		59,783	5,271	26,074	4,387
33 Total RSF					199,908
34 Net Stable Funding Ratio (%)					138%

1. The weighted amounts in rows 20 to 23 have been recalculated by ABN AMRO, as applying the formal EBA instructions does not produce accurate results.

Credit risk

Credit risk quality

EU CR1 – Performing and non-performing exposures and related provisions

The table below provides a breakdown by exposure class of the gross carrying amounts (GCA), the related provisions, partial write offs, and collateral and guarantees, split into performing and non-performing exposures and stages.

In the first half of 2025, total performing exposures rose to EUR 493.5 billion compared to EUR 470.1 billion in Q4 2024, mainly due to an increase in loans and advances. This was primarily the result of the increase in credit institutions and other financial corporations which was mostly driven by higher security financing transactions and increased trading positions of Clearing clients. The non-performing exposures remained stable.

	A	B	C	D	E	F
	30 June 2025					
	Gross carrying amount/nominal amount					
	Performing exposures			Non-performing exposures		
(in millions)		Of which: stage 1 ¹	Of which: stage 2 ¹		Of which: stage 2 ¹	Of which: stage 3 ¹
5 Cash balances at central banks and other demand deposits	48,928	48,928				
10 Loans and advances	304,939	281,152	23,180	5,567	109	5,431
20 Central banks	3,248	3,248				
30 General governments	533	526	7	3		3
40 Credit institutions	16,529	16,492	37			
50 Other financial corporations	52,421	52,060	361	36		36
60 Non-financial corporations	62,794	56,579	6,187	3,166		3,159
70 - of which SMEs	15,285	13,405	1,881	983		977
80 Households	169,414	152,246	16,589	2,361	109	2,233
90 Debt securities	49,174	49,174				
100 Central banks	5,006	5,006				
110 General governments	34,552	34,552				
120 Credit institutions	9,577	9,577				
130 Other financial corporations	10	10				
140 Non-financial corporations	29	29				
150 Off-balance sheet exposures	90,467	51,515	3,442	811		599
160 Central banks	266	168	2			
170 General governments	993	968	2			
180 Credit institutions	457	252	6			
190 Other financial corporations	32,172	9,032	297	18		
200 Non-financial corporations	42,075	33,718	2,851	781		588
210 Households	14,505	7,377	284	12		11
220 Total	493,509	430,768	26,622	6,378	109	6,031

1. Not all Loans and advances and Off-balance sheet exposures have an IFRS 9 stage.

	G	H	I	J	K	L	M	N	O
								30 June 2025	
	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	Collateral and financial guarantees received	
	Performing exposures – accumulated impairment and provisions			Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions				On performing exposures	On non-performing exposures
	Of which: stage 1 ¹		Of which: stage 2 ¹	Of which: stage 2 ¹		Of which: stage 3 ¹			
(in millions)									
5 Cash balances at central banks and other demand deposits	-7	-7							
10 Loans and advances	-324	-163	-161	-941	-1	-923	-49	248,401	3,845
20 Central banks								3,044	
30 General governments								262	3
40 Credit institutions								12,259	
50 Other financial corporations	-10	-8	-2	-2		-2		33,121	10
60 Non-financial corporations	-198	-104	-94	-743		-742	-9	38,436	1,752
70 - of which SMEs	-65	-33	-33	-255		-255	-8	9,931	560
80 Households	-115	-51	-65	-196	-1	-179	-40	161,279	2,080
90 Debt securities									
100 Central banks									
110 General governments									
120 Credit institutions									
130 Other financial corporations									
140 Non-financial corporations									
150 Off-balance sheet exposures	16	9	7	50				8,425	156
160 Central banks									
170 General governments								24	
180 Credit institutions								1	
190 Other financial corporations								1,067	
200 Non-financial corporations	13	8	6	49				6,823	151
210 Households	2	1	1					510	5
220 Total	-347	-179	-168	-991	-1	-924	-49	256,826	4,002

1. Not all Loans and advances and Off-balance sheet exposures have an IFRS 9 stage.

EU CR1-A – Maturity of exposures

As at 30 June 2025, total loans and advances rose across all maturity buckets, most markedly in the ‘on demand’ and ‘≤ 1 year’ maturity buckets. This was mainly driven by increases in trading positions of Clearing clients and security financing transactions. The total debt securities grew principally in the ≤ 1 year maturity bucket, partly offset by a slight decrease in the ≤ 5 years bucket.

	A	B	C	D	E	F
	30 June 2025					
	Net exposure value					
(in millions)	On demand	≤ 1 year	>1 year ≤5 years	> 5 years	No stated maturity	Total
1 Loans and advances	22,845	53,830	49,885	166,216	16,470	309,246
2 Debt securities	68	13,342	18,055	20,665		52,130
3 Total	22,913	67,172	67,939	186,882	16,470	361,376

EU CR2 – Changes in the stock of non-performing loans and advances

In the first half of 2025, there was a slight increase of EUR 143 million in the final stock of non-performing loans and advances. This was attributable to a higher amount of client inflows from performing not forborne. The majority of the outflows were caused by partial or total loan repayments and other reasons.

	A
	30 June 2025
(in millions)	Gross carrying amount
1 Initial stock of non-performing loans and advances	5,425
2 Inflows to non-performing portfolios	2,513
3 Outflows from non-performing portfolios	-2,370
4 Outflows due to write-offs	-165
5 Outflow due to other situations	-2,205
6 Final stock of non-performing loans and advances	5,567

EU CQ1 – Credit quality of forborne exposures

As at 30 June 2025, total forborne exposure (including loan commitments given) decreased to EUR 5.6 billion (31 December 2024: EUR 6.1 billion). The largest reduction was in loans to non-financial corporations (EUR 303 million negative).

		A	B	C	D	E		F	G	H
									30 June 2025	
		Gross carrying amount/nominal amount of exposures with forbearance measures				Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions			Collateral received and financial guarantees received on forborne exposures	
		Performing forborne	Non-performing forborne						Of which: collateral and financial guarantees received on non-performing exposures with forbearance measures	
				Of which: defaulted	Of which: impaired	On performing forborne exposures	On non-performing forborne exposures			
(in millions)										
005	Cash balances at central banks and other demand deposits									
010	Loans and advances	2,520	2,212	2,103	2,103	-28	-356		3,560	1,673
020	Central banks									
030	General governments	1								
040	Credit institutions									
050	Other financial corporations	127	27	27	27	-1			130	6
060	Non-financial corporations	1,772	1,568	1,568	1,568	-22	-318		2,286	1,106
070	Households	620	617	508	507	-5	-37		1,144	561
080	Debt securities									
090	Loan commitments given	645	269	269	269	2			192	44
100	Total	3,165	2,481	2,372	2,371	-30	-356		3,753	1,717

EU CQ4 – Quality of non-performing exposures by geography

The table below includes the top five countries with on-balance sheet exposures in excess of EUR 10 billion. The countries with exposures below EUR 10 billion are considered to be less material and have been grouped under 'Other countries'. At 30 June 2025, the top five countries (NL, US, FR, DE, UK) contributed to 82.1% of the total on- and off-balance GCA, while 135 countries ('Other countries') contributed to the remaining 17.9%.

The total exposure increased to EUR 451.0 billion in Q2 2025 from EUR 431.3 billion in Q4 2024. The increase mainly came from on-balance sheet exposures, most notably from the Netherlands, France and United Kingdom and slightly offset by a decrease in the United States.

	A	B	C	D	E	F	G
							30 June 2025
	Gross carrying amount/nominal amount				Accumulated impairment	Provisions on off-balance sheet commitments and financial guarantees given	Accumulated negative changes in fair value due to credit risk on non-performing exposures
		Of which: non-performing	Of which: defaulted	Of which: subject to impairment			
(in millions)							
010 On-balance sheet exposures	359,681	5,567	5,459	359,053	-1,249		-16
020 Netherlands	225,970	4,601	4,493	225,342	-903		-16
030 United States	25,202			25,202			
040 France	18,971	181	180	18,971	-86		
050 Germany	13,265	60	60	13,265	-36		
060 United Kingdom	12,282	530	530	12,282	-97		
070 Other countries ¹	63,991	195	195	63,991	-126		
080 Off-balance sheet exposures	91,278	811	599			66	
090 Netherlands	48,173	584	469			14	
100 United States	11,876	21	21				
110 United Kingdom	6,544	98	68			1	
120 France	4,279	30	27			4	
130 Germany	3,834	30	12				
140 Other countries ¹	16,571	47	2			46	
150 Total	450,959	6,378	6,058	359,053	-1,249	66	-16

1. Other countries: Albania, Algeria, Andorra, Angola, Argentina, Aruba, Australia, Austria, Azerbaijan, Bahamas, Bahrain, Bangladesh, Belgium, Bermuda, Bolivia, Bonaire, Bosnia and Herzegovina, Brazil, British Virgin Islands, Brunei Darussalam, Bulgaria, Burkina Faso, Burundi, Cambodia, Cameroon, Canada, Cape Verde, Cayman Islands, Chile, China, Colombia, Costa Rica, Cote d'Ivoire, Croatia, Curaçao, Cyprus, Czech Republic, Denmark, Djibouti, Ecuador, Egypt, Estonia, Ethiopia, Finland, French Guiana, Gabon, Gambia, Georgia, Ghana, Gibraltar, Greece, Guernsey, Guyana, Honduras, Hong Kong, Hungary, Iceland, India, Indonesia, Iran, Iraq, Ireland, Isle of Man, Israel, Italy, Japan, Jersey, Jordan, Kazakhstan, Kenya, Kuwait, Latvia, Lebanon, Liberia, Libyan Arab Jamahiriya, Liechtenstein, Lithuania, Luxembourg, Macedonia, Malaysia, Maldives, Malta, Marshall Islands, Martinique, Mauritius, Mexico, Monaco, Montenegro, Morocco, New Zealand, Nigeria, Norway, Oman, Pakistan, Panama, Paraguay, Peru, Philippines, Poland, Portugal, Qatar, Republic of Korea, Republic of Moldova, Reunion, Romania, Russian Federation, Rwanda, Saudi Arabia, Serbia, Singapore, Sint-Bartélemy, Slovakia, Slovenia, South Africa, Spain, Sri Lanka, St. Maarten (MF), St. Maarten (SX), Suriname, Sweden, Switzerland, Taiwan, Tajikistan, Thailand, the Democratic Republic of Congo, Trinidad and Tobago, Tunisia, Turkey, Uganda, Ukraine, United Arab Emirates, United Republic of Tanzania, Uruguay, Vietnam, Zambia.

EU CQ5 – Credit quality of loans and advances to non-financial corporations by industry

At 30 June 2025 the GCA of non-financial corporations remained stable at EUR 66.0 billion compared to 31 December 2024. The most sizable declines were in transport and storage, manufacturing, and administrative and support service activities, which were offset by increases in real estate activities and information and communication. Non-performing exposures grew by EUR 0.2 billion and were for the largest part recorded in information and communication.

	A	B	C	D	E	F
						30 June 2025
	Gross carrying amount			Of which: loans and advances subject to impairment	Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
		Of which: non-performing	Of which: defaulted			
(in millions)						
10 Agriculture, forestry and fishing	4,375	152	152	4,375	-35	
20 Mining and quarrying	1,086	9	9	1,086	-1	
30 Manufacturing	3,976	510	510	3,976	-84	
40 Electricity, gas, steam and air conditioning supply	2,012	93	93	2,012	-36	
50 Water supply	483	5	5	483	-5	
60 Construction	2,456	163	163	2,456	-26	
70 Wholesale and retail trade	5,363	340	340	5,363	-118	
80 Transport and storage	6,928	124	124	6,928	-23	
90 Accommodation and food service activities	685	53	53	685	-8	
100 Information and communication	4,225	395	395	4,225	-86	
110 Financial and insurance activities ¹	15,211	572	572	15,211	-261	
120 Real estate activities	9,519	235	235	9,496	-59	
130 Professional, scientific and technical activities	4,076	364	364	4,076	-133	
140 Administrative and support service activities	3,367	49	49	3,367	-35	
150 Public administration and defense, compulsory social security	1			1		
160 Education	53	1	1	53	-1	
170 Human health services and social work activities	1,792	83	83	1,786	-24	
180 Arts, entertainment and recreation	186	11	11	186	-6	
190 Other services	167	7	7	167	-2	
200 Total	65,960	3,166	3,166	65,932	-941	

1. Non-financial corporations are classified by sector of economic activities using NACE Codes on the basis of the principal activity of the counterparty. Reporting of NACE codes is done with the first level of disaggregation (by 'section'). Loans and advances to non-financial corporations which engage in financial or insurance activities are reported under 'K – Financial and insurance activities'.

EU CQ7 – Collateral obtained by taking possession and execution processes

Compared to 31 December 2024, collateral obtained by taking possession and by execution proceedings decreased slightly as at 30 June 2025, due to a reduction in movable property (auto, shipping, etc.). Residential immovable property remained unchanged.

(in millions)	A		B
			30 June 2025
	Collateral obtained by taking possession		
	Value at initial recognition	Accumulated negative changes	
10 Property, plant and equipment (PP&E)			
20 Other than PP&E	4		
30 Residential immovable property	3		
40 Commercial Immovable property			
50 Movable property (auto, shipping, etc.)	1		
60 Equity and debt instruments			
70 Other collateral			
80 Total	4		

Use of credit risk mitigation techniques

EU CR3 – CRM techniques overview: Disclosure of the use of CRM techniques

This table provides an overview of exposures, split by secured and unsecured. The ratio of the secured carrying amount versus the total carrying amount decreased slightly to 66.2% as at 30 June 2025 from 67.2% as at 31 December 2024.

	A	B	C	D	E
					30 June 2025
	Unsecured carrying amount	Secured carrying amount	Of which: secured by collateral	Of which: secured by financial guarantees	Of which: secured by credit derivatives
(in millions)					
1 Loans and advances	86,594	271,568	268,676	2,892	
2 Debt securities	52,130				
3 Total	138,724	271,568	268,676	2,892	
4 Of which: non-performing exposures	797	3,845	3,646	200	
EU-5 - of which defaulted	672	3,845			

Use of the standardised approach

EU CR4 – Standardised approach – Credit risk exposure and CRM effects

This table discloses the on-balance and off-balance sheet exposures under the Standardised Approach (SA). It also provides an insight into the effects of credit risk mitigation (CRM) and credit conversion factors (CCF) on the exposures within the SA scope.

The on-balance SA credit risk exposures post CRM and CCF went up by EUR 33.5 billion to EUR 127.7 billion as at 30 June 2025 (31 December 2024: EUR 94.2 billion). This rise is mainly reflected in the 'Central Governments or Central Banks' (CGCB) exposure class and is primarily attributable to the modification in the treatment of the guaranteed mortgages under the Nationale Hypotheek Garantie (NHG). The implementation of CRR3 included changes to how CRM should be applied. As a result, the secured part of the NHG-guaranteed mortgages was migrated to SA given that the bank also applies the SA to their guarantor, the Dutch government.

The increase in the on-balance SA credit risk exposures before CRM and CCF, which grew to EUR 97.8 billion in Q2 2025 from EUR 92.0 billion in Q4 2024, further contributed to this upward trend. This growth was primarily driven by business movements within the CGCB exposure class.

(in millions)	Exposure classes	A	B	C	D	E	F
		30 June 2025					
		Exposures before CCF and CRM ¹		Exposures post CCF and CRM ¹		RWEA and RWEA density	
		On-balance sheet exposures	Off-balance sheet exposures	On-balance sheet exposures	Off-balance sheet exposures	RWEA	RWEA density
1	Central governments or central banks	75,192	908	106,232	960	479	0%
2	Non-central government public sector entities	5,473	192	4,459	81	9	0%
EU 2a	<i>Regional governments or local authorities</i>	2,264	141	2,778	57		0%
EU 2b	<i>Public sector entities</i>	3,209	51	1,680	24	9	1%
3	Multilateral development banks	2,649		3,635			0%
EU 3a	International organisations	6,523		5,554			0%
4	Institutions	411	11,475	353	31	220	57%
5	Covered bonds						
6	Corporates	3,443	13,855	3,457	985	3,498	79%
6.1	<i>- of which Specialised Lending</i>						
7	Subordinated debt exposures and equity	14	10	14	4	27	150%
EU 7a	<i>Subordinated debt exposures</i>	14	10	14	4	27	150%
EU 7b	<i>Equity</i>						
8	Retail	2,134	2,786	2,120	456	1,903	74%
9	Secured by mortgages on immovable property and ADC exposures	1,570	105	1,532	45	948	60%
9.1	<i>Secured by mortgages on residential immovable property - non IPRE</i>	1,183	61	1,175	27	679	56%
9.2	<i>Secured by mortgages on residential immovable property - IPRE</i>	68	3	67	1	27	40%
9.3	<i>Secured by mortgages on commercial immovable property - non IPRE</i>	300	41	271	17	224	78%
9.4	<i>Secured by mortgages on commercial immovable property - IPRE</i>	19		19		19	98%
9.5	<i>Acquisition, Development and Construction (ADC)</i>						
10	Exposures in default	195	50	135	15	198	132%
EU 10a	Claims on institutions and corporates with a short-term credit assessment						
EU 10b	Collective investment undertakings (CIU)	3		3		2	77%
EU 10c	Other items	231		231		187	81%
12	Total	97,838	29,381	127,724	2,577	7,472	6%

1. CCF = Credit conversion factor; CRM = Credit risk mitigation

EU CR5 – Standardised approach

At 30 June 2025, the Standardised Approach exposures post CCF and CRM increased by EUR 34.2 billion, reaching EUR 130.3 billion, compared to EUR 96.1 billion on 31 December 2024. This is mainly observed in the CGCB exposure class and is explained by the revised treatment of NHG guaranteed mortgages to SA from IRB following the implementation of CRR3.

	A	B	C	D	E	F	G	H	I	J	
	30 June 2025										
	Risk weight										Subtotal
(in millions)	0%	2%	4%	10%	20%	30%	35%	40%	45%	50%	
Exposure classes											
1 Central governments or central banks	106,522		322		132					49	107,024
2 Non-central government public sector entities	4,493				46						4,539
EU 2a <i>Regional governments or local authorities</i>	2,834				1						2,835
EU 2b <i>Public sector entities</i>	1,659				45						1,704
3 Multilateral development banks	3,635										3,635
EU 3a International organisations	5,554										5,554
4 Institutions						54		2		288	344
5 Covered bonds											
6 Corporates					1,180						1,180
6.1 <i>- of which Specialised Lending</i>											
7 Subordinated debt exposures and equity											
EU 7a <i>Subordinated debt exposures</i>											
EU 7b <i>Equity</i>											
8 Retail exposures									140		140
9 Secured by mortgages on immovable property and ADC exposures					477						477
9.1 <i>Secured by mortgages on residential immovable property - non IPRE</i>					419						419
9.1.1 <i>no loan splitting applied</i>											
9.1.2 <i>loan splitting applied (secured)</i>					419						419
9.1.3 <i>loan splitting applied (unsecured)</i>											
9.2 <i>Secured by mortgages on residential immovable property - IPRE</i>					54						54
9.3 <i>Secured by mortgages on commercial immovable property - non IPRE</i>					3						3
9.3.1 <i>no loan splitting applied</i>											
9.3.2 <i>loan splitting applied (secured)</i>					3						3
9.3.3 <i>loan splitting applied (unsecured)</i>											
9.4 <i>Secured by mortgages on commercial immovable property - IPRE</i>											
9.5 <i>Acquisition, Development and Construction (ADC)</i>											
10 Exposures in default											
EU 10a Claims on institutions and corporates with a short-term credit assessment											
EU 10b Collective investment undertakings (CIU)										1	1
EU 10c Other items	41									4	45
EU 11c Total	120,245		322		1,835	54		2	140	341	122,940

		K	L	M	N	O	P	Q	R
		30 June 2025							
		Subtotal	Risk weight						Subtotal
(in millions)		60%	70%	75%	80%	90%	100%	105%	110%
Exposure classes									
1	Central governments or central banks	107,024					1		107,025
2	Non-central government public sector entities	4,539							4,539
EU 2a	Regional governments or local authorities	2,835							2,835
EU 2b	Public sector entities	1,704							1,704
3	Multilateral development banks	3,635							3,635
EU 3a	International organisations	5,554							5,554
4	Institutions	344							344
5	Covered bonds								
6	Corporates	1,180					3,262		4,442
6.1	- of which Specialised Lending								
7	Subordinated debt exposures and equity								
EU 7a	Subordinated debt exposures								
EU 7b	Equity								
8	Retail exposures	140		2,395			41		2,576
9	Secured by mortgages on immovable property and ADC exposures	477	142	786		1	149	13	1,569
9.1	Secured by mortgages on residential immovable property - non IPRE	419	3	760			19		1,202
9.1.1	no loan splitting applied			6			5		10
9.1.2	loan splitting applied (secured)	419	3						423
9.1.3	loan splitting applied (unsecured)			755			14		769
9.2	Secured by mortgages on residential immovable property - IPRE	54		2			8		65
9.3	Secured by mortgages on commercial immovable property - non IPRE	3	139	24			122		288
9.3.1	no loan splitting applied			3			41		44
9.3.2	loan splitting applied (secured)	3	139						142
9.3.3	loan splitting applied (unsecured)			21			81		102
9.4	Secured by mortgages on commercial immovable property - IPRE					1		13	14
9.5	Acquisition, Development and Construction (ADC)								
10	Exposures in default						55		55
EU 10a	Claims on institutions and corporates with a short-term credit assessment								
EU 10b	Collective investment undertakings (CIU)	1					2		3
EU 10c	Other items	45					185		230
EU 11c	Total	122,940	142	3,182		1	3,694	13	129,972

		S	T	U	V	W	X	Y	Z	AA
		30 June 2025								
		Subtotal	Risk weight						Total	Of which: unrated ¹
(in millions)			130%	150%	250%	370%	400%	1,250%	Others	
Exposure classes										
1	Central governments or central banks	107,025		3				164	107,192	76,540
2	Non-central government public sector entities	4,539							4,539	405
EU 2a	Regional governments or local authorities	2,835							2,835	380
EU 2b	Public sector entities	1,704							1,704	25
3	Multilateral development banks	3,635							3,635	986
EU 3a	International organisations	5,554							5,554	
4	Institutions	344		40					384	329
5	Covered bonds									
6	Corporates	4,442							4,442	3,262
6.1	- of which Specialised Lending									
7	Subordinated debt exposures and equity			18					18	
EU 7a	Subordinated debt exposures			18					18	
EU 7b	Equity									
8	Retail exposures	2,576							2,576	
9	Secured by mortgages on immovable property and ADC exposures	1,569		3				5	1,577	
9.1	Secured by mortgages on residential immovable property - non IPRE	1,202							1,202	
9.1.1	no loan splitting applied	10							10	
9.1.2	loan splitting applied (secured)	423							423	
9.1.3	loan splitting applied (unsecured)	769							769	
9.2	Secured by mortgages on residential immovable property - IPRE	65		3					68	
9.3	Secured by mortgages on commercial immovable property - non IPRE	288							288	
9.3.1	no loan splitting applied	44							44	
9.3.2	loan splitting applied (secured)	142							142	
9.3.3	loan splitting applied (unsecured)	102							102	
9.4	Secured by mortgages on commercial immovable property - IPRE	14						5	19	
9.5	Acquisition, Development and Construction (ADC)									
10	Exposures in default	55		95					150	
EU 10a	Claims on institutions and corporates with a short-term credit assessment									
EU 10b	Collective investment undertakings (CIU)	3							3	3
EU 10c	Other items	230						1	231	231
EU 11c	Total	129,972		159				170	130,300	81,757

1. The 'unrated' amount for 'central governments or central banks' is so high because it includes the exposures where the risk weight is not based on an external rating, because the CRR directly prescribes a risk weight of 0%. This applies for exposures to the ECB and for exposures to (EU) Member States denominated and funded in EUR.

Use of the IRB approach to credit risk

EU CR6 – IRB approach – Credit risk exposures by exposure class and PD range

Due to the implementation of CRR3, there have been some changes in exposure classes in Q2 2025 compared to CRR2. The most notable of these changes is the decline in ‘Retail - secured by residential real estate’ compared to Q4 2024 (previously known as ‘Retail - secured by immovable property non-SME’) due to the transfer of the secured part of the NHG guaranteed mortgages to the SA CGCB exposure class under CRR3.

Exposure to CGCB is calculated with the SA and is therefore absent in the IRB overviews.

Exposure class A-IRB

		A	B	C	D	E	F	G	H	I	J	K	L
		30 June 2025											
	PD range	On-balance sheet exposures (in millions)	Off-balance sheet exposures pre-CCF ¹ (in millions)	Exposure weighted average CCF ¹ (in %)	Exposure post CCF ¹ and post CRM (in millions)	Exposure weighted average PD (in %)	Number of obligors (in units)	Exposure weighted average LGD (in %)	Exposure weighted average maturity (in years)	RWEA after supporting factors (in millions)	Density of RWEA (in %)	Expected loss amount (in millions)	Value adjustments and provisions (in millions)
Central governments and central banks	0.00 to <0.15												
	0.00 to <0.10												
	0.10 to <0.15												
	0.15 to <0.25												
	0.25 to <0.50												
	0.50 to <0.75												
	0.75 to <2.50												
	0.75 to <1.75												
	1.75 to <2.5												
	2.50 to <10.00												
	2.5 to <5												
	5 to <10												
	10.00 to <100.00												
	10 to <20												
	20 to <30												
	30.00 to <100.00												
	100.00 (Default)												
Regional governments or local authorities	Subtotal (exposure class)												
	0.00 to <0.15												
	0.00 to <0.10												
	0.10 to <0.15												
	0.15 to <0.25												
	0.25 to <0.50												
	0.50 to <0.75												
	0.75 to <2.50					0.8%	3	15.1%			46.4%		
	0.75 to <1.75					0.8%	3	15.1%			46.4%		
	1.75 to <2.5												
	2.50 to <10.00												
	2.5 to <5												
	5 to <10												
	10.00 to <100.00			50.0%		26.6%	30	47.1%	0.67		242.2%		
	10 to <20												
	20 to <30			50.0%		26.6%	30	47.1%	0.67		242.2%		
	30.00 to <100.00												
	100.00 (Default)												
	Subtotal (exposure class)			50.0%	1	6.7%	33	22.4%	0.15	1	91.2%		

		A	B	C	D	E	F	G	H	I	J	K	L
		30 June 2025											
	PD range	On-balance sheet exposures (in millions)	Off-balance sheet exposures pre-CCF ¹ (in millions)	Exposure weighted average CCF ¹ (in %)	Exposure post CCF ¹ and post CRM (in millions)	Exposure weighted average PD (in %)	Number of obligors (in units)	Exposure weighted average LGD (in %)	Exposure weighted average maturity (in years)	RWEA after supporting factors (in millions)	Density of RWEA (in %)	Expected loss amount (in millions)	Value adjustments and provisions (in millions)
Public sector entities	0.00 to <0.15	24	70	30.9%	46	0.1%	5	71.7%	2.23	17	36.7%		
	0.00 to <0.10	24	70	30.9%	46	0.1%	5	71.7%	2.23	17	36.7%		
	0.10 to <0.15												
	0.15 to <0.25												
	0.25 to <0.50												
	0.50 to <0.75												
	0.75 to <2.50												
	0.75 to <1.75												
	1.75 to <2.5												
	2.50 to <10.00												
	2.5 to <5												
	5 to <10												
	10.00 to <100.00			50.0%		26.6%	2	45.0%	0.67		231.3%		
	10 to <20												
	20 to <30			50.0%		26.6%	2	45.0%	0.67		231.3%		
	30.00 to <100.00												
	100.00 (Default)												
Corporates - Specialised Lending	Subtotal (exposure class)	24	70	30.9%	46	0.1%	7	71.7%	2.23	17	36.8%		
	0.00 to <0.15	102	12	53.4%	108	0.1%	22	15.8%	4.06	14	12.6%		
	0.00 to <0.10	100	12	53.4%	106	0.1%	8	15.9%	4.11	14	12.8%		
	0.10 to <0.15	2			2	0.1%	14	11.3%	1.51		5.8%		
	0.15 to <0.25	92		40.0%	92	0.2%	27	22.5%	3.86	28	30.0%		
	0.25 to <0.50	2,212	327	46.1%	2,362	0.4%	476	18.4%	2.86	602	25.5%	2	-1
	0.50 to <0.75	3,323	468	42.8%	3,524	0.7%	1,002	19.4%	2.94	1,214	34.4%	5	-3
	0.75 to <2.50	4,073	347	42.3%	4,220	1.3%	1,684	21.4%	2.68	1,783	42.3%	12	-8
	0.75 to <1.75	2,884	209	41.8%	2,971	1.1%	1,168	20.6%	2.60	1,132	38.1%	7	-4
	1.75 to <2.5	1,189	138	43.0%	1,248	1.8%	516	23.3%	2.88	651	52.2%	5	-4
	2.50 to <10.00	2,978	153	34.7%	3,032	4.6%	684	12.1%	2.68	1,078	35.6%	17	-9
	2.5 to <5	2,430	140	34.1%	2,478	4.3%	553	11.5%	2.73	826	33.3%	12	-6
	5 to <10	548	13	40.7%	553	5.8%	131	14.7%	2.44	252	45.5%	5	-4
	10.00 to <100.00	216	2	48.1%	217	25.4%	63	15.8%	3.87	180	82.9%	9	-3
	10 to <20	18	1	69.6%	18	13.3%	5	23.0%	4.16	17	95.0%	1	
	20 to <30	198	2	42.5%	199	26.5%	58	15.1%	3.85	163	81.8%	8	-3
	30.00 to <100.00												
	100.00 (Default)	297		33.5%	297	100.0%	67	16.9%	2.27	450	151.6%	21	-21
	Subtotal (exposure class)	13,293	1,309	42.6%	13,851	4.2%	4,025	18.1%	2.80	5,348	38.6%	64	-46

		A	B	C	D	E	F	G	H	I	J	K	L
		30 June 2025											
	PD range	On-balance sheet exposures (in millions)	Off-balance sheet exposures pre-CCF ¹ (in millions)	Exposure weighted average CCF ¹ (in %)	Exposure post CCF ¹ and post CRM (in millions)	Exposure weighted average PD (in %)	Number of obligors (in units)	Exposure weighted average LGD (in %)	Exposure weighted average maturity (in years)	RWEA after supporting factors (in millions)	Density of RWEA (in %)	Expected loss amount (in millions)	Value adjustments and provisions (in millions)
Corporates - Purchased receivables	0.00 to <0.15												
	0.00 to <0.10												
	0.10 to <0.15												
	0.15 to <0.25												
	0.25 to <0.50	203	198	20.0%	243	0.4%	51	18.3%	0.81	42	17.4%		
	0.50 to <0.75	253	328	20.0%	319	0.7%	134	18.3%	0.66	75	23.5%		
	0.75 to <2.50	780	909	20.0%	962	1.4%	426	18.0%	0.73	311	32.4%	2	
	0.75 to <1.75	456	565	20.0%	569	1.1%	245	18.1%	0.74	170	29.9%	1	
	1.75 to <2.5	325	344	20.0%	393	1.9%	181	17.7%	0.72	141	36.0%	1	
	2.50 to <10.00	416	446	20.0%	505	4.9%	254	18.1%	0.74	260	51.4%	5	
	2.5 to <5	226	248	20.0%	275	3.2%	165	17.6%	0.73	121	43.8%	2	
	5 to <10	190	198	20.0%	229	6.9%	89	18.7%	0.76	139	60.5%	3	
	10.00 to <100.00	39	40	20.0%	47	23.1%	61	17.5%	0.76	40	84.3%	2	
	10 to <20	16	18	20.0%	19	15.0%	18	18.0%	0.63	15	76.9%	1	
	20 to <30	15	14	20.0%	17	26.6%	12	17.4%	0.97	16	90.8%	1	
	30.00 to <100.00	9	8	20.0%	10	32.6%	31	16.7%	0.63	9	87.2%	1	
	100.00 (Default)	241	137	20.0%	268	100.0%	198	20.1%	0.78	479	178.6%	20	-23
	Subtotal (exposure class)	1,933	2,058	20.0%	2,344	13.7%	1,124	18.3%	0.74	1,207	51.5%	30	-23
Corporates - Other	0.00 to <0.15	1,480	1,999	36.8%	2,216	0.1%	651	27.5%	2.50	380	17.1%	1	-1
	0.00 to <0.10	641	704	46.2%	966	0.1%	73	39.9%	3.06	238	24.6%		-1
	0.10 to <0.15	839	1,295	31.7%	1,250	0.1%	578	17.9%	2.07	142	11.3%		
	0.15 to <0.25	1,000	906	46.9%	1,425	0.2%	203	31.1%	3.17	465	32.6%	1	-1
	0.25 to <0.50	3,676	2,921	48.4%	5,088	0.4%	1,215	34.9%	2.48	2,441	48.0%	6	-8
	0.50 to <0.75	4,623	2,322	46.2%	5,695	0.7%	2,571	27.7%	2.63	2,755	48.4%	10	-9
	0.75 to <2.50	10,244	3,564	45.0%	11,848	1.4%	6,117	27.0%	2.56	6,874	58.0%	46	-31
	0.75 to <1.75	5,750	2,147	45.0%	6,716	1.1%	3,739	25.5%	2.52	3,372	50.2%	19	-12
	1.75 to <2.5	4,494	1,417	45.0%	5,132	1.8%	2,378	28.9%	2.60	3,502	68.2%	27	-19
	2.50 to <10.00	3,869	2,404	42.9%	4,899	4.1%	1,525	29.9%	2.82	4,206	85.9%	52	-40
	2.5 to <5	3,106	1,945	42.0%	3,923	3.6%	1,203	29.6%	2.95	3,210	81.8%	35	-29
	5 to <10	763	458	46.5%	976	6.0%	322	31.1%	2.28	996	102.1%	18	-10
	10.00 to <100.00	1,019	717	47.5%	1,360	24.8%	20,952	34.5%	1.87	2,387	175.5%	118	-39
	10 to <20	160	39	47.3%	179	12.7%	107	30.5%	2.28	236	132.1%	7	-5
	20 to <30	837	659	47.6%	1,150	26.3%	20,822	35.2%	1.80	2,099	182.4%	107	-32
	30.00 to <100.00	22	19	43.2%	30	41.5%	23	30.6%	2.04	52	169.5%	4	-2
	100.00 (Default)	1,563	346	35.5%	1,687	100.0%	1,036	28.6%	1.91	2,753	163.2%	371	-374
	Subtotal (exposure class)	27,475	15,180	44.4%	34,216	7.2%	34,270	29.3%	2.56	22,260	65.1%	605	-502

		A	B	C	D	E	F	G	H	I	J	K	L
		30 June 2025											
	PD range	On-balance sheet exposures	Off-balance sheet exposures pre-CCF ¹	Exposure weighted average CCF ¹	Exposure post CCF ¹ and post CRM	Exposure weighted average PD	Number of obligors	Exposure weighted average LGD	Exposure weighted average maturity	RWEA after supporting factors	Density of RWEA	Expected loss amount	Value adjustments and provisions
		(in millions)	(in millions)	(in %)	(in millions)	(in %)	(in units)	(in %)	(in years)	(in millions)	(in %)	(in millions)	(in millions)
Retail - Secured by residential real estate	0.00 to <0.15	50,925	21	40.2%	50,934	0.1%	276,677	11.5%		1,768	3.5%	7	-2
	0.00 to <0.10	2	1	44.2%	2	0.1%	27	14.9%			2.2%		
	0.10 to <0.15	50,923	20	40.0%	50,931	0.1%	276,650	11.5%		1,768	3.5%	7	-2
	0.15 to <0.25	16,924	97	53.0%	16,975	0.2%	78,334	15.2%		1,014	6.0%	4	-3
	0.25 to <0.50	40,495	85	45.7%	40,534	0.4%	211,899	12.9%		3,427	8.5%	19	-15
	0.50 to <0.75	18,489	2,646	50.1%	19,813	0.6%	95,121	13.7%		2,715	13.7%	17	-14
	0.75 to <2.50	8,543	209	93.1%	8,738	1.3%	45,281	14.2%		1,900	21.7%	16	-16
	0.75 to <1.75	7,545	207	93.6%	7,738	1.2%	41,911	13.9%		1,554	20.1%	12	-13
	1.75 to <2.5	998	3	58.5%	1,000	2.0%	3,370	16.0%		346	34.6%	3	-3
	2.50 to <10.00	2,479	4	56.9%	2,481	4.5%	9,199	15.0%		1,213	48.9%	17	-16
	2.5 to <5	1,885	2	59.8%	1,886	3.5%	6,632	15.1%		833	44.2%	10	-10
	5 to <10	594	2	54.2%	595	7.8%	2,567	14.6%		380	63.8%	7	-6
	10.00 to <100.00	1,073	1	44.2%	1,073	25.5%	4,805	14.2%		853	79.5%	40	-13
	10 to <20	606	1	44.2%	607	15.0%	2,788	14.1%		480	79.2%	13	-6
	20 to <30	205		40.0%	205	24.8%	953	13.9%		173	84.4%	7	-2
	30.00 to <100.00	261		40.0%	261	50.3%	1,064	14.8%		200	76.3%	20	-5
	100.00 (Default)	1,225	1	69.2%	1,226	100.0%	5,443	23.2%		1,478	120.6%	175	-50
	Subtotal (exposure class)	140,152	3,064	52.9%	141,774	1.5%	726,759	13.0%		14,366	10.1%	294	-130
Retail - Qualifying revolving	0.00 to <0.15	169	4,285	23.9%	1,194	0.1%	1,464,971	50.0%		27	2.2%		
	0.00 to <0.10	59	2,944	25.0%	794	0.1%	954,556	50.0%		14	1.7%		
	0.10 to <0.15	110	1,340	21.6%	400	0.1%	510,416	50.0%		13	3.2%		
	0.15 to <0.25	81	338	22.8%	158	0.2%	153,509	50.0%		8	5.3%		
	0.25 to <0.50	101	171	21.5%	138	0.4%	107,992	50.0%		12	8.8%		
	0.50 to <0.75	35	25	20.7%	40	0.6%	25,336	51.1%		6	14.4%		
	0.75 to <2.50	84	67	20.0%	98	1.4%	67,937	52.7%		26	26.1%	1	-1
	0.75 to <1.75	72	57	20.7%	84	1.2%	57,872	52.6%		20	24.0%	1	
	1.75 to <2.5	12	11	16.0%	14	2.3%	10,065	53.6%		5	39.1%		
	2.50 to <10.00	21	14	35.2%	25	4.3%	16,380	53.5%		15	60.3%	1	
	2.5 to <5	14	11	43.0%	18	3.4%	11,405	53.3%		9	51.8%		
	5 to <10	7	3	9.1%	7	6.7%	4,975	54.0%		6	81.8%		
	10.00 to <100.00	8	3	3.4%	8	25.0%	5,181	56.0%		12	148.7%	1	
	10 to <20	4	2	4.0%	4	12.3%	2,776	55.2%		5	119.5%		
	20 to <30			36.6%		23.1%	126	62.1%			178.7%		
	30.00 to <100.00	4	1	1.8%	4	39.5%	2,279	56.6%		7	180.4%	1	
	100.00 (Default)	24		25.8%	24	100.0%	15,569	50.8%		39	164.2%	9	-8
	Subtotal (exposure class)	522	4,901	23.7%	1,685	1.8%	1,856,875	50.3%		145	8.6%	12	-10

		A	B	C	D	E	F	G	H	I	J	K	L
		30 June 2025											
	PD range	On-balance sheet exposures (in millions)	Off-balance sheet exposures pre-CCF ¹ (in millions)	Exposure weighted average CCF ¹ (in %)	Exposure post CCF ¹ and post CRM (in millions)	Exposure weighted average PD (in %)	Number of obligors (in units)	Exposure weighted average LGD (in %)	Exposure weighted average maturity (in years)	RWEA after supporting factors (in millions)	Density of RWEA (in %)	Expected loss amount (in millions)	Value adjustments and provisions (in millions)
Retail - Purchased receivables	0.00 to <0.15												
	0.00 to <0.10												
	0.10 to <0.15												
	0.15 to <0.25												
	0.25 to <0.50												
	0.50 to <0.75												
	0.75 to <2.50												
	0.75 to <1.75												
	1.75 to <2.5												
	2.50 to <10.00												
	2.5 to <5												
	5 to <10												
	10.00 to <100.00												
	10 to <20												
	20 to <30												
	30.00 to <100.00												
	100.00 (Default)												
	Subtotal (exposure class)												
Retail - Other	0.00 to <0.15	2	2	46.8%	3	0.1%	281	31.3%			6.7%		
	0.00 to <0.10	2	1	44.2%	2	0.1%	239	20.7%			3.2%		
	0.10 to <0.15	1	1	50.0%	1	0.1%	42	50.8%			13.3%		
	0.15 to <0.25	1,057	662	54.2%	1,415	0.2%	32,683	24.0%		172	12.1%	1	-2
	0.25 to <0.50	709	125	58.2%	782	0.4%	14,064	25.7%		149	19.0%	1	-2
	0.50 to <0.75	203	10	95.4%	212	0.7%	3,901	20.0%		39	18.3%		
	0.75 to <2.50	838	108	58.1%	901	1.5%	74,957	28.3%		327	36.3%	4	-5
	0.75 to <1.75	594	89	56.8%	644	1.2%	54,295	27.7%		216	33.5%	2	-3
	1.75 to <2.5	244	19	64.4%	256	2.2%	20,662	29.8%		111	43.2%	2	-2
	2.50 to <10.00	477	186	41.8%	554	4.7%	41,332	30.8%		275	49.6%	7	-5
	2.5 to <5	338	180	41.3%	413	3.6%	33,436	31.7%		206	49.9%	4	-3
	5 to <10	138	6	56.8%	141	7.9%	7,896	28.1%		69	48.8%	3	-2
	10.00 to <100.00	88	3	54.0%	90	20.3%	7,597	29.7%		64	71.0%	5	-4
	10 to <20	55	3	54.0%	57	15.7%	3,529	29.6%		38	66.6%	3	-2
	20 to <30	33			33	28.2%	4,068	29.8%		26	78.7%	3	-2
	30.00 to <100.00												
	100.00 (Default)	96	9	93.8%	104	100.0%	5,433	40.9%		249	238.8%	26	-42
	Subtotal (exposure class)	3,471	1,103	53.6%	4,062	4.2%	180,248	26.6%		1,274	31.4%	44	-61
Total (all exposures classes)		186,871	27,686		197,978		2,803,341			44,618		1,050	-773

1. CCF = Credit conversion factor; CRM = Credit risk mitigation

Exposure class F-IRB

		A	B	C	D	E	F	G	H	I	J	K	L
		30 June 2025											
	PD range	On-balance sheet exposures	Off-balance sheet exposures pre-CCF ¹	Exposure weighted average CCF ¹	Exposure post CCF ¹ and post CRM	Exposure weighted average PD	Number of obligors	Exposure weighted average LGD	Exposure weighted average maturity	RWEA after supporting factors	Density of RWEA	Expected loss amount	Value adjustments and provisions
		(in millions)	(in millions)	(in %)	(in millions)	(in %)	(in units)	(in %)	(in years)	(in millions)	(in %)	(in millions)	(in millions)
Central governments and central banks	0.00 to <0.15												
	<i>0.00 to <0.10</i>												
	<i>0.10 to <0.15</i>												
	0.15 to <0.25												
	0.25 to <0.50												
	0.50 to <0.75												
	0.75 to <2.50												
	<i>0.75 to <1.75</i>												
	<i>1.75 to <2.5</i>												
	2.50 to <10.00												
	<i>2.5 to <5</i>												
	<i>5 to <10</i>												
	10.00 to <100.00												
	<i>10 to <20</i>												
	<i>20 to <30</i>												
	<i>30.00 to <100.00</i>												
	100.00 (Default)												
	Subtotal (exposure class)												
Regional governments or local authorities	0.00 to <0.15												
	<i>0.00 to <0.10</i>												
	<i>0.10 to <0.15</i>												
	0.15 to <0.25												
	0.25 to <0.50												
	0.50 to <0.75												
	0.75 to <2.50												
	<i>0.75 to <1.75</i>												
	<i>1.75 to <2.5</i>												
	2.50 to <10.00												
	<i>2.5 to <5</i>												
	<i>5 to <10</i>												
	10.00 to <100.00												
	<i>10 to <20</i>												
	<i>20 to <30</i>												
	<i>30.00 to <100.00</i>												
	100.00 (Default)												
	Subtotal (exposure class)												

		A	B	C	D	E	F	G	H	I	J	K	L
		30 June 2025											
	PD range	On-balance sheet exposures	Off-balance sheet exposures pre-CCF ¹	Exposure weighted average CCF ¹	Exposure post CCF ¹ and post CRM	Exposure weighted average PD	Number of obligors	Exposure weighted average LGD	Exposure weighted average maturity	RWEA after supporting factors	Density of RWEA	Expected loss amount	Value adjustments and provisions
		(in millions)	(in millions)	(in %)	(in millions)	(in %)	(in units)	(in %)	(in years)	(in millions)	(in %)	(in millions)	(in millions)
Public sector entities	0.00 to <0.15												
	0.00 to <0.10												
	0.10 to <0.15												
	0.15 to <0.25												
	0.25 to <0.50												
	0.50 to <0.75												
	0.75 to <2.50												
	0.75 to <1.75												
	1.75 to <2.5												
	2.50 to <10.00												
	2.5 to <5												
	5 to <10												
	10.00 to <100.00												
	10 to <20												
	20 to <30												
	30.00 to <100.00												
	100.00 (Default)												
Institutions	Subtotal (exposure class)												
	0.00 to <0.15	7,669	100	45.0%	7,713	0.1%	664	20.4%	2.48	1,020	13.2%	1	
	0.00 to <0.10	7,195	78	52.0%	7,235	0.1%	569	19.9%	2.48	890	12.3%	1	
	0.10 to <0.15	474	22	20.0%	479	0.1%	95	28.5%	2.45	131	27.3%		
	0.15 to <0.25	50	11	46.0%	54	0.2%	44	38.2%	1.50	21	38.1%		
	0.25 to <0.50	32	28	29.0%	40	0.3%	62	43.0%	2.50	27	67.6%		
	0.50 to <0.75	2	1	40.0%	2	0.7%	2	45.0%	2.50	2	82.0%		
	0.75 to <2.50	63	27	42.0%	75	1.2%	41	17.5%	2.50	28	37.8%		
	0.75 to <1.75	61	6	48.0%	64	1.0%	24	18.0%	2.49	25	38.8%		
	1.75 to <2.5	2	21	40.0%	10	1.8%	17	14.6%	2.50	3	31.6%		
	2.50 to <10.00	82	16	50.0%	90	3.9%	25	45.0%	2.50	126	139.9%	2	
	2.5 to <5	82	16	50.0%	90	3.9%	25	45.0%	2.50	126	139.9%	2	
	5 to <10												
	10.00 to <100.00	48	2	49.0%	49	27.7%	222	44.6%	2.50	129	262.2%	6	
	10 to <20			58.0%		15.6%	3	45.0%	2.50		224.0%		
	20 to <30	37	2	49.0%	39	26.8%	215	44.5%	2.50	103	265.9%	5	
	30.00 to <100.00	10		50.0%	11	31.2%	4	45.0%	2.50	26	248.6%	1	
	100.00 (Default)						4						
	Subtotal (exposure class)	7,945	184	42.0%	8,024	0.3%	1,064	21.1%	2.48	1,353	16.9%	9	

		A	B	C	D	E	F	G	H	I	J	K	L
		30 June 2025											
	PD range	On-balance sheet exposures	Off-balance sheet exposures pre-CCF ¹	Exposure weighted average CCF ¹	Exposure post CCF ¹ and post CRM	Exposure weighted average PD	Number of obligors	Exposure weighted average LGD	Exposure weighted average maturity	RWEA after supporting factors	Density of RWEA	Expected loss amount	Value adjustments and provisions
		(in millions)	(in millions)	(in %)	(in millions)	(in %)	(in units)	(in %)	(in years)	(in millions)	(in %)	(in millions)	(in millions)
Corporates - Specialised Lending	0.00 to <0.15												
	0.00 to <0.10												
	0.10 to <0.15												
	0.15 to <0.25												
	0.25 to <0.50	2,962	697	42.0%	3,254	0.4%	210	39.3%	2.50	1,550	47.6%	5	-2
	0.50 to <0.75	2,751	998	40.0%	3,151	0.7%	166	39.3%	2.50	1,983	62.9%	8	-4
	0.75 to <2.50	442	421	40.0%	611	1.1%	46	39.6%	2.50	456	74.6%	3	-2
	0.75 to <1.75	442	421	40.0%	611	1.1%	46	39.6%	2.50	456	74.6%	3	-2
	1.75 to <2.5												
	2.50 to <10.00	537	12	40.0%	542	4.6%	50	23.8%	2.50	443	81.8%	6	-1
	2.5 to <5	419	12	40.0%	424	4.4%	42	24.4%	2.50	343	80.9%	5	-1
	5 to <10	118			118	5.1%	8	21.6%	2.50	101	85.1%	1	
	10.00 to <100.00	84			84	19.8%	6	35.5%	2.50	155	183.3%	6	
	10 to <20	26			26	10.7%	2	23.3%	2.50	25	96.3%	1	
	20 to <30	58			58	24.0%	4	41.0%	2.50	129	222.8%	6	
	30.00 to <100.00												
	100.00 (Default)	246		40.0%	246	100.0%	4	40.0%	2.50			98	-40
	Subtotal (exposure class)	7,022	2,128	41.0%	7,888	4.2%	482	38.2%	2.50	4,587	58.2%	127	-49
Corporates - Purchased receivables	0.00 to <0.15						1						
	0.00 to <0.10						1						
	0.10 to <0.15												
	0.15 to <0.25												
	0.25 to <0.50												
	0.50 to <0.75	20	25	40.0%	30	0.7%	2	40.0%	2.50	22	72.5%		
	0.75 to <2.50	156	225	40.0%	246	1.4%	17	40.0%	2.50	233	95.0%	1	
	0.75 to <1.75	85	127	40.0%	136	1.1%	7	40.0%	2.50	120	88.1%	1	
	1.75 to <2.5	70	98	40.0%	109	1.8%	10	40.0%	2.50	113	103.5%	1	
	2.50 to <10.00	41	118	40.0%	88	3.0%	11	40.0%	2.50	105	118.8%	1	
	2.5 to <5	41	118	40.0%	88	3.0%	11	40.0%	2.50	105	118.8%	1	
	5 to <10												
	10.00 to <100.00												
	10 to <20												
	20 to <30												
	30.00 to <100.00												
	100.00 (Default)	96	20	40.0%	105	100.0%	6	40.0%	2.50			42	
	Subtotal (exposure class)	313	389	40.0%	468	23.7%	37	40.0%	2.50	360	76.8%	44	

		A	B	C	D	E	F	G	H	I	J	K	L
		30 June 2025											
	PD range	On-balance sheet exposures	Off-balance sheet exposures pre-CCF ¹	Exposure weighted average CCF ¹	Exposure post CCF ¹ and post CRM	Exposure weighted average PD	Number of obligors	Exposure weighted average LGD	Exposure weighted average maturity	RWEA after supporting factors	Density of RWEA	Expected loss amount	Value adjustments and provisions
		(in millions)	(in millions)	(in %)	(in millions)	(in %)	(in units)	(in %)	(in years)	(in millions)	(in %)	(in millions)	(in millions)
Corporates - Other	0.00 to <0.15	5,448	9,125	42.0%	9,235	0.1%	1,005	41.1%	2.50	2,963	32.1%	3	-33
	0.00 to <0.10	3,589	5,517	38.0%	5,711	0.1%	500	39.4%	2.50	1,394	24.4%	1	-33
	0.10 to <0.15	1,858	3,608	46.0%	3,524	0.1%	505	43.8%	2.52	1,569	44.5%	2	
	0.15 to <0.25	2,554	5,666	41.0%	4,881	0.2%	479	39.6%	2.50	2,034	41.7%	3	-1
	0.25 to <0.50	3,682	6,536	40.0%	6,327	0.4%	951	37.7%	2.50	3,460	54.7%	9	-3
	0.50 to <0.75	2,355	2,659	39.0%	3,385	0.7%	1,090	38.9%	2.50	2,370	70.0%	9	-4
	0.75 to <2.50	3,545	3,078	38.0%	4,707	1.3%	2,352	36.5%	2.50	3,895	82.8%	23	-10
	0.75 to <1.75	2,352	2,212	38.0%	3,188	1.1%	1,403	35.0%	2.50	2,398	75.2%	12	-5
	1.75 to <2.5	1,194	866	38.0%	1,519	1.8%	949	39.6%	2.50	1,497	98.5%	11	-6
	2.50 to <10.00	1,273	655	39.0%	1,527	4.1%	646	34.9%	2.50	1,679	110.0%	21	-7
	2.5 to <5	941	578	39.0%	1,165	3.4%	501	35.3%	2.50	1,236	106.1%	14	-5
	5 to <10	332	77	40.0%	362	6.1%	145	33.5%	2.50	443	122.3%	7	-2
	10.00 to <100.00	220	226	41.0%	314	22.9%	2,170	32.0%	2.50	536	170.7%	22	-4
	10 to <20	51	142	40.0%	108	11.1%	66	35.6%	2.50	175	162.7%	4	-1
	20 to <30	140	61	42.0%	165	25.8%	2,025	31.6%	2.50	304	183.6%	13	-1
	30.00 to <100.00	30	23	46.0%	41	42.5%	79	24.5%	2.50	57	139.3%	4	-2
	100.00 (Default)	503	263	44.0%	620	100.0%	300	36.8%	2.50			228	-215
	Subtotal (exposure class)	19,580	28,208	44.0%	30,997	2.8%	8,993	38.8%	2.50	16,938	54.6%	318	-276
Total (all exposures classes)		34,860	30,909	40.0%	47,377	2.8%	10,576	35.7%	2.50	23,238	49.1%	498	-325

1. CCF = Credit conversion factor; CRM = Credit risk mitigation

EU CR7-A – IRB approach – Disclosure of the extent of the use of CRM techniques

The table below shows that the majority of our exposures as at 30 June 2025 was covered by eligible collateral consisting mainly of immovable property and other physical collateral. Compared to 31 December 2024, the IRB-based RWEA decreased by EUR 8.4 billion, driven largely by the regulatory transition to CRR3. Under CRR3, the main differences that led to the decrease in RWEA stemmed from different calculation rules, such as the removal of the 1.06 scaling factor, the exclusion of NHG-guaranteed mortgages and changes in credit risk mitigation.

Exposure class A-IRB

	A	B	C	D	E	F	G	H	I	J
	30 June 2025									
Total exposures	Credit risk mitigation techniques									
	Funded credit protection (FCP)									
	Part of exposures covered by									
	Financial collaterals	Other eligible collaterals			Other funded credit protection					
(in millions)			Of which: Immovable property collaterals	Of which: By receivables	Of which: Other physical collateral		Of which: Cash on deposit	Of which: Life insurance policies	Of which: Instruments held by a third party	
1 Central governments and central banks										
2 Regional governments and local authorities	1	21%	77%	77%						
3 Public sector entities	46	0%								
5 Corporates	50,470	5%	72%	44%	10%	17%				
5.1 Corporates – General	34,274	8%	62%	42%	7%	13%				
5.2 Corporates – Specialised lending	13,851	1%	93%	58%	8%	27%				
5.3 Corporates - Purchased Receivables	2,344		84%		62%	22%				
6 Retail	142,506	5%	95%	94%	1%					
6.1 Retail – Qualifying revolving	1,685									
6.2 Retail – secured by residential immovable property	136,759	5%	97%	97%						
6.3 Retail - Purchased Receivables										
6.4 Retail - Other retail exposures	4,062		66%	41%	18%	8%				
7 Total	193,022	5%	89%	81%	3%	5%				

	K	L	M	N
	30 June 2025			
	Credit risk mitigation techniques		Credit risk mitigation methods in the calculation of RWEA ²	
	Unfunded credit protection (UFCP)			
	Part of exposures covered by			
(in millions)	Guarantees ¹	Credit derivatives	RWEA without substitution effects (reduction effects only)	RWEA with substitution effects (both reduction and substitution effects)
1 Central governments and central banks			1	1
2 Regional governments and local authorities				
3 Public sector entities			17	17
5 Corporates			28,914	28,814
5.1 Corporates – General			22,260	22,260
5.2 Corporates – Specialised lending			5,390	5,348
5.3 Corporates – Purchased Receivables			1,264	1,207
6 Retail			15,786	15,786
6.1 Retail – Qualifying revolving			145	145
6.2 Retail – secured by residential immovable property			14,366	14,366
6.3 Retail – Purchased Receivables				
6.4 Retail – Other retail exposures			1,274	1,274
7 Total			44,717	44,618

1. As per the ITS regulation and associated mapping with supervisory reporting, this column contains guarantees that are used in the estimation of LGD.

2. The difference between the amounts disclosed in columns “RWEA with substitution effect” and “RWEA without substitution effect” in EU CR7A relates to the exposures for which the resultant exposure class/treatment (F-IRB, by way of the recognition of F-IRB treated UFCPs) is different than the original exposure class/treatment (A-IRB). In the F-IRB instance of EU CR7A, the RWEA calculated for those exposures is disclosed only in the respective resultant exposure class and in “column n -RWEA with substitution effect”. For the original exposure classes, the RWEA calculated for those exposures is disclosed in the respective original exposure class and in “column m -RWEA without substitution effect” of the A-IRB instance of EU CR7A.

Exposure class F-IRB

	A	B	C	D	E	F	G	H	I	J
	30 June 2025									
Total exposures	Credit risk mitigation techniques									
	Funded credit protection (FCP)									
	Part of exposures covered by									
	Financial Collaterals	Other eligible collaterals				Other funded credit protection				
(in millions)			Of which: Immovable property collaterals	Of which: By receivables	Of which: Other physical collateral		Of which: Cash on deposit	Of which: Life insurance policies	Of which: Instruments held by a third party	
1 Central governments and central banks										
2 Regional governments and local authorities										
3 Public sector entities										
4 Institutions	8,024	5%								
5 Corporates	39,353	4%	17%	15%	3%	0%				
5.1 Corporates – General	30,997	5%	19%	15%	4%	0%				
5.2 Corporates – Specialised lending	7,888	1%	13%	13%	0%					
5.3 Corporates – Purchased Receivables	468									
6 Total	47,377	4%	15%	12%	2%	0%				

	K	L	M	N
			30 June 2025	
	Credit risk mitigation techniques		Credit risk mitigation methods in the calculation of RWEAs ¹	
	Unfunded credit protection (UFCP)			
	Part of exposures covered by			
(in millions)	Guarantees	Credit Derivatives	RWEA without substitution effects (reduction effects only)	RWEA with substitution effects (both reduction and substitution effects)
1 Central governments and central banks				
2 Regional governments and local authorities				
3 Public sector entities				
4 Institutions	12.20%		1,324	1,353
5 Corporates	4.60%		21,865	21,885
5.1 Corporates – General	1.70%		16,747	16,938
5.2 Corporates – Specialised lending	16.30%		4,758	4,587
5.3 Corporates – Purchased Receivables			360	360
6 Total	5.90%		23,188	23,238

1. The difference between the amounts disclosed in columns "RWEA with substitution effect" and "RWEA without substitution effect" in EU CR7A relates to the exposures for which the resultant exposure class/treatment (F-IRB, by way of the recognition of F-IRB treated UFCPs) is different than the original exposure class/treatment (A-IRB). In the F-IRB instance of EU CR7A, the RWEA calculated for those exposures is disclosed only in the respective resultant exposure class and in "column n -RWEA with substitution effect". For the original exposure classes, the RWEA calculated for those exposures is disclosed in the respective original exposure class and in "column m -RWEA without substitution effect" of the A-IRB instance of EU CR7A

EU CR8 – RWEA flow statements of credit risk exposures under the IRB approach

As at 30 June 2025, the credit risk RWEA under the IRB approach rose to EUR 73.7 billion compared to EUR 72.5 billion on 31 March 2025. This increase was primarily driven by business developments, the prepayment in relation to the acquisition of HAL, and changes in methodology and policy. The improvement in asset quality and the foreign exchange (FX) movements both had a mitigating effect on RWEA.

	A
	30 June 2025
(in millions)	RWEA
1 RWEA as at the end of the previous reporting period¹	72,517
2 Asset size (+/-)	668
3 Asset quality (+/-)	-348
4 Model updates (+/-)	
5 Methodology and policy (+/-)	588
6 Acquisitions and disposals (+/-)	675
7 Foreign exchange movements (+/-)	-370
8 Other (+/-)	
9 RWEA as at the end of the reporting period	73,730

1. Following EBA's mapping for this template, the RWEA includes 'Equity IRB' (which includes IRB CIUs that receive the fall-back approach) and Other non credit-obligation assets. For this reason, the CR8 RWEA does not reconcile with the credit risk RWEA reported in the EU OV1 template.

Counterparty credit risk

EU CCR1 – Analysis of CCR exposure by approach

This table provides insight into ABN AMRO's counterparty credit risk (CCR), making a distinction between approach and CCR type.

	A	B	C	D	E	F	G	H
	30 June 2025							
(in millions)	Replacement cost (RC)	Potential future exposure (PFE)	EEPE	Alpha used for computing regulatory exposure value	Exposure value pre-CRM ¹	Exposure value post-CRM	Exposure value	RWEA ¹
EU1 EU - Original Exposure Method (for derivatives)								
EU2 EU - Simplified SA-CCR (for derivatives)								
1 SA-CCR (for derivatives)	776	3,050		1.4	5,455	5,337	5,337	3,240
2 IMM (for derivatives and SFTs)								
2a - of which securities financing transactions netting sets								
2b - of which derivatives and long settlement transactions netting sets								
2c - of which from contractual cross-product netting sets								
3 Financial collateral simple method (for SFTs)								
4 Financial collateral comprehensive method (for SFTs)					41,916	5,662	5,662	2,172
5 VaR for SFTs								
6 Total					47,371	10,999	10,999	5,412

1. In the EU CCR1 table the exposures to central counterparties (CCPs) are excluded, which explains why the amounts do not reconcile with the CCR amounts presented in the EU OV1 and EU CMS1 tables.

EU CCR3 – Standardised approach – CCR exposures by regulatory exposure class and risk weights

In the first half of 2025, the CCR exposures under SA decreased by EUR 2.5 billion, albeit with different flows in the separate exposure classes and risk weight buckets. Although total risk-weighted exposures increased in the buckets 0%, 50%, 75%, 150% and others, this was fully offset by large decreases in the buckets 2% and 20%. The decrease in the 2% bucket was caused by lower exposure to CCPs. The reduction in the 20% bucket was the result of the introduction of the 30% and 40% buckets due to the implementation of CRR3.

	A	B	C	D	E	F	G	H	I	J	K	L
	30 June 2025											
	Risk weight											Total
(in millions)	0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	
Exposure classes												
1 Central governments or central banks	98				25							124
2 Regional governments or local authorities												
3 Public sector entities	57				3							60
4 Multilateral development banks	4											4
5 International organisations	46											46
6 Institutions		3,014			29	28		11		21	2,374	5,477
7 Corporates						62		4	1,978	1		2,044
8 Retail												
9 Institutions and corporates with a short-term credit assessment		216										216
10 Other items												
11 Total exposure value	204	3,230			58	89		15	1,978	21	2,374	7,970

EU CCR4 – IRB approach – CCR exposures by exposure class and PD scale

In the first half of 2025, the total exposure value and total RWEA in the CCR A-IRB disclosure decreased while the total exposure values and total RWEA in the CCR F-IRB increased compared to 31 December 2024.

Due to the implementation of CRR3, the exposure classes have changed for both A-IRB and F-IRB. At the end of Q2 2025, Corporates-Other constituted the bank's entire CCR A-IRB exposure, totalling EUR 497 million; at Q4 2024 this exposure class represented EUR 602 million out of the total of EUR 671 million. In the CCR F-IRB disclosure, Corporates-Other and Institutions were the largest contributors as at 30 June 2025, each with an exposure of EUR 2.9 billion. These exposures remained stable compared to 31 December 2024.

The majority of the portfolio exposure value in the CCR A-IRB was concentrated in the lower PD scale, while most of the obligors were concentrated in the mid-range PD scales. For CCR F-IRB, both Corporates - Other and Institutions, the portfolios were concentrated in the low to mid-range PD scales.

Exposure class A-IRB

		A	B	C	D	E	F	G
		30 June 2025						
		PD scale	Exposure value	Exposure-weighted average PD	Numbers of obligors	Exposure-weighted average LGD	Exposure-weighted average maturity	RWEA
		(in millions)	(in %)	(in units)	(in %)	(in years)	(in millions)	(in %)
Exposure class								
1	Central governments and central banks	0.00 to <0.15						
2		0.15 to <0.25						
3		0.25 to <0.50						
4		0.50 to <0.75						
5		0.75 to <2.50						
6		2.50 to <10.00						
7		10.00 to <100.00						
8		100.00 (Default)						
9		Subtotal						
10	Regional governments or local authorities	0.00 to <0.15						
11		0.15 to <0.25						
12		0.25 to <0.50						
13		0.50 to <0.75						
14		0.75 to <2.50						
15		2.50 to <10.00						
16		10.00 to <100.00						
17		100.00 (Default)						
18		Subtotal						
19	Public sector entities	0.00 to <0.15						
20		0.15 to <0.25						
21		0.25 to <0.50						
22		0.50 to <0.75						
23		0.75 to <2.50						
24		2.50 to <10.00						
25		10.00 to <100.00						
26		100.00 (Default)						
27		Subtotal						
28	Corporates - Specialised Lending	0.00 to <0.15						
29		0.15 to <0.25						
30		0.25 to <0.50						
31		0.50 to <0.75						
32		0.75 to <2.50						
33		2.50 to <10.00						
34		10.00 to <100.00						
35		100.00 (Default)						
36		Subtotal						
37	Corporates - Purchased receivables	0.00 to <0.15						
38		0.15 to <0.25						
39		0.25 to <0.50						
40		0.50 to <0.75						
41		0.75 to <2.50						
42		2.50 to <10.00						
43		10.00 to <100.00						
44		100.00 (Default)						
45		Subtotal						
46	Corporates - Other	0.00 to <0.15	123	0.07%	20	52.17%	4.87	64
47		0.15 to <0.25	16	0.17%	5	69.10%	1.18	6
48		0.25 to <0.50	64	0.40%	64	53.81%	2.91	52
49		0.50 to <0.75	71	0.66%	124	47.33%	2.11	51
50		0.75 to <2.50	128	1.55%	178	48.37%	1.95	133
51		2.50 to <10.00	65	4.35%	74	40.49%	2.52	80
52		10.00 to <100.00	22	25.69%	147	67.15%	0.77	73
53		100.00 (Default)	9	100.00%	30	33.16%	1.13	40
54		Subtotal	497	4.16%	642	50.04%	2.80	499
55	Total		497	4.16%	642	50.04%	2.80	499
								100.44%

Exposure class F-IRB

		A	B	C	D	E	F	G
		30 June 2025						
		PD scale	Exposure value	Exposure-weighted average PD	Numbers of obligors	Exposure-weighted average LGD	Exposure-weighted average maturity	RWEA
		(in millions)	(in %)	(in units)	(in %)	(in years)	(in millions)	RWEA density
								(in %)
Exposure class								
1	Central governments and central banks	0.00 to <0.15						
2		0.15 to <0.25						
3		0.25 to <0.50						
4		0.50 to <0.75						
5		0.75 to <2.50						
6		2.50 to <10.00						
7		10.00 to <100.00						
8		100.00 (Default)						
9		Subtotal						
10	Regional governments or local authorities	0.00 to <0.15						
11		0.15 to <0.25						
12		0.25 to <0.50						
13		0.50 to <0.75						
14		0.75 to <2.50						
15		2.50 to <10.00						
16		10.00 to <100.00						
17		100.00 (Default)						
18		Subtotal						
19	Public sector entities	0.00 to <0.15						
20		0.15 to <0.25						
21		0.25 to <0.50						
22		0.50 to <0.75						
23		0.75 to <2.50						
24		2.50 to <10.00						
25		10.00 to <100.00						
26		100.00 (Default)						
27		Subtotal						
28	Institutions	0.00 to <0.15	2,468	0.06%	197	45.00%	1.13	442
29		0.15 to <0.25	236	0.21%	15	45.00%	0.57	86
30		0.25 to <0.50	106	0.28%	18	45.00%	2.12	71
31		0.50 to <0.75		0.00%		0.00%		0.00%
32		0.75 to <2.50	75	1.31%	7	45.00%	0.54	72
33		2.50 to <10.00	5	3.89%	1	45.00%	2.50	7
34		10.00 to <100.00	1	26.59%	2	45.00%	2.50	3
35		100.00 (Default)		0.00%		0.00%		0.00%
36		Subtotal	2,892	0.13%	240	45.00%	1.11	681
37	Corporates - Specialised Lending	0.00 to <0.15						
38		0.15 to <0.25						
39		0.25 to <0.50						
40		0.50 to <0.75						
41		0.75 to <2.50						
42		2.50 to <10.00						
43		10.00 to <100.00						
44		100.00 (Default)						
45		Subtotal						
46	Corporates - Purchased receivables	0.00 to <0.15						
47		0.15 to <0.25						
48		0.25 to <0.50						
49		0.50 to <0.75						
50		0.75 to <2.50						
51		2.50 to <10.00						
52		10.00 to <100.00						
53		100.00 (Default)						
54		Subtotal						

55	Corporates - Other	0.00 to <0.15	1,668	0.07%	216	44.71%	1.50	408	24.44%
56		0.15 to <0.25	239	0.18%	61	44.26%	0.98	85	35.57%
57		0.25 to <0.50	412	0.36%	180	41.79%	2.04	234	56.81%
58		0.50 to <0.75	299	0.68%	106	40.87%	2.17	226	75.53%
59		0.75 to <2.50	136	1.27%	72	40.29%	2.40	126	92.82%
60		2.50 to <10.00	94	3.59%	21	40.09%	2.50	118	125.10%
61		10.00 to <100.00	7	27.25%	8	41.22%	2.50	17	233.51%
62		100.00 (Default)	16	100.00%	6	40.00%	2.50		0.00%
63		Subtotal	2,871	0.99%	670	43.46%	1.69	1,213	42.26%
64	Total		5,763	0.56%	910	44.23%	1.40	1,895	32.87%

EU CCR5 – Composition of collateral for exposures

The table below provides an overview of the collateral composition for the counterparty credit risk exposures. In Q2 2025 total collateral used in derivative transactions and in Security Financing Transactions (SFTs) increased, mainly due to seasonal movements at Clearing.

	A	B	C	D	E	F	G	H
					30 June 2025			
	Collateral used in derivative transactions				Collateral used in SFTs			
	Fair value of collateral received		Fair value of posted collateral		Fair value of collateral received		Fair value of posted collateral	
(in millions)	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated	Segregated	Unsegregated
Collateral type								
1 Cash – domestic currency	7,417	5,445		2,312	6,788	16,536		21,509
2 Cash – other currencies	5,042	478		154	635	18,841		23,646
3 Domestic sovereign debt		631	17	465		1,832		1,769
4 Other sovereign debt		357		881		32,992		30,718
5 Government agency debt						488		520
6 Corporate bonds				64		8,939		10,160
7 Equity securities	17,172				29,678	9,721		3,037
8 Other collateral						2,899		2,899
9 Total	29,631	6,911	17	3,876	37,101	92,247		94,258

EU CCR6 – Credit derivatives exposures

This table shows ABN AMRO's credit derivative hedges, split by protection bought and protection sold. In the period under review, credit derivatives hedged increased due to business movements.

	A	B
		30 June 2025
(in millions)	Protection bought	Protection sold
Notionals		
1 Single-name credit default swaps		
2 Index credit default swaps	620	135
3 Total return swaps		
4 Credit options		
5 Other credit derivatives		
6 Total notionals	620	135
Fair values		
7 Positive fair value (asset)		3
8 Negative fair value (liability)	-16	

EU CCR8 – Exposures to CCPs

The table shows exposures to several CCPs, primarily due to ABN AMRO's Clearing business. In the first half of 2025, the RWEA of exposures to QCCPs decreased, mainly due to prefunded default fund contributions

(in millions)	30 June 2025	
	A	B
	Exposure value	RWEA
1 Exposures to QCCPs (total)¹		578
2 Exposures for trades at QCCPs (excluding initial margin and default fund contributions)	1,977	40
3 - of which (i) OTC derivatives	1,046	21
4 - of which (ii) Exchange-traded derivatives		
5 - of which (iii) SFTs	931	19
6 - of which (iv) Netting sets where cross-product netting has been approved		
7 Segregated initial margin		
8 Non-segregated initial margin	1,253	25
9 Prefunded default fund contributions	1,952	513
10 Unfunded default fund contributions		
11 Exposures to non-QCCPs (total)¹		2
12 Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions)	2	2
13 - of which (i) OTC derivatives		
14 - of which (ii) Exchange-traded derivatives		
15 - of which (iii) SFTs	2	2
16 - of which (iv) Netting sets where cross-product netting has been approved		
17 Segregated initial margin		
18 Non-segregated initial margin		
19 Prefunded default fund contributions		
20 Unfunded default fund contributions		

1. QCCP = Qualifying central counterparty

Exposures to securitisation positions

The following section includes qualitative and quantitative disclosures on securitised exposures, as well as on securitisation positions held. The bank is currently engaged in securitisation transactions as an investor and as an originator.

Investor securitisations

ABN AMRO provides securitisation lending solutions as part of its client lending activities in Corporate Banking. The resulting exposures reside on ABN AMRO's balance sheet and are treated as securitisation exposures for regulatory purposes. Most of the positions are treated under the standardised approach (SEC-SA) and a limited number under the external ratings-based approach (SEC-ERBA).

Originator securitisations

In April 2025, ABN AMRO and the European Investment Bank Group entered into a synthetic securitisation agreement regarding an approximately EUR 1.0 billion portfolio, with the aim of transferring risk for regulatory capital purposes. The transaction has been set up as a three-tranche synthetic securitisation: mezzanine tranche, senior tranche and junior tranche.

ABN AMRO has the originator role and fully retains the junior tranche. However, because the bank has used the option the CRR provides to fully deduct the retained position from CET1 (instead of applying a 1250% risk weight), the SEC3 template and the section 'Bank acting as originator or as sponsor' in SEC 1 remain empty based on the current EBA's mapping.

EU SEC1 – Securitisation exposures in the non-trading book

Details of total notes outstanding per structured entity

The following table provides details of the securitisation positions in which ABN AMRO acts as an investor. ABN AMRO provides securitisation lending solutions as part of its client lending activities in Corporate Banking. The resulting exposures reside on ABN AMRO's balance sheet and are treated as securitisation exposures for regulatory purposes.

The total invested exposure value increased to EUR 3.1 billion (31 December 2024: EUR 2.9 billion), mainly as a result of a new investment in other wholesale. Note that in Q2 2025 there was a reclassification of exposures from 'Wholesale – of which lease and receivables' to 'Retail – of which other retail exposures'.

	A	B	C	D	E	F	G
	30 June 2025						
	Bank acts as originator						
	Traditional				Synthetic		Subtotal
	STS		Non-STS				
(in millions)	Of which: SRT		Of which: SRT		Of which: SRT		
1	Total exposures						
2	Retail (total)						
3	- of which residential mortgage						
4	- of which credit card						
5	- of which other retail exposures						
6	- of which re-securitisation						
7	Wholesale (total)						
8	- of which loans to corporates						
9	- of which commercial mortgages						
10	- of which lease and receivables						
11	- of which other wholesale						
12	- of which re-securitisation						

	H	I	J	K	L	M	N	O
	30 June 2025							
	Bank acts as sponsor				Bank acts as investor			
	Traditional		Synthetic		Traditional		Synthetic	
	STS		Non-STS		STS		Non-STS	
(in millions)								
1 Total exposures					1,972	1,107	3,079	
2 Retail (total)					1,897	868	2,765	
3 - of which residential mortgage					397	716	1,113	
4 - of which credit card					200		200	
5 - of which other retail exposures					1,300	152	1,452	
6 - of which re-securitisation								
7 Wholesale (total)					75	239	314	
8 - of which loans to corporates								
9 - of which commercial mortgages								
10 - of which lease and receivables					75	64	139	
11 - of which other wholesale						175	175	
12 - of which re-securitisation								

EU SEC4 – Securitisation exposures in the non-trading book and associated regulatory capital requirements – institution acting as investor

The bank provides securitisation lending solutions as part of its client lending activities in Corporate Banking. The resulting exposures reside on our balance sheet and are treated as securitisation exposures for regulatory purposes.

The total invested exposure value increased to EUR 3.1 billion (31 December 2024: EUR 2.9 billion). The increase was mainly attributable to a wholesale investment in the Netherlands. The majority of the exposures continue to be Simple, Transparent and Standardised (STS).

	A	B	C	D	E	F	G	H	I
						30 June 2025			
	Exposure values (by RW bands/deductions)					Exposure values (by regulatory approach)			
(in millions)	≤ 20% RW	> 20% to 50% RW	> 50% to 100% RW	>100% to <1250% RW	1250% RW/ deductions	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW/ deductions
1 Total exposures	2,677	402					313	2,766	
2 Traditional securitisation	2,677	402					313	2,766	
3 Securitisation	2,677	402					313	2,766	
4 <i>Of which: retail underlying</i>	2,614	152					313	2,452	
5 <i>- of which STS</i>	1,897						161	1,736	
6 <i>Of which: wholesale</i>	64	250						314	
7 <i>- of which STS</i>		75						75	
8 Re-securitisation									
9 Synthetic securitisation									
10 Securitisation									
11 <i>Of which: retail underlying</i>									
12 <i>Of which: wholesale</i>									
13 Re-securitisation									

	J	K	L	M	N	O	EU-P	EU-Q
					30 June 2025			
	RWEA (by regulatory approach) ¹				Capital charge after cap			
(in millions)	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW	SEC-IRBA	SEC-ERBA (including IAA)	SEC-SA	1250% RW
1 Total exposures		59	397			5	32	
2 Traditional securitisation		59	397			5	32	
3 Securitisation		59	397			5	32	
4 <i>Of which: retail underlying</i>		59	284			5	23	
5 <i>- of which STS</i>		22	177			2	14	
6 <i>Of which: wholesale</i>			113				9	
7 <i>- of which STS</i>			37				3	
8 Re-securitisation								
9 Synthetic securitisation								
10 Securitisation								
11 <i>Of which: retail underlying</i>								
12 <i>Of which: wholesale</i>								
13 Re-securitisation								

1. The RWEAs securitisation exposures in the banking book include the RWEAs securitisation exposures in the banking book calculated with the SA and the ERBA approaches and exclude the RWEA equivalent for the securitisation position that the bank has deducted from CET1.

EU SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments

In April 2025, ABN AMRO and the EIB Group (whose counterparty is the European Investment Fund - EIF) entered into a synthetic securitisation agreement regarding an approximately EUR 1.0 billion portfolio of existing loans to Dutch SMEs originated by ABN AMRO. From the bank's perspective, the transaction aimed to transfer the credit risk of the selected SMEs loans portfolio and to achieve a significant amount of RWEA reduction.

The transaction was set up as a three-tranche synthetic securitisation under which the EIF is the investor/guarantor, providing protection on the mezzanine tranche of approximately EUR 150 million and on the senior tranche of approximately EUR 835 million. The junior tranche is fully retained by ABN AMRO.

	A	B	C
			30 June 2025
	Exposures securitised by the Bank - Bank acts as originator or as sponsor		
	Total outstanding nominal amount	Total amount of specific credit risk adjustments made during the period	
(in millions)		Of which: Exposures in default	
1 Total exposures	1,005		
2 Retail (total)			
3 - of which residential mortgage			
4 - of which credit card			
5 - of which other retail exposures			
6 - of which re-securitisation			
7 Wholesale (total)	1,005		
8 - of which loans to corporates	1,005		
9 - of which commercial mortgages			
10 - of which lease and receivables			
11 - of which other wholesale			
12 - of which re-securitisation			

Market risk

EU MR1 – Market risk under the standardised approach

(in millions)	A	
	30 June 2025	
	RWEA	
Outright products		
1 Interest rate risk (general and specific)		
2 Equity risk (general and specific)		
3 Foreign exchange risk		
4 Commodity risk		
Options		
5 Simplified approach		
6 Delta-plus method		
7 Scenario approach		
8 Securitisation (specific risk)		
9 Total		

EU MR2-A – Market risk under the Internal Model Approach (IMA)

(in millions)	A		B	
	30 June 2025		30 June 2025	
	RWEA		Own funds requirements	
1 VaR		341		27
a Previous day's VaR				9
b Multiplication factor (mc) x average of previous 60 working days (VaRavg)				27
2 SVaR		922		74
a Latest available SVaR				25
b Multiplication factor (mc) x average of previous 60 working days (sVaRavg)				74
3 IRC		598		48
a Most recent IRC measure				31
b 12 weeks average IRC measure				48
4 Comprehensive risk measure				
a Most recent risk measure of comprehensive risk measure				
b 12 weeks average of comprehensive risk measure				
c Comprehensive risk measure floor				
5 Other				
6 Total		1,861		149

EU MR2-B – RWEA flow statements of market risk exposures under the IMA

Market risk RWEA under the Internal Model Approach (IMA) decreased to EUR 1.9 billion as at 30 June 2025 (31 March 2025: EUR 2.3 billion). This decrease was caused by the reductions in VaR, SVaR and IRC and was primarily driven by lowered exposures.

The number of genuine overshootings during the last 250 trading days remained at one as of June 2025; hence, the capital multipliers for VaR and SVaR stayed at 3.0, in line with the CRR. As a result, the 12-week average multiplied by capital multipliers exceeds the latest observations. This is reflected in the regulatory adjustments.

	A	B	C	D	E	F	G
	30 June 2025						
(in millions)	VaR	SVaR	IRC	Compre- hensive risk measure	Other	Total RWEA	Total own funds require- ments
1 RWEA at the previous quarter-end	547	1,033	714			2,294	183
1a <i>Regulatory adjustment</i>	-404	-649				-1,053	-84
1b <i>RWEA at the previous quarter-end (end of the day)</i>	142	384	714			1,240	99
2 Movement in risk levels	-28	-70	-326			-424	-34
3 Model updates/changes							
4 Methodology and policy							
5 Acquisitions and disposals							
6 Foreign exchange movements							
7 Other							
8a <i>RWEA at the end of the disclosure period (end of the day)</i>	114	314	388			817	65
8b <i>Regulatory adjustment</i>	227	607	210			1,044	84
8 RWEA at the end of the disclosure period	341	922	598			1,861	149

EU MR3 – IMA values for trading portfolios

	A
(in millions)	30 June 2025
	VaR (10 day 99%)
1 Maximum value	21
2 Average value	12
3 Minimum value	6
4 Period end	9
	SVaR (10 day 99%)
5 Maximum value	36
6 Average value	26
7 Minimum value	20
8 Period end	25
	IRC (99.9%)
9 Maximum value	69
10 Average value	49
11 Minimum value	22
12 Period end	31
	Comprehensive risk capital charge (99.9%)
13 Maximum value	
14 Average value	
15 Minimum value	
16 Period end	

EU MR4 – Comparison of VaR estimates with gains/losses

Analysis of outliers

The total number of VaR outliers reported by ABN AMRO in the time series of the 250 most recent business days ending on 30 June 2025 is one. This has no further impact on the multiplication factors. The number of outliers remained the same compared to the 250 days ending on 31 December 2024.

- 4 March 2025: a VaR outlier of the actual and hypothetical P&L was reported as a result of significant upward shocks in EUR interest rate curves driven by signals of increased government spending and potentially higher inflation in the euro area.

Comparison of VaR estimates with gains/losses July 2024 - June 2025



EU IRRBB1 – Interest rate risks of non-trading book activities

The table shows the changes in the Economic Value of Equity (EVE) resulting from various yield curve shocks, as calculated under the six supervisory shock scenarios. The changes in net interest income (NII) are also shown, i.e. the difference in NII between a base scenario and an alternative scenario calculated under the two supervisory shock scenarios. The scenarios are aligned with the EBA guidelines, and the scope is limited to material currencies (EUR and USD).

The most stringent EVE-at-Risk scenario remains the scenario where rates are shifted upwards by 200bps. The absolute change in EVE-at-Risk is higher in comparison with December 2024. We see a higher EVE impact in both upward and downward scenarios, as the interest rate risk position has moderately increased since year-end 2024. The asymmetry between the two scenarios is mainly caused by embedded optionality such as clients' mortgages prepayment behaviour. ABN AMRO actively manages interest rate risk to keep it within its risk appetite.

The NII-at-Risk as of 30 June 2025 was EUR 319 million negative, reflecting a decrease of NII in the parallel downward scenario. This decrease was mainly attributable to increased lending volumes together with a reduction in time deposits.

(in millions)	A		B		C		D	
	Changes of the economic value of equity		Changes of the net interest income					
	30 June 2025	31 December 2024	30 June 2025	31 December 2024	30 June 2025	31 December 2024	30 June 2025	31 December 2024
Supervisory shock scenarios								
1 Parallel up	-2,112	-1,916	439	277				
2 Parallel down	298	210	-319	-106				
3 Steepener	-113	240						
4 Flatteners	-457	-775						
5 Short rates up	-803	-1,030						
6 Short rates down	694	1,030						

ESG disclosures

Tables 1, 2 and 3 – Qualitative information on Environmental, Social and Governance (ESG) risk

Basis of preparation

This disclosure is an interim update of the 31 December 2024 disclosure, which was prepared based on the Sustainability Statements in our Integrated Annual Report 2024. Since our 2025 materiality assessment is not yet finalised, the results of our 2024 materiality assessment constitute the backbone of this disclosure. The scope is focused on the ESG risks in line with the CRR, and is therefore more limited than the scope of the Sustainability Statements in our Annual Report.

Metrics and estimation uncertainty

In this report we use metrics, especially in the case of our client portfolios, that are based on certain estimates, averages or assumptions. The underlying data either comes directly from clients or is sourced from external data vendors. We use sector averages if we cannot reasonably collect information, especially from our value chain business relationships. For certain metrics, such as our financed emissions, we combine several data sources.

Generally, the level of accuracy of these metrics is lower than that of financial metrics, given the quality of the inputs. The quality typically depends on whether the data is directly reported by our clients or based on proxies, the characteristics of the reported data and whether it has been reviewed by an external party, whether the data is forward-looking or historical and whether established measurement frameworks are available. All quantitative metrics relating to information on our value chain currently have a high measurement uncertainty as sustainability reporting is a developing field for most actors in our value chain and we depend on these actors for accurate information.

The data we use is subject to continuous improvement, given also that sustainability-related regulation may result in more standardised data becoming available in the future. Comparability of sustainability information between entities and over time may be affected by the lack of historical sustainability information and by the absence of uniform practices for evaluating and measuring this information. This allows for the application of different, but acceptable, measurement techniques, especially in the initial years. In our disclosures, we aim to be transparent about any changes in underlying data or assumptions, in order to explain movements and provide the appropriate context to readers of the report.

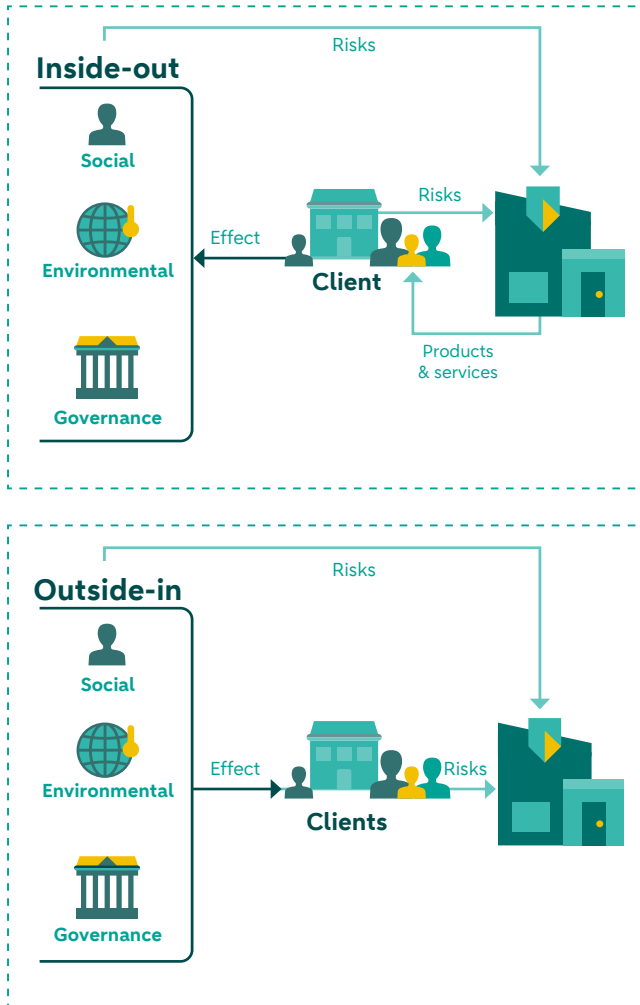
Background and definitions of sustainability risk

Sustainability risk is defined in our risk taxonomy and sustainability risk policy as the risk that Environmental, Social or Governance-related (ESG) factors have a negative financial and/or non-financial impact on ABN AMRO or the wider society, either directly or via other risk types. As sustainability risk is considered a material risk in our risk taxonomy, managing sustainability risk is a fundamental part of safeguarding our risk profile and supporting ABN AMRO's strategic objectives.

ESG factors can create increased risks for the bank. These, in turn, can adversely affect the bank's financial and/or non-financial performance and are a causal factor, or risk driver, of traditional risk types. Transmission channels are the causal pathways that explain how sustainability factors lead to increased financial and non-financial risks for the bank. Understanding transmission channels is therefore key to setting adequate measures to manage sustainability risk. Transmission channels can be classified as microeconomic or macroeconomic:

- Microeconomic transmission channels are causal chains through which sustainability risk affects the bank's individual clients, resulting in financial risks for ABN AMRO.
- Macroeconomic transmission channels are causal chains through which sustainability risk affects macroeconomic factors (e.g. labour productivity or economic growth), which in turn adversely affect ABN AMRO.

Overview of how sustainability risks can impact the bank



As part of overseeing ESG risks arising through its clients, ABN AMRO carries out a two-pronged assessment, whereby the bank manages the effects that our activities have on the world and society (inside-out) and also on how sustainability matters may affect us through the physical and transition risks we are exposed to (outside-in). More specifically:

- 'Inside-out risks' are the financial and non-financial risks arising when clients of the bank may have an effect on people or the planet through ESG factors (which is also defined as impact within ABN AMRO). This impact can be direct; for example, if a client causes and has to clean up water pollution.
- 'Outside-in risks' are the financial and non-financial risks arising when climate or environmental factors may have an effect on the bank and its clients (either at an individual client or portfolio level). For example, extreme weather events such as flooding can have an effect on the value of a client's collateral in the bank's mortgage portfolio. Outside-in risks are, in turn, split into transition risks and physical risks:
 - Transition risk refers to financial and non-financial risks that result, directly or indirectly, from the process of adjusting to a lower-carbon and more environmentally sustainable economy (e.g. changes in regulation, consumer preferences or technology).
 - Physical risk refers to the financial risk of climate change and environmental degradation. Physical risk can be acute (for example, when it relates to extreme weather events) or chronic (when it relates to progressive shifts such as rising temperatures and biodiversity loss).

Strategy and business model

Sustainability in relation to our strategy and business model

The main impact in our value chain is the downstream impact associated with the clients we finance, primarily through our lending portfolios — such as mortgages and corporate loans — which are central to these statements. The relevance of consumer loans depends on their use of proceeds, when known, in line with the principles of the EU Taxonomy Regulation. Examples are real estate, building renovation loans, and motor vehicle loans. While our non-lending activities may have a significant environmental impact, best practices for accounting for them are still evolving. For instance, methodologies for calculating financed GHG emissions for government bonds and underwriting now exist, but broader guidelines for government exposures and underwriting remain unclear.

Similarly, undrawn facilities and guarantees, although not on our balance sheet, facilitate economic activity, yet there is no established approach for assessing their impact.

The influence ABN AMRO has on client assets (investments managed or facilitated for clients) varies depending on the service provided: Discretionary Portfolio Management, Advisory or Execution-only. Nevertheless, ABN AMRO regards client assets as relevant from a sustainability perspective, as evidenced by our previous reporting. In line with past years, we have again chosen to disclose information about our client assets portfolio with regard to climate change mitigation and workers in the value chain.

Besides the impacts identified through our downstream activities and based mainly on our lending portfolios, positive and negative impacts also occur through the products and services that we offer and through the strategic choices that we make regarding, for example, privacy, financial inclusion and access to services. This is described in more detail in the Social section.

Sustainability as part of our strategy

Sustainability is a key component of ABN AMRO's strategy, representing one of three strategic pillars. Sustainability has been part of our strategy since 2018 and has been operationalised through our sustainability ambitions and targets since 2020, ahead of the Corporate Sustainability Reporting Directive (CSRD).

We use our expertise to help clients reduce their carbon footprints, invest in sustainable businesses and technologies, and prioritise social impact initiatives. We have set bank-wide targets related to sustainability. These include increasing sustainability acceleration loans, improving the average energy label of the homes we finance through mortgage loans, and supporting more Wealth Management clients to invest in ESG-focused funds and strategies, among other goals.

In line with the role of sustainability as a pillar, we have steered on and set accountability via our Sustainability Acceleration Standard (SAS). The SAS itself is a comprehensive methodology for measuring our Sustainability (acceleration) assets so as to assess our performance bank-wide and on a client-unit level.

SAS, as an overarching metric, includes topics defined as material in our double materiality assessment (such as climate change and circular economy). The SAS metric was not developed for the purpose of measuring the progress of the identified material matters and should not be considered as a metric under the European Sustainability Reporting Standards (ESRS). The value of SAS as a KPI is that it aims to enable and stimulate clients (and bankers) in their transition to becoming more sustainable, as well as provide insight to investors and shareholders.

SAS, including EU taxonomy-aligned assets measured by the Green Asset Ratio (GAR), is a volume-based metric, while the climate strategy metrics have a direct impact (on GHG emission reductions). In several cases, a positive development in SAS volume will have a positive impact on our pathway towards climate targets, if these loans are provided to clients in sectors in scope and the loan is aimed at mitigating climate impact. However, not all cases have a direct link between SAS (or GAR) and climate reduction pathways as, in some cases, loans will only have an impact on client emissions at a later moment in time.

Our priority in this context is ensuring that KPIs and metrics are clearly linked to the impacts they aim to measure. In the future, we aim to further enhance the connectivity between different sustainability metrics and targets, recognising that different metrics may still be needed for different purposes.

Current and anticipated effects of material matters on strategy and business model

Since our 2025 materiality assessment is not yet finalised, this section is primarily based on the results of our 2024 materiality assessment.

ABN AMRO's strategy incorporates the material matters identified in the 2024 double materiality assessment (DMA) through three focus areas: climate, nature and social impact. In the following sections we explain how each material topic impacts ABN AMRO and we outline the bank's actions in response. The financial plan also details existing initiatives, alongside associated risks and opportunities.

As part of the DMA, the bank determined that climate-related and environmental risks are highly likely to materialise over the medium to long term. A bank-wide ICAAP stress test evaluated the financial impact of environmental and other risks over a five-year horizon, concluding that the effects are well within our loss-absorbing capacity. This confirms that the business model is sufficiently resilient to cover the risks in our adverse scenario. As a result, we consider the design of our business model resilient to these risks. For more details, refer to the Business risk section in the Risk, capital and funding chapter of the Integrated Annual Report 2024.

ABN AMRO's approach to addressing climate and environmental risks centres on stimulating and supporting clients' transition efforts. For example, we offer financial incentives within residential mortgage terms to encourage sustainable home improvements. At the same time, we need to balance material matters such as the environmental and social aspects of sustainability. For example, we acknowledge our social duty as an enabler of home ownership. Consequently, we do not discriminate in lending based on physical risk indicators. Our assessment and approach remain consistent with the previous year.

Risk management of sustainability matters

Sustainability risk management framework relating to ABN AMRO's clients

Sustainability risks, including the risk of negative impacts that relate to our clients, are managed in line with the bank's enterprise risk management cycle (ERM cycle), also referred to as the Sustainability Risk Management Framework. The risk governance in place, together with the Sustainability Risk Policy Framework, ensures oversight and operationalises how we manage risks, including negative impacts, relating to sustainability matters in our downstream value chain.

The Sustainability Risk Management Framework applies to new and existing clients throughout their lifecycle (i.e. from client acceptance, through ongoing due diligence to a potential client exit).

Sustainability Risk Management Framework



Examples of tools and processes:

- 1 Sustainability risk management and strategy, target-setting and climate strategy
- 2 Climate, environmental and social risk heatmaps, CER materiality assessment
- 3 Portfolio scenario analysis, CASY (Client Assessment on Sustainability), stress testing
- 4 Lending criteria, risk policies, engagement
- 5 Risk appetite on sustainability risks
- 6 Sustainability risk reporting at business, risk and executive committees
- 7 Insights sustainability risks to decision-making

Sustainability risk governance relating to ABN AMRO's clients

Risk management sub-committees (positioned directly below the Board-level executive committees) support effective and efficient risk management throughout the bank, each with their own remit:

- Business Risk Committees (BRCs) for oversight on sustainability risk within the specific client units and approval of client unit-specific sustainability risk issues (e.g. scenario analysis). The BRCs meet monthly or quarterly.
- Scenario and Stress-test Committee (SSC) for oversight on climate-related and environmental risks, scenario analyses and stress testing. The SSC meets quarterly.
- Financial Crime Risk Committee (FCRC) approves bank-wide and client unit-overarching decisions on financial crime risks related to money laundering, financing of terrorism, sanctions, bribery, corruption, tax integrity and fraud within the client lifecycle. As part of its remit, the FCRC may deal with sustainability-related aspects in relation, for example, to proceeds of environmental crime. The FCRC meets monthly.
- Methodology Acceptance Group (MAG) approves decisions on the validation and subsequent use of risk models and other models, for example climate stress testing methodologies and models. The MAG meets monthly.
- Impairment & Provisioning Committee (IPC), which designs, implements and manages enterprise-wide impairments, provisions and value adjustment programmes. As part of its remit, the IPC may deal with sustainability-related aspects in relation, for example, to credit losses that may arise in the context of climate transition risk. The IPC meets monthly.

Alongside these risk committees, day-to-day activities and oversight are performed by the Sustainability Risk team within Central Risk Management.

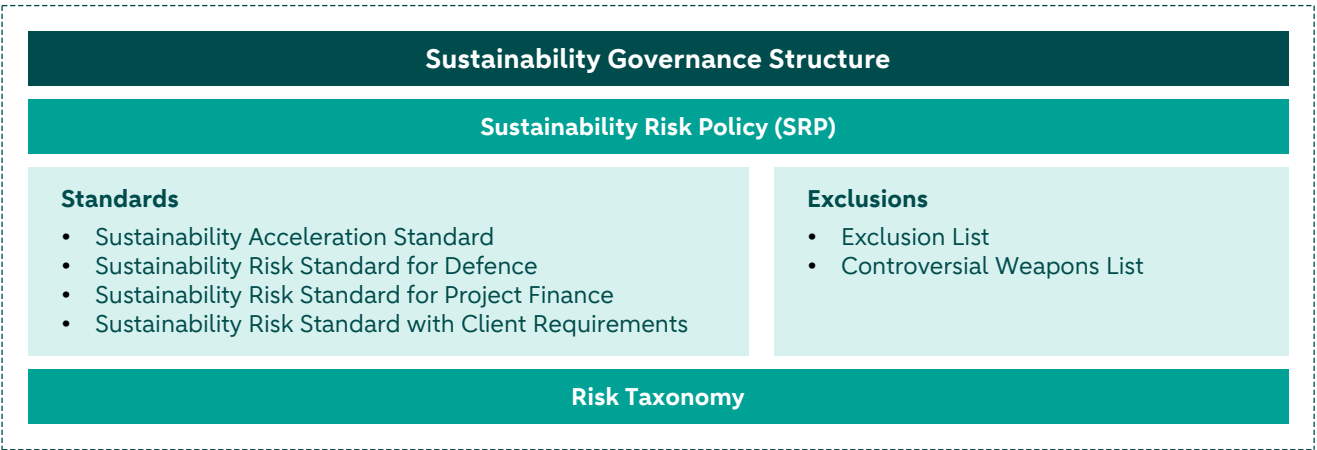
The above risk sub-committees are supported by other first-line-of-defence committees such as the Engagement Committee, which is one of the executive business-led committees. The Engagement Committee is mandated by the Executive Board and is responsible for overseeing the bank's engagement activities regarding clients, sectors and

material suppliers so as to ensure that material ESG risk engagement is appropriately documented and that adequate measures are taken to stay within the bank’s chosen ESG risk. The aim of this engagement approach is to operate in compliance with the bank’s policies for the management of ESG risks, as well as with the UN Guiding Principles on Business and Human Rights (UNGPs) and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.

Sustainability Risk Policy Framework

Our Sustainability Risk Policy Framework underpins how the bank manages sustainability risk, including negative impacts, in relation to our clients. The Sustainability Risk Policy Framework includes our sustainability risk policy, as well as standards and exclusions. It is subject to an annual review to incorporate new insights and practices, internal and external developments, and views of stakeholders, as well as to align with the latest regulatory guidance, such as ECB and EBA requirements and definitions.

The exclusions applied by ABN AMRO relate to specific activities outlined in the Governance of sustainability matters section of the Integrated Annual Report 2024. In practice, these exclusions mean that we will not knowingly provide financial products or services that facilitate activities on our Exclusion List, or engage in business with a client listed in our Controversial Weapons List.



The sustainability risk policy articulates how the bank puts its Sustainability Risk Management Framework into practice by outlining the main principles and requirements for managing the sustainability risks adversely impacting ABN AMRO in relation to our (new and existing) clients for the duration of their lifecycle (i.e. from client acceptance, through ongoing due diligence to a potential client exit). The sustainability risk policy also covers proprietary investments. The policy defines minimum requirements and sets rules for managing sustainability risks relating to the bank’s clients in line with the bank’s risk appetite and enterprise risk management framework, including:

- the definition of sustainability risks
- the governance of sustainability risk management
- how we engage with clients that do not comply with our standards
- minimum requirements for managing sustainability risks relating to client onboarding and during the client lifecycle, lending activities and proprietary investments. As part of the delegated authority granted to it by the Executive Board, the Group Risk Committee is responsible for approving the sustainability risk policy. In line with our framework, this policy is reviewed and approved at least annually, taking into account feedback from relevant internal stakeholders (such as Credit risk and our client units) and external stakeholders (such as NGOs). It is then communicated internally across the first and second lines of defence, and an abbreviated version is available to external stakeholders on our website.

Sustainability-related standards and generic principles applicable to corporate clients

Generic Principles

Minimum sustainability requirements underpinning the SRPF (Sustainability Risk Policy Framework) for corporate clients operating in higher-risk sectors



Clients comply with applicable laws and regulations and are able to demonstrate transparency regarding their responsible business conduct.



Clients know the salient human rights risks of their own activities and business relationships and take measures to address these risks.



Clients have a satisfactory ESG track record.



Clients have identified potentially affected groups and other relevant stakeholders and engage with them constructively and openly in assessing and mitigating human rights risks and addressing any grievances.



Clients take measures to promote circularity and reduce the use of virgin material and waste (e.g. through design, recycling, life time extension), if applicable.



Clients monitor their GHG emissions and take measures to reduce them in line with the Paris climate goals.



Clients are aware of how their business model depends on ecosystem services (i.e. resources, pollination) and take measures to preserve these services.



Clients are aware what the transition to a net zero economy means for their business model and take appropriate measures to prepare for the transition.



Clients are aware what their impact is on biodiversity, water, air and soil and take appropriate measures to prevent biodiversity loss and pollution.



Clients are aware of the physical risks of a changing climate for their business model and take appropriate measures to mitigate these risks.

Our Standards and Generic Principles define the sustainability requirements against which our corporate clients must be assessed to ensure appropriate risk response measures.

The Generic Principles form the foundation of our Environmental, Social and Governance (ESG) assessment of the bank's corporate clients to whom we provide corporate loans or other financing. These Generic Principles are operationalised into specific requirements for our Corporate Banking, Wealth Management, Personal & Business Banking clients.

These Generic Principles support the assessment of whether our clients comply with the UNGPs and the OECD Guidelines for Multinational Enterprises (MNEs), where applicable and as required under Article 18 of the EU Taxonomy Regulation. Although our Generic Principles have remained the same, we have enhanced our underlying Standard with Client Requirements, so that it now applies consistently across all our clients, as well as aligning with the terminology used in the CSRD and related European Sustainability Reporting Standards (ESRS). This Standard also considers the maturity of a client on its ESG journey by taking into account the size and/or sector in which the client is active. The Standard with Client Requirements has additionally been updated on two points relating to the energy sector:

- Firstly, we have widened the lending exclusion to direct lending to oil and gas fields licensed for development to after 2023. This change aligns with the International Energy Agency's (IEA) latest Net Zero Emissions (NZE) 2050 scenario.
- Secondly, we have removed the exclusion of stand-alone project finance for nuclear power generation. This change is based on the recognition that nuclear power is an integral part of the global energy mix, as noted in the IEA NZE scenario, and is included in several countries' transition strategies. However, given the inherent risks associated with nuclear power generation, we have reinforced our due diligence procedures and established stringent criteria for financing nuclear power projects.

Business strategy and strategic decision-making (steps 1 and 7)

The Sustainability Risk Management Framework, which operationalises how we manage sustainability matters via the ERM cycle, starts with setting the business strategy by the first line of defence. The subsequent risk management monitoring and oversight are carried out by the second line of defence.

The business strategy on sustainability matters cannot be set in isolation and, as such, has to align with the bank's risk appetite and risk policies in the second line of defence. As a result, the business strategy and subsequent strategic decision-making go hand-in-hand with the risk control and oversight carried out in the ERM cycle (described in the next sections):

- Insights into sustainability risks inform strategic decision-making. For example, the bank's climate strategy was developed partly in response to climate-related transition risks. Similarly, decisions to engage with a specific client or group of clients to accelerate the sustainability shift are informed by client- or sector-level risk identification and measurement, while decisions to reduce, maintain or expand certain portfolios are informed by our insights into sustainability risks.
- Sustainability risk management is also informed by ABN AMRO's strategic commitments to sustainability matters. For example, our risk appetite limits take into account several elements, such as our strategic targets on carbon reduction. In other words, key performance indicators and key risk indicators (KRIs) should be looked at alongside each other. Similarly, the Sustainability Risk Policy Framework is updated regularly to assess, for example, clients' alignment with our strategic objectives.

Risk identification and materiality assessment (step 2)

Risk identification as part of the ERM cycle relies largely on our Environmental and Social Risk heatmaps. These heatmaps inform, for example, the CER materiality assessment, CER stress testing and risk appetite. Alongside our risk heatmaps, we scan our emerging risks on a quarterly basis. Risks identified as most material following the emerging risk scan and assessment with our internal expert stakeholder group feed into our Risk Event Register (RER), which subsequently informs our risk taxonomy and scenario booklet.

The Environmental and Social Risk heatmaps identify subsectors' inherent sensitivity to sustainability events. These are subsectors in which we operate through our corporate lending and residential real estate portfolios (i.e. business environment). The business environment is analysed under both a sectoral lens (64 distinct subsectors) and a geographical lens (regions and countries to which we have exposure, either directly or through subsectors' value chains).

The sensitivities in the Overview of environmental and social risk heatmaps for corporate loans are based on the sector sensitivities to more than 40 potential underlying physical, transition and negative impact events and focus on our corporate lending activities in the downstream part of the value chain. Examples of these events include flooding and water stress for physical events, policy and market effects for transition events, and greenhouse gas emissions and water use intensity for negative impact. The Overview of environmental and social risk heatmaps for corporate loans can be found in our Integrated Annual Report 2024.

Risk assessment and measurement (step 3)

Various tools are used to assess and measure sustainability risk at different levels:

- At a bank level: sustainability risk elements concerning climate change are part of the internal stress testing scenarios and climate and environmental risks.
- At a portfolio level: scenario analysis is used to measure the impact of sustainability risk in specific portfolios such as the residential and commercial real estate portfolios. In addition, the product approval and review process considers sustainability risks, alongside other risks, that may arise in our product offering, such as residential mortgages.
- At a client level: the sustainability risk of corporate clients is assessed as described under the heading Client assessment on sustainability.

Risk response (step 4)

To ensure that sustainability risk is managed in line with the bank's risk appetite and strategy, mitigating actions are defined at bank, portfolio and client levels.

At a bank level, mitigating actions for sustainability risks are as follows:

- exclusion of some specific sectors and subsectors from lending products and our banking services, as stated in the bank's Exclusion List (for example, illegal logging)
- Controversial Weapons List, where we identify companies with which we do not want any relationship at all because of their involvement in the production of controversial weapons

- strict requirements for corporate lending under the Sustainability Risk Standard with Client Requirements
- sustainability risk considerations included in the bank's credit risk and business risk policies
- our climate strategy for high-emission sectors, portfolio management and wider sector strategies.

At a client and portfolio level, we will consider engaging with companies we finance and that do not comply with our standards, with the aim of improving their performance. Our overall system for and approach to this type of engagement remained unchanged during the reporting period. We divide our engagements with corporate clients into three general categories: normal intensity, high intensity, and thematic engagement.

- Normal intensity: an ongoing process is tailored to the client's particular risk or impacts and improvement areas. It is used as a mitigating action at a client level and focuses primarily on remediating breaches of the Sustainability Risk Policy Framework.
- High intensity: a formal, time-bound process is established involving setting detailed objectives. This process is closely monitored by relationship managers and the Credit Risk Sustainability team, with quarterly oversight by our Engagement Committee.
- Thematic: this category applies if we identify that a sector or industry is at risk of breaching the bank's ESG-related requirements, including our requirements regarding human rights. Various teams within ABN AMRO can propose thematic engagement, and the decision to engage is taken by our Engagement Committee. We use thematic engagements for risk mitigation purposes, as well as to achieve our strategic objectives for accelerating the sustainability shift.

Risk control & monitoring and risk reporting (steps 5 and 6)

Monitoring activities aim to act as a safety net to capture and identify potential shortcomings in our Sustainability Risk Policy Framework in a timely manner. Our monitoring activities are carried out in a variety of ways and at various levels:

- As part of our top-down monitoring, we measure the bank's risk profile and compare it to the bank's Strategic Risk Appetite Statement (SRAS). The SRAS is split into three key areas: sustainable business model & value creation, financial soundness, and sound operating environment. A key element in the sustainable business model & value creation is the management of our portfolio towards a net zero 2050 trajectory in line with the sustainable finance criteria contained in our policies and climate strategy. The resulting SRAS informs our Bank Risk Appetite Statement (BRAS), which aims to set the boundaries for the bank's overall risk profile, including on sustainability risk.
- Positioned below the BRAS, the sustainability risk appetite is set using indicators that address key ESG factors, as well as the inside-out and outside-in perspectives of sustainability risk. To ensure that an identified sustainability risk remains within the approved risk appetite, we set limits and checkpoints and monitor these at bank-wide, client unit and functions levels. This allows us to take timely mitigating actions. These indicators are reviewed on an ongoing basis as we gain access to more granular insights and data over time.
- At a more granular level, the development, review and implementation of risk appetite limits and checkpoints at bank-wide, client unit and functions levels are additional important elements in our risk monitoring.
- Additional bank-wide KRIs are established directly at the level of the client units and functions, where they have their own specific KRIs. These KRIs are increasingly informed by insights from sustainability risk identification and measurement efforts such as scenario analyses.
- We also further enhanced our monitoring activities by introducing additional internal monitoring and testing controls to support our Sustainability Risk Policy Framework's adherence to a particular focus on our client onboarding and review and lending process requirements.

Sustainability risk appetite indicators

	Indicator	Checkpoint/limits	Monitoring only
Sustainability risk	Percentage of clients requiring a valid ESG risk assessment	●	
	Percentage of clients with an overdue ESG risk assessment	●	
	Sustainable and Acceleration Standard volume change	●	
	Green Asset Ratio (EU Taxonomy-aligned volume)		●
Climate risk	Climate strategy sector performance	●	
	Coverage of bank's commitments to Net Zero Banking Alliance decarbonisation targets	●	
Environmental risk	Relative exposure in sectors sensitive to physical environmental risks		●
	Relative exposure in sectors sensitive to transition environmental risks		●
Human rights risk	Strength of human rights risk management	●	
	Relative exposure in sectors sensitive to social risk		●

The status of adherence to the risk appetite and the outlook are discussed monthly by the Executive Board and quarterly by the Supervisory Board, based on the Enterprise Risk Management report.

CER materiality assessment

A materiality assessment on Climate & Environmental Risks (CER) is carried out annually for traditional banking risk types. This assessment constitutes part of our annual risk identification process in our enterprise risk management cycle, and the outcome feeds into the bank's risk taxonomy and into the assessment of sustainability risk as part of the bank's double materiality assessment.

The scope of the assessment was the bank's entire balance sheet. The credit risk type assessment examined the risks in the loan book, while the market and liquidity risk type assessment stressed the fair valuation assets for CER. The risks related to property and equipment were captured by the non-financial risk type assessment.

Time horizons

We assess material CER over the short, medium and long term. The short term refers to the reporting period of the Annual Financial Statements. Since sustainability-related matters often materialise over longer time horizons, the nature of these topics warrants more forward-looking reporting, whereas financial information is related to the annual reporting period. For forward-looking information on ABN AMRO's material risks, ABN AMRO defines:

- 1 year as short term
- between 1 and 5 years as medium term
- more than 5 years as long term

Where our time horizons deviate from these general guiding principles, this is disclosed alongside the specific material topic.

Scenarios

The CER materiality assessment was performed against our global base case scenario, in which a large group of countries make systems changes with a view to decarbonising their economies through policy reform and other initiatives. However, the overall reduction in GHG emissions is falling short of meeting the Paris target of reigning in average global warming to less than 2°C from pre-industrial levels by 2100. Instead, our baseline scenario is compatible with global warming with a mid-point of approximately 2.2°C. This scenario for global emissions falls somewhere between the IEA's Announced Pledges Scenario and the Stated Policies scenario. The scenario also embeds damage caused by chronic physical shocks. The assumptions used in preparing our IFRS financial statements are aligned with this scenario.

Critical assumptions

To assess the financial impact of CER risks, we assumed that physical risk, such as floods or drought, may lead to loss of productivity for businesses and property damage for home-owners. In the short term, transition risk is expected to

lead to higher costs for companies transitioning to a carbon-free environment. The transition may also result in some companies' business models becoming obsolete or in a significant drop in demand. For home-owners, transition risk may lead to a fall in the prices of properties with weaker energy labels.

The table below provides an overview of the 2024 CER assessment results for the short term (ST), medium term (MT) and long term (LT). Further details on 2024 risk type assessments are provided below. 2025 CER materiality assessment is currently ongoing.

Materiality Assessment Table

Risk types	Climate risk						Environmental risk					
	Physical risk			Transition risk			Physical risk			Transition risk		
	ST	MT	LT	ST	MT	LT	ST	MT	LT	ST	MT	LT
Credit risk	○	○	●	○	○	●	●	●	●	●	●	●
Market risk in the trading book	○	○	○	○	○	○	○	○	○	○	○	○
Market risk in the banking book	○	○	○	○	○	○	○	○	○	○	○	○
Liquidity risk	○	○	○	○	○	○	○	○	○	○	○	○
Business risk	○	○	○	○	●	●	○	○	○	○	●	●
Non-financial risk	●	●	●	●	●	●	○	○	○	●	●	●

○ Climate and environmental risk is assessed as not material ● Climate and environmental risk is material

CER materiality assessment - Credit risk

In scope of the CER materiality assessment in Credit risk are the mortgages, commercial real estate (CRE) and corporate portfolios as these are the main portfolios for which clear transmission channels are determined. Our assessment covers approximately 90% of the lending portfolio. Portfolios not included in the CER materiality assessment scope are predominantly related to Clearing clients and consumer loans.

We applied a product approach for loans that are collateralised by real estate (residential mortgages, CRE) and corporate loans as a general product category, given that clear transmission channels could be defined for these product types. The methodology for physical risk applies an expected loss approach, where the probability of a specific CER event occurring is multiplied by the estimated loss when it occurs and the effect of this on the loan-to-value of the collateral. For transition risk, a similar expected loss approach is used, where several scenarios (Network for Greening the Financial System, carbon pricing) are assessed.

The quantitative materiality assessment of CER impact on credit risk performed by ABN AMRO in 2024 showed that the impact of environmental risk on credit risk is material in the short, medium and long term. Climate risk is also material for credit risk, but in the longer term.

Identification and measurement

We used various analyses to assess the materiality of climate risk, including our climate risk heatmap, climate scenario analyses on the mortgage and commercial real estate portfolios, a climate stress test on part of the corporate portfolio and an environmental risk scenario analysis. The materiality assessment of environmental risk is mainly based on a qualitative assessment, supported by scenario analyses.

Mitigating measures

Various measures have been taken in order to mitigate CER within Credit Risk. These relate to credit risk acceptance, risk monitoring, risk appetite setting and financial buffers.

Risk appetite

Credit risk indicators related to climate physical and transition risk were included in the Risk Appetite Statement. As well as monitoring several CER-related indicators, we set, as part of our risk appetite, limits and checkpoints for vulnerable collateral in increased physical risk areas in the mortgage portfolio, and also monitor carbon-related exposures relative to the corporate lending portfolio. This is a developing area.

Capitalisation and provisioning

ABN AMRO recognises loss allowances based on the Expected Credit Loss model (ECL) of IFRS 9. For expected credit loss calculations, ABN AMRO uses macroeconomic scenarios which implicitly incorporate climate and environmental risks. Integration of CER in the credit risk model landscape is currently under construction. In the meantime, based on our materiality assessment results, we have taken management overlays for climate and environmental transition risks and an economic capital add-on for climate transition risk. Given the combination of macroeconomic scenarios and these management overlays, we consider the bank adequately provisioned for climate and environmental risks.

Climate and Environmental Risk in the Credit Risk Model Landscape

Incorporating CER into the credit risk model landscape is challenging for multiple reasons. These vary from a lack of granular and high-quality data to changes in regulatory requirements and limited past materialisation of CER on credit risk. This makes future estimates uncertain, especially over different time horizons. Despite these challenges, we have devised a roadmap on how to integrate CER risks into the credit risk management framework: this covers the process from loan origination, where future high-quality granular data will be created, to modelling and stress testing to service our PD and LGD risk models, and reporting on capital adequacy (economic capital and Basel IRB) and IFRS 9.

CER materiality assessment - Market risk in the trading book

Climate and environmental risk events can materialise in market risks within the trading book. More specifically, CER events can have a negative or potentially negative effect on the bank's P&L through the revaluation of fair valued positions (in particular the bond portfolio) held with a trading intent. In order to assess the impact, stress scenarios have been applied by shocking the market risk factors (e.g. credit spreads). The impact was found to be immaterial because the bond portfolio in the trading book is concentrated in sovereigns and highly-rated financial issuers, which have low sensitivities to physical or transition risks. Accordingly, CER in market risk in the trading book is assessed to be immaterial.

CER materiality assessment - Market risk in the banking book

Climate and environmental risk (CER) events can materialise in market risks within the banking book. More specifically, CER events can have a negative or potentially negative effect on the net interest income (NII) of the bank through changing client behaviour and changes in regulation that have an effect on the bank's interest rate risk position, changing interest rate curves and increases in funding spreads. Based on scenario analyses, the effect of a single physical or environmental event via the NII on the financial indicators of the bank has been assessed to be low, due to the relatively low interest rate sensitivity of portfolios with a higher sensitivity to physical or transition risks. Accordingly, CER in market risk in the banking book is assessed to be immaterial.

CER materiality assessment - Liquidity risk

We updated our assessment of the materiality of climate-related and environmental risk also in relation to liquidity risk. The assessment was quantitative, with a focus on the short term (within 1 year) and medium term (within 5 years). The bank's funding plan is updated on at least a quarterly basis in order to anticipate medium and long-term risks so the bank can adjust its business plan accordingly. Therefore, longer term events have less impact on liquidity risk as the bank has sufficient time to steer the business. The potential negative P&L impact of such business steering is captured under business risk.

To ensure consistency across risk types, we looked at a set of predefined CER events, including climate-related risk events such as floods and drought (physical risk) and policy and technology development (transition risk), as well as environmental risk events. The results of the materiality assessment for liquidity risk are summarised below.

The assessment considers whether material CER could cause net cash outflows and consequent depletion of the liquidity buffer. If material, these factors should be incorporated into the liquidity risk management and liquidity buffer calibration. The impact of CER on the bank's funding market access, funding costs and the liquidity value of the liquidity buffer was also assessed, for both CER transition risks and physical risks. The analysis confirmed that the overall CER impact on liquidity is not currently considered to be material, supported by our sustainability objective and other relevant initiatives.

CER materiality assessment - Business risk

The CER business risk relates to the present and potential effect of events on the bank's operating result. To assess the CER business risk, ABN AMRO used a combination of qualitative and expert judgements and the outcomes of existing quantitative analyses, including the 2022 ECB Climate Stress Test, ABN AMRO's environmental risk heatmap, climate scenario analyses and the impact of the climate transition risk on business risk, in line with the bank's climate strategy.

ABN AMRO assessed the impact of climate transition risk on business risk via the impact of CO₂ reduction targets on lending volumes and revenues for the horizons and sectors in scope.

We aim to reduce business risk for ABN AMRO by increasing the sectors in scope of targets set in line with external good practice and mitigating transition risk.

Climate physical risk

With regard to physical climate risk, individual CER events have not historically had a material impact on our operating expenses, and are not expected to do so in the near future. Instead, we expect that the impact of physical risk will gradually materialise over the medium and longer term, and may particularly affect our mortgage and commercial real estate portfolios. Specifically, we are seeing a gradual rise in physical damage to collateral as a result of severe flooding events and foundation issues (e.g. pole rot), which could have an effect going forward. The effect of a single physical or environmental event on the bank's operating income is currently assessed as marginal.

Climate transition risk

Transition risk refers to the direct and indirect financial and non-financial risks arising from the transition to a lower-carbon economy. This could impact the bank through changes in its (or its clients') regulatory environment, business model or consumer preferences, while the consumer preferences could in turn have an impact on ABN AMRO's business model. In the short-term, we assess transition risk as not material. In the medium to long term, material business risks could result from adjustments made to ABN AMRO's commercial or risk policies in order to reduce other CER-related risks or to decrease emissions within client portfolios in accordance with climate-related regulations.

Environmental risk

Environmental risks are risks occurring due to the degradation of the environment (physical risk) or the transition to a more environmentally sustainable economy affecting ABN AMRO's clients and, by extension, its business model through mechanisms similar to those for climate physical risks and transition risks. Environmental risk events with a high probability and potentially material impact relate to transition risk factors such as regulations or technology.

We manage material CER in business risk through the medium or longer-term portfolio choices we make regarding company strategy. Our assessments in the areas of long-term value creation and potential impact help to reinforce these decisions.

Resilience of our business model to CER risks

Climate-related risks are also considered in the bank's stress testing process, which tests the bank's resilience under an adverse scenario over a medium-term (5 year) horizon. Environmental risks aim to be integrated into the stress testing framework in the future.

Adverse stress test methodology and scope

The adverse stress test assesses the effect of the adverse macro-economic scenario on the bank's profitability and capital position based on quantitative models as well as expert opinions.

The stress test scope is bank wide. Balance sheet assumptions are aligned with bank's five-year forward-looking financial plan, in which financial effects from CER are considered. Our adverse stress test considered the climate-related risk drivers as follows:

Adverse case scenario

Our adverse macroeconomic scenario assumed an abrupt tightening of climate policies, for instance due to a large physical risk event (not specific to the Netherlands) or lagging targets. As a result, the price of emitting carbon would increase rapidly, leading to increased transition risks. Consumer and investor confidence would be hit. Non-renewable energy prices would increase sharply, also due to higher (shadow) carbon prices and there would be a significant inflation impact. There would be a squeeze on household disposable income and corporate profits due to the higher cost pressures, while higher policy rates and credit spreads would also weigh on demand. Real estate prices would fall as the macroeconomic backdrop deteriorates. On top of that, the Dutch government would impose more stringent rules on less energy-efficient real estate, which would drive the prices of these buildings even lower. A significant hit to real GDP growth would follow.

Adverse stress test results

As part of the DMA, the bank determined that climate-related and environmental risks are highly likely to materialise over the medium to long term. A bank-wide ICAAP stress test evaluated the financial impact of CER and other risks over a five-year horizon, concluding that the effects are well within our loss-absorbing capacity. This confirms that the business model is sufficiently resilient to cover the risks in our adverse scenario.

CER in our strategy and business model

In addition to the adverse stress test, the bank has undertaken several business steering activities to ensure continued business model resilience, such as commitment to the Paris Climate Agreement, the Net-Zero Banking Alliance, our climate strategy, as well as other initiatives to enhance positive social impact. With regard to the physical risks, which sit predominantly in our residential mortgages business, we recognise our social duty as an enabler of home ownership, and therefore we do not discriminate lending by physical risk indicators.

ESG materiality assessment - Non-financial risk

Methodology

The NFR Stress Test Methodology is used to determine the materiality of CER risks for NFRs. This methodology provides a structured approach to assessing potentially high-impact non-financial risk events facing the bank and/or its clients (specifically focused on CERs) over 1-year, 5-year and 30-year horizons. These assessments were based on the available CER information and status of ABN AMRO at the time of the assessment. An integrated NFR assessment was performed with the involvement of experts from the first and second lines of defence, who determined the need to change scenarios and/or reassess outcomes.

Selected scenarios for the assessment

Five scenarios were short-listed as potentially material in the NFR domain. They concerned one physical threat relating to data centre failure, three greenwashing scenarios and one scenario relating to the bank's duty of care (regarding mortgages).

Outcome of the assessment

Climate physical and transition risks and environmental transition risks were considered material for all time horizons.

Transition risks (related to climate and environmental risk)

The three greenwashing events (misreporting, mis-selling and mis-advertising) were still considered material in 2024. The risk response for these scenarios is 'monitoring', with no short-term need to implement additional mitigants.

Physical risks (related to climate risk)

The scenario for 'data centre failure' could produce a material impact on the bank's P&L and reputation during the 1-year horizon because of the risk of flooding. The risk response is 'monitoring' as the impact of flooding on the bank's data centres is currently being investigated.

The duty of care scenario regarding physical risk related to mortgages (decreasing value of collateral) was still material in 2024. The risk response for this scenario is 'monitoring', with no short-term need to implement additional mitigants.

Triggers for actions during monitoring activities

Based on continuous risk dialogues and the occurrence of any major CER-related events, ABN AMRO will take appropriate action in accordance with the NFR policy.

The materiality assessment of social and governance risks (from ESG) was performed as part of the double materiality assessment.

Client assessment on sustainability

During the onboarding of corporate clients and periodically thereafter, a dialogue takes place with these clients to assess whether the client complies with the bank's minimum sustainability-related standards and the generic principles applicable to corporate clients. In addition to that, anti-money laundering and terrorist financing controls aim to continuously safeguard proper business conduct by the bank and all its clients. Finally, sustainable home financing solutions are included in the client dialogue with both corporate and retail clients. We use the following tools to assess the sustainability risks of our corporate clients:

Transition Readiness Assessment

The Transition Readiness Assessment (TRA) tool is an engagement instrument used by the first line of defence to evaluate the willingness and ability of corporate clients active in sectors in scope of our climate strategy to adapt to a low-carbon business model (inside-out). The TRA is structured to assess clients on three dimensions:

1. Climate performance: assesses the client's CO₂ trend against benchmarks and the client's sensitivity to climate risk.
2. Transition plan: estimates the ambition of the client in terms of future targets for CO₂ reduction. It considers the characteristics of the client's transition plan (targets, governance, monitoring tools).
3. ABN AMRO's ability to support: evaluates the level of support that the bank can provide to its client for the sustainable transition.

CASY

Client Assessment on Sustainability (CASY) is a client dialogue assessment tool that we use to assess the sustainability performance of our corporate clients with a lending relationship above EUR 1 million at client onboarding and monitoring reviews. The tool stores relevant data to help safeguard the bank against sustainability and reputational risks and provides a basis for a strategic dialogue on sustainability with clients. At client level, CASY addresses clients' compliance with the bank's Sustainability Risk Management Framework by focusing on sustainability-related regulations, sustainability commitments, and the capacity to manage sustainability risks and track records. Depending on the client's level of compliance with the bank's Sustainability Risk Management Framework, the outcome of a CASY assessment is above, on or below par, and serves as the basis for further engaging with the company.

CER Risk Classification Tool

The CER Risk Classification Tool (RCT) classifies non-programme lending clients in relation to their exposure to CER risks on an individual basis. The CER Risk Classification Tool allows the impact of physical climate, transition and environmental risks to be incorporated into the creditworthiness assessment at origination and at periodic reviews. Based on the outcome of the questionnaire, clients are classified into risk profiles from low to high CER risk. The RCT allows the bank to deepen its knowledge and insights on CER risks and their effects at the client level. It also ensures that the data collected can be reused for different purposes within the credit risk process.

Transmission channel framework

Transmission channels are the causal chains through which climate factors translate into financial risks to ABN AMRO by directly influencing our counterparties and the assets they hold. Physical risk, such as floods or drought, can lead to loss of productivity for companies and to property damage for consumers. In the short term, transition risk is expected to lead to higher costs for companies transitioning to a carbon-free environment. The transition may also result in some companies' business models becoming obsolete, or in a significant drop in demand. For consumers, transition risk may lead to a fall in the prices of properties with low energy labels. The Transmission Channel Framework (TCF) aims to capture the possible financial impact arising from these sustainability risks that clients are exposed to, which

could have an impact on the client's creditworthiness, and ultimately, the bank's profit and loss. Reflecting these risks, we improved the transmission channel assessments for the following sectors¹, which have been assessed as contributing highly to climate change:

- Agriculture, Forestry and Fishing (A01-A03)
- Extraction, Oil & Gas (B05-B09)
- Manufacturing Metals & Chemicals (C10-C33)
- New Energies (Power- D35)
- Construction (F41-F43)
- Shipping, Air & Road transport (H49-H51)
- Real Estate (L68)

In this developing discipline, the ultimate goal is to have a better understanding of the possible impact of sustainability risks on the creditworthiness of the client (outside-in perspective), how to manage/mitigate them and incorporate the assessment in the credit proposal and review. We are in the early stages of this process with the help of the above-mentioned tools.

Credit Risk Sustainability Team

Credit Risk Sustainability, as part of the second line of defence, oversees these client-level due diligence assessments and engagement for both lending and non-lending clients. In the context of KYC processes, sustainability risk advice can be provided for lending and non-lending clients, and is triggered by adverse sustainability-related media hits, defence-related activities and/or a potential violation of the bank's Exclusion List or Controversial Weapons List.

For lending clients with a high sustainability risk level and total lending exposure in excess of EUR 1 million, an additional second-line advice is required from Credit Risk Sustainability. This provides validation on the first line assessments against the bank's Sustainability Risk Management Framework.

If a client is not fully compliant with the Sustainability Risk Management Framework, but demonstrates sufficient commitment and capacity to comply, the second line may accept the client relationship/line of credit, subject to conditions aimed at establishing that a client is moving towards full compliance with the framework. Non-compliance is then considered a driver of credit risk that could lead to the deterioration of a counterparty's creditworthiness or collateral due to physical and transition risk or prosecution for health and safety breaches. These clients are monitored annually.

If a client is not compliant with the Sustainability Risk Management Framework and does not demonstrate sufficient capacity or commitment to achieve compliance, the sustainability risk advice will be negative and the Central Credit Committee may be advised to consider exiting the relationship from a sustainability perspective. Given the bank's inclusive strategy, this type of negative conclusion is a last-resort risk response.

Governance of sustainability matters

This section sets out the governance processes, controls and procedures put in place to monitor, manage and oversee sustainability matters. The focus in this section is on the Executive Board and the Supervisory Board.

Composition

To govern ESG matters effectively, the Executive Board and Supervisory Board must be equipped with the right tools to make the best possible decisions for the short, medium and long-term resilience of ABN AMRO and the wider society in which we operate.

For further information on the composition and diversity of the Executive Board and Supervisory Board, please refer to the Leadership & governance section of the Integrated Annual Report 2024.

Roles and responsibilities

The Executive Board is responsible for defining ABN AMRO's overall strategy. It oversees the implementation and execution of material sustainability matters throughout the bank. The Executive Board is also responsible for ensuring that the strategy is informed by, and addresses, sustainability impacts, risks and opportunities.

¹ Sectors refer to ABN AMRO internal definitions, and the indicated NACE codes serve as a proxy only.

The Supervisory Board, in turn, supervises the policies set by the Executive Board, ABN AMRO's general affairs and the connected business. The Supervisory Board also assists the Executive Board by providing advice on sustainability matters.

To carry out its duties, the Executive Board is assisted by its committees, which offer diverse perspectives on sustainability matters, depending on their specific mandates. The Executive Board's procedural rules guide its functioning and internal organisation. Each Executive Board committee also has its own procedural rules.

The Group Sustainability Committee (GSC) is an Executive Board committee for central oversight and steering on sustainability. It serves as a central point to which material information is directed on topics that relate to sustainability. The GSC assists the Executive Board and its committees on matters that relate to sustainability oversight, including in relation to material impacts under ESRS as defined by the double materiality assessment. All relevant departments of the bank are represented within the GSC. The Executive Board has mandated this committee to assist, advise and support in the performance of its duties regarding sustainability-related matters. This includes sustainability aspects of the bank's strategy, policies and standards for various topics to drive and develop a view on sustainable long-term value creation, and formulate specific objectives in line with its mandate. Additionally, the GSC determines the actual and potential effects that ABN AMRO and its affiliated enterprises have on people and the environment. It monitors dialogues about sustainability implementation with both internal and external stakeholders. It also formulates guidance on sustainability KPIs, metrics and due diligence obligations regarding ABN AMRO's operations. The GSC advises on ABN AMRO's values, conduct, culture, and diversity and inclusion matters. It has also established a process for entering into and overseeing sustainability commitments.

The Group Disclosure Committee (GDC) is responsible for maintaining the accuracy, effectiveness and timeliness of disclosures relating to sustainability matters, including performance on social and environmental impacts, as mandated by Dutch and European law. In essence, the GDC serves as the central point for disclosing information on material matters regarding the bank and its operating environment.

The Group Risk Committee (GRC) is responsible for sustainability risk management, for carrying the mandate to review and for steering ABN AMRO's risk profile within the scope of the bank's risk appetite. This committee also evaluates the short, medium and long-term effects of environmental and social risks on ABN AMRO to support the Executive Board in making informed strategic and business decisions. This includes reviewing climate and environmental risks, as well as related sectoral financing policies, which determine both targets and limits for exposures to certain sectors. The GRC also identifies and quantifies environmental risks, with a view to managing and monitoring these risks over a sufficiently long-term horizon. In addition, it assesses interdependencies between sustainability, reputational, legal, credit and business risks, including those related to ABN AMRO's climate strategy-related initiatives.

The Central Credit Committee (CCC) takes ESG risks into account as part of its credit decisions. The CCC makes decisions on the acceptance of credit and counterparty risks relating to credit proposals. As such, it can approve or reject requests for individual corporate loans and facilities and determine whether individual transactions are in line with our policies and standards. This includes sustainability aspects falling within the scope of the risk appetite determined by the Executive Board.

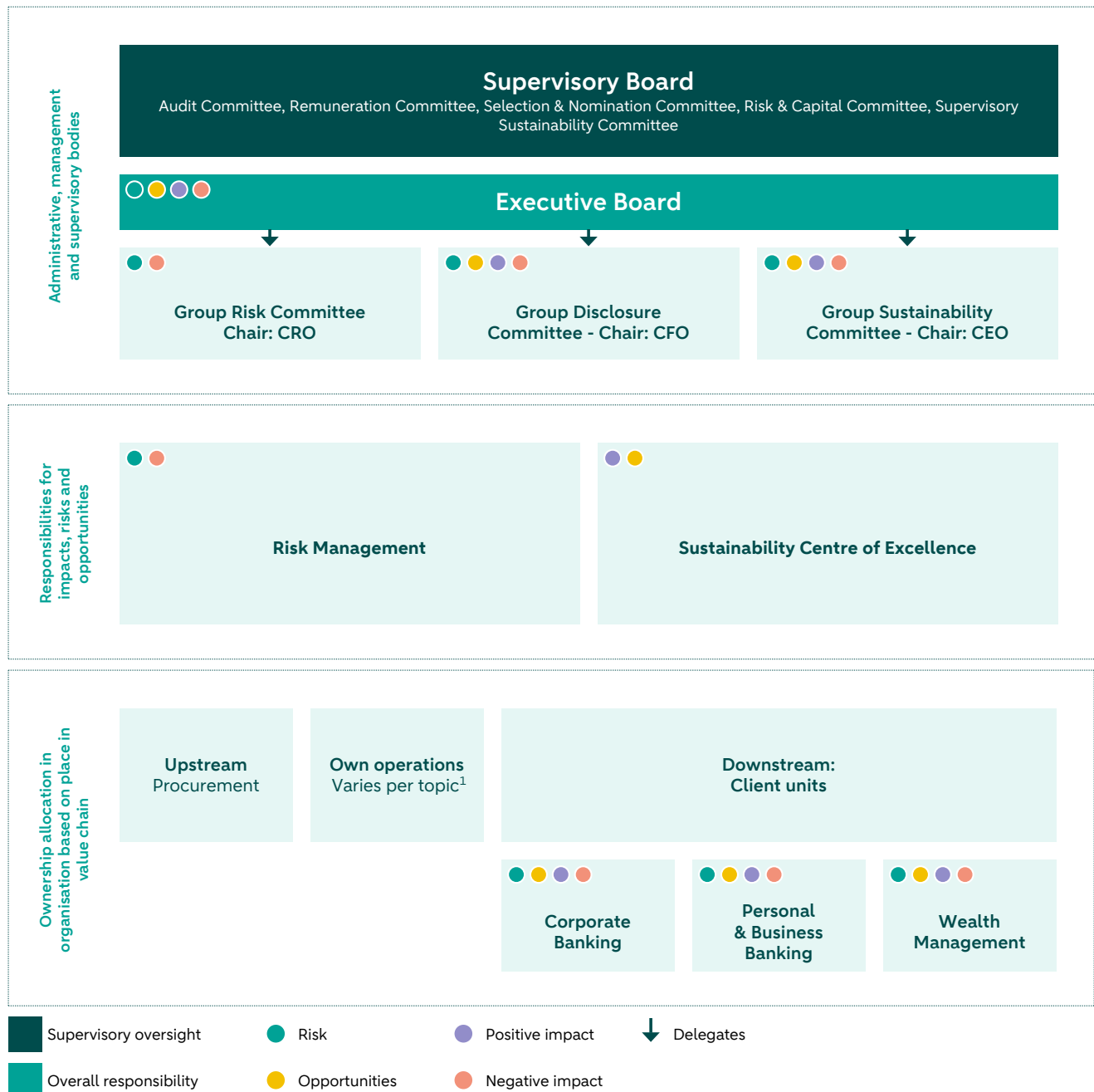
Each of the specialised Supervisory Board committees addresses sustainability aspects within its area of expertise. The Supervisory Sustainability Committee supervises sustainability aspects of our strategy and policies. These cover a broad range of topics, including those covered in ESRS. The Supervisory Sustainability Committee and other Supervisory Board committees, in particular the Risk & Capital Committee and the Audit Committee, coordinate their activities and work together regularly. When required, they work on an ad hoc basis to ensure the exchange of information needed to capture and assess all relevant risks for the performance of their tasks.

The Audit Committee monitors the sustainability reporting process, including the integrity and quality of ABN AMRO's sustainability statements and external disclosures.

We continuously monitor sustainability governance to ensure that sustainability matters are embedded in our governance structure. ABN AMRO aims to address sustainability matters as effectively as possible and to keep up with regulatory expectations and legislation. In doing so, we keep our finger on the pulse of evolving market practices in this area. ABN AMRO's Sustainability Centre of Excellence is led by our Chief Sustainability Officer, who reports directly

to the CEO. The Sustainability Centre of Excellence supports the Chief Sustainability Officer in implementing new sustainability reporting regulations of which the Chief Sustainability Officer is the assigned owner. This includes determining metrics and validating set targets against ambition levels.

Sustainability governance structure



1. Responsibilities for material matters in our own operations: own workforce (HR), privacy of client data (COO), suitability of products (P&BB and WM), social inclusion (SCE).

Environment

Through our double materiality assessment, we have identified two material risks: climate change and pollution.

Climate change

Climate-related policies

This section outlines the internal policies we have implemented to manage the material impacts, risks and opportunities in our value chain related to climate change.

At ABN AMRO, climate risk is integrated into our risk taxonomy, risk appetite and financial planning under sustainability risk. Our Sustainability Risk Policy Framework ensures that environmental risks are managed throughout the enterprise risk management cycle.

Our climate strategy supplements this framework by setting targets and initiatives to align our portfolio and operations with a net-zero trajectory and reduce GHG emissions. Various policies and standards manage climate risks. Our Sustainability Risk Policy Framework addresses climate change mitigation and the management of physical and transition risk, while also helping us to address our broader climate impacts.

Climate strategy

Our climate strategy, introduced in December 2022, defines our approach to aligning with the global goal of limiting global warming to 1.5°C and supporting the transition to a net-zero economy by 2050. As part of our commitment under the Dutch Financial Sector Climate Agreement and the guidance of the Net-Zero Banking Alliance (NZBA), we have prioritised sector-specific targets for high-emitting industries.

For sectors such as iron & steel, aluminium, cement and aviation, we have determined that our current financial exposure is not significant enough to set specific targets. However, we will continue to monitor these sectors and work with corporate clients to support their decarbonisation efforts.

Building on the priorities established in our 2022 climate strategy, we have identified three decarbonisation levers that ABN AMRO uses to implement specific actions aimed at achieving climate targets for each sector. First, we engage with clients and offer financing solutions to support their journey to net zero. One example is our transition readiness assessment, covering the majority of our climate strategy portfolio across six sectors. Second, we aim to ensure our processes and policies are aligned with net zero targets, enabling us to assess risks and challenges to meeting reduction targets and transition risks. This alignment is reflected in credit approval and capital allocation processes, which are continually evolving. A notable development in this respect is that we have updated the requirements for coal-fired power generation companies in the sustainability risk standard with client requirements, which commits to phasing out thermal coal by 2030 (for permitted exceptions, see the footnote¹). Lastly, we engage with industry and governments to raise awareness and promote sector-wide change.

Together with our clients, we are working hard to achieve our targets, but the transition to net zero is a long-term and collaborative process, with dependencies and uncertainties. Significant challenges remain. A worldwide delay in decarbonisation steepened scientific-based benchmarks, making it more demanding to meet a 1.5°C scenario. The active support of many actors in the public and private sectors is required if we are to be successful in achieving our climate ambitions. So, too, are laws and regulation. We maintain a regular dialogue with governments and regulators on climate policy. As the climate transition progresses, we will adjust our targets, also in line with benchmark developments.

Our approach

How the targets were set

We have set emission reduction targets and ambitions across our lending portfolios, operational activities and client asset portfolios, with a focus on responsibly reducing carbon intensity. No external stakeholders were involved in the target-setting process. Our approach to target setting for the lending portfolio is built on three key elements:

- **Industry guidelines:** We align our targets with industry best practices, following guidelines such as the NZBA Climate Target Setting for Banks and the Partnership for Carbon Accounting Financials (PCAF) methodological guidance. This ensures our targets are consistent with our commitments to the NZBA and PCAF.
- **Science-based approach:** Targets are grounded in the methodologies, decarbonisation scenarios and data currently available, adhering to NZBA guidance.
- **Sector-based focus:** We adopt a sector-based approach to target setting, recognising that each sector in the economy faces unique challenges in transitioning to net zero. By prioritising carbon-intensive sectors, as recommended by the NZBA, we aim to drive the most impactful decarbonisation of our portfolio.

¹ We will only finance clients with over 5% reliance on thermal coal if they have a public 2030 phase-out plan, to be achieved at the latest by 2038, as well as a credible renewable energy growth strategy. Exceptions exist for a number of clients in Germany that are over 5% reliant on thermal coal and directly or indirectly operate coal-fired power stations that constitute critical infrastructure in terms of Germany's energy availability and security, and that are scheduled to close down in accordance with the German Coal Phase-out Act.

To achieve our targets we rely on assumptions embedded in the underlying benchmarks, including the development of emerging technologies and shifts in consumer demand. The climate targets have not been validated by an independent external body. To set ambitions related to our assets under management, we use the Institutional Shareholder Services (ISS) framework to guide our approach in measuring the climate impact within our investment portfolios. Our objective is to reduce the Weighted Average Carbon Intensity (WACI) of our clients' investment portfolios, specifically within the equity holdings of our Discretionary Model Portfolios mandates.

Client engagement

Engaging with clients to support their transition to net zero is a cornerstone of our climate strategy and a critical component of our decarbonisation efforts. The Risk assessment and measurement and Risk response sections above explain how we engage with our clients.

Overview of sectors and targets

ABN AMRO has set targets for carbon-intensive sectors that are material and significant to our organisation. For transparency reasons, all sector baseline values calculated are based on data from a single year, rather than on multi-year averages. This approach aligns with NZBA recommendations, which specify that baseline data should be no older than two years. Any subsequent significant changes to the baseline, such as those resulting from external factors or portfolio adjustments, will be reported.

In line with our climate strategy and our commitment to NZBA, we have set and published targets for several of the NZBA carbon-intensive sectors (agriculture, commercial and residential real estate, oil and gas, power generation, and transport).

We have chosen not to set specific targets for certain NZBA sectors because of their limited materiality. These sectors — iron & steel, aluminium, and cement — make up a very small part of our exposure, collectively representing less than 1% of our total exposure to NZBA sectors. We do monitor the exposure to these sectors and engage with clients in these sectors to support their decarbonisation efforts.

With regard to these targets, the selected decarbonisation pathways vary across sectors due to differences in portfolio characteristics, emission generating activities, lending products and the chosen target type. For all sectors apart from agriculture and our ambition on client assets, we have chosen science-based benchmarks that are aligned with 1.5°C scenario reference pathways (including CRREM, the IEA and DNV). For agriculture, we have opted to align with the scientific calculations in the 2022 Climate and Energy Outlook of the Netherlands (Klimaat- en Energieverkenning, KEV) compiled by the Netherlands Environmental Assessment Agency (Planbureau voor de leefomgeving, PBL), which uses the IPCC Fifth Assessment Report (AR5) for GWP values and considers the implemented and proposed policies of the Dutch Coalition Agreement and its ability to fulfil the EU FIT for 55 goals. The scenario used for client assets is not yet science-based.

While we aim for alignment with these pathways, it is important to note that full 1.5°C alignment does not necessarily need to be achieved by 2030. This applies to residential mortgages, inland shipping, and road transport trucks and vans, where the intermediary target is above the benchmark line.

For more information on how we are progressing on the targets we have set per sector, please see our Integrated Annual Report 2024.

Climate risk identification, monitoring and reporting

ABN AMRO recognises climate change as a material risk. Climate risk is embedded in our risk taxonomy and risk appetite as part of sustainability risk. We measure and monitor our climate risk exposure periodically and evaluate whether our client portfolios remain aligned with our climate strategy. Below, we zoom in on the climate risks in our client portfolios.

Climate risk heatmap

The environmental and social heatmap relating to climate risk evaluates the sensitivity of various sectors to climate-related physical and transition risks, including negative impacts.

For physical risks, sensitivity is based on a combination of sector characteristics, such as dependence on assets, labour and ecosystem services, as well as the regional and country-based exposure to hazards (such as flooding, heat stress and sea level rise). For our portfolio located in the Netherlands, we source exposure to flooding from the Climate Impact Atlas of Climate Adaptation Services (CAS), relying on 2050 projections, as well as from Encore (Exploring natural capital opportunities risks and exposure). For other hazards and geographies, we source sensitivity estimations from Moody's ESG Solutions, relying on projections to 2040. Both data sources assume a high emission scenario (Representative Concentration Pathway (RCP) 8.5 scenario).

Transition risk sensitivity is determined by the sector's greenhouse gas emission intensity (derived from PCAF and ISS Oekom sources), alongside various regulatory, technological and market parameters. The regulatory parameters are used at two levels:

- at a sector level, where we reference the annual sector reduction requirements in the Dutch Climate Agreement (focusing on projections to 2030);
- at a country level, where we refer to the most recent policy-induced emission reductions targets in the Environmental Performance Index.

The results of the heatmap show that the highest sensitivities (moderately high and high) are in the agricultural (NACE A), mining (NACE B), manufacturing (NACE C), power generation (NACE D) and transport sectors (NACE H). The climate risk heatmap is available in our Integrated Annual Report 2024.

Climate risk-mitigating processes

Climate risk mitigation is carried out through our risk response process, as explained earlier under Risk management of sustainability matters.

Climate scenario analysis, scenario choice and data

Our loans are concentrated in the Netherlands, which means our material physical risk sits mainly in Dutch regions (referred to as NUTS, Nomenclature of Territorial Units for Statistics, the geographical division of the economic territory in the European Union). Our physical risk assessment covers our corporate loans, residential mortgages and commercial real estate portfolios and constitutes 96% of our loan book collateralised by physical assets. For methodology of our physical risk assessment, please refer to ESG5.

In 2024, we performed climate scenario analyses on our residential and commercial real estate portfolios against several long-term (to 2050) climate change scenarios. These analyses assessed physical risk events (e.g. floods, foundation problems, wildfires, heat stress) and transition risk events (e.g. policy changes and technological shifts impacting industries) and considered risks in climate adaptation plans. The underlying assumptions of the flood assessment reflected a high emission scenario (Representative Concentration Pathway (RCP) 8.5 scenario), where no additional efforts are made to constrain greenhouse gas emissions, resulting in a temperature increase of 4.3°C by 2100. The scenario analysis for residential real estate also included environmental risk. For the physical risk assessment, clients with high loan-to-value and loan-to-income ratios and/or a risk stage 2 (increased risk) classification during the past twelve months were defined as vulnerable, and collateral with an energy label of D or lower and market value of EUR 300,000 or lower was defined as vulnerable. The impact of CER risk events on clients' creditworthiness was assessed and calculated in terms of RWA and provision requirements. The outcomes of the assessment served as an input for the Credit and Liquidity risk CER materiality assessments.

Foundation problems are an important driver of physical climate risk in the Dutch real estate sector. Property-specific data on foundation risk is available from Kennis Centrum Aanpak Funderingsproblematiek (KCAF), a leading party in the Netherlands that generates granular data on this risk. This data is also included in property valuation reports for residential real estate. Data on the other drivers of physical climate risk (flooding, wildfires and heat stress) are obtained from Climate Adaptation Services (CAS), which provides data for the Netherlands at a highly granular level. The CAS data is partly based on the WH scenario to 2050 from the Royal Netherlands Meteorological Institute (the KNMI'14 scenarios). In the case of flood risk, CAS data is based on the new KNMI'23 scenarios. These represent the worst-case outcomes for climate change in the Netherlands and closely align with the Network for Greening the Financial System (NGFS) current policies scenario.

The climate scenario analysis results as published in our Integrated Annual Report 2024 show the risk distribution of our commercial real estate (CRE) and residential real estate (RRE) and portfolio exposures for four climate-related risks: foundation risk, flood risk, wildfire risk and heat stress risk. The analysis was performed by measuring the chances of the risk events occurring in the years until 2050 for buildings in the Netherlands. The probabilities of foundation problems are grouped into five buckets: no risk, low risk, medium risk, high risk and no available data.

Nature: biodiversity, pollution and circular economy

We have identified air and water pollution as material risks through our double materiality assessment.

Cross-sector environmental scenario analysis

In 2023, ABN AMRO conducted a cross-sector environmental risk scenario analysis to assess the effects of environmental transition risks on our corporate lending clients in the Netherlands. Unlike climate risk, there are no globally accepted environmental risk scenarios. We therefore developed our own locally relevant scenario, guided by the Taskforce on Nature-related Financial Disclosure (TNFD). This scenario focused on transition risk and took into account a time horizon until 2030.

Our scenario was based on existing European regulations and their implementation in the Netherlands. We focused on transition risks, which we deemed to be more relevant to our business in the short term, given the European and global policy context.

The analysis assumed that European water and air pollution regulations, along with nature conservation policies, would be strictly implemented and enforced in the Netherlands. This assumption was based on:

- Compliance deadlines: many regulations have deadlines within this timeframe
- Potential non-compliance: the Netherlands may not necessarily meet these deadlines
- Strict enforcement: the European Commission has signalled that further delays will not be tolerated

Using sectoral environmental impact data from the Impact Institute and the Dutch Emission Registration, along with geographical data from the PBL Netherlands Environmental Assessment Agency and the National Institute for Public Health and the Environment, we simulated the costs and business continuity risks for our clients. Costs were calculated by internalising the external environmental costs of pollution, while business continuity risks were evaluated by assuming permit limitations for clients in high-impact sectors operating in highly sensitive natural areas.

The results indicated that water pollution-related costs and business continuity risks were most significant for clients in the manufacturing and agriculture sectors.

As we continue to update our risk management framework in relation to environmental risks, the insights from this scenario analysis will inform ABN AMRO's strategic and risk management initiatives as follows:

- Stress-testing integration: Work is underway to incorporate environmental risk into the bank's stress-testing methodology and models.
- Agriculture Transition Plan: A transition plan for the dairy subsector is being drafted, outlining the bank's vision for the sector in 2040. This plan will include details of ABN AMRO's ambition and role, and an action plan to support clients transitioning to more sustainable and regenerative practices.

Social

As part of our double materiality assessment of the Social standards in 2024, we identified Own workforce, Workers in the value chain, and Consumers and end-users as material.

Social risk heatmap

The social risk element of the environmental and social risk heatmap focuses on workers in the value chain. It examines the negative impacts of the sectors that our clients are active in and focuses on working conditions, equal treatment and opportunities, as well as other work-related rights. Most sectors with moderately high or high scores have links to forced labour in their own operations and/or in their supply chain.

Own workforce

Based on the Double Materiality Assessment (DMA) 2024, we identified the impact of Diversity, Equity and Inclusion (DEI) as the sole material matter in relation to our own workforce.

Policies related to own workforce

ABN AMRO has multiple policies in place to address material impacts on its own workforce. The three policies discussed in this section are the HR Risk Policy, Diversity & Inclusion Policy and the Behavioural Risk Policy. We also describe our human rights commitment related to our own workforce.

The policies mentioned below apply to ABN AMRO Bank N.V. and all subsidiaries, branches and representative offices under its control globally, regardless of location, role or seniority level, unless explicitly stated otherwise and/or subject to legal restrictions. The Executive Board (ExBo) is accountable for managing HR and behavioural risk across the bank, with day-to-day management responsibilities delegated to the Group Risk Committee (GRC).

HR Risk Policy

ABN AMRO defines HR risk as part of its risk taxonomy, which integrates into the bank's Enterprise Risk Management (ERM) framework. HR risk encompasses the potential challenges ABN AMRO may face in attracting, developing, and retaining the critical skills and diverse talent necessary to achieve its strategic objectives. This includes adhering to HR-related laws and regulations. Specific areas of HR risk cover discrimination, employee relations, health and safety, remuneration and employee suitability. The HR Risk Policy is applicable to employees, and where relevant to external and non-employees working with ABN AMRO through third-party suppliers. The HR Risk Policy aims to adhere to the principles of the European System of Central Banks & the Single Supervisory Mechanism Equality and Inclusion Charter. This Charter commits ABN AMRO to a workplace free from discrimination and inappropriate behaviour, upholding both European Union and national laws. The HR Risk Policy also includes obligations for workplace accident prevention, aligning with local regulations in each of ABN AMRO's operational regions. To guide employees in ethical behaviour, both within and outside the organisation, ABN AMRO emphasises its Code of Conduct alongside HR risk management policies. The HR Risk Policy also refers to Diversity, Equity and Inclusion (DEI) best practices in line with the Dutch Corporate Governance Code.

Diversity, Equity and Inclusion Policy

ABN AMRO's DEI policy is an integral part of our HR Risk Policy. This policy reaffirms the bank's dedication to fostering a diverse, inclusive, and equitable workplace by promoting equal opportunities, and focusing on preventing harassment and discrimination as well as adherence to national and local labour and employment laws. The scope and accountability of the DEI policy align with those of the HR Risk Policy. For non-employees working with ABN AMRO through third-party suppliers, these principles are reinforced within the Supplier Code of Conduct.

Our DEI policy encourages equal treatment and opportunity across all areas of the organisation. This policy includes initiatives like the Diversity Circle and Diversity Table to promote inclusion and eliminate discrimination. Protected characteristics under this policy include gender, race, nationality, ethnicity, age, religion, disability, sexual orientation, union affiliation, political affiliation, and other statuses protected by applicable law.

ABN AMRO has integrated its DEI policy into various processes to promote inclusivity across the organisation. For example, the bank has taken steps to create gender-sensitive job advertisements to attract more responses from women and is refining its recruitment process to be more inclusive for female candidates. ABN AMRO also conducts

annual surveys on equal pay for work of equal value. These surveys focus on identifying and addressing any disparities in opportunities or pay between women and men and among employees from diverse cultural backgrounds.

Behavioural Risk Policy

The Behavioural Risk Policy is designed to safeguard an enabling and supportive working environment, encouraging employees and external employees to align their actions with the bank's purpose – 'Banking for better, for generations to come' – and supporting ABN AMRO's core values: care, courage and collaboration, as outlined in our Code of Conduct. The Behavioural Risk Policy emphasises the importance of using the 'speak-up' channels, through which employees can share concerns and feedback. Furthermore, regular employee surveys and pulse surveys are held. These tools enable our own workforce to express needs and concerns directly within the organisation.

Commitment to Human Rights

Our Human Rights Statement applies to ABN AMRO employees, external employees and non-employees working with ABN AMRO through third-party suppliers. We are currently in the process of updating the Statement to better reflect how the bank identifies, addresses, and mitigates human rights risks. It aligns with international standards, including the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the ILO Declaration on Fundamental Principles and Rights at Work.

To manage and mitigate human rights impacts, ABN AMRO has established a due diligence process. As an employer, the bank engages with its own workforce, whose human rights may be affected and consults with organisations that represent their interests. For example, the Employee Council and the European Staff Council directly represent employees in the bank's governance, and ABN AMRO maintains relationships with trade unions in countries where we operate, as applicable.

In the International Framework Agreement (IFA), the bank has pledged to respect ILO Conventions No. 29 on Forced Labour and No. 105 on the Abolition of Forced Labour, as well as Convention No. 182 on the Worst Forms of Child Labour. ABN AMRO addresses modern slavery, including human trafficking, in its Modern Slavery Statement. More information on the Human Rights and Modern Slavery Statements can be found in Our approach to value chain workers.

Dialogue and engagement with our workforce

ABN AMRO has established multiple channels to engage with its own workforce on a wide range of topics. Key engagement processes include employee councils, employee surveys, and ongoing interactions with trade unions. Specific topics, such as employee development, performance, and personal circumstances, are often addressed through direct dialogue between employees and their line managers.

The DEI policy, accessible to our workforce, outlines the organisation's involvement in driving inclusive policies, interventions, and activities. Engagement with employees on DEI topics occurs through initiatives like the Diversity Table and Circles, ABN AMRO's internal networks, and forums for employee feedback, such as employee advice sessions, internal surveys, and colleague discussions. These engagement activities are conducted multiple times each year. The Executive Board (ExBo) is accountable for managing the DEI policy, with day-to-day management responsibilities delegated to the Group Risk Committee (GRC).

ABN AMRO is also a signatory of the International Framework Agreement (IFA) with the Dutch FNV trade union federation and the UNI Global Union. This agreement formalises the bank's commitment – and that of its suppliers – to upholding labour rights and aims to ensure a workplace free from discrimination and harassment. The IFA Monitoring Committee, comprising ABN AMRO and trade union representatives, provides a platform for updates on the bank's adherence to the IFA and offers unions an opportunity to share workforce-related insights.

Employment conditions supporting environmental and social awareness

Various forms of variable remuneration apply within ABN AMRO. The award of performance related variable remuneration is partly based on predefined KPIs at group and business line level and partly on individual objectives, all set at the beginning of the year. For the Executive Board, CLA+ and CLA Identified Staff, sustainability is directly included in these KPIs via the Sustainability Assets and Climate Strategy. For CLA staff, sustainability is included in the calculation of the pool for discretionary variable remuneration.

Our targets related to own workforce

ABN AMRO's DEI targets for 2025 in the Netherlands are the following:

Gender representation

- Ensure at least 48% of the Extended Leadership Team are women
- Target 35% of senior and middle management positions to be held by women
- Set gender diversity targets for senior leadership positions within subsidiaries of the bank. For target setting at subsidiaries, please see our website¹.

Cultural diversity

- Achieve 8% of senior management, and
- 9% of middle management with a migration background.

Inclusion of vulnerable and underrepresented groups

- Support the participation of at least 225 people with a work-related disability
- Continue the annual hiring of 20 people with a refugee background.

Workers in the value chain

Through our DMA, we have identified two key sub-topics as material issues concerning workers in the value chain: working conditions and other work-related rights. When addressing human rights in this context, we focus on the following areas:

- **Working conditions:** this includes secure employment, fair working hours, adequate wages, social dialogue, freedom of association (such as the existence of works councils), collective bargaining, work-life balance, and health and safety.
- **Other work-related rights:** this covers critical issues such as the prevention of child labour and forced labour.

Within the spectrum of human rights, we focus our efforts on the most severe risks to people. Our most salient human rights risks are also assessed as part of the social risk heatmap, which informs the DMA. In 2020, we carried out a salience assessment and in 2022, we carried out a 'salience pulse check' to see whether the issues identified as salient continued to apply. In line with the salience assessment and pulse check, we have listed the salient human rights issues for our role as lender, investment services provider and procurer of goods and services. We then track the degree to which we are managing these salient human rights risks through our internal reporting. For example, we have quarterly reports that feed into the bank's KRIs on human rights. Following the UNGPs' recommendations, we have initiated the update of our human rights saliency assessment, focusing specifically on our role as a procurer of goods and services.

As an internationally operating bank, we have exposure to a wide variety of sectors and countries, especially along our value chain. This potentially connects us to impacts on workers across our value chains, so we carefully consider the impacts, risks and opportunities associated with potential business opportunities. We have developed policies to manage human rights risks and have an exclusion list for activities that we want to avoid financing altogether.

As highlighted in our DMA, we have identified our impact on value chain workers to be material in our financing activities, focusing our efforts on the downstream side of our value chain. However, since our activities cover all value chain workers in order to ensure a comprehensive approach, this disclosure also includes our perspectives in our role as a procurer of goods and services to the extent required.

In the downstream part of the value chain, for our corporate loans portfolio, the social risk element of the social risk heatmap focuses on the inherent social risks associated with a sector's economic activities. As it assesses our clients' own operations and supply chains, it helps us identify the negative human rights impacts on workers in the value chain. In 2024, we identified where the risks of child labour and forced labour are more likely to arise within sectors in our corporate loan portfolio.

¹ Please refer to DEI Target-setting on our website for further information.

Policies related to value chain workers

Social risk is incorporated in the Sustainability Risk Management Framework and the Sustainability Risk Policy. In our efforts to manage our impacts in the downstream part of the value chain, we are guided by key international human rights standards, such as the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.

The relationship manager (first line of defence) is primarily responsible for our clients' compliance with the bank's standards and human rights commitments, which is a continuous effort. The first line also actively engages with our clients on all ESG topics, including human rights issues, where we see that our clients' performance needs improvement. This process is overseen by the second line, Credit Risk Sustainability (part of Credit Risk Decisioning), among others.

Code of conduct / Supplier code of conduct

As a procurer of goods and services, ABN AMRO ensures that our suppliers meet high ethical standards through our Supplier Code of conduct. This document outlines the bank's expectations for suppliers to respect the labour rights of their workers and to operate with integrity, fairness and respect for people and the environment across their value chains. Suppliers need to comply with relevant laws, regulations and standards (including OECD guidelines, UN Guiding Principles on Business & Human Rights, ILO conventions, OHSAS and ISO) in the jurisdictions where they operate.

The Code is a mutual agreement, and failure to adhere to its provisions may impact a supplier's relationship with ABN AMRO. The bank is dedicated to upholding these principles and ensuring its procurement processes reflect ethical and sustainable business practices.

Responsibility for overseeing compliance with the Supplier Code of Conduct rests with the Chief Procurement Officer (CPO), who holds the most senior-level accountability within the bank.

In 2024, ABN AMRO reviewed the Code to ensure alignment with its broader commitments to human rights. The updated version explicitly addresses critical issues such as worker safety, precarious work, human trafficking, forced labour and child labour.

Dialogue and engagement with value chain workers

As part of our commitment to human rights, ABN AMRO strives to engage with potentially affected value chain workers, their legitimate representatives or credible proxies. While our role as a financial institution means we have an indirect impact on the lives of these workers, the difficulty involved in making direct contact with individuals in our value chain adds complexity to our engagement efforts, especially in engaging directly with value chain workers. Being further removed from risks and impacts also impacts our leverage. We engage with our clients and suppliers to better understand the potential or actual negative impacts on the value chain workers.

As in most cases it is not feasible to directly engage with value chain workers, we adopt alternative strategies to ensure their voices are represented. We consult credible proxies, such as NGOs and trade unions, that provide valuable insights into the human rights risks associated with our lending and investment activities. These insights are used to enhance our risk assessments and inform due diligence processes.

Our approach to engagement with workers in the value chain also varies depending on the different roles of the bank as a procurer of goods, lender or investment service provider. We have therefore outlined our approach to engagement in more detail in the next sections.

Engagement in our role as a lender

We acknowledge that direct engagement with workers in the value chain is challenging. As a lender, most of our engagement activities relating to workers in the value chain occur through interactions with our clients facilitated by our CASY tool, which includes human rights-related questions. More information on CASY can be found in the Risk assessment and measurement section of this report.

While this form of engagement is essential, we acknowledge that it does not equate to direct engagement with workers in the value chain. For sectors classified as high-risk from a human rights perspective, our KYC procedures

require clients to provide additional documentation. When necessary, we engage with these clients to obtain all relevant information and ensure compliance with our standards. Risk response (step 4) of Risk management of sustainability matters explains further.

Engagement in our role as an investment services provider

As an investment services provider, we engage with businesses within our sphere of influence on their own stakeholder engagement practices. We also maintain regular discussions with civil society organisations to address human rights risks connected to our investment activities.

As a member of the Platform Living Wage Financials (PLWF), we actively engage with companies on living wage issues, demonstrating our commitment to promoting fair labour practices. These efforts reinforce our broader focus on supporting ethical and sustainable business practices through our investment services.

Most of our engagement activities in our role as investment services provider are carried out by EOS at Federated Hermes Limited or through our subsidiary, ABN AMRO Investment Solutions.

Engagement in our role as a procurer of goods and services

ABN AMRO is dedicated to respecting labour rights as part of its role as a procurer, in line with the International Framework Agreement (IFA) signed with the Dutch FNV trade union federation and UNI Global Union. The IFA monitoring committee, consisting of representatives from ABN AMRO and the trade unions, serves as a platform for the bank to provide updates on compliance efforts and allows trade union representatives to share insights, ensuring that employee and value chain worker perspectives are considered.

Access to remedy

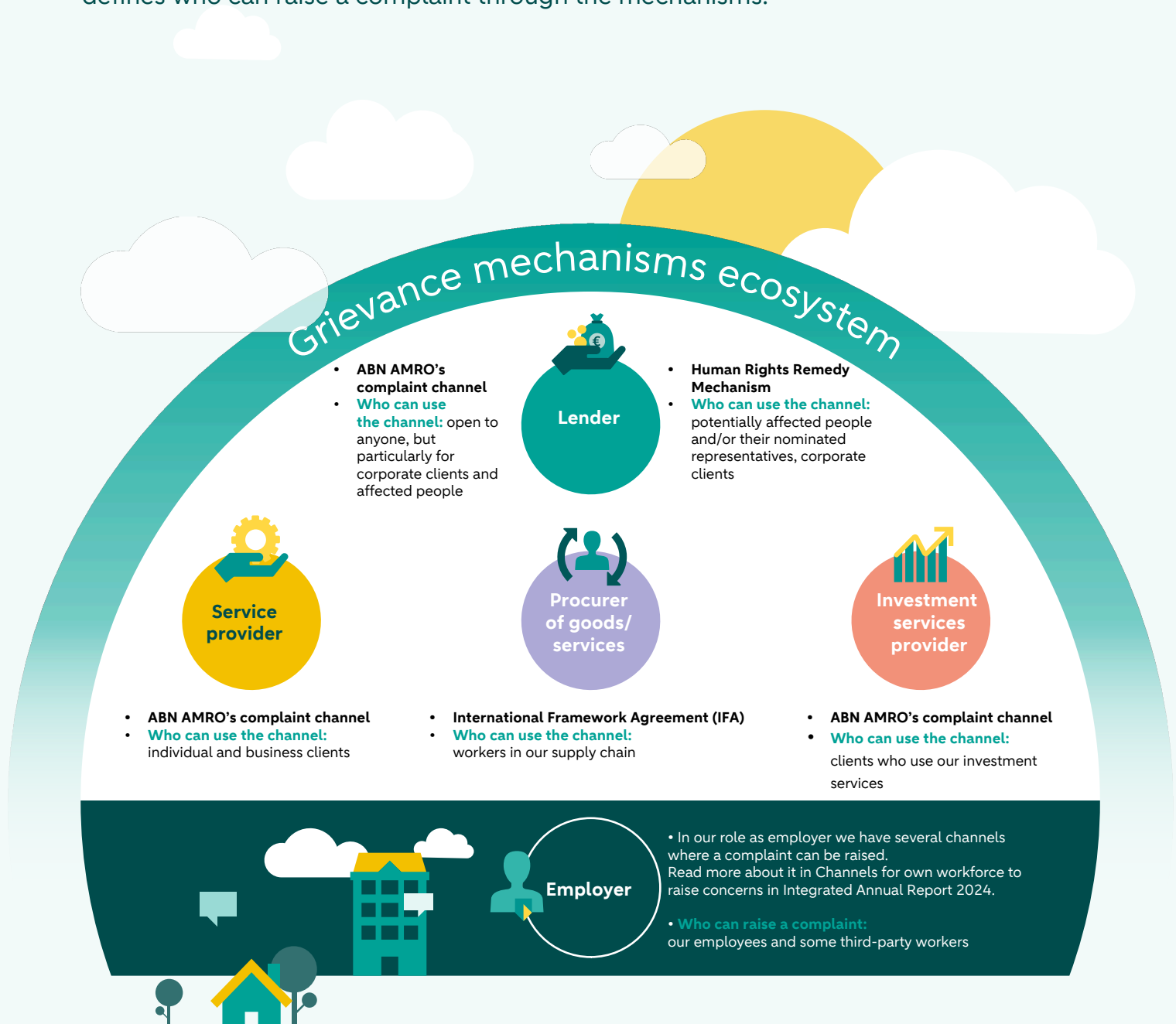
In our Integrated Annual Report 2024, we provide more information on how we enable access to remedy for value chain workers and our approach to action for value chain workers. On 22 May 2025, we hosted a conference on access to remedy which focused on grievance mechanisms and the provision of remedy for rights-holders in supply chains. During the various panel discussions, the roles and responsibilities of companies and financial institutions were explored by representatives of the private sector, NGOs and rights-holders' representatives.

Tracking performance

While formal targets have not yet been established, we currently track the effectiveness of our policies and actions by assessing how well we exercise leverage with corporate clients and businesses in our investment sphere of influence. These assessments provide valuable insights into the impacts and risks associated with our engagement efforts.

ABN AMRO grievance mechanisms

ABN AMRO is committed to meeting the expectations set by the United Nations Guiding Principles on Business and Human Rights (UNGPs). We know that people can experience adverse human rights impacts in connection with our activities. In each of our roles, there are mechanisms in place for potentially affected people to turn to. This ecosystem explains the different grievance mechanisms and speak-up channels per role and defines who can raise a complaint through the mechanisms.



Consumers and end-users

Through our double materiality assessment, we have determined three material matters that relate to our consumers and end-users and reinforce our dedication to their overall well-being and inclusion. These are privacy, suitability of our products and services, and social inclusion.

Addressing human rights issues arising from our consumers' activities

We are dedicated to respecting the human rights of all people that can be affected by our operations and those of our business relations. We have adopted dedicated statements on human rights and financial inclusion that guide our work, and we aim to align with the relevant international human rights standards, such as the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises.

ABN AMRO follows the human rights due diligence approach prescribed by these international standards. To achieve this, we engage with consumers and end-users (or their legitimate representatives or credible proxies), as described in the Dialogue and engagement section of the Integrated Annual Report 2024. When any negative human rights impacts that we are contributing to or are directly linked to are identified, we provide or enable access to remedy according to our complaints mechanism for consumers, outlined in the Complaint mechanisms and remediation channels section of the Integrated Annual Report 2024. We also describe there how we identify and manage our (potential) negative impacts on human rights related to consumers and end-users.

As part of our commitment to upholding the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises, ABN AMRO engages with various departments and individuals who work closely with clients, as well as the Legal Complaints Management team, to identify any reports of human rights violations and identify human rights risks or impacts. To our knowledge, no such cases have been reported.

Policies related to consumers and end-users relating to privacy

Our Personal Data Policy outlines the minimum standards that all staff must follow when processing personal data. It describes the principles and requirements that govern each stage of the data lifecycle, from collection through to erasure. This policy is grounded in the principles of the EU General Data Protection Regulation (GDPR), which have been adapted into ABN AMRO-specific sub-principles and translated into detailed requirements. It also implements relevant parts of ABN AMRO's Binding Corporate Rules (BCRs), which aim to contribute to affording an adequate level of protection to personal data transferred from ABN AMRO's EU entities to entities outside the EU. Together, the Personal Data Policy and the BCRs set minimum standards for handling personal data across ABN AMRO.

The Personal Data Policy includes specific requirements for notifying consumers of personal data breaches, facilitating the exercise of their rights, and enabling them to file complaints. It also refers to the Complaints Management Policy to support the latter.

Policies related to consumers and end-users relating to suitability of products and services and social inclusion

We have a set of policies in place to manage our risks impacting our consumers and end-users.

Product Approval and Review Policy

ABN AMRO's Product Approval and Review (PAR) Policy is designed to ensure that our products and services serve the best interests of clients and are offered to a defined target market, while considering all relevant risks for clients, the bank and external stakeholders. This includes, among other aspects, the inclusivity and suitability of our offerings.

The PAR Policy outlines minimum standards for approving, reviewing, and modifying new and existing products and services and related processes and systems, as well as exceptional transactions. It mandates that products be adapted to reflect macroeconomic, social and sustainability changes and that they comply with all relevant regulations. Additionally, the policy aligns with the bank's Client Centricity Principles and ESG objectives, supporting the bank's broader risk strategy and risk appetite.

The ExBo holds ultimate accountability for managing product approvals and maintaining an effective PAR process, with the GRC assigned responsibility for oversight.

Duty of Care and Client Centricity Policy

The Duty of Care and Client Centricity (DoC & CC) Policy, introduced in June 2024, establishes our approach to managing Duty of Care (DoC) Risk and prioritising clients' interests across all areas of ABN AMRO. This policy aligns with the bank's Client Centricity Principles, purpose, core values and strategy.

Serving as an umbrella policy, it provides a structured framework for DoC & CC policies and controls. The DoC & CC Policy includes:

1. definitions and scope for DoC Risk and Client Centricity
2. key concepts and aspects of DoC Risk management
3. bank-wide requirements to integrate DoC Risk into the ERM management cycle

Oversight is assigned to the Management Body and Senior Management under the ERM Policy.

Client Categorisation, Suitability and Appropriateness Policy

The Client Categorisation, Suitability and Appropriateness Policy establishes minimum standards for providing investment services, performing investment activities, and delivering ancillary services. This policy details how clients are classified and when suitability and appropriateness assessments are required to ensure our products and services meet client needs.

The Compliance department holds an independent mandate to establish and review the bank's Client Categorisation, Suitability and Appropriateness Policy.

Complaints Management Policy

The Complaints Management Policy provides a structured approach to improving our products and services by ensuring effective complaints handling and registration. This policy outlines clear definitions of complaints, specifies roles and responsibilities, and sets standards for timely and accurate resolution. Additionally, it mandates a regular analysis of major complaint causes to drive continuous improvement and ensures adherence to all relevant complaints handling laws and regulations.

The Complaints Management department within Legal holds an independent mandate to develop, review and oversee the bank's Complaints Management Policy. This department also maintains overall ownership of the complaints handling process within the bank.

All the policies mentioned in this section apply to ABN AMRO Bank N.V. and all its controlled subsidiaries, branches and representative offices globally, unless otherwise specified. They are applicable to all locations, roles and seniority levels. Where local requirements are stricter, these will take precedence. Any deviations from any of the policies mentioned above must be approved and recorded according to the requirements outlined in the Policy on the Policy Framework.

Dialogue & engagement with consumers and end-users relating to privacy

The bank's primary focus with regard to privacy is on reactive engagement channels, through which data breaches, privacy complaints, and GDPR-related rights requests are handled. In the event of a data breach, ABN AMRO follows a strict protocol notifying internal teams within 24 hours and safeguarding external regulatory notification within the required 72-hour window. Consumers may report breaches by phone or email or directly to the regulator. Although notification to affected clients is not always mandated, the bank generally informs them of relevant breaches. The complaints process, detailed in the section on the ABN AMRO's grievance mechanism aims to resolve privacy-related issues in a timely manner.

Dialogue & engagement with consumers and end-users relating to suitability of products and services and social inclusion

In our daily interactions with clients, we actively seek feedback to continually refine our services. To deepen our understanding of client perspectives and needs, we engage on an ad hoc basis with various stakeholders – conducting roundtables, surveys, client panels and pilot programmes. We also use insights and feedback from client behaviour to

better align our offerings with client preferences and needs. Our engagement approach varies depending on the type of interaction, as well as the function and seniority of the roles overseeing each interaction. For instance, the Customer Digital Engagement department works both directly and with third-party researchers to gather insights on clients' experiences, such as booking appointments online, accessibility of processes and services and sustainability expectations. Additionally, when organisations like the Dutch consumers' association Consumentenbond reach out to us with insights from their consumer surveys, we take these into account.

Our objective is to leverage client and stakeholder feedback to enhance our products and services, ensuring they effectively address client needs. Engagements help us assess the suitability of our offerings, and we also use product approval reviews to evaluate whether products and services remain valuable for their target markets. This process includes conducting scenario analyses and incorporating product-related complaints into our feedback loop, allowing us to refine product characteristics and target market definition.

Engagement with specific groups of consumers and end-users

We focus on specific client groups who may face barriers, including women, clients from culturally diverse backgrounds, elderly clients, those facing financial stress, individuals with disabilities, clients less familiar with digital tools, and young people. Engagement with these groups includes market research, client panels, and closed feedback loops. In 2024, we engaged with specific groups such as culturally diverse clients, women and individuals with disabilities. For example, we proactively consulted clients with physical disabilities to assess and improve the accessibility of our products and services. We also gathered valuable insights through focus groups, surveys, and one-on-one interviews with clients from diverse backgrounds to understand their unique experiences with banking services.

Grievance mechanisms and remediation channels for consumers and end-users

Under ABN AMRO's official complaints procedure, clients can submit complaints via the website, using our online chat facility, by calling or through the app. This procedure, part of our broader complaints ecosystem, is open to any complaints clients may wish to raise, including those related to accessibility, suitability, discrimination and use of our products and services. We provide an initial response within five days, including the name of the expert handling the complaint, the expected response date, and a contact number for any follow-up questions. If needed, complaints may be escalated to our second line Security and Integrity Management (SIM) team, who will follow up directly with the client.

If clients have not received a response within eight weeks after submitting a complaint, they can contact Kifid, the Dutch Institute for Financial Complaints, or Meldpunt Discriminatie. Furthermore, if a client is unsatisfied with the proposed solution, they can request a reassessment by the bank. If the Complaints Management department decides against a reassessment, the client still has the option to escalate the issue.

To measure the effectiveness of our complaints channels, we invite clients to provide feedback through a survey, which generates a journey Net Promoter Score (jNPS) as well as qualitative feedback. This feedback helps us refine the complaints handling process and improve outcomes.

Feedback from this mechanism is part of our closed feedback loop, informing continuous product and process reviews. Relevant stakeholders, including product and client units, have access to the complaints dashboard, allowing teams to follow up directly on complaints.

The Complaints Management team within Legal also reports quarterly to the ExBo and other stakeholders on trends in complaints, helping us identify key issues and consider potential solutions.

If a complaint highlights specific aspects of one of our products, it can trigger the PAR process to evaluate the product's suitability and accessibility. As a result of this evaluation, products and services may be adapted as necessary.

ABN AMRO also expects its suppliers to maintain an effective complaints mechanism aligned with our Supplier Code of Conduct, which includes a dedicated complaints desk and continuous monitoring of complaint statuses. For intermediaries, legal arrangements ensure that complaints related to ABN AMRO products or services are handled appropriately. Clients who purchase our products through intermediaries or third parties can directly access our

complaints mechanism for any issues. In all cases, complaints regarding our products or services will ultimately be handled by ABN AMRO.

Moreover, ABN AMRO's Whistleblower Policy protects clients as well as third parties against retaliation, ensuring they can raise concerns without fear of adverse consequences. It is worth noting that the Complaints channel mentioned in the ABN AMRO Grievance Mechanism is separate from the whistleblowing channel.

Our approach to consumers and end-users relating to privacy

We take the following approach and actions to address impacts and risks on privacy, suitability of products & services and social inclusion:

Firstly, in 2024 the bank prioritised clarifying ownership and responsibilities while equipping new teams with the necessary skills for effective privacy management. This initiative led to the establishment of the first line of defence (1LoD) Privacy Centre of Excellence and the appointment of Privacy Stewards with defined roles and responsibilities, providing a comprehensive view of privacy-related topics to manage privacy risks more effectively.

Secondly, the bank is implementing a privacy programme to enhance privacy management across the organisation. This programme strengthens the general privacy risk management foundation and helps address privacy risks in areas such as cookie management, client rights, data breaches, consent management, privacy assessments, policies, and governance. Looking ahead to 2025 and beyond, efforts will focus on topics such as translating Personal Data Policy requirements into practical standards, procedures, and guidelines, including initiatives in unstructured data management, data sharing management, and cross-border transfer management to further optimise our privacy foundation.

Thirdly, the anticipated launch of the new Privacy Dashboard is expected to provide insights into privacy-related risks by the end of the year. The new Privacy Dashboard will facilitate steering and mitigation of emerging privacy risks.

Our approach to consumers and end-users relating to social inclusion

ABN AMRO strives to minimise negative impacts on access to financial products and services by improving client due diligence and risk assessments. This reflects our ongoing efforts to maintain an inclusive financial environment. Below are some of the actions we perform to foster social inclusion:

- Research into barriers experienced by culturally diverse customers
- Building employee awareness on unconscious biases
- Enhancing accessibility of products and services
- Collaborations with other organisations

We monitor the effectiveness of our actions through various controls, testing, and tools. This data is integrated into key risk reports and assessments.

Targets related to consumers and end-users

As of 30 June 2025, ABN AMRO did not have specific targets for social risk topics. In 2025, we will be exploring whether setting such targets would be feasible as well as meaningful.

Business conduct (Governance)

We are subject to strict regulatory requirements, at both national and international level. These requirements are translated into internal policies for which mechanisms are in place to monitor operational effectiveness and compliance. The mechanisms enhance risk awareness and effective risk management, fostering a culture of integrity.

Through our materiality assessment of business conduct topics, our activities relating to client integrity are identified as material. We are aware that our role as a bank requires us to remain vigilant in order to safeguard the integrity of the banking system.

Client integrity

Client Integrity risk at ABN AMRO encompasses six key risk types: Anti-Money Laundering, Anti-Bribery and Corruption, Combating the Financing of Terrorism, Tax, Fraud and Sanctions. These forms of financial crime have a profound impact on society and the communities we serve. Our key stakeholders in this area include clients, regulators, employees, shareholders and society at large. Following the DMA, Client Integrity was identified as a material topic from a financial materiality perspective.

While ABN AMRO operates in a highly regulated environment and is subject to strict legal requirements, we also feel a need to play a role in the fight against financial crime and we attach great importance to conducting business with integrity.

Our policies relating to Client Integrity strengthen our dedication to adhering to our legal obligations (such as the Dutch Financial Supervision Act, the Dutch Anti-Money Laundering and Anti-Terrorist Financing Act and the Dutch Sanctions Act 1977), adopting industry best practices and fostering a positive culture to mitigate and manage financial crime risk. The client integrity-related policies are key to the bank's compliance framework. ABN AMRO has implemented several client integrity-related policies.

The Client Acceptance and Anti-Money Laundering (CAAML) Policy aims to protect ABN AMRO's products and services from being used for money laundering and financing of terrorism (ML/FT). The CAAML Policy establishes the measures and requirements by which ABN AMRO seeks to prevent and detect ML/FT, as well as the principles and rules by which ABN AMRO mitigates and manages these risks.

The Anti-Bribery and Corruption (ABC) Policy defines ABN AMRO's framework for managing bank-wide bribery and corruption risks regarding the bank's clients, its employees and organisation, and third parties. The purpose of the ABC Policy is to protect ABN AMRO from any involvement in bribery or corruption by the bank's entities, its employees, clients (and clients' relevant third parties) or third parties with whom the bank has a relationship. Regarding client integrity, the policy describes several indicators that increase clients' bribery and corruption risks (e.g. adverse media). The Tax Policy outlines the tax framework within which ABN AMRO operates. It defines the global tax mandate, provides specific guidance on responsible tax behaviour, defines the bank's tax strategy and states where and when the involvement of Group Tax is mandatory. It also describes the bank's tax risk appetite and provides guidance for tax risk management, including the tax control framework.

The Fraud Risk Policy defines the minimum standards and requirements for safeguarding the bank's risk profile in relation to the risk of fraud, including first-party fraud (i.e. fraud conducted by a client and leading to financial losses and/or reputational damage). The policy enables improved efficiency and efficacy in ABN AMRO's fraud risk management and seeks to ensure a proactive approach to managing fraud risk through fraud prevention, fraud detection and fraud response. This policy has been implemented in a comprehensive framework designed to adapt to the rapidly changing fraud landscape.

The Sanctions Policy aims to protect ABN AMRO's products and services from being used for prohibited transactions and for the purposes of evading, avoiding or otherwise circumventing sanctions. The Sanctions Policy describes the rules and requirements, consequences for non-compliance, escalations and reporting.

All ABN AMRO policies are available on the bank's intranet, in the policy framework section, and are shared with the relevant internal stakeholders. An AML, CFT and Sanctions Statement and the ABC Policy are publicly available on

ABN AMRO's corporate website. Processes and/or control frameworks are in place including policy adherence indicators and key controls to periodically monitor and test the implementation and effectiveness of the policies.

The policies apply globally to all ABN AMRO entities (including majority-owned subsidiaries and branches). However, where local laws and regulations are more stringent, the local laws and regulations prevail. Additionally, the ABC policy extends to employees and third parties with whom ABN AMRO has a relationship or who perform activities on behalf of ABN AMRO.

ABN AMRO requires its employees to understand their role in preventing money laundering and combating the financing of terrorism, as well as to know what to do if they encounter a situation that is not in line with our policy, and the steps to take from there. To support these employees, a curriculum of Client Integrity training is available.

Bribery and corruption

ABN AMRO plays an important role in helping protect the wider financial system against bribery and corruption. In addition to our initiatives focused on client integrity, employee and organisation integrity and third-parties, are looking to improve relevant internal policies, processes, controls and to ensure regulatory compliance and minimise risks for the bank and its stakeholders. More information is available in our Integrated Annual Report 2024.

Governance risk related to our counterparties

Our non-financial risk management looks after governance risks relating to our counterparties, such as fraud, third party and outsourcing risk. More on this can be read under EU ORA – Qualitative information on operational risk. Governance risk related to our clients is addressed as part of our client assessment on sustainability, which is disclosed under "Risk management of sustainability matters" earlier in this section. Client integrity section highlights how we manage governance risks related to our clients.

We report any violation of the Anti-Bribery and Corruption (ABC) Policy by staff or third parties, and any suspicions of bribery and corruption related to our clients, internally as well as to the relevant regulatory bodies. An unacceptable risk of corruption may lead to a prospective third party or client being rejected or, in the case of existing relationships, to the relationship being terminated.

ESG1 – Banking book – Climate change transition risk: Credit quality of exposures by sector, emissions and residual maturity

The table shows our exposure to non-financial corporates in carbon-related sectors, as well as the GHG financed emissions (scope 1, scope 2 and scope 3) of our counterparties.

The bank's exposure to sectors contributing to climate change decreased to EUR 46.0 billion as at 30 June 2025 from EUR 46.7 billion as at 31 December 2024. This explains a large part of the drop in financed emissions for corporate loans to approximately 19.2 mtCO₂e as at 30 June 2025 (31 December 2024: 20.6 mtCO₂e). The main contributors to the decrease in GHG emissions were the manufacturing and transportation sectors.

Data sources and methods are still developing. Below, we have highlighted the main data sources, and the methodologies applied.

	A	B	C	D	E	F	G	H
						30 June 2025		
	Gross carrying amount (in millions)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (in millions)		
		Of which: exposures towards companies excluded from EU Paris-aligned Benchmarks ²	Of which: environmentally sustainable (CCM)	Of which: stage 2 exposures	Of which: non-performing exposures		Of which: Stage 2 exposures	Of which: non-performing exposures
Sector/subsector								
1 Exposures towards sectors that highly contribute to climate change ¹	46,041	1,273	178	4,476	2,106	-569	-62	-441
2 A - Agriculture, forestry and fishing	4,979			464	188	-46	-10	-24
3 B - Mining and quarrying	1,344	1,156		126		-2	-1	
4 B.05 - Mining of coal and lignite								
5 B.06 - Extraction of crude petroleum and natural gas	211	211						
6 B.07 - Mining of metal ores								
7 B.08 - Other mining and quarrying	185			46				
8 B.09 - Mining support service activities	948	945		80		-1	-1	
9 C - Manufacturing	6,509	22	1	834	674	-124	-13	-101
10 C.10 - Manufacture of food products	1,969			165	237	-15	-2	-12
11 C.11 - Manufacture of beverages	115					-1		
12 C.12 - Manufacture of tobacco products								
13 C.13 - Manufacture of textiles	150			8	8	-3		-2
14 C.14 - Manufacture of wearing apparel	7			2	1	-1		
15 C.15 - Manufacture of leather and related products	16				1			
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	224			17	65	-17		-16
17 C.17 - Manufacture of pulp, paper and paperboard	171			10	29	-8		-8
18 C.18 - Printing and service activities related to printing	97			16	3	-1		
19 C.19 - Manufacture of coke oven products	26	22			6			
20 C.20 - Production of chemicals	703			231	42	-4	-4	-1
21 C.21 - Manufacture of pharmaceutical preparations	116			22	20	-1		-1
22 C.22 - Manufacture of rubber products	323			39	51	-2		-1
23 C.23 - Manufacture of other non-metallic mineral products	117			46	11	-3		-3
24 C.24 - Manufacture of basic metals	299			71	53	-2	-1	-1
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	757		1	83	25	-13	-2	-10

	A	B	C	D	E	F	G	H
						30 June 2025		
	Gross carrying amount (in millions)					Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (in millions)		
		Of which: exposures towards companies excluded from EU Paris-aligned Benchmarks ²	Of which: environmentally sustainable (CCM)	Of which: stage 2 exposures	Of which: non-performing exposures		Of which: Stage 2 exposures	Of which: non-performing exposures
26 C.26 - Manufacture of computer, electronic and optical products	289			32	4	-1		
27 C.27 - Manufacture of electrical equipment	77			7	1	-1		-1
28 C.28 - Manufacture of machinery and equipment n.e.c.	467			37	38	-12	-1	-11
29 C.29 - Manufacture of motor vehicles, trailers and semi-trailers	225			4	5	-2		-2
30 C.30 - Manufacture of other transport equipment	103			15	36	-12		-12
31 C.31 - Manufacture of furniture	54			3	2	-1		-1
32 C.32 - Other manufacturing	64			14	22	-12	-1	-10
33 C.33 - Repair and installation of machinery and equipment	139			11	13	-11		-11
34 D - Electricity, gas, steam and air conditioning supply	2,394	95	14	169	112	-41	-2	-37
35 D35.1 - Electric power generation, transmission and distribution	2,219	9	14	169	112	-40	-2	-37
36 D35.11 - Production of electricity	1,651	9	12	167	112	-40	-1	-37
37 D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	86	86						
38 D35.3 - Steam and air conditioning supply	89							
39 E - Water supply; sewerage, waste management and remediation activities	585			104	5	-6	-1	-4
40 F - Construction	2,846		145	294	176	-51	-6	-40
41 F.41 - Construction of buildings	2,039		77	213	134	-21	-4	-14
42 F.42 - Civil engineering	311		68	39	28	-22	-1	-22
43 F.43 - Specialised construction activities	495			41	14	-7	-1	-5
44 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	8,330		1	1,220	563	-228	-16	-198
45 H - Transportation and storage	8,222		17	344	181	-36	-4	-22
46 H.49 - Land transport and transport via pipelines	1,337			107	89	-11	-1	-7
47 H.50 - Water transport	5,457		2	159	3	-7	-2	
48 H.51 - Air transport	9				6	-2		-2
49 H.52 - Warehousing and support activities for transportation	1,250		15	70	82	-15	-1	-13
50 H.53 - Postal and courier activities	169			8	1	-1		-1
51 I - Accommodation and food service activities ³	1,759			233	119	-16	-4	-7
52 L - Real estate activities	10,833			920	206	-37	-10	-14
53 Exposures towards sectors other than those that highly contribute to climate change ¹	20,053		70	1,703	1,061	-372	-32	-302
54 K - Financial and insurance activities	3,812		46	235	76	-43	-5	-31
55 Exposures to other sectors (NACE codes J, M - U)	14,482		24	1,234	866	-313	-22	-264
56 TOTAL	66,094	1,273	248	6,178	3,166	-941	-94	-743

1. In accordance with the Commission delegated regulation (EU) 2020/1818 supplementing regulation (EU) 2016/1011 as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks - Climate Benchmark Standards Regulation - Recital 6: Sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) No 1893/2006.

2. In accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation

3. The rows of the template do not include Sector I, because of an inconsistency between the template and the regulation: sector I is not part of the Sectors that highly contribute to Climate Change, as specified in Recital 6 of the Commission Delegated Regulation (EU) 2020/1818. For this reason the exposures to Sector I have been included in the "Exposures to other sectors" row.

	I	J	K	L	M	N	O	P
	30 June 2025							
	GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO ₂ equivalent)	GHG emissions: gross carrying amount percentage of the portfolio derived from company- specific reporting	Of which: Scope 3 financed emissions	≤ 5 years	> 5 year ≤ 10 years	> 10 year ≤ 20 years	> 20 years	Average weighted maturity
Sector/subsector								
1 Exposures towards sectors that highly contribute to climate change¹	19,191,780	11,627,826	23%	38,954	4,257	2,388	443	3
2 A - Agriculture, forestry and fishing	5,018,475	2,655,883	7%	4,224	690	60	5	3
3 B - Mining and quarrying	1,515,437	963,357	32%	813	195	336		6
4 B.05 - Mining of coal and lignite			0%					
5 B.06 - Extraction of crude petroleum and natural gas	99,516	77,796	100%	211				3
6 B.07 - Mining of metal ores			0%					
7 B.08 - Other mining and quarrying	359,574	308,891	36%	173	12			2
8 B.09 - Mining support service activities	1,056,346	576,670	17%	429	183	336		8
9 C - Manufacturing	4,954,751	3,978,691	4%	5,798	436	232	43	2
10 C.10 - Manufacture of food products	2,759,570	2,168,442	3%	1,874	93	1		2
11 C.11 - Manufacture of beverages	110,769	107,293	1%	115				3
12 C.12 - Manufacture of tobacco products	4	4	0%					
13 C.13 - Manufacture of textiles	28,343	25,351	0%	146	4			1
14 C.14 - Manufacture of wearing apparel	1,157	1,071	1%	6	1		1	3
15 C.15 - Manufacture of leather and related products	2,946	2,717	3%	4	13			5
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	109,373	103,504	14%	210	14			2
17 C.17 - Manufacture of pulp, paper and paperboard	64,409	54,403	0%	159	12	1		2
18 C.18 - Printing and service activities related to printing	41,279	34,018	1%	94	3			1
19 C.19 - Manufacture of coke oven products	9,528	6,196	0%	22	4			1
20 C.20 - Production of chemicals	481,045	303,328	7%	538	9	149	6	4
21 C.21 - Manufacture of pharmaceutical preparations	40,918	27,691	0%	88	1		27	6
22 C.22 - Manufacture of rubber products	135,887	112,406	1%	285	33	5		2
23 C.23 - Manufacture of other non- metallic mineral products	46,736	34,691	0%	99	17			2
24 C.24 - Manufacture of basic metals	244,533	180,911	10%	220	31	48		3
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	521,549	485,390	3%	668	81	6	2	2
26 C.26 - Manufacture of computer, electronic and optical products	66,179	60,356	8%	285	3			2
27 C.27 - Manufacture of electrical equipment	17,077	16,272	0%	57	3	11	6	4
28 C.28 - Manufacture of machinery and equipment n.e.c.	121,837	113,567	1%	422	37	8		2
29 C.29 - Manufacture of motor vehicles, trailers and semi-trailers	63,748	59,339	1%	220	4	1		1
30 C.30 - Manufacture of other transport equipment	23,653	22,346	2%	93	9			3
31 C.31 - Manufacture of furniture	13,126	12,276	1%	47	7			2
32 C.32 - Other manufacturing	16,827	15,048	2%	54	9	1		3
33 C.33 - Repair and installation of machinery and equipment	34,257	32,072	3%	92	46	1		3

		I	J	K	L	M	N	O	P
		30 June 2025							
		GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO ₂ equivalent)		GHG emissions: gross carrying amount percentage of the portfolio derived from company-specific reporting					Average weighted maturity
			Of which: Scope 3 financed emissions		≤ 5 years	> 5 year ≤ 10 years	> 10 year ≤ 20 years	> 20 years	
34	D - Electricity, gas, steam and air conditioning supply	932,879	488,009	2%	1,379	243	769	2	7
35	D35.1 - Electric power generation, transmission and distribution	807,893	445,673	2%	1,221	227	769	2	7
36	D35.11 - Production of electricity	355,968	314,360	2%	704	225	720	2	9
37	D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	36,847	21,459	0%	86				2
38	D35.3 - Steam and air conditioning supply	88,139	20,877	0%	73	16			4
39	E - Water supply; sewerage, waste management and remediation activities	101,638	56,176	0%	420	61	104		6
40	F - Construction	552,928	489,590	36%	2,506	278	49	12	3
41	F.41 - Construction of buildings	320,560	274,103	50%	1,813	167	48	12	3
42	F.42 - Civil engineering	85,902	79,277	1%	257	54			3
43	F.43 - Specialised construction activities	146,466	136,210	5%	435	58	2		3
44	G - Wholesale and retail trade; repair of motor vehicles and motorcycles	1,603,004	1,493,980	3%	7,815	452	27	36	2
45	H - Transportation and storage	4,301,815	1,445,187	34%	6,649	1,040	532		4
46	H.49 - Land transport and transport via pipelines	551,589	284,813	1%	1,108	210	19		3
47	H.50 - Water transport	3,303,125	940,419	47%	4,228	718	511		4
48	H.51 - Air transport	8,388	2,194	0%	9				1
49	H.52 - Warehousing and support activities for transportation	433,353	213,195	15%	1,136	112	2		2
50	H.53 - Postal and courier activities	5,360	4,566	0%	168	1			3
51	I - Accommodation and food service activities ³	375,812	302,782	5%	1,608	128	11	12	3
52	L - Real estate activities	210,853	56,953	49%	9,350	861	278	344	4
53	Exposures towards sectors other than those that highly contribute to climate change¹			0%	16,760	2,298	282	712	4
54	K - Financial and insurance activities			0%	3,077	315	76	344	4
55	Exposures to other sectors (NACE codes J, M - U)			0%	12,075	1,855	195	356	4
56	TOTAL	19,191,780	11,627,826	20%	55,714	6,555	2,670	1,155	3

1. In accordance with the Commission delegated regulation (EU) 2020/1818 supplementing regulation (EU) 2016/1011 as regards minimum standards for EU Climate Transition Benchmarks and EU Paris-aligned Benchmarks - Climate Benchmark Standards Regulation - Recital 6: Sectors listed in Sections A to H and Section L of Annex I to Regulation (EC) No 1893/2006.

2. In accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation

3. The rows of the template do not include Sector I, because of an inconsistency between the template and the regulation: sector I is not part of the Sectors that highly contribute to Climate Change, as specified in Recital 6 of the Commission Delegated Regulation (EU) 2020/1818. For this reason the exposures to Sector I have been included in the "Exposures to other sectors" row.

Companies excluded from the Paris-aligned Benchmark

Under Article 12.1 of the Commission Delegated Regulation (EU) 2020/1818, the identification of companies that are excluded from EU Paris-aligned benchmarks should be done on the basis of revenue split. As many of our counterparties do not yet report on their revenue split per sector, these exposures were identified based on the NACE code of the counterparty's principal activity. The NACE codes used to identify such organisations were: B05.10, B05.20, B06.10, B06.20, B09.10, C19.20, C20.11, D35.11 (except for clients whose principal activity is renewable energy or whose loan specifically finances a renewable energy project), D35.21, D35.22 and D35.23.

With regard to Article 12.2, such companies were identified using the CASY assessment tool as a proxy for the DNSH (Do No Significant Harm) assessment, given the lack of a structural assessment at company level to detect whether a company has done significant harm to one or more of the environmental objectives referred to in Article 9 of Regulation (EU) 2020/852 of the European Parliament and of the Council.

Financed GHG emissions

The financed GHG emissions were calculated according to the Global GHG Accounting and Reporting Standard for the Financial Industry (PCAF, December 2022). The reported absolute emissions are proportional to the share of our exposure in the counterparty's total (company or asset) value. We estimate the emissions by combining various sources of information. The main sources have been summarised below. As a general rule, we use client or collateral level information whenever available. For other exposures, we use economic emission intensities, based on dimensions relevant to the segment.

Portfolio	Sources	Method
Corporate loans – listed Bonds and Equity	ISS – ESG Direct emissions from client reports	Client reported emissions
Corporate loans – non-listed Netherlands	Statistics Netherlands (CBS)	Economic emissions intensity
Corporate loans – non-listed rest of world	PCAF emission factor database	Economic emissions intensity
Agriculture	Rijksdienst voor Ondernemend Nederland (RVO), International Dairy Federation, Statistics Netherlands (CBS)	Sector specific emission factor for dairy farming, Economic emissions intensity other subsectors
Shipping loans	Poseidon principles, CO2emissiefactoren.nl, Kennisinstituut voor Mobiliteitsbeleid (KiM)	Client reported emissions for the sea and coastal freight water transport, Economic emissions intensity for inland shipping and other subsectors
Oil and Gas – upstream and midstream	Rystad Energy, company disclosures, IPCC	Specific emission via third party provider (Rystad), emission factors from IPCC where possible
Power Generation	BP Statistics 2022, company disclosures, Open database of the Dutch government (www.overheid.nl)	Client reported emissions, estimates for average capacity factor
Road Transport	TRACCS and CE Delft	External emission factors per vehicle type
Commercial Real Estate	Rijksdienst voor Ondernemend Nederland (RVO), PCAF Database	Estimated building emissions based on building type and energy label
Residential Mortgages	Rijksdienst voor Ondernemend Nederland (RVO), Statistics Netherlands (CBS), Basisregistratie Adressen en Gebouwen (BAG)	Estimated building emissions based on building type, floor area and energy label

GHG emissions for corporate loans

The ISS ESG database was used as the source for collecting GHG emissions for our corporate clients. For corporate clients not covered by the ISS ESG database, we used the Statistics Netherlands (CBS) and PCAF databases, which provide country- and sector-specific carbon intensity information. For clients active in renewable energy production from solar power, wind power or hydropower, we used an emission intensity of 0 for scope 1 and scope 2 GHG emissions, as the nature of the activity already implies that no emissions are associated with these activities. For scope 3 GHG emissions, client-specific information was used or, if not available, the CBS and the PCAF databases.

GHG emissions for agriculture

For dairy farming, a combination of the research paper Hospers et al. (2022), RVO (via StatLine) and International Dairy Federation was used to calculate a sector-specific emission factor. For all other agriculture subsectors, we used the CBS database, which provides country- and sector-specific carbon intensity information.

GHG emissions for shipping loans

The Poseidon Principles framework was used as our main source for collecting GHG emissions at vessel level for the sea and coastal freight water transport portfolio. ABN AMRO also collaborates with third-party providers like DNV to collect, review and process the data and calculate the performance of the vessels in our portfolio. The Kennisinstituut voor Mobiliteitsbeleid (KiM) and emissiefactoren.nl databases were used as a source to collect GHG emissions for inland shipping cargo vessels. For all vessels not covered by the above-mentioned sources, we used the CBS and the PCAF databases, which provide country- and sector-specific carbon intensity information.

GHG emissions for oil and gas - upstream and midstream

For the ABN AMRO portfolio, the carbon intensity metric measures the kg of CO₂e emissions for each barrel of oil produced, distributed or transported by each client we finance. ABN AMRO links client data (company-specific disclosures) to carbon intensity and production data from Rystad to calculate the carbon intensity baseline and target. IPCC was used for emissions factors related to combustion of fossil fuels. Appropriate proxies were used in instances where carbon intensity and production data were not available.

GHG emissions for power generation

For power generation, a combination of company disclosures, BP energy statistics 2022 and an internal database was used. Most of the emissions data used to measure and track our clients' emissions was a combination of internal and public company disclosures. Wherever possible, data gaps were addressed using estimates, at times with external guidance, such as the average capacity factor of different sources of power generation in Europe taken from BP Energy Statistics 2022.

GHG emissions for road transport

We measure our financed emissions for trucks in grams of CO₂ associated with each transported tonne of freight per kilometre and our financed emissions for vans in grams of CO₂ per vehicle kilometre capturing the scope 1 GHG emissions. The scope 2 emissions for trucks and vans are calculated based on electricity consumption. TRACCS was used for vehicle activity for all countries and for emissions factors for the UK and Germany, while CE Delft was used for emissions factors for the Netherlands. For passenger cars, we rely on external emission factors and average distances travelled to calculate the financed scope 1 emissions associated with our portfolio, and we rely on external data on electricity consumption, as well as electricity grid intensity, to calculate the scope 2 emissions financed.

GHG emissions for commercial real estate and residential mortgages

For residential mortgages, the calculations are in line with the PCAF standard and based on floor area, energy labels and asset type. CBS data for energy consumption was used to calculate CO₂ emissions. To convert the energy data into carbon emission data, the emission factors provided by CBS were used. An attribution factor at loan level was applied; this is the ratio of the GCA and the property value at origination. For the commercial real estate financing portfolio, the GHG emissions calculations (scope 1 and 2) were based on energy label and asset type, and the corresponding emission factors provided by the PCAF emission factor database.

Scope 3 emissions

As of 31 December 2023, we are reporting estimates of our clients' scope 3 emissions. They depend mostly on the environmentally extended input-output (EEIO) emission factors carbon intensities by industry as supplied by the PCAF. These emission factors have the lowest data quality score and are currently limited to upstream scope 3 GHG emissions only.

Percentage of portfolio derived from company-specific reporting

We have defined this as the percentage of GCA of the emissions calculated with a PCAF data quality score 1, 2 and 3, as all of these scores use company-specific inputs.

Maturity buckets

Exposures without stated maturity and for which the counterparty can determine the repayment date are reported in the 20 years bucket. The average weighted maturity was estimated based on the average of each maturity bucket.

ESG2 – Banking book – Climate change transition risk: Loans collateralised by immovable property – Energy efficiency of the collateral

For loans collateralised by residential immovable property, the amounts attributed to EPC labels in this report consist of EPC labels under the old regulation (NEN7120, prior to 1 January 2021) and new regulation (NTA8800) as provided by the Netherlands Enterprise Agency (Rijksdienst voor Ondernemend Nederland - RVO). Only the new regulation EP score is considered 'official' in column B-G and is provided with an accompanying EP score, while this is not the case for the old regulation EPC label, where the EP score is classified as estimated in column B-G.

As such, the attribution of gross carrying amounts to the EP score in row 5 column A, and subsequently columns B-G, is higher than the gross carrying amounts of the estimated EPC labels in row 1 column O-P.

For all loans collateralised by immovable property, in accordance with the instruction, the columns that show the EP score include official as well as estimated labels, while the columns that show the EPC labels only include official energy labels. All the exposures without an official EPC label (NTA8800) are reported in the column 'Without EPC label of collateral'. This includes estimated energy labels for:

- buildings that are not required to have an energy label under the Regulation ("no label"), such as monuments
- buildings that are under development or not yet registered, for which the label cannot be estimated ("unknown label")
- buildings whose energy label is not known to ABN AMRO due to other reasons
- buildings that have an estimated energy label based on proxies

As part of its climate strategy, ABN AMRO has set targets to reduce its carbon footprint. In line with this strategy, the distribution and migration of official energy labels as at 30 June 2025 showed a slight improvement compared to 31 December 2024, (54.9% vs 54.7%, respectively), the majority being A labels and 77.0% of the portfolio having an energy label of C or higher (31 December 2024: 75.5%). This corresponds with EUR 3.3 billion inflow in label A – C, and EUR 1 billion outflow in label D – G.

The data quality related to energy labels improved, leading to a decrease in unknown labels and an increase in final labels. The increase in the category official EPC label A and higher-than-A labels was partly a result of new inflow and migration from the lower-than-A labels to label A. New inflow usually has an official energy label, given that such a label is mandatory at the time of a sale or purchase transaction. We also observed an increase in the new-build houses category based on the Building Decree (Besluit Bouwwerken Leefomgeving) which have at least an A+++ label.

ABN AMRO encourages clients to enhance the sustainability of their homes, with the Sustainable Living Mortgage (Duurzaam Wonen Hypotheek). The bank fosters the purchase of homes with better energy labels by providing a higher mortgage for such properties.

	A	B	C	D	E	F	G
	30 June 2025						
	Total gross carrying amount						
	Level of energy efficiency (EP score in kWh/m ² of collateral)						
(in millions)	0; ≤ 100	> 100; ≤ 200	> 200; ≤ 300	> 300; ≤ 400	> 400; ≤ 500	> 500	
Counterparty sector							
1 Total EU area	189,494	62,001	92,505	15,169	1,391	1,236	1,783
2 - of which Loans collateralised by commercial immovable property	26,511	3,546	4,395	3,646	1,301	1,157	1,632
3 - of which Loans collateralised by residential immovable property	162,983	58,456	88,109	11,523	90	79	151
4 - of which Collateral obtained by taking possession: residential and commercial immovable properties							
5 - of which Level of energy efficiency (EP score in kWh/m ² of collateral) estimated	127,371	39,893	73,653	11,631	610	929	655
6 Total non-EU area	168	1	1				
7 - of which Loans collateralised by commercial immovable property	148						
8 - of which Loans collateralised by residential immovable property	20	1	1				
9 - of which Collateral obtained by taking possession: residential and commercial immovable properties							
10 - of which Level of energy efficiency (EP score in kWh/m ² of collateral) estimated	1						

ABN AMRO has no exposures related to repossessed collateral for either commercial or residential immovable properties, both within and outside the EU area

	H	I	J	K	L	M	N	O	P
	30 June 2025								
	Total gross carrying amount								
	Level of energy efficiency (EPC label of collateral)								Without EPC label of collateral
(in millions)	A ¹	B	C	D	E	F	G		Of which: level of energy efficiency estimated ²
Counterparty sector									
1 Total EU area	48,202	13,245	18,699	8,880	5,820	4,541	4,655	85,453	82%
2 - of which Loans collateralised by commercial immovable property	6,250	917	1,308	536	347	285	490	16,379	34%
3 - of which Loans collateralised by residential immovable property	41,952	12,328	17,391	8,344	5,473	4,255	4,166	69,074	93%
4 - of which Collateral obtained by taking possession: residential and commercial immovable properties									
5 - of which Level of energy efficiency (EP score in kWh/m ² of collateral) estimated								70,043	100%
6 Total non-EU area								168	0%
7 - of which Loans collateralised by commercial immovable property								148	0%
8 - of which Loans collateralised by residential immovable property								19	2%
9 - of which Collateral obtained by taking possession: residential and commercial immovable properties									
10 - of which Level of energy efficiency (EP score in kWh/m ² of collateral) estimated								1	100%

1. Label A includes the category higher than A.

2. (EP score in kWh/m² of collateral).

ESG3 – Banking book - Climate change transition risk: Alignment metrics

This template aims to capture the bank's alignment efforts with respect to the objectives of the Paris Agreement for a selected number of sectors. The products and sectors disclosed in Template 3 are aligned with those currently covered in ABN AMRO's climate strategy, which are disclosed in our Integrated Annual Report (IAR). The IAR serves as our primary disclosure, where we provide comprehensive updates on our progress.

ABNAMRO takes a sector-based approach to target-setting, as we believe this is the most effective way to achieve decarbonisation of our portfolio, given that each sector in the economy faces specific challenges in transitioning to net zero. In doing so, we are prioritising carbon-intensive sectors, as guided by the NZBA. For each sector, we have taken those parts of the value chain that are most material from an emissions and exposure perspective. Therefore, the sectors and NACE codes disclosed in Template 3 align with those currently included in ABNAMRO's climate strategy.¹

Regarding the scope of counterparties included in Template 3, it is important to note that the EBA focuses on non-financial counterparties, while ABN AMRO's climate strategy encompasses all counterparties. Although the majority of sectors within the bank's climate strategy pertain to non-financial counterparties, some sectoral targets do include other types of counterparties. This explains the discrepancies in the reported gross carrying amounts between the two disclosures (Integrated Annual Report and Pillar 3 Report) for the various sectors. The most significant difference observed pertains to agriculture and commercial real estate disclosures, as a substantial share of these portfolios is classified as households, which fall outside the scope of this template. Consequently, for these sectors, the emission intensity disclosed in Template 3 is lower than the figures reported in our Integrated Annual Report, and for agriculture it is even below our target. This discrepancy arises because the target is based on the full counterparty scope of our climate strategy.

Regarding product coverage, the products captured in the portfolio gross carrying amount of Template 3 are aligned with ABNAMRO's climate strategy. Consequently, debt securities and equity instruments are not yet encompassed by our climate strategy and therefore not integrated into the Template 3 disclosures. If debt securities and equity instruments are included in the scope of the climate strategy in the future, this will be reflected accordingly in Template 3.

The economic scenario outlining the decarbonisation pathway prescribed by the EBA is the International Energy Agency (IEA), which sets a benchmark per sector for a scenario towards Net Zero Emissions by 2050 (NZE 2050). It is important to highlight that our climate strategy employs sector-specific scenarios for our targets in respect of shipping, commercial real estate (CRE) and agriculture.

Power generation

Data reported directly by our clients is used to calculate the emissions intensity of the power generation portfolio. Due to different timings in reporting, we report our intensity figures with a one-year delay to ensure that all data used for calculations are sourced from the same year. The latest data available is from 2023, which results in an emissions intensity for this portfolio of 3.5 kgCO₂/MWh. This intensity is well below the 2030 target and the distance to the IEA NZE 2050 scenario is therefore 0%.

Fossil fuel combustion

Oil and gas upstream

Fossil fuel combustion includes our oil and gas upstream portfolio. Our commitments to these sectors decreased in Q2 2025 to EUR 688 million. This is well below the 2030 target, meaning there is a distance (in %) to the NZE 2050 scenario of 0%.

Oil and gas upstream and midstream

Our target for oil and gas upstream and midstream was first published in the 2024 Integrated Annual Report, whereby the processes to actively drive the target have only just begun. The intensity figure is calculated by considering only those assets and companies that were operational over the period for which the intensity is calculated. The operational emission intensity figures are reported with a one-year delay. For the 2024 year-end

¹ If additional sectors come into scope for ABN AMRO's climate strategy, they will be included accordingly in this template.

reporting, the total gross carrying amount reported on consisted of assets and companies that were both operational and non-operational. However for Q2 2025 reporting, the scope narrowed to only include those assets and companies that were operational. This further explains the relative decrease in the gross carrying amount reported on for this sector. The latest data available is from 2023, resulting in an emissions intensity for this portfolio of 16.0 kgCO₂/boe, with a distance (in %) to the NZE 2050 scenario of 77.7%.

Automotive

Trucks and vans

Our targets for trucks and vans for road transport are based on our asset-based financing lease portfolio. The reported financed emissions intensity for trucks is 79.2 gCO₂/tkm and there is a distance (in %) to the NZE 2050 scenario of 29.5%. The reported financed emissions intensity for vans is 216.4 gCO₂/vkm and there is a distance (in %) to the NZE 2050 scenario of 53.0%.

Passenger cars

The target for passenger cars was first published in the 2024 Integrated Annual Report, and the processes to actively drive the target have only just begun. The target initially included our asset-based financing direct lease portfolio as well as our ALFAM consumer loan portfolio. This quarter, however, the counterparty scope was limited to non-financial corporations in order to meet the EBA disclosure requirements, resulting in a decrease in the gross carrying amount of the portfolio. In Q2 2025, the emissions intensity of this portfolio was 106.1 gCO₂/vkm, with a distance (in %) to the NZE 2050 scenario of 68.4%.

Maritime transport

Deep sea shipping

For deep sea shipping, ABN AMRO uses the verified data submitted through the Poseidon Principles framework and verified by DNV. According to our methodology, the scope of clients for NACE H5020 remained unchanged from Q4 2024, since shipping metrics are collected annually based on IMO data availability with a one-year lag. As a result, by Q2 2025, a decrease in exposure was observed due to repayments from this client group, and no new clients were added. The latest data available is from 2023, which results in a climate strategy alignment delta for shipping of -2%. The target is to be fully aligned with the DNV 1.5°C trajectory (Scenario 10).

Inland freight water

For inland freight water transport (inland shipping) the intensity metric for Q2 2025 was 27.7 gCO₂e/tkm. This metric is based on average emissions intensity per ship size (small, medium and large). In the absence of a widely recognised benchmark for our inland shipping portfolio, we have chosen to adopt the IEA freight and shipping benchmark. This global benchmark aggregates the emissions intensity of maritime shipping and trucking, resulting in a relatively low emissions intensity baseline.

Agriculture

The agriculture portfolio utilised Dutch national averages to calculate the baseline and anticipated targets for 2030. The counterparty scope of Pillar 3 impacts the figures reported for the agriculture portfolio, as this partly consists of households, which are therefore excluded from reporting in this template. Consequently, the alignment metric value is impacted by the calculation of financed emissions, resulting in a value lower than the target.

Commercial real estate

For commercial real estate, in Q2 2025 our portfolio emission intensity was 57.9 kgCO₂/m², which is a slight decrease from the 2024 intensity of 58.2 kgCO₂/m². Underlying this performance is an increase in percentage of collateral with energy labels A or higher, and a decrease in percentage of collateral with energy labels D-G.

	A	B	C	D	E	F
						30 June 2025
(in millions)	NACE Sectors ²	Portfolio gross carrying amount	Alignment metric	Year of reference	Distance to IEA NZE2050 in % ³	Target (year of reference +3 years) ⁴
Sector¹						
1 Power	3511	1,510	3.52 kgCO ₂ /MWh	2023	0%	329,7 kgCO ₂ /MWh
2 Fossil fuel combustion						
Oil and gas - upstream	0610, 0620	211	EUR 688 million ⁵	2025	0%	EUR 1.050 million
Oil and gas - upstream and midstream	0610, 0620, 0910, 3512, 3521, 4950, 5210.1, 5221	1,319	16.0 kgCO ₂ e/boe	2023	78%	10,7 kgCO ₂ e/boe
3 Automotive		533				
-of which Road transport trucks		305	79.2 gCO ₂ /tkm	2025	30%	66,9 gCO ₂ /tkm
-of which Road transport vans		93	216.4 gCO ₂ /vkm	2025	53%	165,4 gCO ₂ /vkm
-of which Road transport passenger cars		135	106.1 gCO ₂ /tkm	2025	68% ⁸	72,9 gCO ₂ /tkm
4 Maritime transport		2,264				
-of which Sea and coastal water transport	5020	2,049	-2.0% weighted climate alignment	2023	Target is to be fully aligned with DNV 1.5 trajectory, scenario 10	0% weighted climate alignment
-of which Inland freight water transport	5040	216	27.7 gCO ₂ e/tkm	2025	52%	20,5 gCO ₂ e/tkm
5 Agriculture	0113, 0125, 0128, 0130, 0141, 0142, 0146	2,694	1.1 mtCO ₂ e/mln EUR financed	2025	0% ⁶	1,6 mtCO ₂ e/mln EUR financed
6 Commercial Real Estate		7,699	57.9 kgCO ₂ /m ²	2025	62% ⁷	40,1 kgCO ₂ /m ²

1. Please refer to the Glossary of other sustainability terms in our Integrated Annual Report 2024 for the definitions of the sectors that are included.

2. For Automotive and Commercial Real Estate, the scope of the portfolio is determined by specific-purpose financing rather than by NACE code. In this way, we focus on the particular activity of the financed loan.

3. Point in Time (PiT) distance to 2030 NZE2050 scenario in % (for each metric): Metric at reference year - (IEA scenario metric in 2030)/(IEA scenario metric in 2030)*100. Please note that this formula, prescribed by EBA's calculation guidance, differs from the formula used in the climate strategy disclosures presented in our IAR.

4. ABN AMRO has only set a 2030 target, therefore the figures reported in this column are based on linear targets.

5. This amount includes both the outstanding and undrawn loan amounts.

6. Our Agriculture target is based on the Dutch Coalition Accord.

7. For CRE, we utilize the Carbon Risk Real Estate Monitor (CRREM 1.5 NL V1) methodology. Although it is not the latest CRREM version, it is aligned with a 1.5°C maximum global warming scenario.

8. Our target slightly deviates from the IEA's NZE2050 to also include Scope 2 emissions.

ESG4 – Banking book – Climate change transition risk: Exposures to top 20 carbon-intensive firms

This template has been reported using the list provided in the Carbon Majors Database from CDP¹. Our choosing of this source is based on its reputation and the fact that it not only provides a clear methodological explanation but also includes Scope 3 GHG emissions data. For each counterparty incorporated in the CDP list, the full group related to this counterparty has been assessed.

	A	B	C	D	E
	30 June 2025				
(in millions)	Gross carrying amount (aggregate)	Gross carrying amount towards the counterparties compared to total gross carrying amount (aggregate) ¹	Of which: environmentally sustainable (CCM)	Weighted average maturity	Number of top 20 polluting firms included
1 CDP	3	0.01%			3

1. For counterparties among the top 20 carbon emitting companies in the world

ESG5 – Banking book – Climate change physical risk: Exposures subject to physical risk

Physical risk in the context of this template refers to the financial impact of a changing climate. It is categorised as “acute” when it arises from extreme events, such as droughts, floods and storms, and as “chronic” when it arises from progressive shifts, such as increasing temperatures and water stress. While impact from environmental degradation (such as air, water and land pollution, biodiversity loss and deforestation) also qualifies as physical risk, it is not in the scope of this disclosure. This report’s physical risk assessment considers six climate hazards (flooding, heat stress, hurricanes & typhoons, sea level rise, water stress and wildfires) in addition to buildings’ foundational risk due to drought. The hazards linked to chronic risk are heat stress, water stress, and foundational risks, while those that are linked to acute risk are flooding, hurricanes & typhoons, wildfires and sea level rise.

Compared to 31 December 2024 our exposure sensitive to impact from climate change events increased slightly due to the accompanying increase in total exposure. The majority of our portfolio is located in the Netherlands, which has varying degrees of sensitivity to the impact of flooding, sea level rise and water stress. Most of the Dutch collateral and counterparties in our portfolio are located in the western part of the country, some of which are sensitive to flood risk depending on their proximity to rivers. The majority of our exposures in the west are in urban areas around Amsterdam and Rotterdam, which have lower sensitivity to physical risk mainly because of the highly developed flood protection systems in these cities. The agriculture sector has a large share of exposure in the north and east relative to other sectors in our portfolio, resulting in higher sensitivity to chronic risk.

The next sections contain more details on the data sources and methodology used to arrive at the disclosed figures.

	B	C	D	E	F	G	H
	30 June 2025						
	Gross carrying amount						
	Of which: exposures sensitive to impact from climate change physical events						
	Breakdown by maturity bucket ¹					Average weighted maturity	Of which: exposures sensitive to impact from chronic climate change events
(in millions)	≤ 5 years	> 5 year ≤ 10 years	> 10 year ≤ 20 years	> 20 years			
Geographical area subject to climate change physical risk - acute and chronic events							
1 A - Agriculture, forestry and fishing	4,979	2,620	442	39	3	3	2,518
2 B - Mining and quarrying	1,344	212	11	21		4	3
3 C - Manufacturing	6,509	2,039	141	12		2	769
4 D - Electricity, gas, steam and air conditioning supply	2,394	356	121	471		9	82
5 E - Water supply; sewerage, waste management and remediation activities	585	190	49	4		3	222
6 F - Construction	2,846	519	40	7	1	2	163
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	8,330	2,562	190	16		2	1,041
8 H - Transportation and storage	8,222	1,750	239	22		3	583
9 L - Real estate activities	10,833	2,357	194	67	31	3	914
10 Loans collateralised by residential immovable property	163,004	1,151	1,155	3,024	11,296	21	12,251
11 Loans collateralised by commercial immovable property	26,659	9,185	1,549	166	10	3	5,464
12 Repossessed collaterals	3	3					
13 Other relevant sectors (breakdown below where relevant)	20,053	4,258	637	64	20	3	1,276

1. Exposures without stated maturity and where the counterparty can determine the repayment date, are reported in the bucket <5 years. All other exposures without stated maturity are mapped to the maturity bucket > 20 years.

	I	J	K	L	M	N	O
	30 June 2025						
	Gross carrying amount						
	Of which: exposures sensitive to impact from climate change physical events						
	Of which: exposures sensitive to impact from acute climate change events	Of which: exposures sensitive to impact both from chronic and acute climate change events	Of which: Stage 2 exposures	Of which: non-performing exposures	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions		
(in millions)					Of which: Stage 2 exposures	Of which: non-performing exposures	
Geographical area subject to climate change physical risk - acute and chronic events							
1 A - Agriculture, forestry and fishing	290	297	310	122	-23	-6	-9
2 B - Mining and quarrying	169	72	78		-1	-1	
3 C - Manufacturing	850	573	294	139	-51	-4	-44
4 D - Electricity, gas, steam and air conditioning supply	584	282	91		-1	-1	
5 E - Water supply; sewerage, waste management and remediation activities	7	13	55	3	-5	-1	-4
6 F - Construction	358	45	64	44	-25	-1	-23
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	1,434	293	298	196	-80	-6	-68
8 H - Transportation and storage	875	553	171	33	-15	-2	-10
9 L - Real estate activities	1,563	172	261	24	-10	-2	-2
10 Loans collateralised by residential immovable property	4,099	277	1,258	188	-26	-6	-15
11 Loans collateralised by commercial immovable property	4,598	848	1,131	333	-73	-19	-30
12 Repossessed collaterals		3					
13 Other relevant sectors (breakdown below where relevant)	3,204	499	535	188	-59	-10	-30

Methodology and Data Sources

As previously mentioned, physical risk can be categorised as acute or as chronic. The assessment of whether there is exposure to physical risk takes into account the location of the counterparties and collateral, and the sector in which the counterparty operates. There are two layers of data: i) geographic physical risk data, and ii) sectors sensitivities for physical risk. Geographic physical risk data comes from: i) locations in the Netherlands collateralised by residential real estate, which contains information on flooding and wildfires taken from the Climate Impact Atlas (CIA) and information on foundation risks taken from the Kennis Centrum Aanpak Funderingsproblematiek; ii) other locations in the Netherlands, which includes flooding data taken from the CIA and information on wildfires, heat stress, water stress, hurricanes and typhoons and sea level rise taken from Moody's; iii) locations outside the Netherlands, which includes information on flooding, wildfires, heat stress, water stress, hurricanes and typhoons and sea level rise taken from Moody's. Foundation problems are an important driver of physical climate risk in the Dutch real estate sector. Sector sensitivities for physical risk are obtained from the Environmental and Social Risk Heatmap and are at NACE level 4. Examples of sector sensitivities include assessing flooding sensitivity based on dependency on physical assets and evaluating water stress sensitivity based on water dependency.

Hazard	Data Source		
	Loans in the Netherlands, collateralized by residential immovable property	Loans in the Netherlands, collateralized by commercial immovable property or not secured by immovable property	Loans outside the Netherlands
Flooding	Climate Impact Atlas	Climate Impact Atlas	Moody's ESG Solutions
Wild fire	Climate Impact Atlas	Moody's ESG Solutions	Moody's ESG Solutions
Heat stress		Moody's ESG Solutions	Moody's ESG Solutions
Water stress		Moody's ESG Solutions	Moody's ESG Solutions
Hurricanes & Typhoons		Moody's ESG Solutions	Moody's ESG Solutions
Sea level rise		Moody's ESG Solutions	Moody's ESG Solutions
Foundation risks	Kennis Centrum Aanpak Funderingsproblematiek		

The starting point of the physical risk assessment is the climate hazard exposure to a counterparty's geographical location or, when available, its collateral. The exposure is marked as sensitive to acute or chronic risk if the location is sensitive to one of the underlying hazards, as per Moody's ESG Solutions methodology. An alternative approach is used for Dutch flooding events: a Dutch exposure is classified as sensitive to acute risk if at least 10% of the buildings in a NUTS region are exposed to potential flooding of more than half a metre.

ESG6 – Summary of GAR KPIs

				30 June 2025
	KPI			% coverage (over total assets) ¹
	Climate change mitigation	Climate change adaptation	Total (Climate change mitigation + Climate change adaptation)	
GAR stock	11%	0%	11%	79%
GAR flow	24%	0%	24%	

1. % of assets covered by the KPI over banks' total assets

The table requests the percentage of coverage over total assets for stock and flow. However, this calculation is not feasible for flow since the flow template only includes GAR assets. The total assets relevant to flow are not part of the template, which means they cannot be reported or used to determine the coverage percentage.

ESG7 – Mitigating actions: Assets for the calculation of GAR

	A	B	C	D	E	F	G	H	I	J	K
	30 June 2025										
	Disclosure reference date T										
	Climate Change Mitigation (CCM)						Climate Change Adaptation (CCA)				
	Of which: towards taxonomy relevant sectors (Taxonomy-eligible)						Of which: towards taxonomy relevant sectors (Taxonomy-eligible)				
	Of which: environmentally sustainable (Taxonomy-aligned)						Of which: environmentally sustainable (Taxonomy-aligned)				
(in millions)	Total gross carrying amount			Of which: specialised lending	Of which: transitional	Of which: enabling		Of which: specialised lending	Of which: adaptation	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	191,482	167,668	38,290	37,529	26	106	161,653	4		4	
2 Financial corporations	25,134	5,086	531	18	24	73	9	2		2	
3 Credit institutions	14,869	3,563	318	18	22	20	7	1		1	
4 <i>Loans and advances</i>	<i>7,911</i>	<i>2,340</i>	<i>180</i>		<i>19</i>	<i>12</i>	<i>3</i>				
5 <i>Debt securities, including UoP</i>	<i>6,958</i>	<i>1,223</i>	<i>138</i>	<i>18</i>	<i>3</i>	<i>8</i>	<i>4</i>	<i>1</i>		<i>1</i>	
6 <i>Equity instruments</i>											
7 Other financial corporations	10,265	1,523	213		2	53	3	1		1	
8 <i>Of which: investment firms</i>	<i>50</i>										
9 <i>- of which Loans and advances</i>	<i>17</i>										
10 Debt securities, including UoP											
11 Equity instruments	33										
12 of which management companies	24										
13 Loans and advances	24										
14 Debt securities, including UoP											
15 Equity instruments											
16 of which insurance undertakings	2,423	699	92		2	5	2				
17 Loans and advances	2,423	699	92		2	5	2				
18 Debt securities, including UoP											
19 Equity instruments											
20 Non-financial corporations (subject to NFRD disclosure obligations)	4,408	642	248		2	34	14	2		2	

	A	B	C	D	E	F	G	H	I	J	K
	30 June 2025										
	Disclosure reference date T										
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)					
	Of which: towards taxonomy relevant sectors (Taxonomy-eligible)					Of which: towards taxonomy relevant sectors (Taxonomy-eligible)					
	Of which: environmentally sustainable (Taxonomy-aligned)					Of which: environmentally sustainable (Taxonomy-aligned)					
(in millions)	Total gross carrying amount			Of which: specialised lending	Of which: transitional	Of which: enabling			Of which: specialised lending	Of which: adaptation	Of which: enabling
21 Loans and advances	4,375	642	248		2	34	14	2		2	
22 Debt securities, including UoP	31										
23 Equity instruments	3										
24 Households	161,936	161,936	37,511	37,511			161,630				
25 <i>of which loans collateralised by residential immovable property</i>	<i>161,061</i>	<i>161,061</i>	<i>37,511</i>	<i>37,511</i>			<i>161,061</i>				
26 <i>of which building renovation loans</i>	<i>569</i>	<i>569</i>					<i>569</i>				
27 <i>of which motor vehicle loans</i>	<i>306</i>	<i>306</i>									
28 Local governments financing											
29 Housing financing											
30 Other local governments financing											
31 Collateral obtained by taking possession: residential and commercial immovable properties	3	3									
32 TOTAL GAR ASSETS	191,482	167,668	38,290	37,529	26	106	161,653	4		4	
Assets excluded from the numerator for GAR calculation (covered in the denominator)											
33 EU Non-financial corporations (not subject to NFRD disclosure obligations)	50,596										
34 Loans and advances	50,459										
35 Debt securities											
36 Equity instruments	137										
37 Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)	11,089										
38 Loans and advances	11,068										
39 Debt securities											
40 Equity instruments	21										
41 Derivatives	4,214										
42 On demand interbank loans	2,430										
43 Cash and cash-related assets	313										
44 Other assets (e.g. Goodwill, commodities etc.) ¹	73,478										
45 TOTAL ASSETS IN THE DENOMINATOR (GAR)	333,602										

	A	B	C	D	E	F	G	H	I	J	K
	30 June 2025										
	Disclosure reference date T										
	Total gross carrying amount	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				
		Of which: towards taxonomy relevant sectors (Taxonomy-eligible)					Of which: towards taxonomy relevant sectors (Taxonomy-eligible)				
		Of which: environmentally sustainable (Taxonomy-aligned)					Of which: environmentally sustainable (Taxonomy-aligned)				
		Of which: specialised lending	Of which: transitional	Of which: enabling	Of which: specialised lending	Of which: adaptation	Of which: enabling				
(in millions)											
Other assets excluded from both the numerator and denominator for GAR calculation											
46 Sovereigns	32,513										
47 Central banks exposure	54,752										
48 Trading book	2,961										
49 TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR	90,226										
50 TOTAL ASSETS	423,828										

1. As there is no line item in the P3 template for exposures towards non-NFRD financial corporations, these exposures are included in the line item 'other assets'. The necessity for this is to reconcile with the EU Taxonomy where non-NFRD financial corporations are included in the disclosures as a separate line item. In order to reconcile with the EU Taxonomy disclosures, in the total 'Other financial corporations', exposures to financial corporations that are defined as such under the FINREP but are non-financial under EU Taxonomy, are taking into account. This additional category was created in the EU Taxonomy template to remain aligned with the finrep definition of a financial corporation while simultaneously remain in compliance with the EUT.

2. For household-related activities, the approach taken uses Climate Change Mitigation (CCM) eligibility as the primary measure of total eligibility. CCM encompasses the full scope of eligibility related to households, effectively capturing activities that are also eligible under Climate Change Adaptation (CCA) and Circular Economy (CE). This approach ensures a more precise depiction of eligibility and avoids double counting.

3. The household product loans collateralised by rip and renovation loans have been included in this year's assessment for Climate Change Adaptation, these were previously not in scope for this environmental objective. This change aligns with the recent update to the EU Taxonomy regulation, which has expanded the scope of these household products to include not only Climate Change Mitigation (CCM) but also Climate Change Adaptation (CCA).

	L	M	N	O	P
	30 June 2025				
	Disclosure reference date T				
	TOTAL (CCM + CCA)				
	Of which: towards taxonomy relevant sectors (Taxonomy-eligible)				
	Of which: environmentally sustainable (Taxonomy-aligned)				
			Of which: specialised lending	Of which: transitional/ adaptation	Of which: enabling
(in millions)					
GAR - Covered assets in both numerator and denominator					
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	167,691	38,294	37,529	26	106
2 Financial corporations	5,095	532	18	24	73
3 Credit institutions	3,570	319	18	22	20
4 <i>Loans and advances</i>	<i>2,343</i>	<i>180</i>		<i>19</i>	<i>12</i>
5 <i>Debt securities, including UoP</i>	<i>1,227</i>	<i>139</i>	<i>18</i>	<i>3</i>	<i>8</i>
6 <i>Equity instruments</i>					
7 Other financial corporations	1,526	214		2	53
8 <i>Of which: investment firms</i>					
9 <i>- of which Loans and advances</i>					
10 Debt securities, including UoP					
11 Equity instruments					
12 <i>- of which management companies</i>					
13 Loans and advances					
14 Debt securities, including UoP					
15 Equity instruments					
16 <i>- of which insurance undertakings</i>	<i>701</i>	<i>92</i>		<i>2</i>	<i>5</i>
17 Loans and advances	701	92		2	5
18 Debt securities, including UoP					
19 Equity instruments					
20 Non-financial corporations (subject to NFRD disclosure obligations)	656	250		2	34
21 Loans and advances	656	250		2	34
22 Debt securities, including UoP					
23 Equity instruments					
24 Households	161,936	37,511	37,511		
25 <i>- of which loans collateralised by residential immovable property</i>	<i>161,061</i>	<i>37,511</i>	<i>37,511</i>		
26 <i>- of which building renovation loans</i>	<i>569</i>				
27 <i>- of which motor vehicle loans</i>	<i>306</i>				
28 Local governments financing					
29 Housing financing					
30 Other local governments financing					
31 Collateral obtained by taking possession: residential and commercial immovable properties	3				
32 TOTAL GAR ASSETS	167,691	38,294	37,529	26	106
Assets excluded from the numerator for GAR calculation (covered in the denominator)					
33 EU Non-financial corporations (not subject to NFRD disclosure obligations)					
34 Loans and advances					
35 Debt securities					
36 Equity instruments					
37 Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)					

	L	M	N	O	P
	30 June 2025				
	Disclosure reference date T				
	TOTAL (CCM + CCA)				
	Of which: towards taxonomy relevant sectors (Taxonomy-eligible)				
	Of which: environmentally sustainable (Taxonomy-aligned)				
(in millions)			Of which: specialised lending	Of which: transitional/ adaptation	Of which: enabling
38 Loans and advances					
39 Debt securities					
40 Equity instruments					
41 Derivatives					
42 On demand interbank loans					
43 Cash and cash-related assets					
44 Other assets (e.g. Goodwill, commodities etc.)					
45 TOTAL ASSETS IN THE DENOMINATOR (GAR)					
Other assets excluded from both the numerator and denominator for GAR calculation					
46 Sovereigns					
47 Central banks exposure					
48 Trading book					
49 TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR					
50 TOTAL ASSETS					

- As there is no line item in the P3 template for exposures towards non-NFRD financial corporations, these exposures are included in the line item 'other assets'. The necessity for this is to reconcile with the EU Taxonomy where non-NFRD financial corporations are included in the disclosures as a separate line item. In order to reconcile with the EU Taxonomy disclosures, in the total 'Other financial corporations', exposures to financial corporations that are defined as such under the FINREP but are non-financial under EU Taxonomy, are taken into account. This additional category was created in the EU Taxonomy template to remain aligned with the finrep definition of a financial corporation while simultaneously remain in compliance with the EUT.
- For household-related activities, the approach taken uses Climate Change Mitigation (CCM) eligibility as the primary measure of total eligibility. CCM encompasses the full scope of eligibility related to households, effectively capturing activities that are also eligible under Climate Change Adaptation (CCA) and Circular Economy (CE). This approach ensures a more precise depiction of eligibility and avoids double counting.
- The household product loans collateralised by rip and renovation loans have been included in this year's assessment for Climate Change Adaptation, these were previously not in scope for this environmental objective. This change aligns with the recent update to the EU Taxonomy regulation, which has expanded the scope of these household products to include not only Climate Change Mitigation (CCM) but also Climate Change Adaptation (CCA).

ESG8 – GAR (%)

	A	B	C	D	E	F	G	H	I	J
	30 June 2025									
	KPIs on stock									
	Climate Change Mitigation (CCM)					Climate Change Adaptation (CCA)				
	Proportion of eligible assets funding taxonomy relevant sectors					Proportion of eligible assets funding taxonomy relevant sectors				
	Of which: environmentally sustainable					Of which: environmentally sustainable				
% (compared to total covered assets in the denominator)			Of which: specialised lending	Of which: transitional	Of which: enabling			Of which: specialised lending	Of which: adaptation	Of which: enabling
1 GAR	50%	11%	11%			48%				
2 Loans and advances, debt securities and equity instruments not HFT eligible for GAR calculation	88%	20%	20%			84%				
3 Financial corporations	20%	2%								
4 Credit institutions	24%	2%								
5 Other financial corporations	15%	2%			1%					
6 - of which investment firms	1%									
7 - of which management companies	1%									
8 - of which insurance undertakings	29%	4%								
9 Non-financial corporations subject to NFRD disclosure obligations	15%	6%			1%					
10 Households	100%	23%	23%			100%				
11 - of which loans collateralised by residential immovable property	100%	23%	23%			100%				
12 - of which building renovation loans	100%					100%				
13 - of which motor vehicle loans	100%									
14 Local government financing										
15 Housing financing										
16 Other local governments financing										
17 Collateral obtained by taking possession: residential and commercial immovable properties	100%									

1. As there is no line item in the P3 template for exposures towards non-NFRD financial corporations, these exposures are included in the line item 'other assets'. The necessity for this is to reconcile with the EU Taxonomy where non-NFRD financial corporations are included in the disclosures as a separate line item. In order to reconcile with the EU Taxonomy disclosures, in the total 'Other financial corporations', exposures to financial corporations that are defined as such under the FINREP but are non-financial under EU Taxonomy, are taken into account. This additional category was created in the EU Taxonomy template to remain aligned with the finrep definition of a financial corporation while simultaneously remain in compliance with the EUT.

2. For household-related activities, the approach taken uses Climate Change Mitigation (CCM) eligibility as the primary measure of total eligibility. CCM encompasses the full scope of eligibility related to households, effectively capturing activities that are also eligible under Climate Change Adaptation (CCA) and Circular Economy (CE). This approach ensures a more precise depiction of eligibility and avoids double counting.

3. The household product loans collateralised by rip and renovation loans have been included in this year's assessment for Climate Change Adaptation, these were previously not in scope for this environmental objective. This change aligns with the recent update to the EU Taxonomy regulation, which has expanded the scope of these household products to include not only Climate Change Mitigation (CCM) but also Climate Change Adaptation (CCA).

	K	L	M	N	O	P	Q	R	S	T	U
	30 June 2025										
	KPIs on stock										KPIs on flows
	TOTAL (CCM + CCA)					Climate Change Mitigation (CCM)					
	Proportion of eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					
	Of which: environmentally sustainable					Of which: environmentally sustainable					
% (compared to total covered assets in the denominator)	Of which: specialised lending	Of which: transitional/adaptation	Of which: enabling	Proportion of total assets covered	Of which: specialised lending	Of which: transitional	Of which: enabling				
1 GAR	50%	11%	11%		79%	99%	24%	23%			
2 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	88%	20%	20%		45%	99%	24%	23%			
3 Financial corporations	20%	2%			6%	100%	17%				5%
4 Credit institutions	24%	2%			4%	100%	9%			1%	
5 Other financial corporations	15%	2%		1%	2%	100%	19%				7%
6 - of which investment firms	1%										
7 - of which management companies	1%										
8 - of which insurance undertakings	29%	4%			1%	99%	24%				
9 Non-financial corporations subject to NFRD disclosure obligations	15%	6%		1%	1%	68%	12%				1%
10 Households	100%	23%	23%		38%	100%	25%	25%			
11 - of which loans collateralised by residential immovable property	100%	23%	23%		38%	100%	26%	26%			
12 - of which building renovation loans	100%					100%					
13 - of which motor vehicle loans	100%					100%					
14 Local government financing											
15 Housing financing											
16 Other local governments financing											
17 Collateral obtained by taking possession: residential and commercial immovable properties	100%										

1. As there is no line item in the P3 template for exposures towards non-NFRD financial corporations, these exposures are included in the line item 'other assets'. The necessity for this is to reconcile with the EU Taxonomy where non-NFRD financial corporations are included in the disclosures as a separate line item. In order to reconcile with the EU Taxonomy disclosures, in the total 'Other financial corporations', exposures to financial corporations that are defined as such under the FINREP but are non-financial under EU Taxonomy, are taken into account. This additional category was created in the EU Taxonomy template to remain aligned with the finrep definition of a financial corporation while simultaneously remain in compliance with the EUT.

2. For household-related activities, the approach taken uses Climate Change Mitigation (CCM) eligibility as the primary measure of total eligibility. CCM encompasses the full scope of eligibility related to households, effectively capturing activities that are also eligible under Climate Change Adaptation (CCA) and Circular Economy (CE). This approach ensures a more precise depiction of eligibility and avoids double counting.

3. The household product loans collateralised by rip and renovation loans have been included in this year's assessment for Climate Change Adaptation, these were previously not in scope for this environmental objective. This change aligns with the recent update to the EU Taxonomy regulation, which has expanded the scope of these household products to include not only Climate Change Mitigation (CCM) but also Climate Change Adaptation (CCA).

	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF
	30 June 2025										
	Disclosure reference date T: KPIs on flows										
	Climate Change Adaptation (CCA)						TOTAL (CCM + CCA)				
	Proportion of new eligible assets funding taxonomy relevant sectors					Proportion of new eligible assets funding taxonomy relevant sectors					
	Of which: environmentally sustainable					Of which: environmentally sustainable					Proportion of total new assets covered
% (compared to total covered assets in the denominator)			Of which: specialised lending	Of which: adaptation	Of which: enabling		Of which: specialised lending	Of which: transitional/adaptation	Of which: enabling		
1 GAR	92%					99%	24%	23%			
2 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	92%					99%	24%	23%			100%
3 Financial corporations						100%	17%			5%	3%
4 Credit institutions						100%	9%		1%		1%
5 Other financial corporations						100%	19%			7%	2%
6 - of which investment firms											
7 - of which management companies											
8 - of which insurance undertakings	1%	1%		1%		100%	24%				
9 Non-financial corporations subject to NFRD disclosure obligations						68%	12%			1%	3%
10 Households	99%					100%	25%	25%			93%
11 - of which loans collateralised by residential immovable property	100%					100%	26%	26%			91%
12 - of which building renovation loans	100%					100%					1%
13 - of which motor vehicle loans						100%					1%
14 Local government financing											
15 Housing financing											
16 Other local governments financing											
17 Collateral obtained by taking possession: residential and commercial immovable properties											

1. As there is no line item in the P3 template for exposures towards non-NFRD financial corporations, these exposures are included in the line item 'other assets'. The necessity for this is to reconcile with the EU Taxonomy where non-NFRD financial corporations are included in the disclosures as a separate line item. In order to reconcile with the EU Taxonomy disclosures, in the total 'Other financial corporations', exposures to financial corporations that are defined as such under the FINREP but are non-financial under EU Taxonomy, are taken into account. This additional category was created in the EU Taxonomy template to remain aligned with the finrep definition of a financial corporation while simultaneously remain in compliance with the EUT.

2. For household-related activities, the approach taken uses Climate Change Mitigation (CCM) eligibility as the primary measure of total eligibility. CCM encompasses the full scope of eligibility related to households, effectively capturing activities that are also eligible under Climate Change Adaptation (CCA) and Circular Economy (CE). This approach ensures a more precise depiction of eligibility and avoids double counting.

3. The household product loans collateralised by rip and renovation loans have been included in this year's assessment for Climate Change Adaptation, these were previously not in scope for this environmental objective. This change aligns with the recent update to the EU Taxonomy regulation, which has expanded the scope of these household products to include not only Climate Change Mitigation (CCM) but also Climate Change Adaptation (CCA).

ESG10 – Other climate change mitigating actions not covered in the EU Taxonomy

This template includes other climate change mitigating actions that are not aligned with the strict criteria of the EU Taxonomy, but nevertheless support counterparties in mitigating climate change related risks.

As a reference, we used the loans that we internally label as ‘acceleration’ based on our Sustainability Acceleration Standard (SAS). Our SAS definition is based on current market practice for loans and investments, and is aligned with the definitions set in the EU SFDR regulation for client assets. The criteria in the SAS not only relate to climate change, but can also relate to other environmental objectives or social objectives. As this template only focuses on climate, we have made a sub-selection of our SAS-aligned loans that specifically relate to climate change, based on sub-categories in the standard. An example would be an Acceleration Finance Loan used for Clean transportation or Sustainable Real Estate.

The exposures reported at 30 June 2025 increased compared to 31 December 2024, mainly as a result of inflow stemming from new mortgage production (households loans).

Moreover, we note that there is a limited part of our exposures that is aligned with the EU Taxonomy. This is mainly due to the limited scope and strict requirements of the EU Taxonomy as a result of, among others, the Technical Screening Criteria and the NFRD scope. Therefore, the majority of exposures continue to be reported in this Pillar 3 template.

	C	D	E	F
				30 June 2025
(in millions)	Gross carrying amount	Type of risk mitigated (Climate change transition risk)	Type of risk mitigated (Climate change physical risk)	Qualitative information on the nature of the mitigating actions
Bonds¹				
1 Financial corporations	1,241	Yes	Yes	This includes Green Bonds from European banks, mainly contributing to mitigating climate change transition risk. The green bond frameworks that were assessed included multiple categories for use of proceeds of these bonds, including climate change mitigation and adaptation.
2 Non-financial corporations				
3 <i>Of which Loans collateralised by commercial immovable property</i>				
4 Households				
5 <i>Of which Loans collateralised by residential immovable property</i>				
6 <i>Of which building renovation loans</i>				
7 Other counterparties	1,534	Yes	Yes	This includes sovereign and government guaranteed Green Bonds from the (regional) governments of Austria, Germany, Finland, France, Ireland, Luxembourg, Netherlands, Philippines, Sweden and the European Union.
Loans¹				
8 Financial corporations	1,642	Yes	No	The majority of these loans relate to loans that ABN AMRO Bank have classified as sustainable and with a loan purpose of climate change mitigation, based on a sub-set of criteria within our internal Sustainability Acceleration Standard which is an internal KPI of the bank.
9 Non-financial corporations	14,623	Yes	No	The majority of these loans relate to loans that ABN AMRO Bank have classified as sustainable and with a loan purpose of climate change mitigation, based on a sub-set of criteria within our internal Sustainability Acceleration Standard which is an internal KPI of the bank.
10 <i>Of which Loans collateralised by commercial immovable property</i>	5,553	Yes	No	<i>The majority of these loans relate to loans that ABN AMRO Bank have classified as sustainable and with a loan purpose of climate change mitigation, based on a sub-set of criteria within our internal Sustainability Acceleration Standard which is an internal KPI of the bank.</i>
11 Households	17,533	Yes	No	The majority of these loans relate to loans that ABN AMRO Bank have classified as sustainable and with a loan purpose of climate change mitigation, based on a sub-set of criteria within our internal Sustainability Acceleration Standard which is an internal KPI of the bank.
12 <i>Of which Loans collateralised by residential immovable property</i>	16,274	Yes	No	<i>The majority of these loans relate to loans that ABN AMRO Bank have classified as sustainable and with a loan purpose of climate change mitigation, based on a sub-set of criteria within our internal Sustainability Acceleration Standard which is an internal KPI of the bank.</i>
13 <i>Of which building renovation loans</i>				
14 Other counterparties				

1. (e.g. green, sustainable, sustainability-linked under standards other than the EU standards)

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ABN AMRO has included in this document, and from time to time may make certain statements in its public statements, that may constitute “forward-looking statements”. This includes, without limitation, statements that include the words “expect”, “estimate”, “project”, “anticipate”, “should”, “intend”, “plan”, “probability”, “risk”, “Value-at-Risk (“VaR”)", “target”, “goal”, “objective”, “will”, “endeavour”, “outlook”, “optimistic”, “prospects” and similar expressions or variations of such expressions. In particular, the document may include forward-looking statements relating but not limited to ABN AMRO's potential exposures to various types of operational, credit and market risk. Such statements are subject to uncertainties.

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