

ABN AMRO Bank N.V.

Pillar 3 Report 2024

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1. Pillar 3 intro

About this report

Welcome to ABN AMRO's 2024 Pillar 3 Report.

The purpose of this report is to provide information about ABN AMRO's regulatory capital adequacy, risk exposure, risk management, remuneration and ESG exposures and risks.

Our annual reporting suite

Every year we publish our annual reporting suite, combining relevant annual disclosures on our performance during the year and other topics. Our Integrated Annual Report is our primary statutory and regulatory reporting disclosure. In addition, we publish other reports, including the bank's Impact Report and Pillar 3 Report.

Although published as part of our annual reporting suite, all reports (including this Pillar 3 Report) have their own individual purpose and should be read as separate reports. Content in this report may draw on the Integrated Annual Report, but should not be seen as a substitute for it.

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 2024 includes all the required disclosures, which have been prepared in accordance with the regulations mentioned above.

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. In this report, the terms 'risk-weighted assets (RWA)' and 'risk-weighted exposure amount (RWEA)' are used interchangeably. Similarly, this report may use the terms 'banking book' and 'non-trading book' interchangeably.

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.

In accordance with Article 432 of the CRR, ABN AMRO will 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 are therefore not included in this report:

- **EU INS1 – Insurance participations and EU INS2 – Financial conglomerates information on own funds and capital adequacy ratio** are not applicable as we do not apply the option provided for in CRR Article 49.1 of not deducting investments in insurance subsidiaries from regulatory capital. Instead, we record investments in insurance subsidiaries under significant investments in accordance with CRR Article 48.
- This ITS applies a 5% NPE ratio threshold at consolidated level. ABN AMRO is below this 5% threshold and all or parts of tables for **EU CR2a, EU CQ2, EU CQ6 and EU CQ8** are therefore 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's credit derivatives are not used for RWEA reduction via credit risk mitigation. ABN AMRO does use credit derivatives to hedge CVA risk.
- **EU CR9.1 – IRB approach – Back-testing of PD per exposure class (only for PD estimates according to point (f) of Article 180(1) CRR)** is not applicable as we do not apply Article 180(1)(f).
- **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.
- **EU CCR7 – RWEA flow statements of CCR exposures under the IMM:** ABN AMRO does not use the Internal Model Method (IMM) methodology for measuring 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:** As at 31 December 2024, there are no securitisation positions of which ABN AMRO is the originator or sponsor.
- **EU SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments:** As ABN AMRO does not have the role of originator or sponsor in any of the securitisation transactions, there are no 'exposures securitised by the institution'.

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. ABN AMRO discloses comparative figures for comparability and analytical purposes, if available. As a result, narratives of new or adjusted templates might not provide explanations at a detailed level.

Regulation implemented

As from 31 December 2022, ABN AMRO has disclosed information on environmental, social and governance (ESG) risks, including physical risks and transition risks. Additional ESG disclosure requirements became effective from Q4 2023 Pillar 3 reporting onwards. In March 2021, EBA published a Consultation Paper, followed by the final ITS on ESG disclosures on 24 January 2022. The ITS supports comparable disclosures that show how climate change may exacerbate other risks within banks' balance sheets, how banks are mitigating those risks and banks' exposures to sustainable activities. The framework allows investors and stakeholders to compare sustainability performances of banks. The ITS entered into force in June 2022. ABN AMRO's first disclosure was included in the 2022 Pillar 3 Report. From then onwards, disclosure is made biannually. The qualitative disclosures (tables 1, 2 and 3) and templates 1, 2, 4, 5 and 10 were applicable from 31 December 2022, whereas templates 6, 7 and 8 are effective from 31 December 2023, template 3 from 30 June 2024 and template 9 (voluntarily) from 31 December 2024.

Future changes

The amending Regulation (EU) 2024/1623 ('CRR 3') introduces new and amended disclosure requirements stemming from the latest Basel III Pillar 3 reforms, and a mandate for the EBA to develop IT solutions, including templates and instructions, for the disclosure requirements laid down in the banking regulation. The new ITS implement the CRR 3 prudential disclosures by including new requirements on output floor, credit risk, market risk, CVA risk and operational risk. These changes will be reflected in the Pillar 3 report as from Q1 2025.

Key metrics and overview of RWEA

Highlights

- The CET1 ratio under Basel III increased to 14.5% (30 September 2024: 13.8%, excluding interim profits), mainly due to the inclusion of the interim profits for the third and fourth quarters after deduction of AT1 coupons, which were added to CET1 capital excluding a 50% dividend reservation, and the decrease in Total Risk Exposure Amount (TREA).
- Total risk exposure amount (TREA) decreased to EUR 140.9 billion (30 September 2024: EUR 143.8 billion), predominantly reflecting lower credit risk RWEA in Corporate Banking, which was mainly driven by business developments and partly by data quality improvements.
- The leverage ratio increased to 5.7% as at 31 December 2024 (30 September 2024: 5.4%, excluding interim profits). This was primarily due to the decrease in on-balance sheet exposures and an increase in Tier 1 capital.
- The bank's consolidated LCR was 138% as at 31 December 2024, based on a 12-month rolling average. This is in line with the previous quarter (30 September 2024: 139%).
- The NSFR increased to 137% (30 September 2024: 134%), mainly due to the increase in available stable funding from retail deposits.

EU KM1 - Key metrics template

As at 31 December 2024, the CET1 ratio under Basel III was 14.5% (30 September 2024: 13.8%, excluding interim profits). In comparison with Q3 2024, the CET1 ratio increased, mainly due to the inclusion of the interim profits for the third and the fourth quarters and the decrease in Total Risk Exposure Amount (TREA). This quarter, the amount of CET1 capital increased to EUR 20.4 billion (30 September 2024: EUR 19.9 billion, excluding interim profits). This mainly reflects the addition of the interim net profits for the third and fourth quarters after deduction of AT1 coupons, which were added to CET1 capital excluding a 50% dividend reservation. The increase was partly offset by unrealised losses on investments in debt securities due to market movements and by slightly higher capital deductions. TREA decreased by EUR 3.0 billion compared with 30 September 2024, mainly reflecting a decrease in credit risk RWEA. The decrease in credit risk RWEA was mainly driven by Corporate Banking, reflecting data quality improvements and seasonal effects as well as business steering. Furthermore, portfolio transactions contributed to the decrease in TREA in Wealth Management and Corporate Banking in the fourth quarter. All capital ratios were in line with the bank's risk appetite and comfortably above regulatory requirements.

	A	B	C	D	E
(in millions)	31 December 2024	30 September 2024	30 June 2024	31 March 2024	31 December 2023
Available own funds (amounts)					
1 Common Equity Tier 1 (CET1) capital	20,357	19,915	20,206	19,952	20,003
2 Tier 1 capital	23,831	23,389	22,934	22,680	21,985
3 Total capital	28,477	28,033	27,011	26,856	26,264
Risk-weighted exposure amounts (RWEA)					
4 Total risk exposure amount	140,871	143,822	146,348	144,174	140,187
Capital ratios (as % of RWEA)					
5 Common Equity Tier 1 ratio (%)	14.5%	13.8%	13.8%	13.8%	14.3%
6 Tier 1 ratio (%)	16.9%	16.3%	15.7%	15.7%	15.7%
7 Total capital ratio (%)	20.2%	19.5%	18.5%	18.6%	18.7%
Additional own funds requirements to address risks other than the risk of excessive leverage (as % of RWEA)					
EU 7a Additional own funds requirements to address risks other than the risk of excessive leverage (%)	2.25%	2.25%	2.25%	2.25%	2.00%
EU 7b - of which to be made up of CET1 capital (percentage points)	1.27%	1.27%	1.27%	1.27%	1.13%
EU 7c - of which to be made up of Tier 1 capital (percentage points)	1.69%	1.69%	1.69%	1.69%	1.50%
EU 7d Total SREP own funds requirements (%)	10.25%	10.25%	10.25%	10.25%	10.00%
Combined buffer 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 (%)	1.73%	1.73%	1.72%	0.98%	0.95%
EU 9a Systemic risk buffer (%)					
10 Global Systemically Important Institution buffer (%)					
EU 10a Other Systemically Important Institution buffer	1.25%	1.25%	1.25%	1.50%	1.50%
11 Combined buffer requirement (%)	5.48%	5.48%	5.47%	4.98%	4.95%
EU 11a Overall capital requirements (%)	15.73%	15.73%	15.72%	15.23%	14.95%
12 CET1 available after meeting the total SREP own funds requirements (%)	8.68%	8.11%	7.98%	8.04%	8.18%
Leverage ratio					
13 Total exposure measure	420,932	436,327	430,460	435,207	412,957
14 Leverage ratio (%)	5.7%	5.4%	5.3%	5.2%	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 requirements (%)	3.0%	3.0%	3.0%	3.0%	3.0%
Liquidity Coverage Ratio					
15 Total high-quality liquid assets (HQLA) (Weighted value-average)	88,486	90,110	91,777	95,026	97,015
EU 16a Cash outflows - Total weighted value	95,525	95,482	95,783	96,104	96,333
EU 16b Cash inflows - Total weighted value	31,510	30,805	30,225	29,823	29,122
16 Total net cash outflows (adjusted value)	64,015	64,677	65,558	66,281	67,211
17 Liquidity coverage ratio (%)	138%	139%	140%	144%	144%
Net Stable Funding Ratio					
18 Total available stable funding	264,223	262,125	263,367	262,226	263,379
19 Total required stable funding	193,534	195,423	192,580	191,710	188,458
20 NSFR ratio (%)	137%	134%	137%	137%	140%

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

	A	B	C	D	E	F	G
	Minimum requirement for own funds and eligible liabilities (MREL)		G-SII Requirement for own funds and eligible liabilities (TLAC)				
(in millions)	31 December 2024	30 June 2024	31 December 2024	30 September 2024	30 June 2024	31 March 2024	31 December 2023
Own funds and eligible liabilities, ratios and components							
1 Own funds and eligible liabilities	48,126	46,474					
EU-1a Of which own funds and subordinated liabilities	46,819	44,983					
2 Total risk exposure amount of the resolution group (TREA)	140,871	146,348					
3 Own funds and eligible liabilities as a percentage of TREA (row1/row2)	34.2%	31.8%					
EU-3a Of which own funds and subordinated liabilities	33.2%	30.7%					
4 Total exposure measure of the resolution group	420,932	430,460					
5 Own funds and eligible liabilities as percentage of the total exposure measure	11.4%	10.8%					
EU-5a Of which own funds or subordinated liabilities	11.1%	10.4%					
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%	23.3%					
EU-8 Of which to be met with own funds or subordinated liabilities	16.7%	19.8%					
EU-9 MREL requirement expressed as percentage of the total exposure measure	7.3%	7.4%					
EU-10 Of which to be met with own funds or subordinated liabilities	7.3%	7.4%					

EU TLAC1 – Composition - MREL and, where applicable, G-SII requirement for own funds and eligible liabilities

	A	B	C
			31 December 2024
(in millions)	Minimum requirement for own funds and eligible liabilities (MREL)	G-SII requirement for own funds and eligible liabilities (TLAC)	Memo item: Amounts eligible for the purposes of MREL, but not of TLAC
Own funds and eligible liabilities and adjustments			
1 Common Equity Tier 1 capital (CET1)	20,357		
2 Additional Tier 1 capital (AT1)	3,474		
6 Tier 2 capital (T2)	4,646		
11 Own funds for the purpose of Articles 92a of Regulation (EU) No 575/2013 and 45 of Directive 2014/59/EU	28,477		
Own funds and eligible liabilities: Non-regulatory capital elements			
12 Eligible liabilities instruments issued directly by the resolution entity that are subordinated to excluded liabilities (not grandfathered)	17,631		
EU-12a Eligible liabilities instruments issued by other entities within the resolution group that are subordinated to excluded liabilities (not grandfathered)			
EU-12b Eligible liabilities instruments that are subordinated to excluded liabilities issued prior to 27 June 2019 (subordinated grandfathered)			
EU-12c Tier 2 instruments with a residual maturity of at least one year to the extent they do not qualify as Tier 2 items	711		
13 Eligible liabilities that are not subordinated to excluded liabilities (not grandfathered pre-cap)	1,307		
EU-13a Eligible liabilities that are not subordinated to excluded liabilities issued prior to 27 June 2019 (pre-cap)			
14 Amount of non subordinated eligible liabilities instruments, where applicable after application of Article 72b (3) CRR			
17 Eligible liabilities items before adjustments	19,604		
EU-17a Of which subordinated liabilities items	18,297		
Own funds and eligible liabilities: Adjustments to non-regulatory capital elements			
18 Own funds and eligible liabilities items before adjustments	48,081		
19 (Deduction of exposures between multiple point of entry (MPE) resolution groups)			
20 (Deduction of investments in other eligible liabilities instruments)	-45		
22 Own funds and eligible liabilities after adjustments	48,126		
EU-22a Of which: own funds and subordinated liabilities	46,819		
Risk-weighted exposure amount and leverage exposure measure of the resolution group			
23 Total risk exposure amount (TREA)	140,871		
24 Total exposure measure (TEM)	420,932		
Ratio of own funds and eligible liabilities			
25 Own funds and eligible liabilities as a percentage of TREA	34.2%		
EU-25a Of which own funds and subordinated liabilities	33.2%		
26 Own funds and eligible liabilities as a percentage of TEM	11.4%		
EU-26a Of which own funds and subordinated liabilities	11.1%		
27 CET1 (as a percentage of the TREA) available after meeting the resolution group's requirements	8.7%		
28 Institution-specific combined buffer requirement			
29 of which capital conservation buffer requirement			
30 of which countercyclical buffer requirement			
31 of which systemic risk buffer requirement			
EU-31a of which Global Systemically Important Institution (G-SII) or Other Systemically Important Institution (O-SII) buffer			
Memorandum items			
EU-32 Total amount of excluded liabilities referred to in Article 72a(2) of Regulation (EU) No 575/2013			

EU TLAC3B – Creditor ranking - resolution entity (ABN AMRO Bank N.V.)

31 December 2024						
Insolvency ranking						
	1	2	3	4	5	6
(in millions)	(most junior)					
1 Description of insolvency rank (free text)	Common equity Tier 1 instruments	Additional Tier 1 instruments	Tier 2 capital instruments	No longer qualifying AT1 or T2 unless other contractual ranking	Other subordinated debt	Senior non-preferred "Tier 3" debt instruments
5 Own funds and liabilities potentially eligible for meeting MREL	20,987	3,474	4,681	1,696		16,304
6 of which residual maturity ≥ 1 year < 2 years			414	1,696		1,400
7 of which residual maturity ≥ 2 year < 5 years						7,812
8 of which residual maturity ≥ 5 years < 10 years			2,562			5,981
9 of which residual maturity ≥ 10 years, but excluding perpetual securities			1,705			1,112
10 of which perpetual securities	20,987	3,474				

31 December 2024							
Insolvency ranking							
	7	8	9	10	11	12	
(in millions)	(most senior)						Sum of 1 to 12
1 Description of insolvency rank (free text)	Other liabilities	Preferred deposits retail + SME	Covered deposits - Claims of a DGS following its subrogation in the rights and obligations of covered depositors	Employee liabilities that have a preferential status by law.	Dutch Tax and social security authority. Claims that have a preferential status by law.	Secured creditors (collateralised part)	
5 Own funds and liabilities potentially eligible for meeting MREL	1,491						48,633
6 of which residual maturity ≥ 1 year < 2 years	962						4,472
7 of which residual maturity ≥ 2 year < 5 years	275						8,087
8 of which residual maturity ≥ 5 years < 10 years	173						8,716
9 of which residual maturity ≥ 10 years, but excluding perpetual securities	81						2,899
10 of which perpetual securities							24,460

EU OV1 – Overview of total risk exposure amounts

The total risk exposure amount (TREA) decreased by EUR 3.0 billion to EUR 140.9 billion as at 31 December 2024 (30 September 2024: EUR 143.8 billion), predominantly reflecting lower credit risk RWEA. Credit risk RWEA (Basel III) decreased to EUR 122.8 billion by year-end 2024, mainly driven by Corporate Banking, and partly due to data quality improvements. Business developments added to the decrease, partly due to seasonal effects and steering measures. Furthermore, portfolio transactions contributed to the decrease in Wealth Management and Corporate Banking in the fourth quarter.

Market risk RWEA remained flat over the fourth quarter of 2024.

	A	B	C	D	E	F
	31 December 2024		30 September 2024		31 December 2023	
(in millions)	TREA	Total own funds requirements	TREA	Total own funds requirements	TREA	Total own funds requirements
1 Credit risk (excluding CCR)	116,050	9,284	118,211	9,457	115,996	9,280
2 - of which the Standardised Approach	6,776	542	7,397	592	5,848	468
3 - of which the foundation IRB (F-IRB) approach ¹	29,548	2,364	31,016	2,481	10,848	868
4 - of which slotting approach						
EU 4a - of which equities under the simple risk-weighted approach	2,496	200	2,515	201	2,358	189
5 - of which the advanced IRB (A-IRB) approach	48,322	3,866	48,756	3,901	63,895	5,112
6 Counterparty Credit Risk (CCR)	6,357	509	7,157	573	6,494	519
7 - of which the Standardised Approach	2,878	230	3,343	267	3,027	242
8 - of which internal model method (IMM)						
EU 8a - of which exposures to a CCP	790	63	724	58	713	57
EU 8b - of which credit valuation adjustment (CVA)	122	10	101	8	261	21
9 - of which other CCR	2,566	205	2,990	239	2,492	199
15 Settlement risk						
16 Securitisation exposures in the non-trading book (after the cap)	371	30	361	29	277	22
17 - of which SEC-IRBA approach						
18 - of which SEC-ERBA (including IAA)	65	5	63	5	47	4
19 - of which SEC-SA approach	307	25	298	24	230	18
EU 19a - of which 1250%						
20 Position, foreign exchange and commodities risks (Market risk)	2,115	169	2,117	169	1,956	156
21 - of which Standardised Approach			2		2	
22 - of which IMA	2,115	169	2,115	169	1,954	156
EU 22a Large exposures						
23 Operational risk	15,977	1,278	15,977	1,278	15,465	1,237
EU 23a - of which basic indicator approach						
EU 23b - of which Standardised Approach	15,977	1,278	15,977	1,278	15,465	1,237
EU 23c - of which advanced measurement approach						
24 Amounts below the thresholds for deduction (subject to 250% risk weight) (For information)	1,143	91	1,417	113	1,304	104
29 Total	140,871	11,270	143,822	11,506	140,187	11,215

1. Following EBA's instructions for this template, the amount reported under F-IRB also includes Other non-credit obligation assets.

Following EBA's instructions for this template, the amount of which the advanced IRB approach is excluding Equity exposures subject to risk weights and CIU exposures subject to the fall-back approach.

EU OVC - ICAAP information

The bank assesses the adequacy of its capital on an ongoing basis. This is embedded in the Internal Capital Adequacy Assessment Process (ICAAP), which is an integral part of the bank's risk management.

The bank has a structured process in place to identify, assess and quantify risks that may have a material impact on its capital position. The potential impact of risks on the capital position is assessed and quantified using several techniques, including modelling, scenario analysis and stress testing.

Capital adequacy is assessed from both a regulatory (or 'normative') perspective and an internal economic perspective. Under the regulatory perspective, the bank endeavours to fulfil all regulatory and supervisory requirements (e.g. CET1 ratio, leverage ratio, MREL). The economic perspective is complementary to the regulatory perspective and aims to identify and quantify all material risks that may cause economic losses, based on Economic Capital (EC) modelling.

Capital is managed in such a way that it supports ABN AMRO's strategy and stays within the risk appetite. Risk appetite limits and checkpoints are set and monitored to ensure capital adequacy from a regulatory and an economic perspective (available capital versus required capital). The limits and checkpoints are evaluated and updated at least annually. Capital planning is applied to assess and manage the capital position over a medium-term horizon, based on strategic targets that are set above the risk appetite checkpoints and limits. Stress testing is performed in order to assess the bank's capital position under adverse conditions.

On an annual basis, the results of the ICAAP process are reflected in a Capital Adequacy Statement that, together with supporting documentation, is submitted to the ECB and assessed as part of the Supervisory Review and Evaluation Process (SREP).

Risk management objectives and policies

EU OVA – Institution risk management approach & EU OVB – Information on governance arrangements

Information requirements of EU OVA and EU OVB templates are merged in this section.

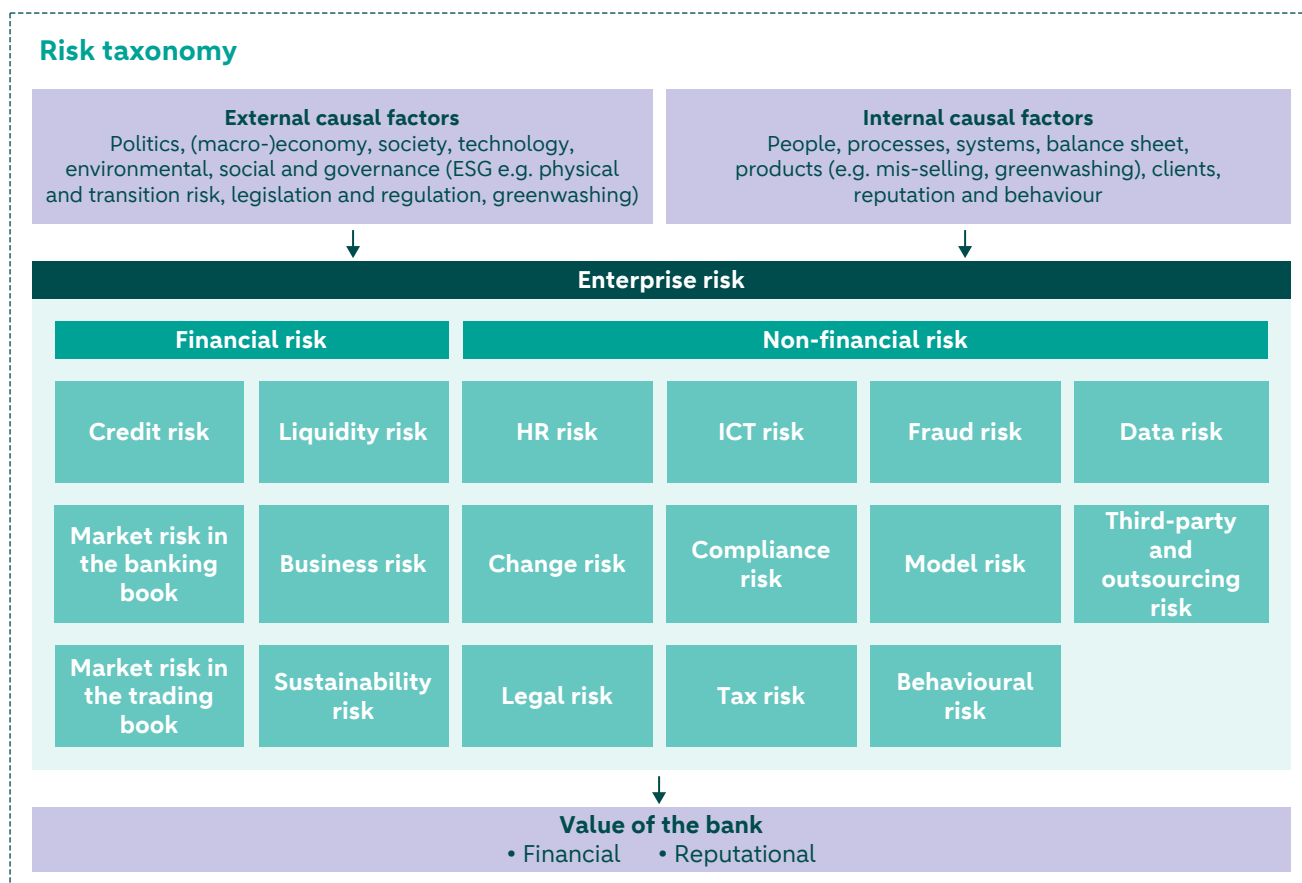
Risk management approach

ABN AMRO is committed to being a well-capitalised and sufficiently liquid bank that focuses on delivering sustainable value to all its stakeholders. This is defined by our strategic risk appetite statement and ensured by our risk management framework, which is further explained in this chapter.

Risk taxonomy

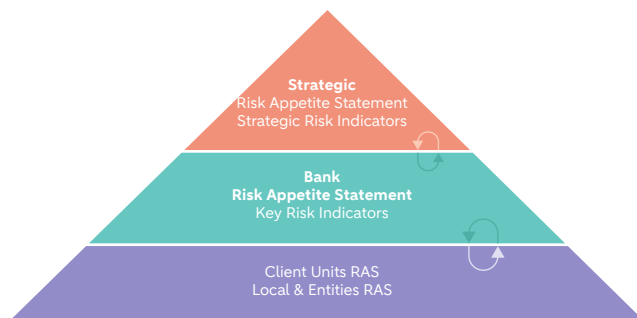
The ABN AMRO risk appetite follows from the ABN AMRO risk taxonomy, which ensures that all identified material risks are defined and incorporated into the risk governance framework. The visual below summarises these risks. The risk taxonomy is reviewed and updated on an annual basis, or sooner if any new material risk type emerges and requires an update.

The financial impact is assessed on the basis of capital and net profit. The key financial risk types related to our business model are credit risk, market risk in the banking book and liquidity risk. The non-financial impact is determined by the Net Promoter Score (NPS), sustainability (acceleration) asset volume and environmental and social footprint.



Risk appetite framework

Our risk appetite determines the level of risk that the bank is willing to take in order to pursue its strategy, in line with our strict risk focus. It is regularly evaluated and updated to ensure continuous alignment with our strategy.



The Strategic Risk Appetite Statement entails three focus areas, each of which is substantiated by a qualitative statement and concrete Strategic Risk Indicators (SRIs). The Strategic Risk Appetite Statement SRIs are further articulated in the bank-wide (bank RAS) and Key Risk Indicators (KRIs), which are cascaded to client unit level risk appetite statement (Client Unit RAS), local level (LRAS) and entity level (ERAS).

The risk indicator framework consists of quantitative and/or qualitative SRIs and KRIs. A limit and checkpoint is set for every SRI and KRI, against which the actual risk profile is monitored. Examples of SRIs and KRIs in our risk appetite include:

- regulatory and internal capital ratios
- risk-adjusted return measures
- concentration limits for single counterparties, sectors and countries
- economic capital and risk-weighted asset limits for various risk types
- regulatory and internal liquidity metrics
- market risk parameters (Supervisory Outlier Test on Net Interest Income and Supervisory Outlier Test on Economic Value of Equity)
- non-financial risk parameters (effectiveness of internal control environment)
- reputational risk parameter (NPS)
- a social risk indicator on facilitating financial inclusiveness
- several sustainability risk appetite indicators

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.



Risk profile

We manage our risk profile through our enterprise risk management framework, which identifies all types of risks and overarching risks, to provide a single, integrated view on the bank and its business lines. By taking an integrated view, we strive to carefully balance our actions to manage our moderate risk profile. The Enterprise Risk Management policy provides a formal approach to risk management at an enterprise level that is aligned with the bank's strategic objectives, including its risk profile.

The key financial risk types related to our business model are credit risk, market risk in the banking book and liquidity risk. Regarding material intra-group transactions, ABN AMRO provides liquidity and capital guarantees to its subsidiaries as a consequence of its centralised treasury approach. By means of a 403 statement, the bank is jointly and severally liable for all liabilities of its material subsidiaries, particularly ABN AMRO Clearing Bank N.V. and ABN AMRO Hypotheken Groep N.V.

Adequacy of risk management arrangements

ABN AMRO's internal risk management and control process is designed to provide reasonable assurance regarding the achievement of several categories of objectives, including strategic objectives. ABN AMRO's first and second lines of defence perform a variety of tests and controls on risk management and control systems. Group Audit, as the third line of defence, evaluates the design and effectiveness of ABN AMRO's governance, as well as its risk management and control systems.

In 2024, the evaluation of the adequacy of ABN AMRO's internal risk management and control systems was regularly discussed with the Audit Committee, the Risk & Capital Committee and the Supervisory Board. ABN AMRO continuously upgrades the effectiveness of its risk control framework. This includes executing interventions to foster strong risk awareness and practices via, for example, reflection dialogues with management teams on decision making and sound risk taking, and by elevating credit risk and non-financial risk management as well as upgrading data, IT and reporting.

The topics that have the bank's focused attention include enhancing internal processes and systems to contribute to the prevention of financial crime, safeguarding knowledge and capabilities to ensure consistent application of relevant regulations bank-wide, as well as ensuring transparent and sufficient client communications on our banking products, and continuous evaluation and updating of the model landscape.

Risk measurement

We develop and implement internal models to assess the various risk types in our risk taxonomy. These models support daily decision-making and periodic monitoring of the bank's portfolio and activities. They estimate the probability and effect of potential events, forming the basis for ABN AMRO's internal risk measures (Economic Capital) and regulatory capital calculations under the Basel framework (Regulatory Capital).

New models require approval before use. Such approval is granted by the Methodology Acceptance Group (MAG), a subgroup of the Group Risk Committee, following validation by independent model validators. External approval is sought from supervisors when necessary, especially for new Pillar 1 models or those undergoing significant changes.

Our modelling teams work closely with business and risk experts to develop models, which are validated at least every three years or more frequently for critical models. Annual monitoring involves back-testing, assessing changes impacting the model, and benchmarking with external data when relevant. Corrective actions, like redevelopment or recalibration, are taken if model performance declines or the portfolio's risk profile changes significantly.

The independent Model Validation & Model Risk Management department validates internal models according to the model risk management framework, which includes model validation standards and procedures. This ensures that models are validated in a consistent and independent manner. Model data, methodology, performance and implementation are checked according to these standards and reviewed against internal and regulatory requirements. Since September 2024, the Head of Model Validation & Model Risk Management reports directly to the Chief Risk Officer.

Capital

Regulatory capital (CRD V/CRR2)

Under the Basel framework as implemented in European legislation (CRD V and CRR2), banks are required to hold capital to cover their financial risks. As an intermediate step in determining the minimum level of capital, banks have to calculate their exposure to three major risk types (credit, operational and market risk). The outcome of the internal models serve as input for this calculation. The capital requirements are stated as a percentage of RWA. Under Pillar 1, banks are required to hold a regulatory fixed percentage of RWA in capital. Under Pillar 2, supervisors impose a bank-specific percentage of RWA in addition to the Pillar 1 requirement. As from 1 January 2025, CRR3 will be applicable, which will lead to an adjusted calculation of RWA.

Economic capital

For Pillar 2, we calculate the economic capital (EC) in addition to the amount of regulatory capital required. The economic capital covers all risk types in our risk taxonomy for which capital is deemed to be the instrument for mitigating unexpected losses, and is used as the key metric for internal risk measurement and management. It is the amount of capital we reserve in order to achieve a sufficient level of protection against large unexpected losses that could result from extreme market conditions or events.

Internal models are used to calculate EC at a 99.9% confidence level and a one-year time horizon. This implies that the estimated capital figure for the coming year is sufficient to cover a level of loss that will be exceeded in only 0.1% of all possible cases. The confidence level is aligned with the definition of core available financial resources (core AFR). Core AFR is the amount of capital that is available to cover losses on a continuity-based approach (i.e. excluding AT1, Tier 2 and senior non-preferred instruments).

EC is aggregated for all risk types (without applying inter-risk diversification) to determine the total EC at bank level and to support capital adequacy assessment, capital allocation, ex-post performance measurement and risk appetite setting, such as industry concentration risk limits.

EC quality assessment

The EC models described above form the core of the Internal Capital Adequacy Assessment Process (ICAAP). In order to monitor and secure the quality of the EC framework and its outcome in terms of capital adequacy, an EC Quality Assessment (ECQA) is performed quarterly as part of the ICAAP. For each main risk type, the calculated EC figure is evaluated in terms of risk coverage and responsiveness to internal and external developments, such as in the areas of regulation and data quality. If considered necessary, an additional capital buffer ('EC add-on') is taken to cover any identified shortfalls in the EC.

Capital performance

RWEA and EC are also used to evaluate capital performance at both a client unit level and a transactional level. For individual transactions, the risk/return is determined both ex-ante and ex-post to assess profitability of new and existing loans. Two metrics are used in assessing capital performance: the risk-adjusted return on equity (RAROE, based on RWEA) and the risk-adjusted return on risk-adjusted capital (RARORAC, based on EC). This ensures that both the normative (RWEA) and economic (EC, which is more risk-sensitive) views are considered.

Stress testing and scenario analysis

ABN AMRO uses stress testing and scenario analysis as an important risk management instrument. This entails looking at profitability, capital and liquidity from a bank-wide perspective in various scenarios on a regular basis. The stress testing framework covers both internal and external stress test types. In addition, sub-portfolio and risk type-specific stress testing and scenario analyses are performed.

Stress testing purposes

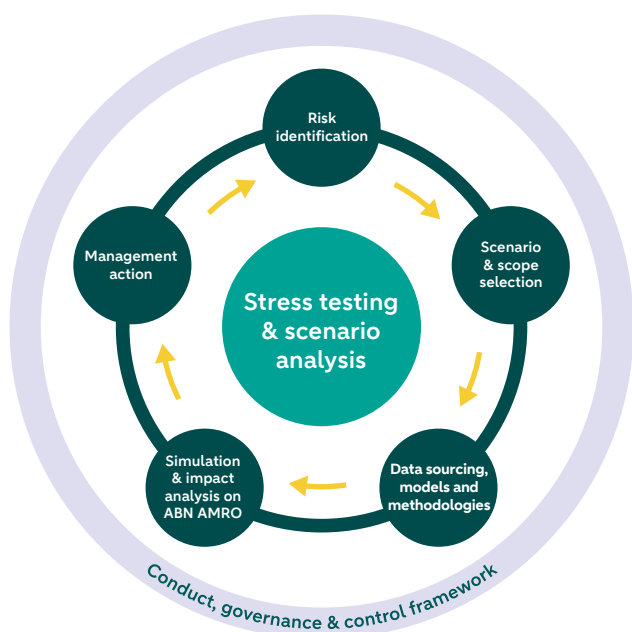
ABN AMRO applies stress testing for several purposes, including:

- Business planning: various macroeconomic scenarios for budget purposes.
- Capital planning: stress testing is used to gain insight into the resilience of our capital under adverse changes in the economic environment and ABN AMRO-specific circumstances.
- Risk appetite setting and monitoring: the outcome of stress testing is used for setting and monitoring risk appetite limits and targets, including limits under stress.

- Contingency planning: stress testing is used to assess and strengthen the triggers and measures in the liquidity and capital contingency and recovery plans. Reverse stress testing is performed to gain deeper insight into plausible events that could put the continuity of ABN AMRO under pressure.
- Risk type-specific and client unit stress testing, such as market risk trading and banking book and mortgage stress testing.
- Supervisory stress testing, based on prescribed scenarios and assumptions. This includes the stress test programme of the European Banking Authority (EBA), which is designed to assess banks' resilience to adverse economic or financial developments, and the ECB economy-wide climate stress test, which aims to evaluate the impact of alternative climate scenarios on the resilience of the bank.

The figure below shows the stress testing and scenario analysis cycle.

Stress test & scenario analysis cycle



Scenario projections for stress testing purposes are based on quantitative models as well as expert opinions. In general, the results are presented together with the mitigating actions, based on contingency plans, whenever they result in a breach of a pre-defined internal threshold. The stress testing framework also comprises the sensitivity scenarios that address the impact of various severe events on specific portfolios, countries and/or sectors, as well as the annual reverse stress test, in line with regulatory requirements. Climate-related and environmental risks are also incorporated into our bank-wide stress testing framework by including specific events related to physical risk and drivers of transition risk, such as carbon prices. For physical and transition risk definitions and more information on internal carbon pricing, please see the Risk and Environment sections respectively in the Sustainability Statements of the Integrated Annual Report 2024.

Risk governance

Effective risk management requires organisation-wide risk governance. Our risk and control structure is based on the 'three lines of defence' governance model, which has been designed to ensure risk is managed in line with the risk appetite approved by the Executive Board and Supervisory Board.

Supervisory Board and supervisory risk committees

Risk & Capital Committee

The Executive Board and Supervisory Board of ABN AMRO define the governance arrangements designed to ensure effective and prudent management of the bank, and oversee the implementation of these arrangements. The Boards are accountable for setting, approving and overseeing the implementation of the bank's risk management framework, including:

- an adequate and effective internal governance and control framework. This includes a clear organisational structure and effective independent internal control functions (Risk Management, Compliance and Group Audit) that have sufficient authority, stature and resources to perform their functions
- the three lines of defence model at all levels of the bank
- a risk culture that addresses risk awareness and risk-taking behaviour in the bank
- key policies of the bank within the applicable legal and regulatory framework
- the bank's overall strategy, risk strategy and risk appetite
- the amounts, types and distribution of internal capital and regulatory capital that are required to ensure that the bank's exposure to risks is adequately covered
- targets for the bank's liquidity and funding management

Executive Board and executive risk committees

The Risk Management organisation operates under the direct responsibility of the Chief Risk Officer, who is a member of the Executive Board.

Executive risk committees

The Executive Board is responsible for setting, monitoring, reviewing and realising the bank's mission, vision, strategy, risk appetite and risk framework, with a view to creating long-term value for the bank and ensuring that effective internal risk management and control systems are in place. In the risk decision-making framework, the Executive Board has set up three executive risk management committees: the Group Risk Committee and the Group Regulatory Committee, both chaired by the Chief Risk Officer, and the Group Central Credit Committee, chaired by the Head of Credit Risk. The mandates of the executive risk committees are summarised below.

Group Risk Committee

The Group Risk Committee (GRC) is mandated by the Executive Board to monitor, assess and manage the bank's risk profile within the approved risk appetite. The GRC monitors and approves all material risks as defined in the bank's risk taxonomy. The GRC has delegated specific approval powers to sub-committees, including Business Risk Committees for the bank's main client units, the Financial Crime Risk Committee, the Methodology Acceptance Group, the Scenario and Stress Testing Committee, and the Impairment and Provisioning Committee.

Group Central Credit Committee

The Group Central Credit Committee (CCC) is mandated by the Executive Board to make decisions on the acceptance of credit and counterparty risk in respect of individual persons, legal persons and public administrative bodies relating to credit proposals falling within the scope of the risk appetite and limits that have been set by the Executive Board. In addition, the CCC is responsible for approving and monitoring large intercompany credit facilities.

Group Regulatory Committee

The Group Regulatory Committee is mandated by the Executive Board to ensure a thorough understanding and adequate overview of regulatory changes. This Committee makes choices and decisions on matters relating to timely compliance with new and changing national and international legislation and regulations affecting the bank.

Diversity and inclusion policy

The composition of the Supervisory Board and Executive Board is based on ABN AMRO's guiding principle that diversity of thought, expertise, background, competences and interpersonal styles, including gender diversity, is a prerequisite for effective management and, by extension, for sustainable long-term value creation. In line with ABN AMRO's suitability and diversity policy on gender diversity, ABN AMRO's target is for at least one third of ABN AMRO's Supervisory Board and Executive Board members to be of the underrepresented gender. Similar targets also apply to ABN AMRO subsidiaries. At the end of 2024, the percentage of the underrepresented gender on the Supervisory Board and the Executive Board was 43% and 38%, respectively.

Risk reporting

The Chief Risk Officer is responsible for reporting to the Executive Board and the Supervisory Board on the group's risks. Risk type owners provide regular reporting to executive risk committees. On a quarterly basis, portfolio reports are provided to the Executive Board and Supervisory Board.

Three lines of defence

The three lines of defence (3LoD) model aims to clarify the relationship between risk takers and the internal control functions, and provides all employees within the bank with clarity regarding their risk management responsibilities. This defence model is applied across all risk types and covers the whole organisation, including the client units, functions, the Risk Management organisation, outsourced activities and distribution channels.

1 1st Line of Defence	2 2nd Line of Defence	3 3rd Line of Defence
Risk Ownership	Risk Control & Oversight	Risk Assurance
Responsibility <ul style="list-style-type: none"> Delivers value-added services to our clients Takes primary ownership to identify and assess, measure, mitigate, monitor and report the risk that it incurs Proposes the client unit risk appetite and operates within it Strikes the right balance between return and risk in its decisions Seeks outside-in views and advice, where necessary Ensure systems, processes and reporting capabilities are commensurate to its activities and risk appetite 	Responsibility <ul style="list-style-type: none"> Sets the bank-wide risk management framework Sets risk policies and ensures regulations are translated into policies Maintains risk control and oversight through monitoring, reporting and escalating, where necessary Provides independent challenge and expertise to the First Line Proactively opines on how to identify and mitigate risks Provides outside-in views and ensures consistency in risk management practices across First Line 	Responsibility <ul style="list-style-type: none"> Protects and enhances organisational value by providing risk-based and objective assurance, insight and added value to support the achievement of our objectives Evaluates the design and effectiveness of governance, risk management & control processes, agrees with management on remediation and monitors follow-up

- The first line of defence comprises management within each client unit or function (such as Finance, Innovation & Technology, HR, Asset & Liability Management/Treasury), who are responsible for managing the risks they incur in conducting their activities and for designing and executing effective and efficient controls.
- The second line of defence consists of dedicated departments in the Risk Management organisation and Legal, which are responsible for setting the risk management framework within which the first line must operate. These dedicated departments are headed by risk type owners.
- The third line of defence consists of Group Audit, which evaluates the effectiveness of the governance, risk management and control processes in order to strengthen management's solution focus and accountability.

Personal details of the members of the Executive Board

The information below refers to the members of the Executive Board as at 11 March 2025. Resumés of executive and supervisory board members are available on ABN AMRO's website under [About us/Corporate Governance](#).



Chief Executive Officer and
Chair of the Executive Board

Robert Swaak Dutch, male, 1960

Robert Swaak was appointed as CEO and Chair of the Executive Board of ABN AMRO, effective 22 April 2020. As CEO, Robert Swaak is also responsible for Brand, Marketing & Communications, Group Audit, Group Economics, Human Resources, Legal & Corporate Office, Strategy & Innovation and the Sustainability Centre of Excellence. The Supervisory Board reappointed Robert Swaak to extend his term of office as CEO by four years, from the Annual General Meeting in April 2024 to the 2028 General Meeting of Shareholders. However, as indicated above, he has announced that he would not be completing his second term. On 10 January 2025, ABN AMRO announced that it intends to propose Marguerite Bérard as the new CEO from 23 April 2025, subject to regulatory approval.

Relevant positions pursuant to CRD V

Chief Executive Officer and Chair of the Executive Board of ABN AMRO Bank N.V.

Other relevant ancillary positions

Chair of the Supervisory Council (Raad van Toezicht), Stichting Nederlandse Bachvereniging, chair of the Supervisory Council of Stichting Paleis Het Loo, member of the Board of Stichting Amerika-Europese Gemeenschap (Nederland) of Stichting American European Community Association (Netherlands), member of the Board of Directors of the Nederlandse Vereniging van Banken (NVB), member of the Advisory Board IRCC (Integrated Reporting and Connectivity Council) of the IFRS Foundation, member of the Board of Directors of Stichting Nationaal Fonds 4/5 mei.



Chief Commercial Officer
Corporate Banking and Vice-
Chair of the Executive Board

Dan Dorner Dutch, male, 1976

Dan Dorner was appointed to the Executive Board of ABN AMRO as CCO Corporate Banking, effective 24 November 2021. As CCO Corporate Banking, he is responsible for the Corporate Banking client unit. Dan Dorner was appointed Vice-Chair of the Executive Board with effect from 1 April 2023. His current term ends at the close of ABN AMRO's Annual General Meeting in 2026.

Relevant positions pursuant to CRD V

Chief Commercial Officer Corporate Banking and Vice-Chair of the Executive Board of ABN AMRO Bank N.V.

Other relevant ancillary positions

Member of the Advisory Board of Euronext, member of the general board and the daily board of Vereniging VNO-NCW (Confederation of Netherlands Industry and Employers).



Chief Innovation & Technology
Officer

Carsten Bittner German, male, 1971

Carsten Bittner was appointed to the Executive Board of ABN AMRO as CI&TO, effective 1 January 2023. As CI&TO, he is responsible for Innovation and Technology, including the Central Data Office, Change Management & Consultancy, the Corporate Information Security Office, IT, Platforms & Technology and Procurement. His current term ends at the close of ABN AMRO's Annual General Meeting in 2027.

Relevant positions pursuant to CRD V

Chief Innovation & Technology Officer of the Executive Board of ABN AMRO Bank N.V.



Chief Risk Officer

Serena Fioravanti Italian and Swiss, female, 1973

Serena Fioravanti was appointed to the Executive Board as Chief Risk Officer of ABN AMRO effective 1 October 2024. As CRO, she is responsible for Risk Management, including Central Risk Management, Compliance, Credit Risk, Financial Restructuring & Recovery, Information & Operational Risk Management, Market & ALM/T Risk, Model Validation & Model Risk Management, Regulatory Model Management Unit, Risk Modelling and Security & Intelligence Management. Her current term ends at the close of ABN AMRO's Annual General Meeting in 2029.

Relevant positions pursuant to CRD V

Chief Risk Officer of the Executive Board of ABN AMRO Bank N.V.

Other relevant ancillary position

Lecturer at the University of Zurich, member of the board of directors of the Swiss Risk Association.



Chief Commercial Officer
Wealth Management

Choy van der Hooft-Cheong Dutch, female, 1971

Choy van der Hooft-Cheong was appointed to the Executive Board of ABN AMRO as CCO Wealth Management, effective 24 November 2021. As CCO Wealth Management, she is responsible for the Wealth Management client unit. Her current term ends at the close of ABN AMRO's Annual General Meeting in 2026.

Relevant positions pursuant to CRD V

Chief Commercial Officer Wealth Management and member of the Executive Board of ABN AMRO Bank N.V.

Other relevant ancillary positions

Founder and board member of Stichting Children's Khazana Foundation, Chair of the statutory board of Stichting Talent naar de Top.



Chief Operations Officer

Ton van Nimwegen Dutch, male, 1969

Ton van Nimwegen was appointed to the Executive Board of ABN AMRO Bank N.V. as Chief Operations Officer, effective 1 December 2023. As COO, Ton van Nimwegen is responsible for BPM & Process Digitalisation, Customer Care & Operations, Customer Data Solutions, Detecting Financial Crime, First Line Risk & Privacy, Strategic Portfolio Management, Strategy Execution & Implementation and Workplace Management. His current term ends at the close of ABN AMRO's Annual General Meeting in 2028.

Relevant positions pursuant to CRD V

Chief Operations Officer of the Executive Board of ABN AMRO Bank N.V.

Other relevant ancillary position

Chair of the Board of Trustees of the International School of Amsterdam.



Chief Financial Officer

Ferdinand Vaandrager Dutch, male, 1970

Ferdinand Vaandrager was appointed to the Executive Board of ABN AMRO Bank N.V. as interim Chief Financial Officer, effective 1 May 2023. He was appointed to the Executive Board of ABN AMRO Bank N.V. as Chief Financial Officer, effective 16 November 2023. As CFO, Ferdinand Vaandrager is responsible for Finance, including Asset & Liability Management and Treasury, Corporate Controlling, Corporate Development, Finance & Risk Business Grids, Financial Accounting, Investor Relations and Tax. His current term ends at the close of ABN AMRO's Annual General Meeting in 2027.

Relevant positions pursuant to CRD V

Chief Financial Officer of the Executive Board of ABN AMRO Bank N.V.



Chief Commercial Officer
Personal & Business Banking

Annerie Vreugdenhil Dutch, female, 1963

Annerie Vreugdenhil was appointed to the Executive Board of ABN AMRO as CCO Personal & Business Banking, effective 1 March 2022. As CCO Personal & Business Banking, she is responsible for the Personal & Business Banking client unit. Her term ends at the close of ABN AMRO's Annual General Meeting in 2026.

Relevant positions pursuant to CRD V

Chief Commercial Officer Personal & Business Banking and member of the Executive Board of ABN AMRO Bank N.V., member of the Supervisory Board of Stadsherstel Amsterdam N.V., non-executive member of the Board of EPI Company SE.

Other relevant ancillary positions

Member of the Board of Directors of the Nederlandse Vereniging van Banken (NVB), member of the Advisory Board of the Erasmus Centre for Data Analytics (ECDA).

Personal details of the members of the Supervisory Board

The information below refers to the members of the Supervisory Board as at 11 March 2025.



Chair of the Supervisory Board

Tom de Swaan Dutch, male, 1946

Tom de Swaan was appointed to the Supervisory Board of ABN AMRO effective 12 July 2018 and reappointed for a second term effective 20 April 2022. His current term expires at the close of the Annual General Meeting in 2026.

Last executive position held
Interim CEO of Zurich Insurance Group. Ltd

Relevant positions pursuant to CRD V.

Chair of the Supervisory Board of ABN AMRO Bank N.V.

Other relevant ancillary positions

Chair of the Board of Foundation National Opera & Ballet Fund, the Netherlands; member of the International Advisory Board of Akbank; Chair of the Management Board of Stichting Fondsen Nederlands Kanker Instituut; member of the Supervisory Council of Foundation Holland Festival, the Netherlands; member of the Advisory Board of Stichting tot Instandhouding van de Diergaarde van het Koninklijk Zoölogisch Genootschap Natura Artis Magistra; member of the Board of Stichting Liszt Concours; member of the Board of Directors of The International Centre for Missing & Exploited Children; Chair of the Board of the Liberal Jewish Community of Amsterdam; member of the Board of Stichting Gan Hasjalom; member of the Committee of Recommendation of Stichting Het Stenen Archief, member of the Ambassador's Group (ambassadeursgroep) Scope Group.



Vice-Chair of the Supervisory Board

Arjen Dorland Dutch, male, 1955

Arjen Dorland was appointed to the Supervisory Board of ABN AMRO effective 18 May 2016 and reappointed for a period of two years effective 24 April 2024. His current term expires at the close of the Annual General Meeting in 2026.

Last executive position held
Executive Vice-President of Technical and Competitive IT, Royal Dutch Shell.

Relevant positions pursuant to CRD V

Vice-Chair of the Supervisory Board of ABN AMRO Bank N.V., Vice-Chair of the Supervisory Board of Essent N.V., Chair of the Supervisory Board of Bovemij N.V. and N.V. Schadeverzekering-Maatschappij Bovemij.

Other relevant ancillary positions

Chair of the Supervisory Council of Haaglanden Medisch Centrum.



Member

Laetitia Griffith Dutch, female, 1965

Laetitia Griffith was appointed to the Supervisory Board of ABN AMRO effective 17 December 2019 and reappointed effective 24 April 2024. Her current term expires at the close of the Annual General Meeting in 2028.

Last executive position held
Member of Parliament on behalf of the VVD (portfolio: Home Affairs), House of Representatives of the Netherlands.

Relevant positions pursuant to CRD V

Member of the Supervisory Board of ABN AMRO Bank N.V.; member of the Aufsichtsrat, Tennet TSO GmbH, the Netherlands and Germany; member of the Supervisory Board of Coca-Cola Europacific Partners Nederland B.V.

Other relevant ancillary positions

Chair of the Supervisory Board of the Dutch Film Fund; Chair of the Board of Stichting Nederlandse Vioolconcoursen; Chair of the Supervisory Council of Stichting Save the Children Nederland; Chair of the Supervisory Council of Stichting Metropole Orkest; member of the Supervisory Council of the Kadaster; member of the Electoral Council (Kiesraad); member of the Board of Stichting Assurances KLM; member of the Board of Koninklijke Verzamelingen, onderdeel van de Dienst van het Koninklijk Huis (Royal Collections of the Netherlands, part of the Royal Household).



Member

Michiel Lap Dutch, male, 1962

Michiel Lap was appointed to the Supervisory Board of ABN AMRO effective 24 April 2019 and reappointed effective 19 April 2023. His current term expires at the close of the Annual General Meeting in 2027.

Last executive position held
Partner, Goldman Sachs.

Relevant positions pursuant to CRD V

Member of the Supervisory Board of ABN AMRO Bank N.V., Chair of the Supervisory Board of Arcadis N.V.

Other relevant ancillary positions

Member of the Supervisory Board of Stichting Het Nederlands Kanker Instituut – Antoni van Leeuwenhoek Ziekenhuis.



Member

Mariken Tannemaat Dutch, female, 1971

Mariken Tannemaat was appointed to the Supervisory Board of ABN AMRO effective 15 December 2020. Her current term expires at the close of the Annual General Meeting in 2025.

Last executive position held
Chief Innovation Officer at Robeco N.V.

Relevant positions pursuant to CRD V

Member of the Supervisory Board of ABN AMRO Bank N.V., vice-Chair of the Supervisory Board of CM.com N.V. and member of the Supervisory Board of CM Payments B.V., non-executive director of Prudential Assurance Company Limited.

Other relevant ancillary positions

Advisor to the Executive Board of Erasmus Enterprise B.V.



Member

Sarah Russell Australian, female, 1962

Sarah Russell was appointed to the Supervisory Board of ABN AMRO effective 20 April 2022. Her current term expires at the close of the Annual General Meeting in 2026.

Last executive position held
CEO of AEGON Asset Management Holding B.V. and member of the Managing Board of AEGON N.V.

Relevant positions pursuant to CRD V

Member of the Supervisory Board of ABN AMRO Bank N.V., member and vice-chair of the Supervisory Board of APG Groep N.V., member of the Supervisory Board and vice-chair of APG Asset Management N.V., member and vice-chair of the Supervisory Board of The Currency Exchange Fund N.V.



Member

Femke de Vries Dutch, female, 1972

Femke de Vries was appointed to the Supervisory Board of ABN AMRO effective 29 June 2023. Her current term expires at the close of the Annual General Meeting in 2027.

Last executive position held
Managing Partner at &samhoud consultancy.

Relevant positions pursuant to CRD V

Member of the Supervisory Board of ABN AMRO Bank N.V., board member of the private consultancy firm Ms De Vries, vice-chair of the Supervisory Board of BNG Bank N.V.

Other relevant ancillary positions

Chair of the Advisory Board of the Authority for Nuclear Safety and Radiation Protection, member of the Advisory Board of the Human Environment and Transport Inspectorate (ILT), regular author of expert contributions to the Dutch financial daily gazette (Het Financieele Dagblad).

Foreseeable changes to the composition of the management body

ABN AMRO intends to appoint Marguerite Bérard as its new CEO at the shareholders' meeting of 23 April 2025.

Scope of application

EU LI1 - Differences between the accounting scope and the scope of prudential consolidation and mapping of financial statement categories with regulatory risk categories

	A	B	C	D	E	F	G
	Carrying values		Carrying values of items				
	As reported in published financial statements	Under scope of regulatory consolidation	Subject to the credit risk framework	Subject to the CCR framework	Subject to the securitisation framework	Subject to the market risk framework	Not subject to own funds requirements or subject to deduction from own funds
(in millions)							
Assets							
1 Cash and balances at central banks	44,464	44,464	44,464				
2 Financial assets held for trading	2,503	2,503				2,503	
3 Derivatives	4,347	4,347		4,347		3,891	
4 Financial investments	47,173	47,131	46,250				881
5 Securities financing	26,989	26,989		26,989			
6 Loans and advances banks	2,049	2,404	1,923	481			
7 Residential mortgages	151,390	151,390	151,390				
8 Consumer loans	8,045	8,045	8,045				
9 Corporate loans	82,860	82,860	82,860		2,303		
10 Other loans and advances customers	6,487	6,487	6,487	6,191			
11 Equity-accounted investments	244	343	343				
12 Property and equipment	1,068	1,067	1,067				
13 Goodwill and other intangible assets	253	253					253
14 Assets held for sale	1,330	1,330	1,330				
15 Tax assets	326	326	326				
16 Other assets	5,518	5,512	5,512				
17 Total assets	385,047	385,450	349,996	38,008	2,303	6,394	1,134
Liabilities							
18 Financial liabilities held for trading	1,163	1,163				1,163	
19 Derivatives	2,499	2,499		2,499		2,125	
20 Securities financing	10,352	10,352		10,352			
21 Due to banks	2,329	2,684					2,684
22 Current account	92,746	92,764					92,764
23 Demand deposits	108,008	108,008					108,008
24 Time deposits	53,533	53,577					53,577
25 Other due to customers	1,899	1,899					1,899
26 Issued debt	74,542	74,542					74,542
27 Subordinated liabilities	6,613	6,613					6,613
28 Provisions	612	606					606
29 Liabilities held for sale							
30 Tax liabilities	395	393					393
31 Other liabilities	4,247	4,243					4,243
32 Total liabilities	358,939	359,342		12,851		3,288	345,329

The credit risk framework total is not the equivalent of the credit risk amounts reported in the Consolidated Annual Financial Statements, due to scope differences.

	A	B	C	D	E	F	G
	Carrying values		Carrying values of items				
(in millions)	As reported in published financial statements	Under scope of regulatory consolidation	Subject to the credit risk framework	Subject to the CCR framework	Subject to the securitisation framework	Subject to the market risk framework	Not subject to own funds requirements or subject to deduction from own funds
Assets							
1 Cash and balances at central banks	53,656	53,656	53,656				
2 Financial assets held for trading	1,371	1,371				1,371	
3 Derivatives	4,403	4,403		4,403		4,038	
4 Financial investments	41,501	41,469	40,010				1,459
5 Securities financing	21,503	21,503		21,503			
6 Loans and advances banks	2,324	2,651	2,215	437			
7 Residential mortgages	144,875	144,875	144,875				
8 Consumer loans	8,881	8,881	8,881				
9 Corporate loans	85,685	85,685	85,685		1,644		
10 Other loans and advances customers	6,494	6,494	6,494	6,043			
11 Equity-accounted investments	333	433	433				
12 Property and equipment	978	977	977				
13 Goodwill and other intangible assets	99	99					99
14 Assets held for sale	130	130	130				
15 Tax assets	327	327	327				
16 Other assets	5,351	5,342	5,342				
17 Total assets	377,909	378,295	349,023	32,385	1,644	5,409	1,558
Liabilities							
18 Financial liabilities held for trading	917	917				917	
19 Derivatives	2,856	2,856		2,856		2,422	
20 Securities financing	11,710	11,710		11,710			
21 Due to banks	5,352	5,352					5,352
22 Current account	99,948	99,962					99,962
23 Demand deposits	100,943	100,943					100,943
24 Time deposits	51,728	52,114					52,114
25 Other due to customers	1,846	1,846					1,846
26 Issued debt	66,227	66,227					66,227
27 Subordinated liabilities	5,572	5,572					5,572
28 Provisions	742	734					734
29 Liabilities held for sale							
30 Tax liabilities	159	156					156
31 Other liabilities	5,741	5,738					5,738
32 Total liabilities	353,741	354,127	14,566	3,339	3,339	3,339	338,644

The credit risk framework total is not the equivalent of the credit risk amounts reported in the Consolidated Annual Financial Statements, due to scope differences.

EU LI2 - Main sources of differences between regulatory exposure amounts and carrying values in financial statements

	A	B	C	D	E
	31 December 2024				
	Items subject to				
(in millions)	Total	Credit risk framework	Securitisation framework	CCR framework	Market risk framework
1 Asset carrying value amount under scope of regulatory consolidation (as per template LI1)	384,316	349,996	2,303	38,008	6,394
2 Liabilities carrying value amount under regulatory scope of consolidation (as per template LI1)	14,014			12,851	3,288
3 Total net amount under regulatory scope of consolidation	370,302	349,996	2,303	25,158	3,107
4 Off-balance sheet amounts	96,318	95,750	568		
5 Differences in valuations	-102	-102			
6 Differences due to different netting rules, other than those already included in row 2	-3,589			-3,589	
7 Differences due to consideration of provisions	1,104	1,104			
8 Differences due to the use of credit risk mitigation techniques (CRMs)	-11,123	-30		-11,093	
9 Differences due to credit conversion factors	-64,763	-64,761	-2		
10 Differences due to securitisation with risk transfer					
11 Other differences	1,859	-11,656		6,360	
12 Exposure amounts considered for regulatory purposes	390,006	370,302	2,869	16,836	

	A	B	C	D	E
	31 December 2023				
	Items subject to				
(in millions)	Total	Credit risk framework	Securitisation framework	CCR framework	Market risk framework
1 Asset carrying value amount under scope of regulatory consolidation (as per template LI1)	376,737	349,023	1,644	32,385	5,409
2 Liabilities carrying value amount under regulatory scope of consolidation (as per template LI1)	15,483			14,566	3,339
3 Total net amount under regulatory scope of consolidation	361,254	349,023	1,644	17,819	2,070
4 Off-balance sheet amounts	93,885	93,275	610		
5 Differences in valuations	-78	-78			
6 Differences due to different netting rules, other than those already included in row 2	-3,939			-3,939	
7 Differences due to consideration of provisions	1,248	1,248			
8 Differences due to the use of credit risk mitigation techniques (CRMs)	-5,836	-72		-5,765	
9 Differences due to credit conversion factors	-65,377	-65,328	-49		
10 Differences due to securitisation with risk transfer					
11 Other differences	4,868	-10,969		8,605	
12 Exposure amounts considered for regulatory purposes	386,024	367,100	2,205	16,720	

EU LI3 - Outline of the differences in the scopes of consolidation (entity by entity)

A	B	C	D	E	F	G
	Method of accounting consolidation	Method of regulatory consolidation				Description of the entity
		Full consolidation	Proportional consolidation	Equity method	Neither consolidated nor deducted	Deducted
Name of the entity						
AA Custodial Serv Ireland Ltd.	Full consolidated	X				Other financial corporation
AA FS (Cayman) Ltd	Full consolidated	X				Other financial corporation
AA Hybrid Capital B.V.	Full consolidated	X				Other financial corporation
AA MeesPierson PEmanagement BV	Full consolidated	X				Other financial corporation
AA Retained Custodial Serv Ire Ltd	Full consolidated	X				Other financial corporation
AA Sust Impact Fund PE BV	Full consolidated	X				Other financial corporation
AA Sust Impact Fund VC BV	Full consolidated	X				Other financial corporation
AAB Capital Markets (USA) LLC	Full consolidated	X				Other financial corporation
AAC IT Services Romania S.R.L.	Full consolidated			X		Non-financial corporation
AAP France SAS	Full consolidated	X				Other financial corporation
ABN AMRO - ODDO BHF B.V.	Full consolidated	X				Other financial corporation
ABN AMRO Accelerator B.V.	Full consolidated	X				Other financial corporation
ABN AMRO Acquisition Finance Holding B.V.	Full consolidated	X				Other financial corporation
ABN AMRO Arbo Services B.V.	Full consolidated			X		Non-financial corporation
ABN AMRO Asset Based Finance N.V.	Full consolidated	X				Other financial corporation
ABN AMRO Bank N.V.	Full consolidated	X				Credit institution
ABN AMRO Captive N.V.	Full consolidated				X	Other financial corporation
ABN AMRO Clearing Bank N.V.	Full consolidated	X				Credit institution
ABN AMRO Clearing Chicago LLC	Full consolidated	X				Other financial corporation
ABN AMRO Clearing Holdings USA LLC	Full consolidated	X				Other financial corporation
ABN AMRO Clearing Hong Kong Limited	Full consolidated	X				Other financial corporation
ABN AMRO Clearing Investments B.V.	Full consolidated	X				Other financial corporation
ABN AMRO Clearing London Limited	Full consolidated	X				Other financial corporation
ABN AMRO Clearing Singapore Pte. Ltd.	Full consolidated	X				Other financial corporation
ABN AMRO Clearing Sydney Pty Ltd	Full consolidated	X				Other financial corporation
ABN AMRO Clearing Tokyo Co Ltd.	Full consolidated	X				Other financial corporation
ABN AMRO Clearing USA LLC	Full consolidated	X				Other financial corporation
ABN AMRO Corretora de Títulos e Valores Mobiliários Ltda	Full consolidated	X				Other financial corporation
ABN AMRO Covered Bond Company 2 B.V.	Full consolidated	X				Other financial corporation
ABN AMRO Covered Bond Company B.V.	Full consolidated	X				Other financial corporation
ABN AMRO Effecten Compagnie B.V.	Full consolidated	X				Other financial corporation
ABN AMRO Funding USA LLC	Full consolidated	X				Other financial corporation
ABN AMRO Hypotheken Groep B.V.	Full consolidated	X				Credit institution
ABN AMRO International Services B.V.	Full consolidated	X				Other financial corporation
ABN AMRO Investment Holding B.V.	Full consolidated	X				Other financial corporation
ABN AMRO Investment Solutions S.A.	Full consolidated	X				Other financial corporation
ABN AMRO Investments USA LLC	Full consolidated	X				Other financial corporation
ABN AMRO Jonge Bedrijven Fonds B.V.	Full consolidated	X				Other financial corporation
ABN AMRO Mahler Assets B.V.	Full consolidated	X				Non-financial corporation
ABN AMRO Mahler Assets SpainSL	Full consolidated	X				Other financial corporation
ABN AMRO Markets (UK) Limited	Full consolidated	X				Other financial corporation
ABN AMRO MeesPierson Private & Trust Holding B.V.	Full consolidated	X				Other financial corporation
ABN AMRO Participaties Fund I B.V.	Full consolidated	X				Other financial corporation
ABN AMRO Participaties Management B.V.	Full consolidated	X				Other financial corporation
ABN AMRO Participaties NPE Fund B.V.	Full consolidated	X				Other financial corporation
ABN AMRO Projectontwikkeling B.V.	Full consolidated	X				Non-financial corporation
ABN AMRO Retained FS (IOM) Limited	Full consolidated	X				Other financial corporation
ABN AMRO Retained Services (Cayman) Ltd	Full consolidated	X				Other financial corporation
ABN AMRO Securities (USA) LLC	Full consolidated	X				Other financial corporation
ABN AMRO SME Participation B.V.	Full consolidated	X				Other financial corporation

A	B	C	D	E	F	G
	Method of accounting consolidation	Method of regulatory consolidation				Description of the entity
		Full consolidation	Proportional consolidation	Equity method	Neither consolidated nor deducted	Deducted
ABN AMRO Social Impact Investments B.V.	Full consolidated	X				
ABN AMRO Support Services (Ireland) Limited	Full consolidated	X				
ABN AMRO Ventures Management B.V.	Full consolidated	X				
ALFAM Holding N.V.	Full consolidated	X				
Amsterdamsche Holding Company B.V.	Full consolidated	X				
Aurasio GmbH	Full consolidated	X				
B.V. Financieringsmaatschappij N.O.B.	Full consolidated	X				
Banco AAB Clearing S.A.	Full consolidated	X				
BUX B.V.	Full consolidated	X				
BUX Technology B.V.	Full consolidated	X				
FFSB LIMITED	Full consolidated	X				
Franx B.V.	Full consolidated	X				
International Card Services B.V.	Full consolidated	X				
Maas Capital Investments B.V.	Full consolidated	X				
Moneyou B.V.	Full consolidated	X				
Neufize OBC Cin Gest S.a.r.l.	Full consolidated	X				
New10 B.V.	Full consolidated	X				
Oosteroever Hypotheken B.V.	Full consolidated	X				
P.H.P. Investeringsmaatschappij II B.V.	Full consolidated	X				
PF Energy USA 1 B.V.	Full consolidated	X				
PF Energy USA 2 B.V.	Full consolidated	X				
PF Energy USA 3 Inc.	Full consolidated	X				
Principal Finance Investments Holding B.V.	Full consolidated	X				
Quion 9 B.V.	Full consolidated	X				
Sumsare N.V.	Full consolidated			X		
Trapsgewijs Kopen C.V.	Full consolidated	X				

EU LIA – Explanations of differences between accounting and regulatory exposure amounts

Risk measures vary according to the purpose for which the exposure is calculated: EU IFRS or the determination of regulatory or economic capital (CRD V/CRR2).

EU IFRS reporting scope

The objective of the financial statements is to provide primary users of these financial statements with useful financial information about the bank in order to support their decisions. Financial information is useful when it is relevant and reliably represents what it purports to represent. Financial statements provide information about the financial position of the bank and the effects of transactions and other events that change the bank's financial position and performance. The consolidation scope of ABN AMRO is determined in accordance with IFRS 10 Consolidated Financial Statements. More information can be found in Note 1 Accounting policies in the Consolidated Annual Financial Statements of Integrated Annual Report 2024.

Regulatory reporting scope

The objective of regulatory reporting is to take a risk view on the bank's portfolio and to ensure that the bank maintains sufficient capital buffers to cover unexpected losses, and sufficient liquidity buffers. The scope of consolidation for the purpose of calculating regulatory and economic capital (based on the CRD V and CRR2) is based on the same concept of control as applies for EU IFRS. However, subsidiaries consolidated under EU IFRS but active in sectors other than banking and finance are excluded from the regulatory scope of consolidation.

EU LIB - Other qualitative information on the scope of application

For capital efficiency reasons, ABN AMRO has obtained the capital waivers referred to in CRR Article 7 for some of its Dutch subsidiaries, specifically ABN AMRO Hypotheken Groep B.V. and ABN AMRO Clearing Bank N.V. However, ABN AMRO Clearing Bank N.V. must meet the CRR requirements on a sub-consolidated basis. These subsidiaries are included in the group-wide central funding and risk management governance framework, and guarantees issued by ABN AMRO Bank N.V. are in place.

With regard to the prudential requirements of ABN AMRO Bank N.V. on an individual basis, the individual consolidation method laid down in CRR Article 9(2) is applied. Dutch subsidiaries (active in the banking and finance sector) are consolidated for this purpose if they meet the conditions laid down in points (c) and (d) of CRR Article 7(1), they have material exposures or material liabilities to ABN AMRO Bank N.V. and they are covered by the bank's risk management and risk governance framework.

There are no current or expected material practical or legal impediments to the timely transfer of own funds or to the repayment of liabilities between ABN AMRO Bank N.V. and its subsidiaries. This is specifically relevant in the context of the capital waivers obtained pursuant to CRR Article 7, the application of the individual consolidation method in accordance with CRR Article 9(2) and the application of the intragroup exposure exemptions in accordance with the Large Exposures framework.

Subsidiaries not included in the prudential consolidation of ABN AMRO are ABN AMRO Arbo Services B.V., ABN AMRO Captive N.V. and Sumsare N.V. At 31 December 2024, none of the entities within the group had a capital adequacy below the applicable minimum regulatory requirements.

EU PV1 - Prudent valuation adjustments (PVA)

The Capital Requirements Regulation (CRR) sets out requirements relating to prudent valuation adjustments for fair valued positions, taking into account the dynamic nature of these positions. ABN AMRO Bank applies the core approach to determine these additional valuation adjustments (AVA).

The majority of the impact of the overall AVA is caused by market price uncertainty (MPU). For the valuation inputs in MPU, where a range of plausible values is available, the estimated value is based on a 90th percentile, i.e. where there is 90% confidence that the positions can be exited at that price or better. The largest contributor to this adjustment is in the risk category Interest rates. The other large adjustment is the unearned credit spreads (UCS) adjustment, which represents the valuation uncertainty in the calculation of the credit and debit valuation adjustments (CVA and DVA).

As at 31 December 2024, the additional valuation adjustments (AVAs) totalled EUR 102 million (31 December 2023: EUR 78 million), including EUR 30 million (31 December 2023: EUR 20 million) for the fall-back approach relating to unlisted equity investments.

The increase of the total AVA was mainly driven by the higher market price uncertainty for interest rate risk, which was driven by the positions, MTM and spread movements, and the fallback AVA for unlisted equity investments, offset by a lower unearned credit spread AVA (lower reversal IFRS DVA) and a lower funding valuation adjustment (FVA, part of the investment and funding costs AVA). On a monthly basis, the fair value adjustments and prudent valuation AVA are discussed and approved in the Business Risk Committee Trading and the Business Risk Committee ALM.

	A	B	C	D	E	EU e1	EU e2	F	G	H
	31 December 2024									
	Risk category						Category level AVA - Valuation uncertainty	Total category level post-diversification		
	Equity	Interest rates	Foreign exchange	Credit	Commodities	Unearned credit spreads AVA	Investment and funding costs AVA	Of which: Total core approach in the trading book	Of which: Total core approach in the banking book	
(in millions)										
Category level AVA										
1 Market price uncertainty	6	46		6		7	1	60	16	44
3 Close-out cost										
4 Concentrated positions		4						4		4
5 Early termination		2	1					3	3	
6 Model risk		1						1	1	
7 Operational risk	1	4						5	1	4
10 Future administrative costs										
12 Total Additional Valuation Adjustments (AVAs)								102	20	82

	A	B	C	D	E	EU e1	EU e2	F	G	H
	31 December 2023									
	Risk category						Category level AVA - Valuation uncertainty	Total category level post-diversification		
	Equity	Interest rates	Foreign exchange	Credit	Commodities	Unearned credit spreads AVA	Investment and funding costs AVA	Of which: Total core approach in the trading book	Of which: Total core approach in the banking book	
(in millions)										
Category level AVA										
1 Market price uncertainty	5	25	1	8		10	7	48	26	22
3 Close-out cost										
4 Concentrated positions		4						4		4
5 Early termination		1						1	1	
6 Model risk		3						1	1	
7 Operational risk		2						3	1	2
10 Future administrative costs										
12 Total Additional Valuation Adjustments (AVAs)								78	29	49

2. Own funds, leverage & liquidity

Own funds

Capital management strategy

The primary objective of the bank's capital management strategy is to ensure that capital adequacy requirements are met at all times and that sufficient capital is available to support the bank's strategy. Capital is a necessary resource for doing business and defines the bank's commercial possibilities. The balance between available and required capital is managed centrally to optimise the use of available capital. The basis of the capital management strategy is the bank's risk appetite and its business plans. Other important factors in managing the capital position are expectations and requirements of external stakeholders (such as regulators, investors, shareholders, equity analysts, rating agencies and clients), the bank's position in the market, market developments, contingent capital needs and the feasibility of capital management actions. Although ABN AMRO manages its capital centrally, the group companies are sufficiently capitalised to comply with all local regulatory solvency requirements and to meet any local business needs. ABN AMRO's banking activities are carried out by legal entities that are part of the bank's fiscal unity. Apart from prevailing statutory and regulatory legislation, there are no specific material impediments for prompt transfer of the bank's regulatory capital.

EU CC1 - Composition of regulatory own funds

Developments impacting capital ratios

On 31 December 2024, the Basel III Common Equity Tier 1 (CET1), Tier 1 and total capital ratios were 14.5%, 16.9% and 20.2% respectively (30 June 2024: 13.8%, 15.7% and 18.5% respectively). In comparison with 30 June 2024, the CET1 capital ratio increased, mainly due to the decrease in TREA and an increase in CET1 capital, partly offset by higher capital deductions. The EUR 5.2 billion decrease in TREA mainly reflects a decrease in credit risk RWEA. The decrease in Credit risk RWEA was mainly driven by Corporate Banking, reflecting data quality improvements and seasonal effects as well as business steering. The amounts recorded for market risk exposure and CVA risk exposure decreased as well. Operational risk RWEA remained flat. The CET1 capital position increased mainly due to the addition of the net profits for the third and the fourth quarters after deduction of AT1 coupons, which were added to CET1 capital excluding a 50% dividend reservation. The increase was partly offset by unrealised losses on investments in debt securities resulting from market movements, and by higher capital deductions. All capital ratios were in line with the bank's risk appetite and comfortably above regulatory requirements.

The maximum distributable amount (MDA) trigger level (excluding AT1 shortfall) remained flat at 11.2% (30 June 2024: 11.2%). The Basel III CET1 ratio of 14.5% remained well above the MDA trigger level.

As part of the 2024 Supervisory Review and Evaluation Process (SREP), the ECB has notified ABN AMRO of the final outcome of its capital requirements for 2025. The CET1 requirement is unchanged at 11.2%. The maximum distributable amount (MDA) trigger level for 2025 is 11.2%.

	A	B	C	D
(in millions)	31 December 2024	30 June 2024	31 December 2023	Source ¹
Common Equity Tier 1 (CET1) capital: instruments and reserves				
1 Capital instruments and the related share premium accounts	12,682	13,057	13,057	
- of which shares	12,682	13,057	13,057	CC2-33 & CC2-34
2 Retained earnings	7,955	8,646	6,739	
3 Accumulated other comprehensive income (and other reserves)	-409	-256	-315	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	1,723	647	1,901	
6 Common Equity Tier 1 (CET1) capital before regulatory adjustments	21,951	22,094	21,383	
Common Equity Tier 1 (CET1) capital: regulatory adjustments				
7 Additional value adjustments (-)	-95	-63	-68	
8 Intangible assets (net of related tax liability) (-)	-247	-137	-99	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) (-)	-47	-70	-85	
11 Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value	10	106	250	
12 Negative amounts resulting from the calculation of expected loss amounts	-415	-281	-135	
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		2	2	
15 Defined-benefit pension fund assets (-)	-3	-6	-6	
16 Direct, indirect and synthetic holdings by an institution of own CET1 instruments (-)	-30	-530	-530	
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				
EU-20b - of which qualifying holdings outside the financial sector (-)				
EU-20c - of which securitisation positions (-)				
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	-768	-909	-709	
28 Total regulatory adjustments to Common Equity Tier 1 (CET1)	-1,594	-1,889	-1,379	
29 Common Equity Tier 1 (CET1) capital	20,357	20,206	20,003	

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

	A	B	C	D
(in millions)	31 December 2024	30 June 2024	31 December 2023	Source ¹
Additional Tier 1 (AT1) capital: instruments				
30 Capital instruments and the related share premium accounts	3,479	2,733	1,987	CC2-37
31 - of which classified as equity under applicable accounting standards	3,479	2,733	1,987	
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	3,479	2,733	1,987	
Additional Tier 1 (AT1) capital: regulatory adjustments				
37 Direct, indirect and synthetic holdings by an institution of own AT1 instruments (-)	-5	-5	-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	-5	-5	
44 Additional Tier 1 (AT1) capital	3,474	2,728	1,982	
45 Tier 1 capital (T1 = CET1 + AT1)	23,831	22,934	21,985	
Tier 2 (T2) capital: instruments				
46 Capital instruments and the related share premium accounts	4,676	4,107	4,270	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			39	
51 Tier 2 (T2) capital before regulatory adjustments	4,676	4,107	4,309	
Tier 2 (T2) capital: regulatory adjustments				
52 Direct, indirect and synthetic holdings by an institution of own T2 instruments and subordinated loans (-)	-30	-30	-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	-30	-30	
58 Tier 2 (T2) capital	4,646	4,077	4,279	
59 Total capital (TC = T1 + T2)	28,477	27,011	26,264	
60 Total risk exposure amount	140,871	146,348	140,187	

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

	A	B	C	D
(in millions)	31 December 2024	30 June 2024	31 December 2023	Source ¹
Capital ratios and requirements including buffers				
61 Common Equity Tier 1 (as a % of total risk exposure amount)	14.5%	13.8%	14.3%	
62 Tier 1 (as a % of total risk exposure amount)	16.9%	15.7%	15.7%	
63 Total capital (as a % of total risk exposure amount)	20.2%	18.5%	18.7%	
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)	11.25%	11.24%	10.57%	
65 - of which capital conservation buffer requirement	2.50%	2.50%	2.50%	
66 - of which countercyclical buffer requirement	1.73%	1.72%	0.95%	
67 - of which systemic risk buffer requirement				
EU-67a - of which G-SII or O-SII buffer	1.25%	1.25%	1.50%	
EU-67b - of which additional own funds requirements to address the risks other than the risk of excessive leverage	1.27%	1.27%	1.13%	
68 Common Equity Tier 1 available to meet buffers (as a % of risk exposure amount)	8.68%	7.98%	8.18%	
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)	173	154	173	
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)	225	396	415	
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)	233	133	106	
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	125	147	114	
78 Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)			39	
79 Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach	502	519	484	
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	D	E	F	G
	31 December 2024		30 June 2024		31 December 2023		
	Balance sheet as in published financial statements	Under regulatory scope of consolidation	Balance sheet as in published financial statements	Under regulatory scope of consolidation	Balance sheet as in published financial statements	Under regulatory scope of consolidation	Reference
(in millions)	As at period end	As at period end	As at period end	As at period end	As at period end	As at period end	
Assets¹							
1 Cash and balances at central banks	44,464	44,464	38,085	38,085	53,656	53,656	
2 Financial assets held for trading	2,503	2,503	2,109	2,109	1,371	1,371	
3 Derivatives	4,347	4,347	4,576	4,576	4,403	4,403	
4 Financial investments	47,173	47,131	50,326	50,289	41,501	41,469	
5 Securities financing	26,989	26,989	34,993	34,993	21,503	21,503	
6 Loans and advances banks	2,049	2,404	3,279	3,625	2,324	2,651	
7 Residential mortgages	151,390	151,390	146,579	146,579	144,875	144,875	
8 Consumer loans	8,045	8,045	8,423	8,423	8,881	8,881	
9 Corporate loans	82,860	82,860	90,134	90,134	85,685	85,685	
10 Other loans and advances customers	6,487	6,487	6,376	6,376	6,494	6,494	
11 Equity-accounted investments	244	343	251	348	333	433	
12 Property and equipment	1,068	1,067	999	999	978	977	
13 Goodwill and other intangible assets	253	253	138	138	99	99	
14 Assets held for sale	1,330	1,330	177	177	130	130	
15 Tax assets	326	326	303	302	327	327	CC1-8
16 Other assets	5,518	5,512	6,655	6,661	5,351	5,342	
17 Total assets	385,047	385,450	393,404	393,816	377,909	378,295	
Liabilities¹							
18 Financial liabilities held for trading	1,163	1,163	1,410	1,410	917	917	
19 Derivatives	2,499	2,499	2,628	2,628	2,856	2,856	
20 Securities financing	10,352	10,352	18,523	18,523	11,710	11,710	
21 Due to banks	2,329	2,683	5,286	5,286	5,352	5,352	
22 Current account	92,746	92,764	90,231	90,255	99,948	99,962	
23 Demand deposits	108,008	108,008	103,350	103,350	100,943	100,943	
24 Time deposits	53,533	53,577	65,020	65,414	51,728	52,114	
25 Other due to customers	1,899	1,899	2,225	2,225	1,846	1,846	
26 Issued debt	74,542	74,542	67,241	67,241	66,227	66,227	
27 Subordinated liabilities	6,613	6,613	5,608	5,608	5,572	5,572	CC1-46
28 Provisions	612	606	630	626	742	734	
29 Liabilities held for sale							
30 Tax liabilities	395	393	181	180	159	156	
31 Other liabilities	4,247	4,243	6,075	6,073	5,741	5,738	
32 Total liabilities	358,939	359,342	368,408	368,820	353,741	354,127	
Shareholders' equity¹							
33 Share capital	833	833	866	866	866	866	CC1-1
34 Share premium	11,849	11,849	12,192	12,192	12,192	12,192	CC1-1
35 Other reserves (incl. retained earnings/profit for the period)	10,358	10,358	9,462	9,462	9,436	9,436	CC1-2
36 Accumulated other comprehensive income	-409	-409	-256	-256	-315	-315	CC1-3 & CC1-8
37 AT1 capital securities	3,475	3,475	2,730	2,730	1,987	1,987	CC1-36
38 Equity attributable to owners of the parent company	26,105	26,105	24,993	24,993	24,165	24,165	
39 Equity attributable to non-controlling interests	3	3	3	3	3	3	
40 Total equity	26,108	26,108	24,995	24,995	24,168	24,168	

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

EU CCA - Main features of regulatory own funds instruments and eligible liabilities instruments

Common Equity Tier 1

1 Issuer	ABN AMRO Bank N.V.
2 Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	NL0011540547
3 Governing law(s) of the instrument	Dutch Law
3a Contractual recognition of write down and conversion powers of resolution authorities	N/A
Regulatory treatment	
4 Transitional CRR rules	Common equity tier 1
5 Post-transitional CRR rules	Common equity tier 1
6 Eligible at solo/ (sub-)consolidated/ solo & (sub-) consolidated	Solo & consolidated
7 Instrument type (types to be specified by each jurisdiction)	Ordinary shares A
8 Amount recognised in regulatory capital (in millions, as of most recent reporting date)	EUR 833
9 Nominal amount of instrument (as of most recent reporting date)	EUR 1
9a Issue price	EUR 17.75; 20.40; 22.75; 23.50
9b Redemption price	N/A
10 Accounting classification	Equity
11 Original date of issuance	09 April 2009
12 Perpetual or dated	Perpetual
13 Original maturity date	N/A
14 Issuer call subject to prior supervisory approval	N/A
15 Optional call date, contingent call dates, and redemption amount	N/A
16 Subsequent call dates, if applicable	N/A
Coupons / dividends	
17 Fixed or floating dividend/coupon	N/A
18 Coupon rate and any related index	N/A
19 Existence of a dividend stopper	N/A
20a Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary
20b Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary
21 Existence of step up or other incentive to redeem	N/A
22 Non-cumulative or cumulative	Non-cumulative
23 Convertible or non-convertible	Non-convertible
24 If convertible, conversion trigger(s)	N/A
25 If convertible, fully or partially	N/A
26 If convertible, conversion rate	N/A
27 If convertible, mandatory or optional conversion	N/A
28 If convertible, specify instrument type convertible into	N/A
29 If convertible, specify issuer of instrument it converts into	N/A
30 Write-down features	No
31 If write-down, write-down trigger(s)	N/A
32 If write-down, full or partial	N/A
33 If write-down, permanent or temporary	N/A
34 If temporary write-down, description of write-up mechanism	N/A
34a Type of subordination (only for eligible liabilities)	Statutory
EU-34b Ranking of the instrument in normal insolvency proceedings	1
35 Position in subordination hierarchy in liquidation	Junior to Additional Tier 1
36 Non-compliant transitioned features	No
37 If yes, specify non-compliant features	N/A
37a Link to the full term and conditions of the instrument (signposting)	Web link

N/A inserted if the question is not applicable.

Additional Tier 1

1 Issuer	ABN AMRO Bank N.V.	ABN AMRO Bank N.V.
2 Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	XS1693822634	XS2131567138
3 Governing law(s) of the instrument	Dutch law	Dutch law
3a Contractual recognition of write down and conversion powers of resolution authorities	Yes	Yes
Regulatory treatment		
4 Transitional CRR rules	Additional Tier 1	Additional Tier 1
5 Post-transitional CRR rules	Additional Tier 1	Additional Tier 1
6 Eligible at solo/ (sub-)consolidated/ solo & (sub-) consolidated	Solo & consolidated	Solo & consolidated
7 Instrument type (types to be specified by each jurisdiction)	AT1 EU 575/2013 art 52	AT1 EU 575/2013 art 52
8 Amount recognised in regulatory capital (in millions, as of most recent reporting date)	EUR 994	EUR 993
9 Nominal amount of instrument (as of most recent reporting date)	EUR 1,000	EUR 1,000
9a Issue price	100%	100%
9b Redemption price	100%	100%
10 Accounting classification	Equity	Equity
11 Original date of issuance	04 October 2017	15 June 2020
12 Perpetual or dated	Perpetual	Perpetual
13 Original maturity date	No maturity	No maturity
14 Issuer call subject to prior supervisory approval	Yes	Yes
15 Optional call date, contingent call dates, and redemption amount	22 Sept 2027 (100% nominal amount), regulatory & tax call (prevailing principal amount)	22 Sept 2025 (100% nominal amount), regulatory & tax call (prevailing principal amount)
16 Subsequent call dates, if applicable	Callable on each interest payment date after first call date	Callable on each interest payment date after first call date
Coupons / dividends		
17 Fixed or floating dividend/coupon	Fixed	Fixed
18 Coupon rate and any related index	4.75% per year	4.375% per year
19 Existence of a dividend stopper	No	No
20a Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary	Fully discretionary
20b Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary	Fully discretionary
21 Existence of step up or other incentive to redeem	No	No
22 Non-cumulative or cumulative	Non-cumulative	Non-cumulative
23 Convertible or non-convertible	Non-convertible	Non-convertible
24 If convertible, conversion trigger(s)	N/A	N/A
25 If convertible, fully or partially	N/A	N/A
26 If convertible, conversion rate	N/A	N/A
27 If convertible, mandatory or optional conversion	N/A	N/A
28 If convertible, specify instrument type convertible into	N/A	N/A
29 If convertible, specify issuer of instrument it converts into	N/A	N/A
30 Write-down features	Yes	Yes
31 If write-down, write-down trigger(s)	7%/5.125% CET1	7%/5.125% CET1
32 If write-down, full or partial	Partial	Partial
33 If write-down, permanent or temporary	Temporary	Temporary
34 If temporary write-down, description of write-up mechanism	Subject to profit MDA and Max Write up Amount	Subject to profit MDA and Max Write up Amount
34a Type of subordination (only for eligible liabilities)	Statutory	Statutory
EU-34b Ranking of the instrument in normal insolvency proceedings	2	2
35 Position in subordination hierarchy in liquidation	Junior to Tier 2	Junior to Tier 2
36 Non-compliant transitioned features	No	No
37 If yes, specify non-compliant features	N/A	N/A
37a Link to the full term and conditions of the instrument (signposting)	Web link	Web link

N/A inserted if the question is not applicable.

Additional Tier 1 (continued)

1 Issuer	ABN AMRO Bank N.V.	ABN AMRO Bank N.V.
2 Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	XS2774944008	XS2893176862
3 Governing law(s) of the instrument	Dutch law	Dutch law
3a Contractual recognition of write down and conversion powers of resolution authorities	Yes	Yes
Regulatory treatment		
4 Transitional CRR rules	Additional Tier 1	Additional Tier 1
5 Post-transitional CRR rules	Additional Tier 1	Additional Tier 1
6 Eligible at solo/ (sub-)consolidated/ solo & (sub-) consolidated	Solo & consolidated	Solo & consolidated
7 Instrument type (types to be specified by each jurisdiction)		
8 Amount recognised in regulatory capital (in millions, as of most recent reporting date)	EUR 746	EUR 746
9 Nominal amount of instrument (as of most recent reporting date)	EUR 750	EUR 750
9a Issue price	100%	100%
9b Redemption price	100%	100%
10 Accounting classification	Equity	Equity
11 Original date of issuance	04 October 2024	09 September 2024
12 Perpetual or dated	Perpetual	Perpetual
13 Original maturity date	No maturity	No maturity
14 Issuer call subject to prior supervisory approval	Yes	Yes
15 Optional call date, contingent call dates, and redemption amount	22 Sept 2031 (100% nominal amount), regulatory & tax call (prevailing principal amount)	22 Sept 2034 (100% nominal amount), regulatory & tax call (prevailing principal amount)
16 Subsequent call dates, if applicable	Callable on each interest payment date after first call date	Callable on each interest payment date after first call date
Coupons / dividends		
17 Fixed or floating dividend/coupon	Fixed	Fixed
18 Coupon rate and any related index	6.875% per year	6.375% per year
19 Existence of a dividend stopper	No	No
20a Fully discretionary, partially discretionary or mandatory (in terms of timing)	Fully discretionary	Fully discretionary
20b Fully discretionary, partially discretionary or mandatory (in terms of amount)	Fully discretionary	Fully discretionary
21 Existence of step up or other incentive to redeem	No	No
22 Non-cumulative or cumulative	Non-cumulative	Non-cumulative
23 Convertible or non-convertible	Non-convertible	Non-convertible
24 If convertible, conversion trigger(s)	N/A	N/A
25 If convertible, fully or partially	N/A	N/A
26 If convertible, conversion rate	N/A	N/A
27 If convertible, mandatory or optional conversion	N/A	N/A
28 If convertible, specify instrument type convertible into	N/A	N/A
29 If convertible, specify issuer of instrument it converts into	N/A	N/A
30 Write-down features	Yes	Yes
31 If write-down, write-down trigger(s)	7%/5.125% CET1	7%/5.125% CET1
32 If write-down, full or partial	Partial	Partial
33 If write-down, permanent or temporary	Temporary	Temporary
34 If temporary write-down, description of write-up mechanism	Subject to profit MDA and Max Write up Amount	Subject to profit MDA and Max Write up Amount
34a Type of subordination (only for eligible liabilities)	Statutory	Statutory
EU-34b Ranking of the instrument in normal insolvency proceedings	2	2
35 Position in subordination hierarchy in liquidation	Junior to Tier 2	Junior to Tier 2
36 Non-compliant transitioned features	No	No
37 If yes, specify non-compliant features	N/A	N/A
37a Link to the full term and conditions of the instrument (signposting)	Web link	Web link

N/A inserted if the question is not applicable.

Tier 2

1 Issuer	ABN AMRO Bank N.V.	ABN AMRO Bank N.V.	ABN AMRO Bank N.V.
2 Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	US00080QAF28 / XS1264600310	XS1385037558	US00084DAL47 / XS1392917784
3 Governing law(s) of the instrument	Dutch law	Dutch law	Dutch law
3a Contractual recognition of write down and conversion powers of resolution authorities	Yes	Yes	Yes
Regulatory treatment			
4 Transitional CRR rules	Tier 2	Tier 2	Tier 2
5 Post-transitional CRR rules	Tier 2	Tier 2	Tier 2
6 Eligible at solo/ (sub-)consolidated/ solo & (sub-) consolidated	Solo & consolidated	Solo & consolidated	Solo & consolidated
7 Instrument type (types to be specified by each jurisdiction)	Tier 2 EU 575/2013 art 63	Tier 2 Eu 575/2013 art 63	Tier 2 EU 575/2013 art 63
8 Amount recognised in regulatory capital (in millions, as of most recent reporting date)	EUR 165	EUR 288	EUR 249
9 Nominal amount of instrument (as of most recent reporting date)	USD 1,500 (EUR 1,440)	USD 300 (EUR 288)	USD 1,000 (EUR 960)
9a Issue price	99.732%	100%	99.827%
9b Redemption price	100%	100%	100%
10 Accounting classification	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost
11 Original date of issuance	28 July 2015	08 April 2016	18 April 2016
12 Perpetual or dated	Dated	Dated	Dated
13 Original maturity date	28 July 2025	08 April 2031	18 April 2026
14 Issuer call subject to prior supervisory approval	No	No	No
15 Optional call date, contingent call dates, and redemption amount	Tax & regulatory call (100% nominal amount)	Tax & regulatory call (100% nominal amount)	Tax & regulatory call (100% nominal amount)
16 Subsequent call dates, if applicable	N/A	N/A	N/A
Coupons / dividends			
17 Fixed or floating dividend/coupon	Fixed	Fixed	Fixed
18 Coupon rate and any related index	4.75% per year	5.6% per year	4.8% per year
19 Existence of a dividend stopper	No	No	No
20a Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory	Mandatory	Mandatory
20b Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory	Mandatory	Mandatory
21 Existence of step up or other incentive to redeem	No	No	No
22 Non-cumulative or cumulative	N/A	N/A	N/A
23 Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
24 If convertible, conversion trigger(s)	N/A	N/A	N/A
25 If convertible, fully or partially	N/A	N/A	N/A
26 If convertible, conversion rate	N/A	N/A	N/A
27 If convertible, mandatory or optional conversion	N/A	N/A	N/A
28 If convertible, specify instrument type convertible into	N/A	N/A	N/A
29 If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
30 Write-down features	No	No	No
31 If write-down, write-down trigger(s)	N/A	N/A	N/A
32 If write-down, full or partial	N/A	N/A	N/A
33 If write-down, permanent or temporary	N/A	N/A	N/A
34 If temporary write-down, description of write-up mechanism	N/A	N/A	N/A
34a Type of subordination (only for eligible liabilities)	Statutory	Statutory	Statutory
EU-34b Ranking of the instrument in normal insolvency proceedings	3	3	3
35 Position in subordination hierarchy in liquidation	junior to senior non preferred	junior to senior non preferred	junior to senior non preferred
36 Non-compliant transitioned features	No	No	No
37 If yes, specify non-compliant features	N/A	N/A	N/A
37a Link to the full term and conditions of the instrument (signposting)	Web link	Web link	Web link

N/A inserted if the question is not applicable.

Tier 2 (continued)

1 Issuer	ABN AMRO Bank N.V.	ABN AMRO Bank N.V.	ABN AMRO Bank N.V.
2 Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	XS2415308761/ US00084DAV29	XS2498035455	XS2558022591
3 Governing law(s) of the instrument	Dutch law	Dutch law	Dutch law
3a Contractual recognition of write down and conversion powers of resolution authorities	Yes	Yes	Yes
Regulatory treatment			
4 Transitional CRR rules	Tier 2	Tier 2	Tier 2
5 Post-transitional CRR rules	Tier 2	Tier 2	Tier 2
6 Eligible at solo/ (sub-)consolidated/ solo & (sub-) consolidated	Solo & consolidated	Solo & consolidated	Solo & consolidated
7 Instrument type (types to be specified by each jurisdiction)	Tier 2 Eu 575/2013 art 63	Tier 2 EU 575/2013 art 63	Tier 2 EU 575/2013 art 63
8 Amount recognised in regulatory capital (in millions, as of most recent reporting date)	EUR 957	EUR 527	EUR 997
9 Nominal amount of instrument (as of most recent reporting date)	USD 1,000 (EUR 960)	SGD 750 (529 EUR)	EUR 1,000
9a Issue price	100%	100%	99,759%
9b Redemption price	100%	100%	100%
10 Accounting classification	Liability - amortised cost	Liability - amortised cost	Liability - amortised cost
11 Original date of issuance	13 December 2021	5 July 2022	22 November 2022
12 Perpetual or dated	Dated	Dated	Dated
13 Original maturity date	13 March 2037	5 October 2032	22 February 2033
14 Issuer call subject to prior supervisory approval	Yes	Yes	Yes
15 Optional call date, contingent call dates, and redemption amount	31 December 2031 (100% nominal amount), tax & regulatory call (100% nominal amount)	5 July 2027 (100% nominal amount), tax & regulatory call (100% nominal amount)	22 November 2027 (100% nominal amount), tax & regulatory call (100% nominal amount)
16 Subsequent call dates, if applicable	N/A	N/A	N/A
Coupons / dividends			
17 Fixed or floating dividend/coupon	Fixed	Fixed	Fixed
18 Coupon rate and any related index	3.324% per year	5.500% per year	5.125% per year
19 Existence of a dividend stopper	No	No	No
20a Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory	Mandatory	Mandatory
20b Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory	Mandatory	Mandatory
21 Existence of step up or other incentive to redeem	No	No	No
22 Non-cumulative or cumulative	N/A	N/A	N/A
23 Convertible or non-convertible	Non-convertible	Non-convertible	Non-convertible
24 If convertible, conversion trigger(s)	N/A	N/A	N/A
25 If convertible, fully or partially	N/A	N/A	N/A
26 If convertible, conversion rate	N/A	N/A	N/A
27 If convertible, mandatory or optional conversion	N/A	N/A	N/A
28 If convertible, specify instrument type convertible into	N/A	N/A	N/A
29 If convertible, specify issuer of instrument it converts into	N/A	N/A	N/A
30 Write-down features	No	No	No
31 If write-down, write-down trigger(s)	N/A	N/A	N/A
32 If write-down, full or partial	N/A	N/A	N/A
33 If write-down, permanent or temporary	N/A	N/A	N/A
34 If temporary write-down, description of write-up mechanism	N/A	N/A	N/A
34a Type of subordination (only for eligible liabilities)	Statutory	Statutory	Statutory
EU-34b Ranking of the instrument in normal insolvency proceedings	3	3	3
35 Position in subordination hierarchy in liquidation	junior to senior non preferred	junior to senior non preferred	junior to senior non preferred
36 Non-compliant transitioned features	No	No	No
37 If yes, specify non-compliant features	N/A	N/A	N/A
37a Link to the full term and conditions of the instrument (signposting)	Web link	Web link	Web link

N/A inserted if the question is not applicable.

Tier 2 (continued)

1 Issuer	ABN AMRO Bank N.V.	ABN AMRO Bank N.V.
2 Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)	XS2637967139	XS2859413341
3 Governing law(s) of the instrument	Dutch law	Dutch law
3a Contractual recognition of write down and conversion powers of resolution authorities	Yes	Yes
Regulatory treatment		
4 Transitional CRR rules	Tier 2	Tier 2
5 Post-transitional CRR rules	Tier 2	Tier 2
6 Eligible at solo/ (sub-)consolidated/ solo & (sub-) consolidated	Solo & consolidated	Solo & consolidated
7 Instrument type (types to be specified by each jurisdiction)	Tier 2 Eu 575/2013 art 63	Tier 2 Eu 575/2013 art 63
8 Amount recognised in regulatory capital (in millions, as of most recent reporting date)	EUR 747	EUR 746
9 Nominal amount of instrument (as of most recent reporting date)	EUR 750	EUR 750
9a Issue price	100%	99.634%
9b Redemption price	100%	100%
10 Accounting classification	Liability - amortised cost	Liability - amortised cost
11 Original date of issuance	21 June 2023	16 July 2024
12 Perpetual or dated	Dated	Dated
13 Original maturity date	21 September 2033	16 July 2036
14 Issuer call subject to prior supervisory approval	Yes	Yes
15 Optional call date, contingent call dates, and redemption amount	21 June 2028 (100% nominal amount), regulatory call (100% nominal amount)	16 July 2031 (100% nominal amount), regulatory call (100% nominal amount)
16 Subsequent call dates, if applicable	N/A	N/A
Coupons / dividends		
17 Fixed or floating dividend/coupon	Fixed	Fixed
18 Coupon rate and any related index	5.5% per year	4.375% per year
19 Existence of a dividend stopper	No	No
20a Fully discretionary, partially discretionary or mandatory (in terms of timing)	Mandatory	Mandatory
20b Fully discretionary, partially discretionary or mandatory (in terms of amount)	Mandatory	Mandatory
21 Existence of step up or other incentive to redeem	No	No
22 Non-cumulative or cumulative	N/A	N/A
23 Convertible or non-convertible	Non-convertible	Non-convertible
24 If convertible, conversion trigger(s)	N/A	N/A
25 If convertible, fully or partially	N/A	N/A
26 If convertible, conversion rate	N/A	N/A
27 If convertible, mandatory or optional conversion	N/A	N/A
28 If convertible, specify instrument type convertible into	N/A	N/A
29 If convertible, specify issuer of instrument it converts into	N/A	N/A
30 Write-down features	No	No
31 If write-down, write-down trigger(s)	N/A	N/A
32 If write-down, full or partial	N/A	N/A
33 If write-down, permanent or temporary	N/A	N/A
34 If temporary write-down, description of write-up mechanism	N/A	N/A
34a Type of subordination (only for eligible liabilities)	Statutory	Statutory
EU-34b Ranking of the instrument in normal insolvency proceedings	3	3
35 Position in subordination hierarchy in liquidation	junior to senior non preferred	junior to senior non preferred
36 Non-compliant transitioned features	No	No
37 If yes, specify non-compliant features	N/A	N/A
37a Link to the full term and conditions of the instrument (signposting)	Web link	Web link

N/A inserted if the question is not applicable.

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
	31 December 2024					
	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	5	17				23
Belgium	149	3,546		1		3,696
Bulgaria	10	1				11
Chile		114				114
Croatia						1
Cyprus		40				40
Czech Republic	1	16				17
France	631	9,412		6		10,049
Germany	1,018	5,921		34		6,972
Denmark	17	161		8		186
Estonia						1
Hong Kong	14	117				131
Hungary		7				7
Iceland						
Ireland	21	478				500
Korea		1				1
Latvia						
Lithuania						
Luxembourg	3	3,939		1		3,943
Netherlands	6,231	226,689		70		232,990
Norway		1,997		1		1,998
Romania	1	8				9
Sweden		1,325		4		1,329
Slovakia		17				17
Slovenia	3	1				4
United Kingdom	443	9,569		2		10,014
United States	839	1,411		3		2,252
Other countries	892	10,337		29		11,258
Total	10,280	275,125		158		285,564

	G	H	I	J	K	L	M
					31 December 2024		
	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	1			1	13	0.01%	1.00%
Belgium	191	1		192	2,399	2.02%	1.00%
Bulgaria	1			1	10	0.01%	2.00%
Chile	2			2	26	0.02%	0.50%
Croatia						0.00%	1.50%
Cyprus	2			2	25	0.02%	1.00%
Czech Republic	1			1	16	0.01%	1.25%
France	461	4		465	5,817	4.90%	1.00%
Germany	323	5		328	4,098	3.45%	0.75%
Denmark	9	1		11	137	0.12%	2.50%
Estonia						0.00%	1.50%
Hong Kong	5			5	57	0.05%	1.00%
Hungary					5	0.00%	0.50%
Iceland						0.00%	2.50%
Ireland	30			30	379	0.32%	1.50%
Korea						0.00%	1.00%
Latvia						0.00%	0.50%
Lithuania						0.00%	1.00%
Luxembourg	176			177	2,206	1.86%	0.50%
Netherlands	6,922			6,922	86,526	72.85%	2.00%
Norway	143			143	1,786	1.50%	2.50%
Romania	1			1	12	0.01%	1.00%
Sweden	58	1		59	736	0.62%	2.00%
Slovakia	2			2	22	0.02%	1.50%
Slovenia					3	0.00%	0.50%
United Kingdom	535	1		537	6,710	5.65%	2.00%
United States	176			176	2,198	1.85%	0.00%
Other countries	431	16		447	5,591	4.71%	0.00%
Total	9,472	30		9,502	118,772		

	A	B	C	D	E	F
						30 June 2024
	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	3	18		1		22
Belgium	175	3,579		10		3,764
Bulgaria						
Chile		110				110
Croatia		1				1
Cyprus		47				47
Czech Republic	1	17				18
France	749	9,186		27		9,962
Germany	1,208	5,786		20		7,014
Denmark	25	177		6		208
Estonia						
Hong Kong	24	101				125
Iceland		89				89
Ireland	8	572		1		581
Korea		3				3
Lithuania						
Luxembourg	15	3,629		1		3,646
Netherlands	7,219	225,766		20		233,005
Norway		2,142		1		2,144
Romania		7				7
Sweden		1,099		3		1,101
Slovakia	1	17				17
Slovenia	2	1				3
United Kingdom	791	9,087		9		9,888
United States	859	1,388		14		2,261
Other countries	1,233	10,553		21		11,807
Total	12,315	273,372		133		285,822

	G	H	I	J	K	L	M
					30 June 2024		
	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	1			1	10	0.01%	1.00%
Belgium	179	1		180	2,246	1.83%	0.50%
Bulgaria						0.00%	2.00%
Chile	2			2	24	0.02%	0.50%
Croatia						0.00%	1.00%
Cyprus	3			3	32	0.03%	0.50%
Czech Republic	1			1	17	0.01%	1.75%
France	519	3		522	6,528	5.33%	1.00%
Germany	360	2		362	4,524	3.70%	0.75%
Denmark	9	1		10	128	0.10%	2.50%
Estonia						0.00%	1.50%
Hong Kong	4			4	48	0.04%	1.00%
Iceland	4			4	49	0.04%	2.50%
Ireland	28			28	354	0.29%	1.00%
Korea					1	0.00%	1.00%
Lithuania						0.00%	1.00%
Luxembourg	163			163	2,033	1.66%	0.50%
Netherlands	7,106	2		7,107	88,839	72.58%	2.00%
Norway	172			172	2,155	1.76%	2.50%
Romania	1			1	10	0.01%	1.00%
Sweden	48	1		48	604	0.49%	2.00%
Slovakia	2			2	21	0.02%	1.50%
Slovenia					2	0.00%	0.50%
United Kingdom	539	1		540	6,751	5.51%	2.00%
United States	159	3		162	2,022	1.65%	0.00%
Other countries	481	2		483	6,036	4.93%	
Total	9,779	16		9,795	122,435		

	A	B	C	D	E	F
	31 December 2023					
	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	3	18		1		23
Belgium	151	3,428		2		3,581
Bulgaria	13					14
Croatia						
Cyprus		63				63
Czech Republic		15				15
France	805	8,607		31		9,442
Germany	884	5,362		35		6,281
Denmark	12	175		1		188
Estonia						
Hong Kong	18	110				128
Iceland		80				80
Ireland	2	444		1		447
Lithuania						
Luxembourg	5	3,789		2		3,795
Netherlands	5,229	224,732		14		229,975
Norway		1,833		2		1,835
Romania		9				9
Sweden		970				970
Slovakia		18				18
United Kingdom	558	7,630		12		8,200
United States	725	1,587		6		2,318
Other countries	785	10,466		10		11,261
Total	9,191	269,336		116		278,643

	G	H	I	J	K	L	M
					31 December 2023		
	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	1			1	9	0.01%	1.00%
Belgium	173			173	2,164	1.83%	0.00%
Bulgaria	1			1	13	0.01%	2.00%
Croatia						0.00%	1.00%
Cyprus	3			3	42	0.04%	0.50%
Czech Republic	1			1	11	0.01%	2.00%
France	517	2		519	6,491	5.49%	0.50%
Germany	277	10		286	3,579	3.03%	0.75%
Denmark	9			9	114	0.10%	2.50%
Estonia						0.00%	1.50%
Hong Kong	3			3	42	0.04%	1.00%
Iceland	4			4	44	0.04%	2.00%
Ireland	22			22	274	0.23%	1.00%
Lithuania						0.00%	1.00%
Luxembourg	168			168	2,102	1.78%	0.50%
Netherlands	7,090			7,090	88,623	75.02%	1.00%
Norway	135			135	1,682	1.42%	2.50%
Romania	1			1	12	0.01%	1.00%
Sweden	30			31	385	0.33%	2.00%
Slovakia	2			2	21	0.02%	1.50%
United Kingdom	431	2		433	5,415	4.58%	2.00%
United States	163			164	2,044	1.73%	0.00%
Other countries	405			406	5,069	4.29%	0.00%
Total	9,435	16		9,451	118,135		

EU CCyB2 - Amount of institution-specific countercyclical capital buffer

The institution-specific countercyclical capital buffer requirement increased slightly from 30 June 2024 to 31 December 2024 and significantly from 31 December 2023 to 30 June 2024, mainly due to the Dutch central bank (DNB) raising the countercyclical capital buffer for Dutch exposures to 2% (from 1%) on 31 May 2024.

(in millions)	31 December 2024	30 June 2024	31 December 2023
1 Total risk exposure amount	140,871	146,348	140,187
2 Institution specific countercyclical capital buffer rate	1.734%	1.723%	0.950%
3 Institution specific countercyclical capital buffer requirement	2,443	2,522	1,332

Leverage ratio

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

	A	B	C
(in millions)	31 December 2024	30 June 2024	31 December 2023
1 Total assets as per published financial statements	385,047	393,404	377,909
2 Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation	404	412	386
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	-799	-1,993	-2,288
7 Adjustment for eligible cash pooling transactions			
8 Adjustments for derivative financial instruments	4,662	6,085	4,008
9 Adjustments for securities financing transactions (SFTs)	2,238	2,773	2,379
10 Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of off-balance sheet exposures)	31,025	31,059	31,413
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	-1,643	-1,279	-851
13 Total exposure amount	420,932	430,460	412,957

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

	A	B	C
(in millions)	31 December 2024	30 June 2024	31 December 2023
EU-1 Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures)	353,040	352,953	350,678
EU-2 Of which: Trading book exposures	2,503	2,109	1,371
EU-3 Of which: Banking book exposures	350,537	350,844	349,307
EU-4 - of which covered bonds	5,228	5,636	5,046
EU-5 - of which exposures treated as sovereigns	86,657	82,968	90,040
EU-6 - of which exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns	12	1	42
EU-7 - of which institutions	2,671	4,250	3,561
EU-8 - of which secured by mortgages of immovable properties	178,886	174,976	174,318
EU-9 - of which retail exposures	3,895	5,079	4,696
EU-10 - of which corporates	60,688	65,524	62,520
EU-11 - of which exposures in default	4,796	4,992	4,775
EU-12 - of which other exposures (e.g. equity, securitisations, and other non-credit obligation assets)	7,705	7,418	4,309

EU LR2 - LRCom: Leverage ratio common disclosure

The Capital Requirements Regulation (CRR) includes a non-risk-based and binding leverage ratio. The leverage ratio increased to 5.7% as at 31 December 2024 (30 June 2024: 5.4%, excluding interim profits). This was primarily due to the decrease in on-balance sheet exposures and the increase in Tier 1 capital. The reported leverage ratio remained well above the 3.0% requirement.

(in millions)	A	B	C
	31 December 2024	30 June 2024	31 December 2023
On-balance sheet exposures (excluding derivatives and SFTs)			
1 On-balance sheet items (excluding derivatives, SFTs, but including collateral)	354,443	354,359	352,260
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)	-708	-754	-1,045
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)	-1,367	-1,909	-1,427
7 Total on-balance sheet exposures (excluding derivatives and SFTs)	352,367	351,696	349,788
Derivative exposures			
8 Replacement cost associated with SA-CCR derivatives transactions (i.e. net of eligible cash variation margin)	5,386	5,157	9,053
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	9,010	11,976	7,198
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)	-5,388	-6,700	-7,840
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	9,008	10,432	8,411
Securities financing transaction (SFT) exposures			
14 Gross SFT assets (with no recognition of netting), after adjusting for sales accounting transactions	32,192	37,850	29,876
15 (Netted amounts of cash payables and cash receivables of gross SFT assets)	-5,203	-2,857	-8,374
16 Counterparty credit risk exposure for SFT assets	2,238	2,932	2,379
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	29,227	37,925	23,882
Other off-balance sheet exposures			
19 Off-balance sheet exposures at gross notional amount	97,673	90,772	92,266
20 (Adjustments for conversion to credit equivalent amounts)	-66,648	-59,714	-60,853
21 (General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)			
22 Off-balance sheet exposures	31,025	31,059	31,413

(in millions)	A	B	C
	31 December 2024	30 June 2024	31 December 2023
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)	-695	-652	-537
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 (Total exempted exposures)	-695	-652	-537
Capital and total exposure measure			
23 Tier 1 capital	23,831	22,934	21,985
24 Total exposure measure	420,932	430,460	412,957
Leverage ratio			
25 Leverage ratio	5.7%	5.3%	5.3%
EU-25 Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)	5.7%	5.3%	5.3%
25a Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves)	5.7%	5.3%	5.3%
26 Regulatory minimum leverage ratio requirement (%)	3.0%	3.0%	3.0%
EU-26a Additional own funds requirements to address the risk of excessive leverage (%)			
EU-26b <i>- of which to be made up of CET1 capital (percentage points)</i>			
27 Leverage ratio buffer requirement (%)			
EU-27a Overall leverage ratio requirement (%)	3.0%	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	35,955	34,633	32,273
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	26,989	34,993	21,503
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)	429,898	430,099	423,727
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)	429,898	430,099	423,727
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%	5.3%	5.2%
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%	5.3%	5.2%

EU LRA - Disclosure of leverage ratio qualitative information

ABN AMRO monitors and reports its leverage ratio based on CRR2 and we expect the leverage ratio to remain above the anticipated regulatory requirements. The exposure measure is reported to the Asset and Liability Committee (ALCO) and monitored closely in order to ensure the leverage ratio remains within the bank's risk appetite. The leverage ratio outlook takes account of business-specific plans, as well as macroeconomic conditions, regulatory developments and capital-related uncertainties.

In addition, ABN AMRO performs stress tests to measure the impact on the capital positions in severe but plausible scenarios. Capital adequacy must remain above the minimum capital adequacy levels under stress scenarios defined in the risk appetite and must be monitored in terms of limits and checkpoints.

ABN AMRO does not specifically take into account maturity mismatches and asset encumbrance while managing the risk of excessive leverage. Maturity mismatches and asset encumbrance are managed within the liquidity risk metrics.

In the event of risk appetite breaches for the leverage ratio, the bank-wide escalation paths for capital and funding are followed. Contingency plans are in place setting out a range of actions that can be undertaken based on the level of severity and urgency of the issues.

Liquidity requirements

EU LIQA - Liquidity risk management

Liquidity risk management framework

ABN AMRO has a liquidity risk management framework that supports a moderate risk profile and safeguards the bank's reputation from a liquidity perspective. This framework ensures that the bank meets its payment obligations in a timely matter and at a reasonable cost, even under severely adverse conditions. The bank maintains a set of liquidity risk indicators to manage its liquidity position within the requirements set internally and by the regulator. In addition, regular stress testing is performed.

Three lines of defence

- The first line of defence includes the ALM and Treasury departments, where the bank's daily business activities are executed, and the Finance department, which is in charge of reporting.
- The second line of defence comprises the Risk department, which monitors, analyses, measures and reports the risks associated with ALM and Treasury activities.
- The third line of defence is Group Audit, which provides assurance regarding the design and effectiveness of the governance structure, systems and processes of ALM, Treasury, Risk and Finance.

Monitoring liquidity risk

ABN AMRO uses a comprehensive set of liquidity indicators to monitor and measure liquidity risk, both in business as usual (BaU) and stressed conditions. The main indicators of liquidity risk are captured in the risk appetite. The moderate risk profile is safeguarded by setting appropriate limits and checkpoints for identified risk appetite indicators. In addition to the liquidity risk appetite statements (RAS), which are generally bank-specific and reported on a monthly basis, early warning indicators (EWIs) are set for the purpose of ensuring early signalling of potential liquidity stress. These are reported on a daily basis. In addition, intraday liquidity risk metrics contain warning triggers and thresholds to signal expected or actual problems in payment activities.

Stress identification

ABN AMRO targets a moderate risk profile with a stable and diversified funding and collateral mix of markets, investors, currencies and maturities to ensure liquidity at any point in time and limit the risk of concentrations in funding and collateral. This is reflected in our RAS framework and EWIs.

The RAS and EWIs are complemented by a stress testing framework that is used to identify potential vulnerabilities in the bank's liquidity position. Internal liquidity stress testing is conducted monthly to ensure that the bank's liquidity buffer is sufficient to cover the liquidity risks faced. The outcome of stress tests is incorporated into day-to-day liquidity management.

A more holistic approach has been chosen with regard to the Contingency Plan for Capital and Funding and the Recovery Plan. An integrated set of indicators gives guidance on the appropriate level of escalation. These indicators outline the responsibilities with regard to managing and monitoring ABN AMRO's capital and liquidity profile during the different contingency stages. The liquidity contingency stage depends on the number of EWIs and/or risk appetite indicator breaches in combination with expert judgement. The contingency plan provides guidelines for managing a range of stress environments and describes the lines of responsibility, escalation procedures and mitigating actions.

Governance

The Group Risk Committee (GRC) is an executive risk committee of ABN AMRO and has a delegated authority from the Executive Board to set the limits for ALM and Treasury risk-related activities. The GRC is responsible for approving the liquidity risk policy of the bank. The Group Asset & Liability Committee (ALCO) is mandated by the Executive Board to manage the liquidity risk profile. The bank is required to have a liquidity risk policy in place that enables it to monitor, measure and steer its liquidity risk. The policy describes the bank's liquidity risk management framework, which includes maintaining a diversified funding mix and a strong liquidity buffer, both from an internal and a regulatory perspective. The policy also requires the bank to actively manage its liquidity risk exposures and funding needs across client units, countries, legal entities and currencies. This includes taking into account legal, regulatory and operational limitations on the transferability of liquidity. ABN AMRO uses a centralised model for ALM and Treasury activities. Business entities must pass on liquidity risks to ALM and Treasury, unless specifically approved otherwise.

Incorporation of the liquidity risk profile

The bank's 'moderate risk profile' is translated into its risk appetite for liquidity risk by setting risk appetite statements (RAS) for key liquidity indicators. The risk appetite for liquidity risk includes both qualitative and quantitative indicators. Limits and checkpoints are put in place to ensure that the liquidity risk indicators reflect the bank's risk profile. Conditions that influence the bank's future liquidity position are uncertain. Therefore, stress testing serves as a tool for setting the limits and checkpoints in the liquidity RAS. ABN AMRO has sufficient buffers in place to meet liquidity requirements from a regulatory and internal perspective. In addition, stress testing results indicate that the buffers are sufficient during times of stress.

EU LIQ1 - Quantitative information of LCR

	A	B	C	D	E	F	G	H
	Total unweighted value (average)				Total weighted value (average)			
	31 December 2024	30 September 2024	30 June 2024	31 March 2024	31 December 2024	30 September 2024	30 June 2024	31 March 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					88,486	90,110	91,777	95,026
Cash - outflows								
2 Retail deposits and deposits from small business customers, of which:	148,225	147,202	146,195	145,216	10,717	10,609	10,573	10,575
3 <i>Stable deposits</i>	88,260	88,107	88,177	88,260	4,413	4,405	4,409	4,413
4 <i>Less stable deposits</i>	45,918	45,265	45,032	45,067	6,050	5,951	5,902	5,872
5 Unsecured wholesale funding	107,458	108,195	109,226	110,667	56,812	56,500	56,496	56,274
6 <i>Operational deposits (all counterparties) and deposits in networks of cooperative banks</i>	24,055	27,591	30,991	35,045	6,004	6,887	7,732	8,735
7 <i>Non-operational deposits (all counterparties)</i>	79,456	76,632	74,346	71,604	46,861	45,640	44,875	43,521
8 <i>Unsecured debt</i>	3,947	3,973	3,889	4,018	3,947	3,973	3,889	4,018
9 Secured wholesale funding					4,150	4,430	4,597	4,923
10 Additional requirements	57,925	57,487	57,200	56,262	14,441	14,655	14,922	14,962
11 <i>Outflows related to derivative exposures and other collateral requirements</i>	11,358	10,915	10,645	10,063	7,803	7,863	8,011	8,093
12 <i>Outflows related to loss of funding on debt products</i>	17	150	279	305	17	150	279	305
13 <i>Credit and liquidity facilities</i>	46,550	46,422	46,276	45,895	6,621	6,642	6,632	6,565
14 Other contractual funding obligations	10,601	10,194	9,732	9,328	7,590	7,316	7,074	6,812
15 Other contingent funding obligations	41,515	41,668	41,399	41,771	1,815	1,972	2,120	2,558
16 Total cash outflows					95,525	95,482	95,783	96,104
Cash - inflows								
17 Secured lending (e.g. reverse repos)	33,601	33,289	32,797	32,982	13,118	13,118	13,059	12,579
18 Inflows from fully performing exposures	17,373	16,872	16,319	16,150	14,589	14,070	13,532	13,550
19 Other cash inflows	12,202	11,565	11,245	11,167	3,804	3,617	3,633	3,694
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	63,176	61,726	60,361	60,298	31,510	30,805	30,225	29,823
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>	56,461	55,297	53,972	53,952	31,510	30,805	30,225	29,823
Total adjusted value								
EU-21 Liquidity buffer					88,486	90,110	91,777	95,026
22 Total net cash outflows					64,015	64,677	65,558	66,281
23 Liquidity coverage ratio					138%	139%	140%	144%

EU LIQB - Qualitative information on LCR that complements template EU LIQ1

The consolidated LCR amounted to 138% at 31 December 2024, based on a 12-month rolling average. This is in line with the previous quarter (30 September 2024: 139%).

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. ABN AMRO's main source of funding consists of client deposits and is well diversified across its client segments Personal & Business Banking, Wealth Management and Corporate Banking. The remainder of the bank's funding is raised through various long-term wholesale funding instruments. Short-term wholesale funding is raised via commercial paper and certificates of deposit programmes.

Composition of the liquidity buffer

The LCR eligible liquidity buffer (excluding retained notes) at 31 December 2024 amounted to EUR 88.5 billion, based on a 12-month rolling average and was composed mainly of cash at central banks and government bonds. This is in line with the previous quarter (30 September 2024: EUR 90.1 billion).

Derivative exposures and potential collateral calls

To manage liquidity risk regarding 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

The bank's liquidity risk management focuses on significant currencies. The bank's significant currencies are the euro and the US dollar, given that the aggregate liabilities denominated in these currencies amount to 5% or more of the bank's total liabilities. The liquidity buffer reflects the composition of the balance sheet as it comprises cash and securities primarily in euros and secondarily in US dollars. To mitigate the risk of currency mismatches in US dollar, ABN AMRO has internal metrics and monitoring in place to ensure that the currency distribution of the liquid assets is consistent with the currency distribution of 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 137% at 31 December 2024. This is in line with previous snapshot (30 June 2024: 137%).

	A	B	C	D	E
	31 December 2024				
	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	23,957	4	2,445	5,158	29,114
2 <i>Own funds</i>	23,957		1,158	4,511	28,468
3 <i>Other capital instruments</i>		4	1,287	646	646
4 Retail deposits		142,103	2,365	5,686	140,234
5 <i>Stable deposits</i>		89,334	1,200	1,837	87,845
6 <i>Less stable deposits</i>		52,768	1,165	3,849	52,389
7 Wholesale funding:		142,771	2,845	49,409	93,973
8 <i>Operational deposits</i>		21,473			10,737
9 <i>Other wholesale funding</i>		121,298	2,845	49,409	83,236
10 Interdependent liabilities		2,203			
11 Other liabilities:		5,409	85	860	902
12 <i>NSFR derivative liabilities</i>					
13 <i>All other liabilities and capital instruments not included in the above categories</i>		5,409	85	860	902
14 Total available stable funding (ASF)					264,223
Required stable funding (RSF) Items					
15 Total high-quality liquid assets (HQLA)					770
EU-15a Assets encumbered for a residual maturity of ≥1 year in a cover pool		22	35	33,882	28,848
16 Deposits held at other financial institutions for operational purposes		645			322
17 Performing loans and securities:		60,406	7,872	174,186	141,329
18 <i>Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut</i>		18,624	495		248
19 <i>Performing securities financing transactions with financial customers collateralised by other assets and loans and advances to financial institutions</i>		23,915	1,954	4,174	6,935
20 <i>Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs¹</i>		13,770	5,126	51,758	53,260
21 <i>- of which with a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk¹</i>		625	185	908	995
22 <i>Performing residential mortgages¹</i>		104	231	115,277	77,720
23 <i>- of which with a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk¹</i>		94	207	102,168	66,560
24 <i>- 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</i>		3,993	66	2,976	3,167
25 Interdependent assets		2,203			
26 Other assets:		18,937	300	6,790	17,669
27 <i>Physical traded commodities</i>				87	74
28 <i>Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs</i>		11,186			9,508
29 <i>NSFR derivative assets</i>		276			276
30 <i>NSFR derivative liabilities before deduction of variation margin posted</i>		1,693			85
31 <i>All other assets not included in the above categories</i>		5,782	300	6,704	7,727
32 Off-balance sheet items		65,715	5,128	26,496	4,596
33 Total RSF					193,534
34 Net Stable Funding Ratio (%)					137%

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.

	A	B	C	D	E
					30 June 2024
	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	24,489		3	5,604	30,093
2 Own funds	24,489			4,107	28,595
3 Other capital instruments			3	1,498	1,498
4 Retail deposits		141,607	2,274	5,595	139,685
5 Stable deposits		91,185	758	1,845	89,191
6 Less stable deposits		50,422	1,516	3,750	50,494
7 Wholesale funding:		143,635	11,878	45,392	92,530
8 Operational deposits		19,262			9,631
9 Other wholesale funding		124,373	11,878	45,392	82,899
10 Interdependent liabilities		2,250			
11 Other liabilities:		7,261	100	1,009	1,059
12 NSFR derivative liabilities					
13 All other liabilities and capital instruments not included in the above categories		7,261	100	1,009	1,059
14 Total available stable funding (ASF)					263,367
Required stable funding (RSF) Items					
15 Total high-quality liquid assets (HQLA)					783
EU-15a Assets encumbered for a residual maturity of ≥1 year in a cover pool		25	20	33,192	28,252
16 Deposits held at other financial institutions for operational purposes		1,094			547
17 Performing loans and securities:		71,761	9,623	169,458	141,743
18 Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		14,687	555		277
19 Performing securities financing transactions with financial customers collateralised by other assets and loans and advances to financial institutions		35,100	3,613	3,807	8,193
20 Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs1		17,502	5,189	51,063	54,564
21 - of which with a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk ¹		609	112	927	963
22 Performing residential mortgages ¹		110	179	111,313	75,267
23 - of which with a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk ¹		97	159	97,467	63,481
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		4,363	86	3,274	3,441
25 Interdependent assets		2,250			
26 Other assets:		19,321	581	6,270	16,772
27 Physical traded commodities				13	11
28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		10,701			9,096
29 NSFR derivative assets		56			56
30 NSFR derivative liabilities before deduction of variation margin posted		1,892			95
31 All other assets not included in the above categories		6,672	581	6,257	7,515
32 Off-balance sheet items		59,425	5,940	25,101	4,483
33 Total RSF					192,580
34 Net Stable Funding Ratio (%)					137%

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.

	A	B	C	D	E
					31 December 2023
	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	22,952			5,572	28,524
2 Own funds	22,952			4,270	27,222
3 Other capital instruments				1,302	1,302
4 Retail deposits		138,705	2,991	5,542	137,565
5 Stable deposits		88,766	1,163	1,829	87,261
6 Less stable deposits		49,939	1,828	3,713	50,304
7 Wholesale funding:		142,592	2,561	50,394	96,551
8 Operational deposits		34,679			17,339
9 Other wholesale funding		107,913	2,561	50,394	79,212
10 Interdependent liabilities		1,978			
11 Other liabilities:		6,649	49	714	739
12 NSFR derivative liabilities					
13 All other liabilities and capital instruments not included in the above categories		6,649	49	714	739
14 Total available stable funding (ASF)					263,379
Required stable funding (RSF) Items					
15 Total high-quality liquid assets (HQLA)					489
EU-15a Assets encumbered for a residual maturity of ≥1 year in a cover pool		20	26	32,739	27,868
16 Deposits held at other financial institutions for operational purposes		1,086			543
17 Performing loans and securities:		58,510	7,648	170,377	139,622
18 Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut		16,133			
19 Performing securities financing transactions with financial customers collateralised by other assets and loans and advances to financial institutions		24,146	1,662	5,116	7,713
20 Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs ¹		13,991	5,417	52,364	54,031
21 - of which with a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk ¹		638	143	911	982
22 Performing residential mortgages ¹		79	522	110,206	74,985
23 - of which with a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk ¹		69	455	95,074	62,084
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		4,161	48	2,691	2,893
25 Interdependent assets		1,978			
26 Other assets:		17,865	314	5,461	15,183
27 Physical traded commodities				10	9
28 Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs		8,977			7,631
29 NSFR derivative assets		390			390
30 NSFR derivative liabilities before deduction of variation margin posted		2,104			105
31 All other assets not included in the above categories		6,393	314	5,451	7,048
32 Off-balance sheet items		56,467	7,323	28,169	4,754
33 Total RSF					188,458
34 Net Stable Funding Ratio (%)					140%

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.

3. Credit risk

Credit risk quality

EU CRA – General qualitative information about credit risk

Credit risk is the risk that the value and/or the earnings of the bank decline due to uncertainty in a counterparty's ability or willingness to repay a loan or meet the terms of a contractual obligation. The key indicators for preserving our credit risk profile are defined in our risk appetite statement.

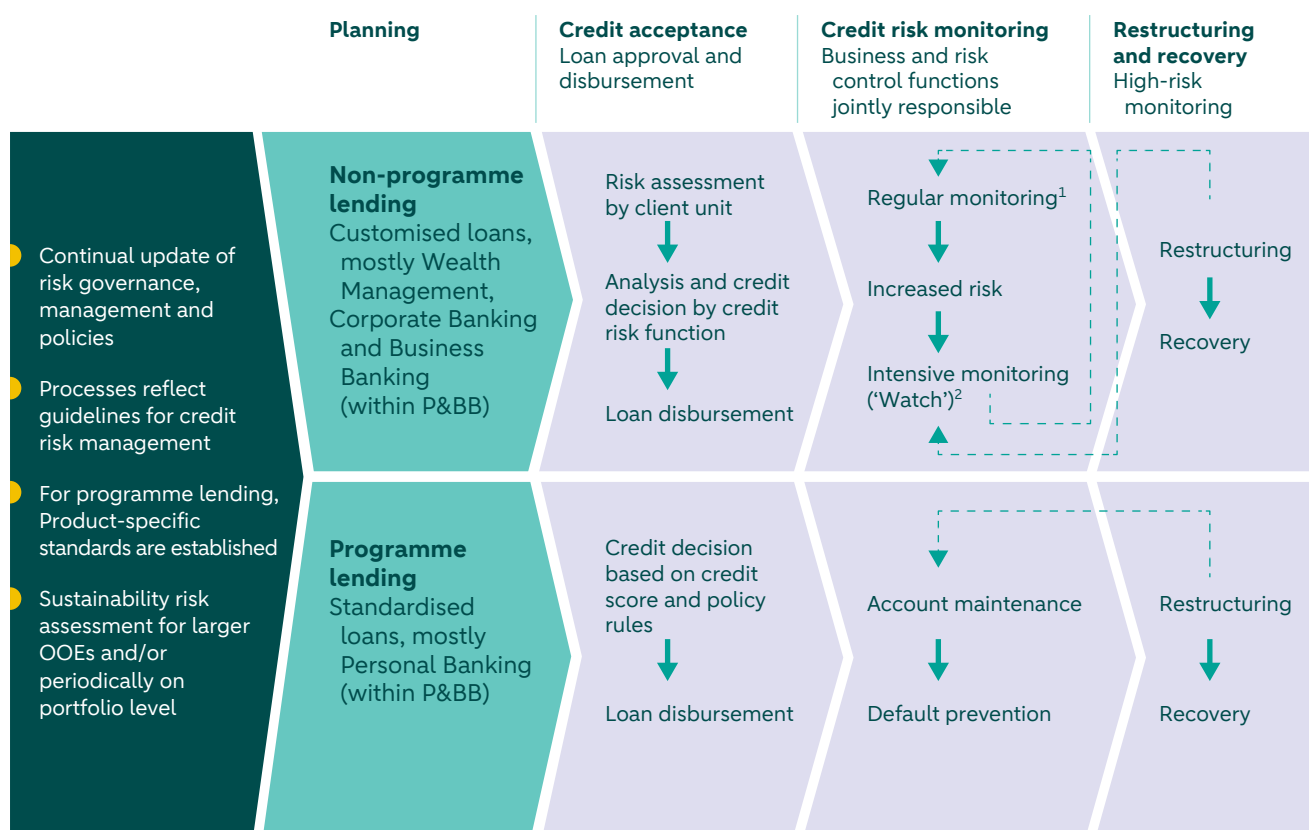
Credit risk management within the bank is governed by the bank-wide central credit risk policy and further detailed in underlying specific credit risk policies and standards, which are aligned with the bank's strategy. Credit risk management is the responsibility of the first and second lines of defence. The primary responsibility for intake, managing and monitoring credit risk lies with the business as the first line of defence. The second line of defence has a permanent and ongoing responsibility to define the boundaries and monitor whether the type and level of credit risk exposures are within the limits of the bank's and client units' risk appetite. The first and the second lines of defence are subject to review by Group Audit (third line of defence).

Credit risk management approach

Credit risk constitutes a key risk in our business model. ABN AMRO employs two separate approaches to managing credit risk, which reflect the bank's way of doing business. Standardised products and processes are managed on a pooled basis (programme lending), to which uniform risk criteria are assigned. For customised lending to counterparties (non-programme lending), risks are assessed on an individual basis. In addition, we are integrating climate risks into our risk management practices.

The following figure presents a simplified overview of the credit risk management process.

Credit risk management process



¹ Daily monitoring or (semi-) annual credit review.

² 'Watch': status assigned to counterparties with an increased risk.

Planning

Within programme lending, the credit cycle starts with a product planning phase, during which the product is designed and/or reviewed. The goal is to optimise the key drivers of risk and return within the context of ABN AMRO's strategy, risk appetite, clients' best interests and sustainability. For non-programme lending, the lending product is customised and not subject to a product planning phase.

Credit acceptance

For a credit approval decision within programme lending, client-specific aspects and internal and external data are taken into consideration to calculate a credit score (scorecard). The credit decision is based on the outcome of the scorecard and policy rules.

Within non-programme lending, the credit acceptance phase of a credit proposal starts with an assessment of the proposal by the relevant client unit. The qualitative and quantitative details of the credit risk associated with the loan are assessed prior to approval. Information must be provided on matters such as the purpose, details and structure of the proposed credit facility, the borrower and other counterparties, the industry and geography, management and owners, and financial and non-financial analyses. Compliance with internal policies is checked. After the assessment, an analysis is performed by Risk Management. The credit decision is based on independent assessments by the commercial and credit risk functions.

Credit risk monitoring

Consistent and regular monitoring of counterparties, exposures, risk mitigants and ongoing compliance with internal policies helps to safeguard the bank's position in relation to all risks associated with the counterparty, credit type or portfolio. Monitoring starts when the credit facility is granted and periodically continues throughout the lifecycle of the credit facility and the relationship with the counterparty until the exposure has been fully repaid and/or the limit has been cancelled.

Depending on whether a facility is considered programme or non-programme lending, a time-based or event-based review applies. For programme lending portfolios, the entire risk management framework defined in a product programme must be reviewed at least annually. Individual credit reviews are performed on the basis of pre-defined triggers for risk-based credit reviews. For non-programme lending, all counterparties are subject to at least an annual review. The review takes into consideration not only changes in risk profile, financial position, creditworthiness compared to the criteria and the assessment at the point of loan origination, but also climate and environmental risk (CER). Below we outline CER in our client assessment in more detail.

If a situation arises in which an individual counterparty shows signs of credit risk deterioration and an action is required in order to avoid the credit risk evolving into a default classification, a 'watch' status is assigned. This indicates that a counterparty is subject to increased monitoring and appropriate follow-up measures in order to prevent further deterioration or a default. Indicators for this status are changes in risk profile, liquidity problems, management issues, the market outlook, potential breach of a credit agreement, solvency issues and uncertain continuity.

Restructuring & Recovery

Non-programme lending credit facilities that are subject to a default event are mandatorily transferred to the Financial Restructuring & Recovery department (FR&R). If a 'going concern' approach is applicable and return to a performing status is considered likely, the credit facility is transferred to the Restructuring team, which will devise a plan aimed either at rehabilitation or enhancement of the likelihood of full repayment. If a 'gone concern' approach is applicable and the bank does not expect that the restructuring will result in the counterparty returning to a performing classification, the credit facility is transferred to the Recovery team.

Once a client is considered able to meet its future payment obligations and the involvement of FR&R is no longer required, the client is transferred back to the client unit.

Programme lending contracts are transferred to the Late Collections team if a default status is assigned because payments have been past due for more than 90 days or because another default trigger applies. If restructuring is ultimately ineffective, the client is transferred to other internal departments or external parties (such as Flanderijn) for debt collection.

FR&R plays a significant role in the execution of the bank's non-performing exposure (NPE) strategy, which consists of NPE targets for each business segment and specific sectors.

Credit concentration risk

Credit concentration risk is the risk of loss arising from large exposures, relative to the bank's total risk exposure, to a single counterparty or to counterparties that are positively and highly correlated. As limiting excessive concentrations is fundamental to our credit risk strategy, we aim to keep the credit risk portfolio sufficiently granular and diversified. To avoid excessive credit risk concentrations, Risk Management sets maximum levels for subgroups in the following categories:

- single counterparty and groups of related counterparties (counterparty concentration)
- countries (geographic concentration)
- industries (industry concentration)
- products (product concentration)
- climate risk (physical and/or transition risk concentration)

Counterparty concentration

Counterparty concentration credit risk is the risk of loss arising from relatively large exposures to counterparties belonging to the same risk group. The One Obligor Exposure (OOE) is the exposure to a risk group and includes all drawn and undrawn credit facilities granted, plus all indirect exposure to the risk group, including guarantees and any other recourse claims.

A risk group is an interrelated group of counterparties with a high degree of interdependency due to a control relationship. This control relationship may be due to direct or indirect majority interests being held by the same shareholder or group of shareholders.

Counterparty credit concentration risk is measured by the OOE and the Economic Capital (EC) per counterparty. The bank limits its counterparty credit risk by setting OOE and EC limits. Additionally, all credit applications with an OOE and/or EC above a certain threshold are reviewed by the Executive Board.

Geographic concentration

Geographic concentration risk is the risk of credit losses arising from events or circumstances specifically related to a country or location. We recognise geographic concentration in our books for climate risks in the Netherlands and for cross-border risks outside the Netherlands. ABN AMRO has branches and subsidiaries located outside the Netherlands, as well as clients who operate internationally.

Management of country risk focuses on cross-border risk, which includes the risk that funds, goods or services cannot be transferred out of a country as a result of actions by local authorities in that country or other events. These risks are managed by setting country credit limits, based on individual country analyses by economic, compliance and country risk experts.

Country limits are reviewed at least once a year. Each country also has an annually reviewed internal credit rating, which is an important factor in managing country concentration risks. As the Netherlands is our home country, it is not included in any concentration risk appetite statement or credit limits. Given that our strategic focus is on Northwest Europe, our country risk exposure has declined significantly in recent years.

Industry concentration

Industry concentration risk is the risk of loss arising from a relatively large credit exposure to counterparties active in a single industry. Industry concentration risk arises when deterioration in a specific industry has an effect on all credit exposures relating to that industry. ABN AMRO manages its industry concentrations by setting limits on economic capital (EC) for credit risk in each industry as a percentage of total EC for credit risk. Industries with a concentration limit are financial institutions, industrial transportation, industrial engineering and food & beverages. In addition to the EC limits, EC concentration checkpoints are set to facilitate timely and sufficient management interventions so as to avoid limits being breached.

Product concentration

Product concentration risk is the risk of loss arising from relatively large credit exposures in a specific asset or product class. This asset or product class concentration occurs, for example, in residential mortgages, commercial real estate and leveraged loans. In line with our risk appetite, ceilings are defined per product type.

Climate risk concentration

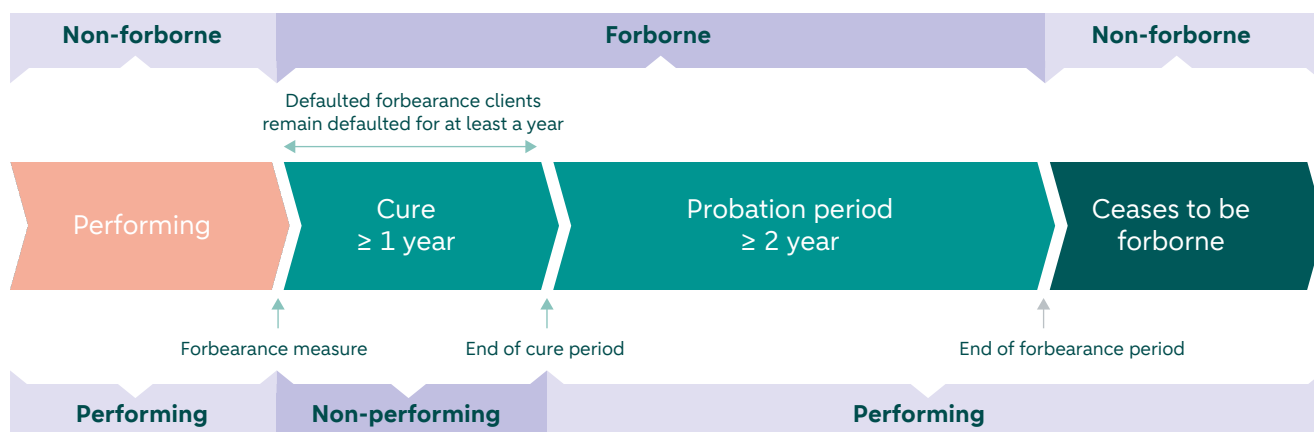
Concentration of corporate exposures highly susceptible to climate transition risk is limited in size and is monitored. In particular, we monitor the concentration of corporate loans in sectors contributing highly to climate change and also carbon-related corporate loans in such sectors. For managing climate risk in the residential mortgages book, the bank monitors the percentage of vulnerable properties that have relatively high climate transition risks and are located in an area sensitive to climate physical risk. Please refer to the Environment section in the Sustainability Statements of the Integrated Annual Report 2024 for more details of the GHG financed emissions and climate risks in our real estate portfolios.

EU CRB – Additional disclosures related to the credit quality of assets

We continuously monitor the credit portfolio for signs indicating that a counterparty may become credit impaired in the future. Loans at risk are classified into different risk categories for individual counterparties and into days-in-arrears buckets for groups of aggregated counterparties in order to optimise the monitoring and review of these loans.

Forbearance

Forbearance is the process of making concessions to clients who are or will soon be experiencing financial difficulty, with the intention of bringing them back within their payment capacity. A forbore asset is any contract that has been entered into with a counterparty that is in or about to face financial difficulty, and that has been refinanced or modified on terms and conditions that we would not have accepted if the counterparty had been financially healthy.



Forbearance measures can be applied to contracts on which the counterparty has already defaulted, as well as to contracts that are still performing. If the contract is considered to be performing at the time the forbearance measure is taken, an assessment is made to determine whether the counterparty will be able to meet the revised conditions of the contract and whether full repayment of the credit facility is expected. A forbore contract will cease to qualify as forbore only when all the following conditions are met:

- The contract is considered performing.
- A minimum probation period of at least two years has passed since the later of the last forbearance measure or the date on which the forbore contract was considered performing.
- Regular and timely payments of more than an insignificant amount of principal or interest have been made during at least half of the probation period.
- The counterparty does not have any contract, within the credit agreement, that is more than 30 days past due at the end of the probation period.

If the forbore contract is or has become non-performing at the time of the forbearance measure, a mandatory cure period of at least one year applies to the contract before it is returned to performing status. The cure period starts

when the contract becomes non-performing or, if the contract was already non-performing, when the last forbearance measure was taken.

Past due credit exposures

A financial asset is past due if a counterparty fails to make a payment on the contractual due date or if the counterparty has exceeded an agreed credit limit. ABN AMRO starts counting days past due on the first day that a counterparty is past due on any financial obligation.

Determining general and specific credit risk adjustments

The IFRS 9 impairment requirements are applicable to financial assets measured at amortised cost or fair value through other comprehensive income (FVOCI), loan commitments, lease receivables and contract assets and financial guarantee contracts. At each reporting date, these financial instruments are classified into one of three risk stages, depending on current credit quality, or as purchased or originated credit impaired (POCI).

POCI assets, which are credit impaired at initial recognition, are accounted for at fair value (i.e. net of the initial lifetime ECLs) and do not carry an impairment allowance. Instead, a credit-adjusted effective interest rate (EIR), which is calculated using expected cash flows including initial lifetime ECLs, is applied to the amortised cost. Subsequently, the cumulative changes in lifetime ECLs since initial recognition, which are discounted at the credit-adjusted effective interest rate, are recognised in the profit or loss statement as an impairment gain or loss, and presented under impairment charges on financial instruments. Once a financial asset is classified as POCI, it retains that classification until it is derecognised. For this reason, the POCI stage is not included in the following figure.

Change in credit quality since initial recognition		
Stage 1	Stage 2	Stage 3
Performing (Initial recognition)	Credit quality deteriorated (Assets with significant increase in credit risk since initial recognition)	Default = Impaired (Credit impaired assets)
Recognition of ECL		
12 month ECL	Lifetime ECL	Lifetime ECL
Interest income		
Effective interest on gross carrying amount	Effective interest on gross carrying amount	Effective interest on amortised cost (gross carrying amount less loss allowance)

Classification in stage 2

We use quantitative and qualitative stage triggers to determine whether a financial instrument should be classified as stage 1 or stage 2.

Quantitative stage triggers

The key quantitative metric that determines when a financial instrument is transferred from stage 1 to stage 2 is the deterioration in the lifetime probability of default (LPD) from the date of origination to the reporting date, based on internal data. The LPD represents the likelihood that a counterparty will default during the lifetime of the financial instrument and depends on credit risk drivers such as:

- product characteristics (e.g. repayment and interest terms, term of the product)
- the financial condition of the borrower
- the number of days past due
- expected developments in the economy

The lifetime PD deterioration (LPDD) measures the relative difference between the remaining lifetime PD at reporting (LPDR) and the remaining lifetime PD at origination (LPDO) as $LPDD = LPDR/LPDO$. If the LPD deterioration of an exposure is above a predefined threshold, the LPD is considered to be significantly deteriorated. The exposure is then transferred to stage 2 and impairment allowances equal to the lifetime expected credit loss are recognised. If the LPD

deterioration subsequently reduces and falls below the threshold, the client is transferred back to stage 1. When determining the thresholds, ABN AMRO distinguishes between various portfolios within consumer lending, residential mortgages and corporate loans. A specific threshold is calculated for each portfolio, based on a statistical method. The following table shows LPD deterioration thresholds that triggered transfers to stage 2 as at 31 December 2024. The table provides ranges because each product class uses multiple ECL models, and thresholds are determined for each ECL model.

Range of lifetime PD deterioration thresholds

Product class	Range
Consumer lending	1.8x-5.2x
Residential mortgages	1.5x-2.1x
Corporate loans	1.3x-5.8x

Qualitative stage triggers

The bank transfers a financial instrument from stage 1 to stage 2 if the instrument meets any of the following qualitative triggers:

- forbore status of a borrower
- watch status of a borrower. ABN AMRO assigns the watch status to counterparties with an increased credit risk. This process comprises intensive monitoring, early detection of deterioration in the credit portfolio and appropriate follow-up measures
- a delinquency-based regulatory backstop is in place, such that the credit risk of financial assets that are more than 30 days past due will be assumed to have significantly increased

Reclassification to stage 1

As a general rule, favourable changes in credit risk are recognised consistently with unfavourable changes, and a financial instrument is transferred back to stage 1 if quantitative or qualitative triggers are no longer met. In some cases, a probation period applies:

- Forborne financial instruments are transferred back from stage 2 to stage 1 only after a probation period of at least two years has ended, in line with the ABN AMRO forbearance policy. Stage 3 forborne instruments transfer back to stage 2 after a cure period of at least one year.
- For financial instruments that are 30 days past due, a three-month probation period is applied for transfers from stage 2 to stage 1.

Classification in stage 3

A transfer to stage 3 will always be the result of the default of a financial instrument. The definition of default for IFRS 9 is aligned with the regulatory capital definition. A default is deemed to have occurred when:

- the counterparty is past due by more than 90 days on any material financial credit obligation to the bank or
- the bank considers the borrower to be unlikely to meet its contractual obligations (unlikely to pay, or UTP)

The materiality of a financial obligation past due is assessed against an absolute and a relative threshold, in line with regulatory standards. To determine unlikelihood to pay, the bank has specified mandatory default triggers (always resulting in the assignment of a default status, whereby no additional expert judgement is allowed) and judgemental triggers (requiring an assessment by credit risk managers to determine whether the UTP indications should result in a default classification).

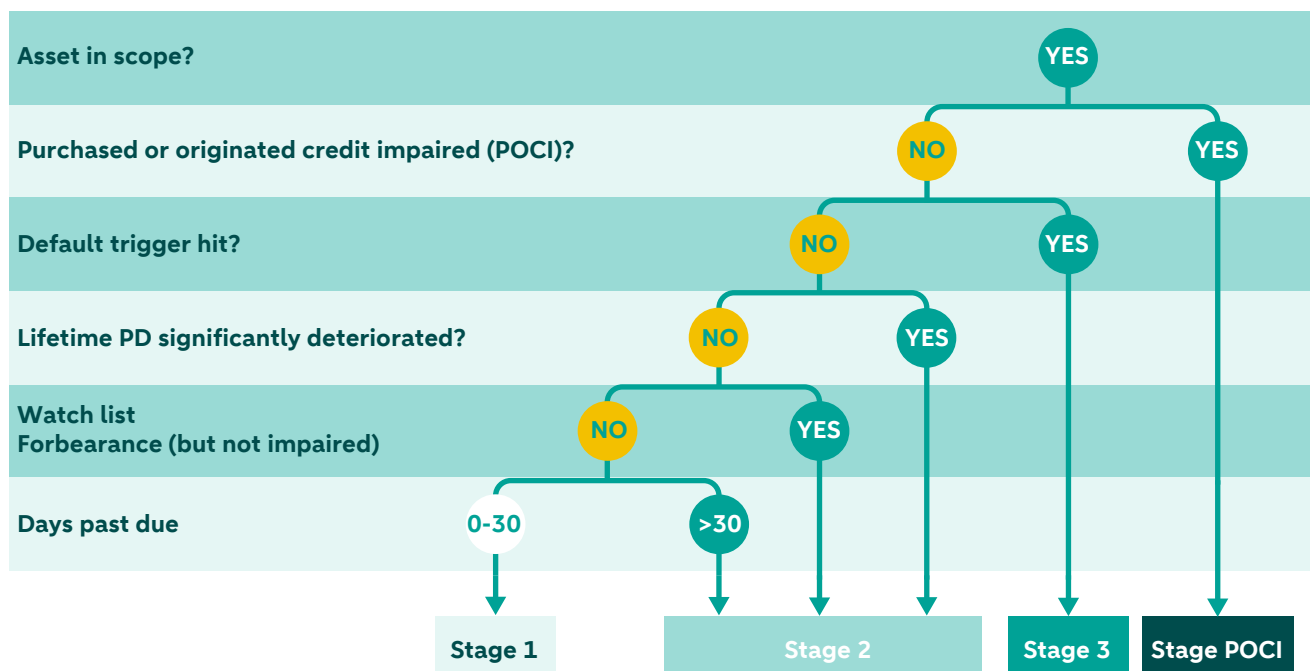
The mandatory triggers include the reporting of a forborne exposure under probation as non-performing for being 30 days past due or owing to an additional forbearance measure being applied. As a result, the definitions of non-performing and default are materially aligned.

Reclassification to stage 2

The default classification for non-forborne exposures ends when the default triggers no longer apply and a probation or cure period of at least three months has passed since the default trigger was last applied. For forborne exposures, a twelve-month cure period starts from the moment the last forbearance measure or default trigger was applied. After

the cure period, an assessment is performed to establish whether the improvement in the credit quality is factual and permanent (including, for example, no remaining past due amounts).

Asset stages



Calculation method

ABN AMRO recognises loss allowances based on the Expected Credit Loss model (ECL) of IFRS 9, which is designed to be forward-looking. The amount of ECL is based on the probability-weighted present value of all expected cash shortfalls over the remaining life of the financial instrument for both on- and off-balance sheet exposures. ABN AMRO distinguishes between two types of calculation methods for credit loss allowances:

- Individual Lifetime ECL (LECL) for credit impaired (stage 3) financial instruments with exposures above EUR 3 million.
- Collective 12-month ECL (stage 1) and LECL (stage 2 and 3) for financial instruments that have similar credit risk characteristics (e.g. residential mortgages, consumer loans and SME loans); these are clustered in portfolios and collectively assessed for impairment losses. A collective impairment calculation approach based on individual parameters is also applied to stage 3 exposures below EUR 3 million. ABN AMRO has models to quantify the Probability of Loss (PL), Loss Given Loss (LGL) and Exposure at Loss (EAL) for the purpose of calculating the collective 12-month ECL and LECL for these financial instruments.

Lifetime expected credit loss

ABN AMRO defines the lifetime of credit as the maximum contractual period during which the bank is exposed to credit risk; we do not apply a longer period, even if that longer period is consistent with business practice. For some contracts, such as overdraft facilities or credit cards, no end date is specified or amounts can be contractually withdrawn by the lender at short notice. In these cases, ABN AMRO uses behavioural maturity models that rely on historical client behaviour to determine future expected exposures.

Forward-looking information

For expected credit loss calculations, ABN AMRO uses three different scenarios of future economic developments: a baseline (or most likely) scenario, a negative scenario and a positive scenario. The three scenarios are incorporated into the expected credit loss calculation and risk stage determination in a probability-weighted manner.

In order to incorporate the latest economic outlook, the scenarios and their weights are reviewed each quarter and adjusted if necessary. Details of the scenarios and their weights used in the reporting period can be found in the Credit risk review section of the Integrated Annual Report 2024. The baseline scenario entails our Group Economics analysts' current macroeconomic base scenario, which usually covers the current year and subsequent year. For the purpose of scenario analysis under IFRS 9, this baseline is extended by three or four additional calendar years, after which it

is assumed that macroeconomic variables (MEVs) gradually move to their potential or equilibrium values. At least once every quarter, Group Economics compares its forecasts with those of institutions like the Netherlands Bureau for Economic Policy Analysis (CPB), the Dutch central bank (DNB), ECB, IMF or OECD in order to determine possible differences and to analyse whether it can underpin them. This external benchmarking exercise is a standard input to the Scenario Booklet that is presented to the bank's Scenario and Stress Testing Committee for approval. Group Economics also develops a negative and a positive scenario. These scenarios are designed to give an impression of the bandwidth within which the economy, interest and FX rates, and other relevant variables are likely to move in the next four to five years, with a probability of around 85% (roughly corresponding to a standard deviation of plus and minus one and a half). Hence, these scenarios produce upper and lower boundaries, with a resulting bandwidth between the outcomes of the negative ('bad weather' in terms of financial results of the bank) and positive ('good weather') scenarios. To determine these boundaries, Group Economics may look at historical developments, medium-term (non-baseline) scenarios made by the above institutions and other relevant developments.

Management overlays and other adjustments

Where necessary to reflect credit risk dynamics not captured by our models, management judgement is applied via a management overlay or other IFRS 9 adjustment. A management overlay is a temporary adjustment in a loss allowance until a long-term solution (e.g. model adjustment) is effective, and must be an amount commensurate to the model limitation. All overlays require a decision by the Impairment and Provision Committee (IPC). The main types of management overlays that ABN AMRO distinguishes are: post-model adjustments (adjustments to model outcomes), adjustments in the weightings of macroeconomic scenarios and stage overrides. Other adjustments such as adjustments to model parameters or input data are not considered management overlays, but follow the same internal approval process.

Cured financial assets

When a credit impaired financial asset cures, the interest that was previously unrecognised is reported as an impairment release in the impairment charge rather than as a credit to the interest income calculated using the effective interest method.

Write-off

Under IFRS 9, 'write-off' refers to the process of recognising that a financial asset, or a portion of it, is uncollectible and should be removed from an entity's balance sheet. This typically happens when there is no reasonable expectation of recovering the asset, indicating that the entity has exhausted all practical recovery efforts.

- For non-programme lending, a loan must be written off if all possible means of recovery have been exhausted and it has become clear that there is a low probability of recovering the debt, either in part or full.
- Most of the programme lending facilities are automatically written off after 1,080 days in default.

Such loans are written off after all the necessary procedures have been completed and the amount of the loss has been determined. Subsequent recoveries of amounts previously written off are credited to impairment charges on financial instruments in the income statement.

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

The tables below provide an overview of the gross carrying amounts and the related provisions, split into performing and non-performing exposures. The gross carrying amount is split into loans and advances, debt securities, and off-balance sheet positions.

In the second half of 2024, the total loans and advances decreased significantly, most in relation to credit institutions and other financial corporations. This was mainly the result of seasonal balance sheet steering measures combined with lower trading positions of Clearing clients. There was also a decrease in non-financial corporations, mainly due to developments in Corporate Banking. On the other hand, there was a strong increase in cash balances at central banks and other demand deposits, and in off-balance sheet exposures. There was also an increase noted in households, mainly due to the increase in our mortgages portfolio. Also, off-balance sheet exposures increased mainly in other financial corporations.

Non-performing exposures increased, mostly coming from households. This is mainly due to the implementation of methodology changes to better reflect the presentation of credit risk characteristics of interest only mortgages.

	A	B	C	D	E	F
	31 December 2024					
	Gross carrying amount/nominal amount					
	Performing exposures	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)						
005 Cash balances at central banks and other demand deposits	45,216	45,216				
010 Loans and advances	282,221	256,497	25,122	5,425	109	5,256
020 Central banks	840	840				
030 General governments	400	393	7	5		5
040 Credit institutions	8,240	8,203	37			
050 Other financial corporations	44,169	43,649	520	50		50
060 Non-financial corporations	63,026	55,328	7,668	2,935		2,928
070 - of which SMEs	15,100	12,999	2,101	971		969
080 Households	165,547	148,084	16,891	2,435	109	2,273
090 Debt securities	46,155	46,155				
100 Central banks	1,408	1,408				
110 General governments	35,434	35,434				
120 Credit institutions	8,974	8,974				
130 Other financial corporations	310	310				
140 Non-financial corporations	29	29				
150 Off-balance sheet exposures	96,525	51,414	3,294	927		627
160 Central banks	111	111				
170 General governments	1,131	987	1			
180 Credit institutions	652	387	8			
190 Other financial corporations	36,211	8,484	365	1		
200 Non-financial corporations	44,448	34,554	2,652	914		616
210 Households	13,971	6,891	269	12		11
220 Total	470,116	399,282	28,415	6,352	109	5,883

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
	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions						Accumulated partial write-off	31 December 2024	
	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)									
005 Cash balances at central banks and other demand deposits	-4	-4						16	
010 Loans and advances	-393	-167	-226	-998	-1	-972	-45	234,167	3,880
020 Central banks								645	
030 General governments				-1		-1		79	
040 Credit institutions								7,063	
050 Other financial corporations	-12	-8	-3	-9		-9		29,377	13
060 Non-financial corporations	-252	-103	-149	-763		-763	-6	39,679	1,764
070 - of which SMEs	-79	-30	-49	-250		-250	-4	10,039	566
080 Households	-129	-56	-73	-225	-1	-199	-39	157,324	2,102
090 Debt securities	-1	-1							
100 Central banks									
110 General governments	-1	-1							
120 Credit institutions									
130 Other financial corporations									
140 Non-financial corporations									
150 Off-balance sheet exposures	16	6	10	80		3		8,674	192
160 Central banks									
170 General governments								3	
180 Credit institutions								1	
190 Other financial corporations								604	
200 Non-financial corporations	13	5	8	80		3		7,670	188
210 Households	3	1	2					397	4
220 Total	-413	-177	-236	-1,078	-1	-976	-45	242,857	4,072

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

	A	B	C	D	E	F
	30 June 2024					
	Gross carrying amount/nominal amount					
	Performing exposures		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)						
005 Cash balances at central banks and other demand deposits	39,044	39,044				
010 Loans and advances	297,728	276,332	20,792	5,097	125	4,904
020 Central banks	1,092	1,092				
030 General governments	1,402	1,381	21	6		6
040 Credit institutions	16,225	16,225		37		37
050 Other financial corporations	48,676	47,628	1,048	110		110
060 Non-financial corporations	65,979	57,373	8,577	2,991		2,988
070 - of which SMEs	16,602	13,884	2,718	965		963
080 Households	164,354	152,633	11,145	1,953	125	1,764
090 Debt securities	49,349	49,349				
100 Central banks	4,692	4,692				
110 General governments	34,803	34,803				
120 Credit institutions	9,204	9,204				
130 Other financial corporations	635	635				
140 Non-financial corporations	16	16				
150 Off-balance sheet exposures	89,447	49,365	3,850	1,118		678
160 Central banks	2		2			
170 General governments	1,127	988				
180 Credit institutions	745	489	8			
190 Other financial corporations	31,744	8,818	678			
200 Non-financial corporations	42,098	32,577	2,868	1,102		663
210 Households	13,731	6,493	295	16		15
220 Total	475,568	414,090	24,642	6,215	125	5,582

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
	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)									
005 Cash balances at central banks and other demand deposits	-2	-2						18	
010 Loans and advances	-446	-220	-226	-1,087	-2	-1,055	-47	246,623	3,309
020 Central banks								892	
030 General governments								1,095	
040 Credit institutions								12,948	37
050 Other financial corporations	-8	-5	-4	-49		-49	-6	34,016	27
060 Non-financial corporations	-309	-157	-151	-731		-730	-2	41,996	1,725
070 - of which SMEs	-103	-48	-55	-228		-228		11,218	536
080 Households	-129	-58	-71	-308	-2	-276	-40	155,676	1,520
090 Debt securities	-1	-1							
100 Central banks									
110 General governments	-1	-1							
120 Credit institutions									
130 Other financial corporations									
140 Non-financial corporations									
150 Off-balance sheet exposures	28	15	13	130		56		9,735	291
160 Central banks									
170 General governments								3	
180 Credit institutions								1	
190 Other financial corporations	2	1						1,265	
200 Non-financial corporations	24	13	11	130		56		7,910	285
210 Households	3	1	1					556	6
220 Total	-478	-238	-239	-1,217	-2	-1,111	-47	256,376	3,600

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

	A	B	C	D	E	F
	31 December 2023					
	Gross carrying amount/nominal amount					
	Performing exposures	Of which:		Non-performing exposures		
		stage 1 ¹	stage 2 ¹		Of which: stage 2 ¹	Of which: stage 3 ¹
(in millions)						
005 Cash balances at central banks and other demand deposits	54,761	54,761				
010 Loans and advances	275,637	253,102	21,876	4,922	117	4,708
020 Central banks	491	491				
030 General governments	622	596	26	7		7
040 Credit institutions	8,161	8,124	37			
050 Other financial corporations	40,183	39,569	614	188		188
060 Non-financial corporations	64,225	54,877	9,290	2,804		2,799
070 - of which SMEs	15,824	13,143	2,681	970		967
080 Households	161,955	149,446	11,909	1,923	117	1,714
090 Debt securities	40,632	40,632				
100 Central banks	1,357	1,357				
110 General governments	30,697	30,697				
120 Credit institutions	7,751	7,751				
130 Other financial corporations	752	752				
140 Non-financial corporations	74	74				
150 Off-balance sheet exposures	90,730	52,141	3,507	1,328		965
160 Central banks						
170 General governments	1,099	1,072	3			
180 Credit institutions	410	258	10			
190 Other financial corporations	31,949	9,582	323			
200 Non-financial corporations	43,827	35,072	2,879	1,312		951
210 Households	13,444	6,158	292	15		13
220 Total	461,760	400,637	25,383	6,250	117	5,672

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
	31 December 2023								
	Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions			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	Of which: stage 2 ¹	Of which: stage 3 ¹			
(in millions)									
05 Cash balances at central banks and other demand deposits	-2	-2						39	
010 Loans and advances	-523	-235	-288	-1,126	-2	-1,080	-71	225,484	3,137
020 Central banks								243	
030 General governments	-2		-1	-1		-1		158	5
040 Credit institutions	-1	-1						6,778	
050 Other financial corporations	-9	-6	-4	-59		-59		25,289	19
060 Non-financial corporations	-362	-167	-195	-736		-736	-23	40,584	1,670
070 - of which SMEs	-119	-53	-65	-252		-252	-5	11,011	591
080 Households	-149	-61	-88	-331	-2	-285	-48	152,431	1,443
090 Debt securities	-1	-1							
100 Central banks									
110 General governments	-1	-1							
120 Credit institutions									
130 Other financial corporations									
140 Non-financial corporations									
150 Off-balance sheet exposures	28	16	12	92		81		8,675	547
160 Central banks									
170 General governments								4	
180 Credit institutions								1	
190 Other financial corporations	1							849	
200 Non-financial corporations	24	14	10	92		81		7,233	543
210 Households	3	1	2					588	4
220 Total	-554	-254	-300	-1,219	-2	-1,161	-71	234,199	3,684

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

EU CR1-A - Maturity of exposures

As at 31 December 2024, total loans and advances decreased notably in the ≤ 1 year maturity bucket, mainly driven by lower trading positions of Clearing clients. Similarly, total debt securities decreased notably in the ≤ 1 year maturity bucket due to balance sheet steering.

	A	B	C	D	E	F
	31 December 2024					
	Net exposure value					
(in millions)	On demand	≤ 1 year	>1 year ≤ 5 years	> 5 years	No stated maturity	Total
1 Loans and advances	15,183	46,334	48,349	163,464	13,012	286,341
2 Debt securities		9,720	19,151	19,698		48,569
3 Total	15,183	56,054	67,499	183,162	13,012	334,910

	30 June 2024					
1 Loans and advances	20,894	56,893	47,482	161,802	14,232	301,304
2 Debt securities		12,402	19,399	19,641		51,442
3 Total	20,895	69,295	66,882	181,443	14,232	352,746

	31 December 2023					
1 Loans and advances	13,065	44,914	46,268	163,219	11,453	278,919
2 Debt securities	1,970	5,880	17,461	16,679		41,991
3 Total	15,036	50,794	63,729	179,898	11,453	320,910

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

The table illustrates the changes in the stock of non-performing loans and advances. In the second half of 2024, there was a slight increase in the final stock of non-performing loans and advances.

The increase was attributable to a higher amount of inflows relative to outflows, primarily as a result of client inflows from performing not-forborne, mainly driven by the increase in mortgages resulting from methodology changes. The majority of the outflows related to the reclassification of clients to performing not-forborne and other reasons.

(in millions)	A	B	C
	31 December 2024	30 June 2024	31 December 2023
	Gross carrying amount	Gross carrying amount	Gross carrying amount
1 Initial stock of non-performing loans and advances	4,922	4,922	5,320
2 Inflows to non-performing portfolios	3,182	2,020	3,370
3 Outflows from non-performing portfolios	-2,679	-1,845	-3,769
4 Outflows due to write-offs	-101	-161	-301
5 Outflow due to other situations	-2,578	-1,683	-3,468
6 Final stock of non-performing loans and advances	5,425	5,097	4,922

EU CQ1 - Credit quality of forborne exposures

As at 31 December 2024, total forborne exposure (including loan commitments given) decreased to EUR 6.1 billion (30 June 2024: EUR 6.9 billion). The largest decrease was in loans to non-financial corporations.

(in millions)	A	B	C	D	E	F	G	H
							31 December 2024	
	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			On performing forborne exposures	On non-performing forborne exposures	Of which: collateral and financial guarantees received on non-performing exposures with forbearance measures	
			Of which: defaulted	Of which: impaired				
005 Cash balances at central banks and other demand deposits								
010 Loans and advances	2,799	2,301	2,191	2,186	-43	-440	3,559	1,694
020 Central banks								
030 General governments		1	1	1				
040 Credit institutions								
050 Other financial corporations	111	39	39	39	-1	-7	30	8
060 Non-financial corporations	2,011	1,632	1,632	1,632	-37	-381	2,357	1,135
070 Households	677	628	519	513	-6	-52	1,172	552
080 Debt securities								
090 Loan commitments given	690	291	262	262	2	3	241	82
100 Total	3,490	2,591	2,454	2,448	-45	-442	3,800	1,776

	A	B	C	D	E	F	G	H
							30 June 2024	
	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 forbore exposures	
	Performing forbore	Non-performing forbore	Of which: defaulted	Of which: impaired	On performing forbore exposures ¹	On non-performing forbore exposures ¹	Of which: collateral and financial guarantees received on non-performing exposures with forbearance measures	
(in millions)								
005 Cash balances at central banks and other demand deposits								
010 Loans and advances	3,148	2,528	2,403	2,395	-49	-449	3,915	1,792
020 Central banks								
030 General governments		1	1	1				
040 Credit institutions								
050 Other financial corporations	140	31	31	31	-1		136	8
060 Non-financial corporations	2,355	1,834	1,834	1,834	-40	-380	2,627	1,234
070 Households	654	662	537	529	-8	-69	1,153	550
080 Debt securities								
090 Loan commitments given	823	421	421	421	2	53	243	116
100 Total	3,971	2,949	2,824	2,815	-51	-502	4,158	1,908

	A	B	C	D	E	F	G	H
							31 December 2023	
	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 forbore exposures	
	Performing forbore	Non-performing forbore	Of which: defaulted	Of which: impaired	On performing forbore exposures	On non-performing forbore exposures	Of which: collateral and financial guarantees received on non-performing exposures with forbearance measures	
(in millions)								
005 Cash balances at central banks and other demand deposits								
010 Loans and advances	3,062	2,472	2,355	2,342	-56	-510	3,873	1,649
020 Central banks								
030 General governments		2	2	2		-1		
040 Credit institutions								
050 Other financial corporations	117	34	34	34			35	10
060 Non-financial corporations	2,298	1,774	1,774	1,774	-50	-438	2,691	1,096
070 Households	647	663	545	533	-6	-71	1,147	543
080 Debt securities								
090 Loan commitments given	553	613	613	613	1		328	183
100 Total	3,616	3,086	2,968	2,955	-57	-510	4,201	1,832

EU CQ3 - Credit quality of performing and non-performing exposures by past due days

Performing exposures that are past due for longer than 30 days declined marginally, compared to 31 December 2023. Non-performing exposures increased by EUR 0.1 billion, driven largely by two factors: Exposures that were classified as unlikely to pay but less than 90 days past due were up by EUR 0.7 billion, mainly in the households category and primarily driven by mortgages. On the other hand, non-performing off-balance sheet exposures declined by EUR 0.4 billion.

	A	B	C
	31 December 2024		
	Gross carrying amount/nominal amount		
	Performing exposures		
		Not past due + past due ≤ 30 days	Past due > 30 days ≤ 90 days
(in millions)			
005 Cash balances at central banks and other demand deposits	45,216	45,216	
010 Loans and advances	282,221	281,870	351
020 Central banks	840	840	
030 General governments	400	399	
040 Credit institutions	8,240	8,240	
050 Other financial corporations	44,169	44,133	36
060 Non-financial corporations	63,026	62,778	248
070 - of which SMEs	15,100	14,975	126
080 Households	165,547	165,480	67
090 Debt securities	46,155	46,155	
100 Central banks	1,408	1,408	
110 General governments	35,434	35,434	
120 Credit institutions	8,974	8,974	
130 Other financial corporations	310	310	
140 Non-financial corporations	29	29	
150 Off-balance sheet exposures	96,525		
160 Central banks	111		
170 General governments	1,131		
180 Credit institutions	652		
190 Other financial corporations	36,211		
200 Non-financial corporations	44,448		
210 Households	13,971		
220 Total	470,116	373,241	351

	D	E	F	G	H	I	J	K	L
	31 December 2024								
	Gross carrying amount/nominal amount								
	Non-performing exposures								
	UTP, past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 year	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which: defaulted	
(in millions)									
005 Cash balances at central banks and other demand deposits									
010 Loans and advances	5,425	4,876	115	126	124	102	57	25	5,316
020 Central banks									
030 General governments	5				5				5
040 Credit institutions									
050 Other financial corporations	50	47	1			1			50
060 Non-financial corporations	2,935	2,702	39	54	50	49	24	17	2,935
070 - of which SMEs	971	807	26	46	31	40	8	14	971
080 Households	2,435	2,126	75	72	68	52	33	8	2,326
090 Debt securities									
100 Central banks									
110 General governments									
120 Credit institutions									
130 Other financial corporations									
140 Non-financial corporations									
150 Off-balance sheet exposures	927								627
160 Central banks									
170 General governments									
180 Credit institutions									
190 Other financial corporations	1								
200 Non-financial corporations	914								616
210 Households	12								11
220 Total	6,352	4,876	115	126	124	102	57	25	5,943

	A	B	C
	31 December 2023		
	Gross carrying amount/nominal amount		
	Performing exposures		
(in millions)		Not past due + past due ≤ 30 days	Past due > 30 days ≤ 90 days
005 Cash balances at central banks and other demand deposits	54,761	54,761	
010 Loans and advances	275,637	275,252	384
020 Central banks	491	491	
030 General governments	622	616	6
040 Credit institutions	8,161	8,161	
050 Other financial corporations	40,183	40,129	54
060 Non-financial corporations	64,225	63,968	258
070 - of which SMEs	15,824	15,749	75
080 Households	161,955	161,888	67
090 Debt securities	40,632	40,632	
100 Central banks	1,357	1,357	
110 General governments	30,697	30,697	
120 Credit institutions	7,751	7,751	
130 Other financial corporations	752	752	
140 Non-financial corporations	74	74	
150 Off-balance sheet exposures	90,730		
160 Central banks			
170 General governments	1,099		
180 Credit institutions	410		
190 Other financial corporations	31,949		
200 Non-financial corporations	43,827		
210 Households	13,444		
220 Total	461,760	370,645	384

	D	E	F	G	H	I	J	K	L
	31 December 2023								
	Gross carrying amount/nominal amount								
	Non-performing exposures								
(in millions)	UTP, past due ≤ 90 days	Past due > 90 days ≤ 180 days	Past due > 180 days ≤ 1 year	Past due > 1 year ≤ 2 year	Past due > 2 years ≤ 5 years	Past due > 5 years ≤ 7 years	Past due > 7 years	Of which: defaulted	
005 Cash balances at central banks and other demand deposits									
010 Loans and advances	4,922	4,219	100	185	158	144	35	80	4,805
020 Central banks									
030 General governments	7	2		5					7
040 Credit institutions									
050 Other financial corporations	188	144				1		43	188
060 Non-financial corporations	2,804	2,486	27	85	80	87	7	32	2,804
070 - of which SMEs	970	790	13	30	66	36	7	28	970
080 Households	1,923	1,588	74	95	77	56	28	5	1,806
090 Debt securities									
100 Central banks									
110 General governments									
120 Credit institutions									
130 Other financial corporations									
140 Non-financial corporations									
150 Off-balance sheet exposures	1,328								966
160 Central banks									
170 General governments									
180 Credit institutions									
190 Other financial corporations									
200 Non-financial corporations	1,312								951
210 Households	15								15
220 Total	6,250	4,219	100	185	158	144	35	80	5,771

EU CQ4 - Quality of non-performing exposures by geography

The table below includes the top five countries with on-balance sheet exposure in excess of EUR 10 billion. The countries that fall below EUR 10 billion and that we consider to be less material, in the context of this template, have been grouped under 'Other countries'. In comparison with 30 June 2024, on-balance sheet exposures have decreased markedly, most notably in Germany and the United Kingdom, partly as a result of steering the Asset Based Finance portfolio.

	A	B	C	D	E	F	G
						31 December 2024	
	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: subject to impairment			
			Of which: defaulted				
(in millions)							
010 On-balance sheet exposures	333,800	5,425	5,316	333,145	-1,367		-25
020 Netherlands	217,799	4,915	4,806	217,145	-1,065		-25
030 United States	27,358	1	1	27,358	-1		
040 France	15,665	161	161	15,665	-76		
050 Germany	12,557	61	61	12,557	-45		
060 United Kingdom	10,113	84	84	10,113	-24		
070 Other countries ¹	50,308	204	204	50,308	-155		
080 Off-balance sheet exposures	97,452	927	627			97	
090 Netherlands	47,827	652	474			22	
100 United States	12,993	24	24				
110 United Kingdom	8,106	61	61			2	
120 France	4,401	22	20			4	
130 Germany	4,084	45	45				
140 Other countries ¹	20,041	124	4			69	
150 Total	431,252	6,352	5,943	333,145	-1,367	97	-25

1. Other countries: Albania, Algeria, Andorra, Angola, Argentina, Armenia, 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, El Salvador, Estonia, Ethiopia, Finland, French Guiana, Gabon, Gambia, Georgia, Ghana, Gibraltar, Greece, Guadeloupe, Guernsey, Guyana, Haiti, Honduras, Hong Kong, Hungary, Iceland, India, Indonesia, Iran, Iraq, Ireland, Isle of Man, Israel, Italy, Japan, Jersey, Jordan, Kazakhstan, Kenya, Kuwait, Laos, Latvia, Lebanon, Liberia, Libyan Arab Jamahiriya, Liechtenstein, Lithuania, Luxembourg, Macedonia, Malaysia, Maldives, Malta, Marshall Islands, Martinique, Mauritius, Mexico, Monaco, Montenegro, Morocco, Namibia, New Zealand, Nigeria, Norway, Oman, Pakistan, Panama, 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, St. Maarten (MF), St. Maarten (SX), Suriname, Sweden, Switzerland, Taiwan, Tajikistan, Thailand, Tunisia, Turkey, Ukraine, United Arab Emirates, Uruguay, Vietnam, Zambia.

	A	B	C	D	E	F	G
							30 June 2024
	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: subject to impairment			
(in millions)			Of which: defaulted				
010 On-balance sheet exposures	352,174	5,097	4,972	351,505	-1,505		-30
020 Netherlands	221,627	4,298	4,173	220,958	-1,135		-30
030 United States	25,908	64	64	25,908	-1		
040 France	17,238	165	165	17,238	-76		
050 Germany	15,838	104	104	15,838	-43		
060 United Kingdom	12,190	118	118	12,190	-25		
070 Other countries ¹	59,373	349	349	59,373	-224		
080 Off-balance sheet exposures	90,565	1,118	678			158	
090 Netherlands	46,453	867	614			85	
100 United States	11,279	23	23				
110 United Kingdom	6,630	31	31			3	
120 France	3,935	5	4			4	
130 Germany	3,868	9	2				
140 Other countries ¹	18,399	182	5			65	
150 Total	442,739	6,215	5,650	351,505	-1,505	158	-30

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

	A	B	C	D	E	F	G
						31 December 2023	
	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: subject to impairment			
(in millions)			Of which: defaulted				
010 On-balance sheet exposures	321,190	4,922	4,805	320,439	-1,606		-44
020 Netherlands	217,187	4,176	4,060	216,436	-1,249		-44
030 United States	28,878	81	81	28,878	-14		
040 Germany	11,909	38	38	11,909	-20		
050 France	11,902	120	120	11,902	-73		
060 United Kingdom	8,538	85	85	8,538	-19		
070 Other countries ¹	42,776	421	421	42,776	-231		
080 Off-balance sheet exposures	92,058	1,328	966			120	
090 Netherlands	49,860	1,084	885			90	
100 United States	10,714	29	29			3	
110 United Kingdom	6,310	35	35			5	
120 Germany	4,164	1	1				
130 France	4,003	2				4	
140 Other countries ¹	17,008	176	16			18	
150 Total	413,248	6,250	5,771	320,439	-1,606	120	-44

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

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

Non-financial corporations are classified by sector of economic activities using NACE codes on the basis of the principal activity of the counterparty. NACE codes are reported with the first level of disaggregation (by 'section'). Compared to June 2024, the gross carrying amount to non-financial corporations decreased by EUR 3.0 billion. Largest declines were in financial and insurance activities, information and communication, and wholesale and retail trade. Non-performing exposures declined by EUR 0.1 billion, and were for the largest part in financial and insurance activities.

	A	B	C	D	E	F
					31 December 2024	
	Gross carrying amount	Of which: non-performing	Of which: defaulted	Of which: loans and advances subject to impairment	Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
(in millions)						
010 Agriculture, forestry and fishing	4,524	151	151	4,524	-57	
020 Mining and quarrying	1,223	10	10	1,223	-1	
030 Manufacturing	4,224	535	535	4,224	-72	
040 Electricity, gas, steam and air conditioning supply	1,951	102	102	1,951	-40	
050 Water supply	560	43	43	560	-7	
060 Construction	2,423	128	128	2,423	-32	
070 Wholesale and retail trade	5,408	384	384	5,408	-150	
080 Transport and storage	7,381	111	111	7,381	-29	
090 Accommodation and food service activities	644	22	22	644	-12	
100 Information and communication	3,757	46	46	3,757	-40	
110 Financial and insurance activities ¹	15,216	634	634	15,216	-338	
120 Real estate activities	8,996	232	232	8,972	-78	
130 Professional, scientific and technical activities	3,871	249	249	3,871	-91	
140 Administrative and support service activities	3,598	118	118	3,598	-38	
150 Public administration and defense, compulsory social security	1			1		
160 Education	49	1	1	49	-1	
170 Human health services and social work activities	1,843	151	151	1,837	-20	
180 Arts, entertainment and recreation	159	12	12	159	-7	
190 Other services	132	8	8	132	-2	
200 Total	65,960	2,935	2,935	65,930	-1,015	

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'.

	A	B	C	D	E	F
					30 June 2024	
	Gross carrying amount				Accumulated impairment	Accumulated negative changes in fair value due to credit risk on non-performing exposures
		Of which: non-performing	Of which: defaulted	Of which: loans and advances subject to impairment		
(in millions)						
010 Agriculture, forestry and fishing	4,496	158	158	4,496	-79	
020 Mining and quarrying	1,368	63	63	1,368	-1	
030 Manufacturing	4,331	556	556	4,331	-100	
040 Electricity, gas, steam and air conditioning supply	1,986	101	101	1,986	-45	
050 Water supply	617	36	36	617	-3	
060 Construction	2,213	50	50	2,213	-19	
070 Wholesale and retail trade	6,211	374	374	6,211	-187	
080 Transport and storage	7,320	99	99	7,320	-28	
090 Accommodation and food service activities	735	24	24	735	-11	
100 Information and communication	4,707	106	106	4,707	-39	
110 Financial and insurance activities ¹	16,206	737	737	16,206	-289	
120 Real estate activities	8,764	203	203	8,761	-92	
130 Professional, scientific and technical activities	4,052	236	236	4,052	-89	
140 Administrative and support service activities	3,682	78	78	3,682	-27	
150 Public administration and defense, compulsory social security	1			1		
160 Education	60	1	1	60	-1	
170 Human health services and social work activities	1,914	141	141	1,888	-18	
180 Arts, entertainment and recreation	177	14	14	177	-7	
190 Other services	130	15	15	130	-4	
200 Total	68,970	2,991	2,991	68,941	-1,039	

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'.

	A	B	C	D	E	F
					31 December 2023	
					Accumulated negative changes in fair value due to credit risk on non-performing exposures	
	Gross carrying amount				Accumulated impairment	
		Of which: non-performing	Of which: defaulted	Of which: loans and advances subject to impairment		
(in millions)						
010 Agriculture, forestry and fishing	4,735	216	216	4,735	-79	
020 Mining and quarrying	1,386	68	68	1,386	-1	
030 Manufacturing	3,772	590	590	3,772	-134	
040 Electricity, gas, steam and air conditioning supply	1,915	115	115	1,915	-59	
050 Water supply	609	1	1	609	-1	
060 Construction	2,226	73	73	2,226	-34	
070 Wholesale and retail trade	5,904	302	302	5,904	-159	
080 Transport and storage	7,285	158	158	7,257	-33	
090 Accommodation and food service activities	686	26	26	686	-18	
100 Information and communication	3,926	47	47	3,926	-30	
110 Financial and insurance activities ¹	16,029	574	574	16,029	-304	
120 Real estate activities	8,913	152	152	8,883	-72	
130 Professional, scientific and technical activities	4,065	240	240	4,065	-108	
140 Administrative and support service activities	3,209	68	68	3,209	-22	
150 Public administration and defense, compulsory social security	2			2		
160 Education	60	3	3	60	-1	
170 Human health services and social work activities	2,015	139	139	2,015	-29	
180 Arts, entertainment and recreation	181	18	18	181	-6	
190 Other services	112	13	13	112	-6	
200 Total	67,029	2,804	2,804	66,970	-1,098	

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

This table provides an overview of collateral that the bank obtained by taking possession. Compared to 30 June 2024, the collateral obtained remained relatively unchanged. Movable property (auto, shipping, etc.) increased slightly.

	A	B	C	D	E	F
	31 December 2024		30 June 2024		31 December 2023	
	Collateral obtained by taking possession		Collateral obtained by taking possession		Collateral obtained by taking possession	
	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes	Value at initial recognition	Accumulated negative changes
(in millions)						
010 Property, plant and equipment (PP&E)						
020 Other than PP&E	4		4		4	
030 Residential immovable property	3		3		3	
040 Commercial Immovable property						
050 Movable property (auto, shipping, etc.)	1					
060 Equity and debt instruments						
070 Other collateral						
080 Total	4		4		4	

Use of credit risk mitigation techniques

EU CRC – Qualitative disclosure requirements related to CRM techniques

Credit risk mitigation

Credit risk mitigation techniques are used by the bank to reduce the credit risk associated with its credit exposures. Such techniques relate mainly to collateral, guarantees and credit insurance, netting of financial assets and liabilities, and enforcing master netting agreements or similar instruments. We currently do not actively make use of credit risk mitigation for physical risks in our loan portfolio.

Credit risk mitigation techniques have to meet certain requirements so they can be used effectively and in line with the bank's risk appetite. For this reason, ABN AMRO has established mandatory, bank-wide policies governing the acceptance, management, monitoring and reporting of credit risk mitigation techniques. These are in line with regulatory requirements, as well as the needs of the bank and its clients. These bank-wide policies provide the rules that must be met by business-specific procedures and processes to ensure the effectiveness of credit risk mitigation.

Collateral management and guarantees

Collateral and guarantees represent assets with material value that have been received by (or pledged to) the bank to secure obligations under a credit facility or other exposure. To be effective, such security must give the bank the right to appropriate and liquidate collateral on time and without impediment so that losses on the exposure at default are minimised.

In addition to minimising exposure risk, eligible collateral and guarantees can also reduce the regulatory and economic capital the bank is required to hold as a buffer for unexpected losses. The Capital Requirements Regulation prescribes the criteria that collateral must meet to be considered eligible for capital reduction. These criteria, which provide for legal effectiveness and for the enforceability, valuation and monitoring of collateral, are aimed at the effective and timely realisation of collateral.

Residential mortgages, followed by commercial real estate, represent the largest collateral category in our books. We manage our collateral risk through lending criteria such as loan to value, and for commercial real estate financing we apply a minimum energy label.

According to ABN AMRO's collateral policy, the bank has to have a diversified portfolio of collateral assets. Concentration risks for particular types of collateral assets must be strictly controlled, monitored and reported, and the relevant business must have policies to address them.

Collateral value

- Nominal value: Depending on the type of collateral, a specific valuation method (for example, a market value) is applied, leading to a nominal value of collateral.
- Gross Collateral Value (GCV): It may be necessary to apply a haircut to the nominal value to arrive at the GCV. Haircuts are adjustments to the nominal value for elements such as maturity mismatches or currency mismatches between the collateral and the facility.

Where applicable, the Net Collateral Value (NCV) can subsequently be calculated. The NCV for each collateral type is calculated using the recovery rate, which represents the extent to which the collateral value can be recovered. Recovery rates are expressed as a percentage of the collateral value and are based on statistics on actual collateral recoveries or, where the recovery rate cannot be determined statistically, on an objective expert opinion. The NCV is determined by multiplying the GCV (as determined by the appropriate valuation method) by the respective recovery rate.

Regulatory approaches to credit risk measurement and their applicable collateral types

The purpose of collateral is to mitigate credit risk and to reduce credit losses during a restructuring or recovery of loans and other exposures, preferably in a way that relieves the bank's capital requirements. This means that when we accept collateral, we prefer to accept collateral that is also eligible for capital relief. But even though collateral is a

credit risk mitigation technique, it carries risks of its own, such as a change in effectiveness, change in value, the possibility of damage and so on. Collateral therefore needs to be actively managed so that it continues to qualify as an effective and eligible risk mitigation technique recognised by the regulator and manifesting in reduced regulatory capital for the bank. For this purpose, collateral needs to be managed separately and not in the context of debtor reviews.

There are three different credit risk measurement approaches through which, subject to regulatory approval, collateral may be accounted for to reduce the bank's required regulatory capital – the Standardised Approach (SA), the Foundation Internal Ratings-Based approach (F-IRB) and the Advanced Internal Ratings-Based approach (A-IRB). Currently, ABN AMRO primarily uses A-IRB and, to a lesser extent, F-IRB and SA.

After meeting their eligibility criteria, the various types of collateral can be used as credit risk mitigation techniques through the respective credit risk measurement approaches. The SA is stricter in terms of the acceptance and eligibility criteria for these collateral types.

Collateral types used by ABN AMRO

Collateral type	Definition	SA	F-IRB	A-IRB
Immovable property	Immovable property, or real estate, is 'a piece of land and/or the structures on it and/or the building(s) on it'. Real estate collateral is real estate taken as collateral in financing its construction, reconstruction, purchase and/or maintenance.	V	V	V
Financial collateral	Financial collateral is collateral that directly reflects a financial value, such as cash on demand.	V	V	V
Other physical collateral	Other physical collateral is collateral that is tangible and moveable. The following types of collateral are considered physical collateral within ABN AMRO and can be eligible only if they comply with the applicable eligibility, valuation and monitoring criteria: inventory/stock, floating producing storage and offloading units, commodities etc.	X	V	V
Collateral for lease credit facilities	Lease credit facilities may be treated as collateralised by the type of property leased if they meet specific conditions.	X Other physical collateral V Immovable property	V	V
Receivables	Receivables are assets in the form of rights to payments related to debts, unsettled transactions or other monetary obligations owed to a company by its debtors or customers.	X	V	V
Life insurance policies	A life insurance policy is a contract between the insurer and the policyholder, whereby a benefit is paid to the designated beneficiary (or beneficiaries) if an insured event occurs. Life-based insurance contracts fall into two major categories: protection policies and investment policies.	V	V	V
Other collateral	All collateral not mentioned in the above definitions can be considered as Other collateral. Other collateral includes non-marketable securities, intangibles and certain other assets.	X	X	V

Guarantees

Where the direct credit risk to an obligor exceeds the risk appetite or risk limits, guarantees (among other forms of credit risk mitigation) may be obtained to reduce the direct credit risk to the obligor. A substantial proportion of ABN AMRO's assets benefit from guarantees provided by third parties to lower the credit risk of these positions. The largest provider of such guarantees is the Dutch State, which provides a counter-guarantee via the Stichting Waarborgfonds Eigen Woningen (WEW). Mortgage loans subject to the Nationale Hypotheek Garantie, as provided by the WEW, are considered to be guaranteed by the Dutch State. The other main third-party providers of guarantees are other sovereigns, export credit agencies and financial institutions. It is common, especially in the Dutch market, for loans to corporate clients to be subject to guarantees provided by other parties within their group (often, but not necessarily, a holding company such as the parent of the subsidiary that is ABN AMRO's direct obligor). The most common forms of such group guarantees are '403 declarations', joint and several liability statements and direct guarantees. The effects of such group guarantees are specifically assessed under ABN AMRO's credit assessment process and take account of the various risk parameters, where relevant.

Minimising exposure risk

In addition to minimising exposure risk, eligible collateral and guarantees can also reduce the regulatory and economic capital the bank is required to hold as a buffer for unexpected losses. The Capital Requirements Regulation prescribes the criteria that collateral must meet to become eligible for capital reduction. These criteria, which provide for legal effectiveness and for the enforceability, valuation and monitoring of collateral, are aimed at the effective and timely realisation of collateral.

Accounting policy for offsetting financial assets and liabilities

Financial assets and liabilities are offset, and the net amount is reported on the EU IFRS balance sheet, if there is a legally enforceable right to offset the recognised amounts and there is an intention either to settle on a net basis or to realise the asset and settle the liability simultaneously. The bank applies netting to debtor and creditor balances such as current accounts where offsetting is justified by formal agreement with the client, provided the balances meet the applicable criteria.

Accounting policy for enforceable master netting agreements or similar instruments

Enforceable master netting arrangements take into account all agreements containing conditions that allow offsetting in the event of default. In addition, agreements are enforceable if the bank has a legally enforceable right to offset and no ability and/or intention to realise the asset and settle the liability simultaneously. These arrangements include derivative clearing agreements, global master repurchase agreements and global master securities lending agreements.

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

This table provides an overview of exposures, split by secured and unsecured. Compared to 30 June 2024, the ratio of secured versus unsecured carrying amount decreased to 67% (30 June 2024: 68%), mainly driven by the decline in corporate loans to clients.

	A	B	C	D	E
					31 December 2024
	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	77,707	253,760	250,050	3,710	
2 Debt securities	46,154				
3 Total	123,861	253,760	250,050	3,710	
4 Of which: non-performing exposures	572	3,880	3,778	102	
EU-5 - of which defaulted	438	3,880			
					30 June 2024
1 Loans and advances	73,519	266,814	263,423	3,391	
2 Debt securities	49,348				
3 Total	122,867	266,814	263,423	3,391	
4 Of which: non-performing exposures	730	3,309	3,213	96	
EU-5 - of which defaulted	576	3,309			
					31 December 2023
1 Loans and advances	86,382	247,286	243,350	3,936	
2 Debt securities	40,631				
3 Total	127,013	247,286	243,350	3,936	
4 Of which: non-performing exposures	702	3,137	3,059	78	
EU-5 - of which defaulted	542	3,137			

Use of the Standardised Approach

EU CRD – Qualitative disclosure requirements related to Standardised Approach

Under the Standardised Approach, regulatory capital is calculated by using exposures characteristics for retail exposures and using ratings from External Credit Assessment Institutions (ECAI) for non-retail exposures. For this purpose the bank has nominated three external credit rating agencies: Standard & Poor's, Moody's and Fitch. ABN AMRO uses ECAIs for exposures to central governments and central banks. For mapping ECAI and ECA ratings to risk weights, ABN AMRO complies with the standard association published by the EBA.

Underlying obligors in other exposure classes tend not to have external ratings because they are relatively small. In the case of non-retail counterparties for which no credit ratings are available, exposures are classified as unrated for the purpose of determining regulatory capital requirements.

The bank complies with the standard association published by the EBA.

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

Standardised approach and the effect of CRM and CCF

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

In comparison with 30 June 2024, standardised approach credit risk exposures increased by EUR 2.7 billion (post credit risk mitigation), mainly due to higher cash positions with the Dutch central bank. Credit risk RWEA declined by EUR 0.5 billion, thanks to use of credit risk mitigation particularly for institutions and corporates that are subject to higher risk weights.

	A	B	C	D	E	F
	31 December 2024					
	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
(in millions)						
Exposure classes						
1 Central governments or central banks	70,078	1,074	73,531	487	674	1%
2 Regional governments or local authorities	2,594	139	3,068	69		0%
3 Public sector entities	3,258	219	2,735	93	92	3%
4 Multilateral development banks	1,962		1,962			0%
5 International organisations	6,639		5,606			0%
6 Institutions	459	13,763	337	26	125	34%
7 Corporates	3,555	15,953	3,527	542	2,955	73%
8 Retail	2,572	2,871	2,566	603	2,377	75%
9 Secured by mortgages on immovable property	577	21	577	10	209	36%
10 Exposures in default	150	36	147	11	213	135%
11 Exposures associated with particularly high risk						
12 Covered bonds						0%
13 Institutions and corporates with a short-term credit assessment						
14 Collective investment undertakings	36		36		19	55%
15 Equity						
16 Other items	152		152		110	73%
17 Total	92,030	34,075	94,243	1,841	6,776	7%

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

	A	B	C	D	E	F
	30 June 2024					
	Exposures before CCF and CRM ¹		Exposures post CCF and CRM ¹		RWEA and RWEA density	
(in millions)	On-balance sheet exposures	Off-balance sheet exposures	On-balance sheet exposures	Off-balance sheet exposures	RWEA	RWEA density
Exposure classes						
1 Central governments or central banks	66,657	1,079	68,333	538	400	1%
2 Regional governments or local authorities	2,553	137	3,539	69	16	0%
3 Public sector entities	3,141	101	3,668	45	62	2%
4 Multilateral development banks	1,981		1,981			0%
5 International organisations	6,379		5,421			0%
6 Institutions	340	10,932	340	75	156	38%
7 Corporates	4,017	14,100	3,971	603	3,526	77%
8 Retail	2,668	2,543	2,660	644	2,478	75%
9 Secured by mortgages on immovable property	947	11	947	5	338	36%
10 Exposures in default	182	56	180	16	269	137%
11 Exposures associated with particularly high risk						
12 Covered bonds						
13 Institutions and corporates with a short-term credit assessment						
14 Collective investment undertakings						
15 Equity						
16 Other items	110		110		73	66%
17 Total	88,975	28,959	91,150	1,997	7,318	

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

	A	B	C	D	E	F
	31 December 2023					
	Exposures before CCF and CRM ¹		Exposures post CCF and CRM ¹		RWEA and RWEA density	
(in millions)	On-balance sheet exposures	Off-balance sheet exposures	On-balance sheet exposures	Off-balance sheet exposures	RWEA	RWEA density
Exposure classes						
1 Central governments or central banks	75,600	956	76,407	476	345	0%
2 Regional governments or local authorities	2,896	150	3,010	75	24	1%
3 Public sector entities	2,697	104	3,445	40	50	1%
4 Multilateral development banks	1,447		1,447			
5 International organisations	6,100		6,100			
6 Institutions	530	10,967	499	75	209	36%
7 Corporates	3,301	13,459	3,231	577	3,039	80%
8 Retail	1,699	2,952	1,697	573	1,703	75%
9 Secured by mortgages on immovable property	627	26	627	13	233	36%
10 Exposures in default	125	175	123	38	217	135%
11 Exposures associated with particularly high risk						
12 Covered bonds						
13 Institutions and corporates with a short-term credit assessment						
14 Collective investment undertakings						
15 Equity						
16 Other items	56		56		30	53%
17 Total	95,077	28,789	96,641	1,868	5,848	

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

EU CR5 – Standardised Approach

EAD under the Standardised Approach

This table discloses the EAD under the Standardised Approach, excluding counterparty credit risk, and is aligned with EU CR4. The overall increase in standardised approach credit risk exposures is attributable to higher cash positions with the Dutch central bank.

	A	B	C	D	E	F	G	H	I	J
	31 December 2024									
	Risk weight									Subtotal
(in millions)	0%	2%	4%	10%	20%	35%	50%	70%	75%	
Exposure classes										
1 Central governments or central banks	73,326				459					73,785
2 Regional governments or local authorities	3,137									3,137
3 Public sector entities	2,448				327		53			2,828
4 Multilateral development banks	1,962									1,962
5 International organisations	5,606									5,606
6 Institutions					188		175			363
7 Corporates	2				1,171	41	297			1,510
8 Retail									3,170	3,170
9 Secured by mortgages on immovable property						568	16			584
10 Exposures in default										
11 Exposures associated with particularly high risk										
12 Covered bonds										
13 Institutions and corporates with a short-term credit assessment										
14 Units or shares in collective investment undertakings							32			32
15 Equity exposures										
16 Other items	41									41
17 Total	86,522				2,145	610	572		3,170	93,019

	K	L	M	N	O	P	Q	R	S
	31 December 2024								
	Subtotal	Risk weight						Total	Of which: unrated
(in millions)		100%	150%	250%	370%	1250%	Others		
Exposure classes									
1 Central governments or central banks	73,785		1	233				74,018	
2 Regional governments or local authorities	3,137							3,137	
3 Public sector entities	2,828							2,828	
4 Multilateral development banks	1,962							1,962	
5 International organisations	5,606							5,606	
6 Institutions	363							363	363
7 Corporates	1,510	2,558						4,069	4,069
8 Retail	3,170							3,170	3,170
9 Secured by mortgages on immovable property	584	2						587	
10 Exposures in default		49	109					158	
11 Exposures associated with particularly high risk									
12 Covered bonds									
13 Institutions and corporates with a short-term credit assessment									
14 Units or shares in collective investment undertakings	32	3						36	
15 Equity exposures									
16 Other items	41	110						152	
17 Total	93,019	2,723	110	233				96,084	7,602

	A	B	C	D	E	F	G	H	I	J
	30 June 2024									
	Risk weight									Subtotal
(in millions)	0%	2%	4%	10%	20%	35%	50%	70%	75%	
Exposure classes										
1 Central governments or central banks	68,406				332					68,738
2 Regional governments or local authorities	3,530				78					3,608
3 Public sector entities	3,474				191		49			3,713
4 Multilateral development banks	1,981									1,981
5 International organisations	5,421									5,421
6 Institutions					173		243			416
7 Corporates					1,311					1,311
8 Retail									3,303	3,303
9 Secured by mortgages on immovable property						926	24			950
10 Exposures in default										
11 Exposures associated with particularly high risk										
12 Covered bonds										
13 Institutions and corporates with a short-term credit assessment										
14 Units or shares in collective investment undertakings										
15 Equity exposures										
16 Other items	37									37
17 Total	82,848				2,085	926	315		3,303	89,478

	K	L	M	N	O	P	Q	R	S
	30 June 2024								
	Subtotal	Risk weight						Total	Of which: unrated
(in millions)		100%	150%	250%	370%	1250%	Others		
Exposure classes									
1 Central governments or central banks	68,738			133				68,871	
2 Regional governments or local authorities	3,608							3,608	
3 Public sector entities	3,713							3,713	
4 Multilateral development banks	1,981							1,981	
5 International organisations	5,421							5,421	
6 Institutions	416							416	416
7 Corporates	1,311	3,263						4,575	4,575
8 Retail	3,303							3,303	3,303
9 Secured by mortgages on immovable property	950	2						952	
10 Exposures in default		51	145					196	
11 Exposures associated with particularly high risk									
12 Covered bonds									
13 Institutions and corporates with a short-term credit assessment									
14 Units or shares in collective investment undertakings									
15 Equity exposures									
16 Other items	37	73						110	
17 Total	89,478	3,390	145	133				93,147	8,294

	A	B	C	D	E	F	G	H	I	J
	31 December 2023									
	Risk weight									Subtotal
(in millions)	0%	2%	4%	10%	20%	35%	50%	70%	75%	
Exposure classes										
1 Central governments or central banks	76,427				342					76,769
2 Regional governments or local authorities	2,964				121					3,085
3 Public sector entities	3,299				145		41			3,485
4 Multilateral development banks	1,447									1,447
5 International organisations	6,100									6,100
6 Institutions					261		313			574
7 Corporates					961					961
8 Retail								2,270		2,270
9 Secured by mortgages on immovable property						607	26			632
10 Exposures in default										
11 Exposures associated with particularly high risk										
12 Covered bonds										
13 Institutions and corporates with a short-term credit assessment										
14 Units or shares in collective investment undertakings										
15 Equity exposures										
16 Other items	26									26
17 Total	90,263				1,830	607	380		2,270	95,350

	K	L	M	N	O	P	Q	R	S
	31 December 2023								
	Subtotal	Risk weight						Total	Of which: unrated
(in millions)		100%	150%	250%	370%	1250%	Others		
Exposure classes									
1 Central governments or central banks	76,769		7	106				76,883	
2 Regional governments or local authorities	3,085							3,085	
3 Public sector entities	3,485							3,485	
4 Multilateral development banks	1,447							1,447	
5 International organisations	6,100							6,100	
6 Institutions	574							574	574
7 Corporates	961	2,847						3,808	3,808
8 Retail	2,270							2,270	2,270
9 Secured by mortgages on immovable property	632	8						640	
10 Exposures in default		50	111					161	
11 Exposures associated with particularly high risk									
12 Covered bonds									
13 Institutions and corporates with a short-term credit assessment									
14 Units or shares in collective investment undertakings									
15 Equity exposures									
16 Other items	26	30						56	
17 Total	95,350	2,934	119	106				98,508	6,652

Use of the IRB approach to credit risk

EU CRE – Qualitative disclosure requirements related to IRB approach

Credit risk approach

The bank has approval from its supervisor to use the advanced internal ratings-based (A-IRB) approach, including various exemptions, for a number of its credit portfolios. The approval for use of the A-IRB approach is not restricted to certain exposures classes and excludes certain portfolios. The use of the Standardised Approach (SA) will increase substantially in the coming years as more restrictive requirements and supervisory standards are implemented for the use of internal models and business strategies are updated. In Q1 2025, ABN AMRO will make a final submission to move certain models to less sophisticated approaches. This takes into account the implementation of Basel IV, including the constrained use of the IRB approach to credit risk.

Probability of Default

The Probability of Default (PD) indicates the likelihood that a counterparty or exposure will default within a one-year time horizon. Models make use of risk drivers such as financial information, behavioural information, arrears information and assessments of industry, geographic and market conditions. Model output is calibrated to long-run average observed default rates, based on internal default data. For low-default portfolios, this is supplemented by external data, if available. For the non-programme lending portfolio, the model score is mapped to and expressed as an internal Uniform Counterparty Rating (UCR). The UCR rating scale consists of 14 performing ratings, each representing a fixed PD range. The indicative mapping of the internal UCR rating scale to external rating agency ratings is included below. For programme lending, exposures with the same characteristics are pooled and a PD is assigned to each pool.

Internal rating scale mapped to external ratings

Grade Category	UCR (internal rating)	Low PD%	Mid PD%	High PD%	Standard & Poor's equivalent	Moody's equivalent	Fitch equivalent
Investment grade	UCR 1	0.000	0.03	0.035	AAA to A+	Aaa to Aa3	AAA to AA-
	UCR 2+	0.035	0.04	0.045	A+	A1	A+
	UCR 2	0.045	0.05	0.071	A	A2	A+ to A
	UCR 2-	0.071	0.10	0.127	A-	A3	A-
	UCR 3+	0.127	0.16	0.200	BBB+	Baa1	BBB+
	UCR 3	0.200	0.25	0.300	BBB	Baa2	BBB
	UCR 3-	0.300	0.36	0.465	BBB-	Baa3	BBB-
Sub-investment grade	UCR 4+	0.465	0.60	0.775	BB+	Ba1	BB+
	UCR 4	0.775	1.00	1.285	BB	Ba3	BB
	UCR 4-	1.285	1.65	2.225	BB-	B1	B+
	UCR 5+	2.225	3.00	4.243	B	B2	B
	UCR 5	4.243	6.00	8.485	B-	Caa	B-
	UCR 5-	8.485	12.00	16.971	CCC/C	Ca/C	CCC/C
	UCR 6+	16.971	24.00	99.999	CCC/C	Ca/C	CCC/C
Default	UCR 6-8		100		D	C-D	D

Loss Given Default

Loss Given Default (LGD) models estimate the amount the bank would lose if the counterparty were to default. LGD is expressed as a percentage of the outstanding amount at default. LGD estimates for credit facilities are influenced by the risk mitigating techniques used by the bank (such as collateral coverage and/or third-party protection), the credit facility's seniority and structure, and the bank's view of the creditor-friendliness of the relevant country's legal framework. The model output for these credit facilities is calibrated to long-run average observed loss rates and downturn conditions, based on internal default data. For low-default portfolios, this is supplemented by expert opinion and/or external data, if available. For credit facilities that are already in default, an in-default LGD is estimated that also takes into account post-default information reflecting the progress of the recovery process. In-default LGD is

calibrated to reflect possible adverse changes in economic conditions during the expected length of the recovery process.

Exposure at Default

Exposure at Default (EAD) models estimate the expected exposure at the time a counterparty defaults. EAD is calculated on a monthly basis for all credit facilities, using actual limits and outstanding exposure data. EAD estimates are influenced by the type of credit facility, the drawn percentage and the limit size. If all or part of a facility is undrawn (i.e. the outstanding amount is less than the approved limit) at the time of the EAD calculation, a portion of the undrawn amount is added to the exposure to reflect the tendency of counterparties to utilise larger portions of their approved credit facilities when nearing default. The percentage of the undrawn part of the facility that is expected to be drawn in the event of default (Credit Conversion Factor or CCF) differs per product type and is reviewed at least annually. The value of the CCF is determined based on the average realised conversion factor by product type or pool, using the default weighted average resulting from all observed defaults. The CCF is tested for sufficiency in the event of adverse changes in economic conditions.

Rating assignment

For non-programme lending, ratings are individually assigned to each counterparty (PD) and facility (LGD) by the business account manager (first line of defence) and approved by credit risk (second line of defence). For programme lending, exposure ratings are not assigned individually, but are instead assigned to pools with similar characteristics. For all exposures, the EAD estimation is performed automatically, based on the facility type and the undrawn part of the facility.

Model risk framework

All credit risk models are subject to our model risk framework, which describes our model risk governance and model review process.

Model risk governance

The Executive Board (ExBo) is ultimately accountable for the management of model risk in the bank. The ExBo has delegated responsibility for management of model risk to the Group Risk Committee (GRC). For model risk, the three lines of defence principle is applied as follows:

- The model owner, model developers, model implementers and model users assume the first line of defence role for the management of model risk. The model owner has overall accountability for the management of the risk that a model poses and for the coordination of all activities during a model's lifecycle, including design or selection, development, oversight and performance of models (and rating systems for credit risk).
- The Model Risk Management (MRM) department assumes the second line of defence role for the management of model risk. The MRM department includes the independent model validation functions per risk type. The head of the MRM department assumes the role of the Risk Type Owner for model risk ('RTO model risk'). The RTO model risk has overall accountability for the bank's model risk management framework as described in this policy.
- Group Audit represents the third line of defence and assesses the effectiveness and efficiency of the model risk framework by performing periodic audits.

Model monitoring

The IRB models are subject to annual monitoring in which the performance of the model is tested and evaluated. The monitoring is performed by the model developer, reviewed and signed off by the model owner and serves as input for the annual validation/revalidation executed by the independent model validation function. The model monitoring leads to the conclusion that the model is either still fit for purpose or requires recalibration or redevelopment.

Model review process

A model review is performed by the model developer at the request of the model owner or the model approval authority. A model review takes place at least every three years, or earlier in the event of:

- a marked deterioration in the model's performance (as highlighted by model monitoring or revalidation results), or
- a marked change in the risk profile of the portfolio to which the model relates (the change may be actual or anticipated and based on actions the bank is taking or on external factors).

Model risk reporting

On a quarterly basis, senior management and key stakeholders discuss the status of the models that have a direct or indirect impact on the bank's risk profile and the bank's estimated returns. The model risk reports address the aggregated risk perceived in models, based on the results of regular validations and on the various risks witnessed in the model lifecycle.

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

Exposure class A-IRB

Exposure to central government or central banks (CGCB) is calculated with the Standardised Approach (SA) and therefore absent in the IRB overviews. Compared to 30 June 2024, the A-IRB RWEA decreased by EUR 1.2 billion, mostly due to Corporates - SME and Corporates - Specialised. The F-IRB RWEA also decreased significantly by EUR 1.9 billion, mostly driven by the decrease in the exposures for Corporate - Other and Institutions by EUR 3.5 billion.

	A	B	C	D	E	F	G	H	I	J	K	L	M
	31 December 2024												
	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 government or 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)												
Corporates - SME	Subtotal (exposure class)												
	0.00 to <0.15	182	344	18.8%	247	0.1%	125	14.6%	1.14	15	6.0%		
	0.00 to <0.10	20	13	30.7%	24	0.1%	7	29.0%	1.95	3	13.1%		
	0.10 to <0.15	163	331	18.3%	223	0.1%	118	13.1%	1.05	12	5.3%		
	0.15 to <0.25	156	39	16.2%	162	0.2%	52	18.0%	2.78	30	18.3%		
	0.25 to <0.50	1,251	238	31.1%	1,325	0.4%	262	25.3%	2.28	411	31.0%	1	-2
	0.50 to <0.75	3,656	613	42.6%	3,917	0.7%	1,432	21.6%	2.60	1,360	34.7%	6	-7
	0.75 to <2.50	8,540	1,942	37.7%	9,273	1.4%	3,129	22.8%	2.60	4,406	47.5%	30	-36
	0.75 to <1.75	5,036	1,198	37.4%	5,484	1.1%	1,938	22.0%	2.59	2,343	42.7%	13	-18
	1.75 to <2.5	3,504	744	38.3%	3,789	1.8%	1,191	23.9%	2.62	2,063	54.4%	17	-18
	2.50 to <10.00	2,019	705	28.9%	2,223	4.1%	819	23.8%	2.45	1,486	66.9%	21	-33
	2.5 to <5	1,620	536	30.0%	1,781	3.4%	652	23.6%	2.53	1,143	64.2%	14	-19
	5 to <10	399	169	25.1%	441	6.9%	167	24.4%	2.12	343	77.7%	7	-14
	10.00 to <100.00	856	250	41.0%	958	24.6%	1,210	24.0%	2.43	1,098	114.6%	56	-34
	10 to <20	69	17	25.1%	74	13.4%	35	25.1%	2.46	77	104.5%	2	-6
	20 to <30	782	230	42.5%	880	25.4%	1,170	24.0%	2.43	1,017	115.6%	53	-28
	30.00 to <100.00	5	3	17.1%	5	36.2%	5	14.3%	1.00	5	85.4%		
	100.00 (Default)	919	186	5.8%	930	98.6%	529	20.4%	1.94	820	88.1%	174	-178
	Subtotal (exposure class)	17,579	4,317	33.7%	19,035	7.4%	7,558	22.6%	2.50	9,626	50.6%	288	-292

	A	B	C	D	E	F	G	H	I	J	K	L	M
	31 December 2024												
			Off-balance sheet exposures pre-CCF ¹	Exposure weighted average CCF ¹	Exposure post CCF ¹ and post CRM	Exposure weighted average PD		Exposure weighted average LGD	Exposure weighted average maturity	RWEA after supporting factors	Density of RWEA	Expected loss amount	Value adjustments and provisions
	PD range	On-balance sheet exposures					Number of obligors						
	(in millions)	(in millions)	(in %)	(in millions)	(in %)	(in units)	(in %)	(in years)	(in millions)	(in %)	(in millions)	(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	92	23	50.0%	104	0.2%	4	13.3%	3.74	17	16.6%		
	0.25 to <0.50	1,318	197	52.3%	1,421	0.4%	32	11.9%	3.31	296	20.8%	1	
	0.50 to <0.75	1,434	754	36.7%	1,711	0.7%	54	11.6%	3.38	452	26.4%	1	-1
	0.75 to <2.50	1,350	440	50.0%	1,570	1.3%	49	13.2%	3.32	564	35.9%	3	-2
	0.75 to <1.75	1,008	394	49.7%	1,204	1.1%	37	12.8%	3.33	399	33.1%	2	-1
	1.75 to <2.5	342	46	52.8%	366	1.8%	12	14.5%	3.28	165	45.1%	1	-1
	2.50 to <10.00	4,789	707	39.6%	5,069	3.8%	185	9.3%	2.62	1,429	28.2%	18	-16
	2.5 to <5	4,662	679	40.3%	4,935	3.7%	176	9.2%	2.66	1,372	27.8%	17	-15
	5 to <10	127	28	23.5%	134	7.3%	9	13.0%	1.27	58	43.1%	1	-1
	10.00 to <100.00	310	60	46.7%	338	27.6%	20	6.9%	3.70	138	40.9%	6	-21
	10 to <20												
	20 to <30	310	60	46.7%	338	27.6%	19	6.9%	3.70	138	40.9%	6	-21
	30.00 to <100.00			0.0%		43.8%	1	12.3%	1.00		67.2%		
100.00 (Default)	143		0.0%	143	100.0%	5	13.7%	2.38	40	27.7%	23	-23	
	Subtotal (exposure class)	9,435	2,182	42.2%	10,355	4.5%	349	10.6%	2.99	2,936	28.4%	52	-63
Corporates - Other	0.00 to <0.15	2,095	4,396	29.9%	3,411	0.1%	714	40.3%	2.41	1,067	31.3%	1	-2
	0.00 to <0.10	884	1,974	29.9%	1,474	0.1%	91	45.7%	2.83	441	29.9%		-1
	0.10 to <0.15	1,210	2,422	30.0%	1,937	0.1%	623	36.2%	2.09	626	32.3%	1	-1
	0.15 to <0.25	1,137	1,890	46.4%	2,014	0.2%	265	36.2%	3.26	931	46.2%	1	-1
	0.25 to <0.50	4,166	3,395	44.1%	5,665	0.3%	1,023	35.6%	2.59	2,948	52.0%	7	-4
	0.50 to <0.75	3,749	2,013	32.7%	4,407	0.7%	958	28.5%	2.49	2,448	55.6%	8	-6
	0.75 to <2.50	5,785	2,767	24.9%	6,474	1.4%	1,568	27.0%	2.07	4,117	63.6%	24	-16
	0.75 to <1.75	3,695	1,694	25.7%	4,129	1.1%	1,044	25.3%	1.97	2,206	53.4%	11	-5
	1.75 to <2.5	2,090	1,074	23.7%	2,345	1.8%	524	30.0%	2.25	1,910	81.5%	13	-10
	2.50 to <10.00	1,495	913	28.7%	1,757	4.0%	318	34.4%	2.53	2,108	120.0%	23	-14
	2.5 to <5	1,192	579	22.1%	1,320	3.3%	248	35.0%	2.61	1,550	117.4%	15	-12
	5 to <10	303	333	40.2%	437	6.0%	70	32.4%	2.29	558	127.8%	8	-2
	10.00 to <100.00	613	979	28.2%	889	22.2%	18,490	36.7%	1.95	1,739	195.6%	77	-23
	10 to <20	66	24	38.0%	75	14.2%	22	35.5%	2.76	140	185.3%	4	-2
	20 to <30	519	933	27.9%	779	22.3%	18,433	36.7%	1.90	1,521	195.2%	68	-19
	30.00 to <100.00	28	22	31.1%	35	36.1%	35	40.2%	1.28	79	225.2%	5	-2
100.00 (Default)	1,306	418	11.0%	1,352	96.1%	314	26.1%	1.83	1,462	108.1%	313	-274	
	Subtotal (exposure class)	20,346	16,771	33.5%	25,969	6.6%	23,650	32.4%	2.41	16,820	64.8%	455	-338
Institutions	0.00 to <0.15	111	93	26.0%	136	0.1%	20	68.7%	0.84	28	20.8%		-1
	0.00 to <0.10	110	73	31.3%	133	0.1%	13	69.7%	0.83	28	21.0%		-1
	0.10 to <0.15	2	20	6.8%	3	0.1%	7	22.5%	1.33		12.3%		
	0.15 to <0.25	2	129	53.6%	71	0.2%	5	43.8%	2.15	29	41.5%		
	0.25 to <0.50	32	12	25.8%	35	0.3%	4	11.9%	1.07	5	13.7%		
	0.50 to <0.75	60		0.0%	60	0.5%	2	11.3%	0.03	1	2.3%		
	0.75 to <2.50			24.0%		1.1%	1	2.4%	0.67		5.3%		
	0.75 to <1.75			24.0%		1.1%	1	2.4%	0.67		5.3%		
	1.75 to <2.5			0.0%		0.0%		0.0%			0.0%		
	2.50 to <10.00			0.0%		0.0%		0.0%			0.0%		
	2.5 to <5			0.0%		0.0%		0.0%			0.0%		
	5 to <10			0.0%		0.0%		0.0%			0.0%		
	10.00 to <100.00	20	3	41.3%	21	26.6%	61	44.8%	0.78	56	267.6%	2	
	10 to <20			0.0%		0.0%		0.0%			0.0%		
	20 to <30	20	3	41.3%	21	26.6%	61	44.8%	0.78	56	267.6%	2	
	30.00 to <100.00												
100.00 (Default)													
	Subtotal (exposure class)	225	237	41.2%	322	1.9%	93	44.8%	1.00	119	37.0%	3	-1

	A	B	C	D	E	F	G	H	I	J	K	L	M	
	31 December 2024													
		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	
	PD range	(in millions)	(in millions)	(in %)	(in millions)	(in %)	(in units)	(in %)	(in years)	(in millions)	(in %)	(in millions)	(in millions)	
Retail - Secured by immovable property SME	0.00 to <0.15	9	1	0.2%	9	0.1%	47	9.8%			3.1%			
	0.00 to <0.10	1	1	0.2%	1	0.0%	16	0.0%			0.0%			
	0.10 to <0.15	8		0.0%	8	0.1%	31	11.2%			3.6%			
	0.15 to <0.25	1,459	299	47.5%	1,634	0.2%	11,822	18.1%	159	9.7%		1	-1	
	0.25 to <0.50	788	56	43.3%	828	0.4%	3,938	21.1%	144	17.5%		1	-2	
	0.50 to <0.75	1		0.0%	1	0.6%	14	10.8%			11.0%			
	0.75 to <2.50	527	75	34.0%	569	1.3%	3,742	18.8%	191	33.6%		1	-5	
	0.75 to <1.75	416	62	35.7%	451	1.0%	3,154	18.2%	127	28.2%		1	-4	
	1.75 to <2.5	111	13	26.0%	118	2.2%	588	21.2%	64	54.4%		1	-2	
	2.50 to <10.00	150	13	17.5%	156	6.2%	904	19.5%	135	86.2%		2	-4	
	2.5 to <5	86	7	21.5%	90	4.2%	555	19.4%	65	72.0%		1	-2	
	5 to <10	64	6	12.1%	66	8.9%	349	19.6%	70	105.4%		1	-2	
	10.00 to <100.00	30	2	8.4%	30	17.7%	163	20.3%	42	138.2%		1	-2	
	10 to <20	30	2	8.4%	30	17.7%	163	20.3%	42	138.2%		1	-2	
	20 to <30													
	30.00 to <100.00													
100.00 (Default)	55	16	11.8%	55	100.0%	377	31.6%		57	102.9%		14	-12	
	Subtotal (exposure class)	3,018	461	42.5%	3,282	2.6%	21,007	19.3%		728	22.2%		20	-27
Retail - Secured by immovable property non-SME	0.00 to <0.15	55,961	23	80.7%	55,988	0.1%	277,542	11.4%		2,037	3.6%		8	-2
	0.00 to <0.10	4	2	32.5%	4	0.0%	43	21.8%			3.0%			
	0.10 to <0.15	55,958	21	84.6%	55,984	0.1%	277,499	11.4%		2,036	3.6%		8	-2
	0.15 to <0.25	17,844	3	91.7%	17,847	0.2%	73,013	14.8%		1,080	6.1%		4	-2
	0.25 to <0.50	48,721	62	85.4%	48,791	0.4%	213,019	12.0%		3,978	8.2%		21	-15
	0.50 to <0.75	23,645	7	78.1%	23,659	0.6%	97,305	12.3%		2,872	12.1%		18	-15
	0.75 to <2.50	10,282	3	84.9%	10,286	1.3%	45,346	13.0%		2,186	21.2%		17	-15
	0.75 to <1.75	9,142	3	84.9%	9,146	1.2%	41,789	12.7%		1,785	19.5%		14	-12
	1.75 to <2.5	1,140		0.0%	1,140	2.0%	3,557	15.4%		401	35.2%		4	-3
	2.50 to <10.00	2,879	1	36.3%	2,880	4.5%	9,562	14.7%		1,452	50.4%		18	-16
	2.5 to <5	2,190		70.1%	2,191	3.4%	6,973	15.1%		1,025	46.8%		11	-11
	5 to <10	689	1	17.0%	689	7.7%	2,589	13.5%		427	61.9%		7	-5
	10.00 to <100.00	1,271		64.1%	1,272	23.7%	4,785	13.7%		1,034	81.3%		42	-12
	10 to <20	772		64.1%	772	14.6%	2,944	13.4%		612	79.3%		15	-6
	20 to <30	250		90.7%	250	24.7%	927	13.9%		223	89.1%		9	-2
	30.00 to <100.00	250		0.0%	250	50.8%	914	14.5%		199	79.6%		18	-4
100.00 (Default)	1,418	2	8.5%	1,421	100.0%	5,488	21.6%		1,603	112.8%		188	-53	
	Subtotal (exposure class)	162,022	100	81.8%	162,146	1.5%	726,060	12.4%		16,241	10.0%		316	-130
Retail - Qualifying revolving	0.00 to <0.15	137	4,259	23.1%	1,136	0.1%	926,674	40.0%		22	1.9%			
	0.00 to <0.10	46	2,893	24.4%	757	0.0%	926,673	39.2%		11	1.4%			
	0.10 to <0.15	91	1,366	20.3%	379	0.1%	1	41.6%		11	2.8%			
	0.15 to <0.25	68	347	20.1%	145	0.2%	222,151	44.9%		7	5.1%			
	0.25 to <0.50	87	169	16.9%	122	0.4%	33,789	48.3%		11	9.0%			
	0.50 to <0.75	30	22	13.0%	34	0.6%	41,588	51.8%		5	15.5%			
	0.75 to <2.50	89	61	14.3%	101	1.5%	57,134	54.3%		31	30.6%		1	
	0.75 to <1.75	67	50	14.7%	77	1.2%	33,234	53.7%		20	26.4%		1	
	1.75 to <2.5	22	11	12.6%	24	2.3%	23,900	56.5%		11	43.6%			
	2.50 to <10.00	33	15	7.5%	35	4.2%	14,428	56.2%		23	65.6%		1	
	2.5 to <5	25	11	9.3%	26	3.4%	10,104	56.4%		15	58.2%		1	
	5 to <10	9	3	1.6%	9	6.5%	4,324	55.5%		8	87.7%			
	10.00 to <100.00	10	3	0.9%	11	23.7%	4,571	57.2%		17	159.5%		1	
	10 to <20	6	2	1.4%	6	12.4%	1,816	56.9%		8	131.2%			
	20 to <30			7.5%		24.2%	81	64.3%			199.1%			
	30.00 to <100.00	5	1	0.0%	5	38.0%	2,674	57.4%		9	194.0%		1	
100.00 (Default)	23		0.0%	23	100.0%	15,450	49.4%		36	159.3%		8		
	Subtotal (exposure class)	478	4,876	22.4%	1,608	1.9%	1,315,785	42.8%		153	9.5%		12	

	A	B	C	D	E	F	G	H	I	J	K	L	M
	31 December 2024												
	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 - Other SME	0.00 to <0.15			0.1%		0.0%	178	0.0%			0.0%		
	0.00 to <0.10			0.1%		0.0%	178	0.0%			0.0%		
	0.10 to <0.15												
	0.15 to <0.25	170	480	46.3%	429	0.2%	5,890	33.7%		78	18.1%		
	0.25 to <0.50	268	95	51.5%	327	0.4%	3,612	33.0%		85	25.9%		-1
	0.50 to <0.75												
	0.75 to <2.50	146	68	36.0%	189	1.5%	1,811	37.9%		100	53.1%	1	-2
	0.75 to <1.75	86	49	34.5%	117	1.0%	1,189	38.7%		57	48.8%		-1
	1.75 to <2.5	60	19	39.7%	73	2.2%	622	36.6%		43	60.0%	1	-1
	2.50 to <10.00	72	9	28.0%	79	5.8%	3,737	35.2%		51	65.0%	2	-3
	2.5 to <5	48	4	23.6%	52	4.1%	3,410	33.2%		30	57.6%	1	-1
	5 to <10	24	5	31.9%	27	8.9%	327	39.2%		21	79.0%	1	-2
	10.00 to <100.00	17	1	32.8%	18	19.5%	676	38.3%		18	101.4%	1	-1
	10 to <20	14	1	32.8%	15	17.7%	230	40.9%		16	107.6%	1	-1
	20 to <30	3		0.0%	3	27.9%	446	25.7%		2	71.6%		
	30.00 to <100.00												
	100.00 (Default)	45	10	31.4%	46	99.9%	913	45.0%		132	286.4%	12	-24
	Subtotal (exposure class)	718	663	45.5%	1,088	5.4%	16,817	34.9%		464	42.6%	17	-32
Retail - Other non-SME	0.00 to <0.15	1	1	20.0%	3	0.1%	162	38.5%			11.4%		
	0.00 to <0.10			100.0%		0.0%	40	0.0%			0.0%		
	0.10 to <0.15	1	1	20.0%	3	0.1%	122	41.0%			12.2%		
	0.15 to <0.25		1	50.5%	1	0.2%	60	37.9%			20.3%		
	0.25 to <0.50			100.0%		0.4%	1	18.8%			12.1%		
	0.50 to <0.75	10		6.7%	23	0.6%	901	21.6%		4	19.0%		
	0.75 to <2.50	414		14.5%	416	1.8%	30,837	29.4%		168	40.3%	2	-1
	0.75 to <1.75	261		14.5%	264	1.5%	21,639	29.3%		102	38.6%	1	-1
	1.75 to <2.5	153		0.0%	153	2.2%	9,198	29.5%		66	43.3%	1	
	2.50 to <10.00	317		13.9%	317	4.4%	16,078	29.5%		151	47.7%	4	-1
	2.5 to <5	240		13.9%	240	3.5%	12,980	29.5%		112	46.7%	2	-1
	5 to <10	77		100.0%	77	7.1%	3,098	29.4%		39	50.7%	2	
	10.00 to <100.00	50		45.3%	50	19.6%	2,881	29.5%		35	70.6%	3	-3
	10 to <20	27		45.3%	27	13.0%	1,671	29.6%		17	61.3%	1	-1
	20 to <30	23		0.0%	23	27.5%	1,210	29.5%		19	81.6%	2	-2
	30.00 to <100.00												
	100.00 (Default)	28		0.5%	28	99.4%	1,627	31.6%		43	154.2%	6	-22
	Subtotal (exposure class)	821	2	30.4%	839	7.1%	52,547	29.3%		403	48.0%	15	-27
Total (all exposures classes)		214,641	29,610		224,646		2,163,866			47,490		1,178	-910

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

	A	B	C	D	E	F	G	H	I	J	K	L	M
	30 June 2024												
		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
	PD range	(in millions)	(in millions)	(in %)	(in millions)	(in %)	(in units)	(in %)	(in years)	(in millions)	(in %)	(in millions)	(in millions)
Central government or 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)													
	Subtotal (exposure class)												
Corporates - SME	0.00 to <0.15	205	354	16.2%	262	0.1%	134	14.2%	1.14	16	5.9%		
	0.00 to <0.10	20	13	30.7%	24	0.1%	7	30.4%	2.35	4	15.1%		
	0.10 to <0.15	185	341	15.6%	238	0.1%	127	12.5%	1.02	12	5.0%		
	0.15 to <0.25	103	45	25.5%	114	0.2%	45	19.6%	3.27	24	21.4%		
	0.25 to <0.50	992	316	38.7%	1,115	0.4%	267	23.7%	2.60	369	33.1%	1	-1
	0.50 to <0.75	3,634	672	39.6%	3,899	0.7%	1,429	21.5%	2.65	1,341	34.4%	6	-13
	0.75 to <2.50	8,699	1,836	36.2%	9,363	1.4%	2,755	22.7%	2.65	4,465	47.7%	30	-30
	0.75 to <1.75	5,203	1,132	36.8%	5,619	1.1%	1,696	22.2%	2.62	2,440	43.4%	14	-14
	1.75 to <2.5	3,496	704	35.2%	3,743	1.8%	1,059	23.4%	2.69	2,025	54.1%	16	-16
	2.50 to <10.00	2,312	744	27.6%	2,517	4.1%	794	22.9%	2.55	1,622	64.5%	23	-49
	2.5 to <5	1,883	586	28.1%	2,048	3.5%	639	23.1%	2.57	1,273	62.2%	16	-30
	5 to <10	428	158	25.6%	469	6.9%	155	22.4%	2.42	349	74.4%	7	-19
	10.00 to <100.00	1,238	287	42.9%	1,361	25.2%	1,044	22.8%	2.44	1,515	111.3%	77	-85
	10 to <20	84	22	28.8%	91	13.7%	44	23.8%	1.82	90	98.6%	3	-8
	20 to <30	1,141	254	45.4%	1,256	25.9%	989	22.8%	2.50	1,413	112.4%	74	-76
30.00 to <100.00	13	11	13.1%	14	36.1%	11	15.6%	0.99	13	90.8%	1		
100.00 (Default)	948	200	6.2%	960	98.5%	529	20.2%	2.03	1,012	105.3%	152	-155	
	Subtotal (exposure class)	18,130	4,454	32.8%	19,592	7.9%	6,997	22.3%	2.57	10,363	52.9%	289	-334
Corporates - Specialised lending	0.00 to <0.15												
	0.00 to <0.10												
	0.10 to <0.15												
	0.15 to <0.25	14			14	0.2%	1	15.4%	1.51	2	12.1%		
	0.25 to <0.50	1,256	528	23.5%	1,380	0.4%	31	10.7%	3.53	274	19.9%	1	-1
	0.50 to <0.75	1,161	406	52.1%	1,373	0.7%	42	11.0%	2.81	310	22.6%	1	-1
	0.75 to <2.50	1,449	335	46.2%	1,604	1.2%	61	12.4%	2.94	506	31.5%	2	-3
	0.75 to <1.75	1,139	335	46.2%	1,294	1.1%	49	12.9%	3.02	413	31.9%	2	-2
	1.75 to <2.5	310			310	1.8%	12	10.6%	2.59	93	29.9%	1	-1
	2.50 to <10.00	5,253	1,030	39.7%	5,662	4.6%	201	8.9%	2.54	1,618	28.6%	23	-8
	2.5 to <5	4,275	823	36.8%	4,578	4.4%	152	8.3%	2.71	1,213	26.5%	17	-6
	5 to <10	978	207	51.4%	1,084	5.4%	49	11.4%	1.82	406	37.4%	7	-2
	10.00 to <100.00	303	59	50.7%	332	31.1%	14	13.4%	3.23	228	68.7%	14	-4
	10 to <20	25			25	10.6%	2	9.5%	1.10	9	37.0%		-1
	20 to <30	70			70	21.1%	2	16.3%	4.40	54	77.9%	2	-2
30.00 to <100.00	208	59	50.7%	238	36.2%	10	13.0%	3.11	165	69.3%	11	-1	
100.00 (Default)	187			187	100.0%	10	29.1%	1.72	370	198.1%	27	-27	
	Subtotal (exposure class)	9,623	2,358	39.4%	10,552	5.5%	360	10.5%	2.77	3,309	31.4%	68	-44

	A	B	C	D	E	F	G	H	I	J	K	L	M
	30 June 2024												
	PD range	On-balance sheet exposures	Off-balance sheet exposures pre-CCF ¹	Exposure weighted average CCF	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	2,371	4,182	31.3%	3,681	0.1%	731	36.3%	2.53	1,105	30.0%	1	-2
	0.00 to <0.10	1,037	1,907	29.8%	1,605	0.1%	101	41.4%	3.27	485	30.2%		-2
	0.10 to <0.15	1,335	2,275	32.6%	2,076	0.1%	630	32.3%	1.96	620	29.8%	1	-1
	0.15 to <0.25	1,042	1,735	46.8%	1,853	0.2%	279	34.3%	3.29	815	44.0%	1	-1
	0.25 to <0.50	4,358	3,861	45.2%	6,102	0.4%	1,039	35.2%	2.40	3,157	51.7%	8	-4
	0.50 to <0.75	3,665	1,749	29.7%	4,185	0.7%	1,007	25.7%	2.34	2,051	49.0%	7	-9
	0.75 to <2.50	6,000	2,464	26.5%	6,654	1.4%	1,553	26.7%	2.19	4,280	64.3%	25	-15
	0.75 to <1.75	3,762	1,643	24.9%	4,170	1.1%	1,062	25.9%	2.06	2,355	56.5%	12	-5
	1.75 to <2.5	2,239	821	29.8%	2,484	1.8%	491	28.2%	2.39	1,924	77.5%	13	-10
	2.50 to <10.00	1,775	1,061	25.0%	2,040	3.9%	284	30.4%	2.30	2,106	103.2%	23	-15
	2.5 to <5	1,407	779	24.1%	1,595	3.3%	226	30.8%	2.30	1,589	99.6%	16	-11
	5 to <10	368	282	27.5%	445	6.2%	58	29.1%	2.29	517	116.1%	8	-4
	10.00 to <100.00	891	789	29.0%	1,119	21.7%	14,355	30.7%	1.82	1,644	146.9%	70	-23
	10 to <20	97	26	30.2%	105	14.0%	26	33.4%	1.89	178	170.3%	5	-5
	20 to <30	690	739	28.8%	903	20.4%	14,278	31.5%	1.83	1,329	147.2%	55	-15
	30.00 to <100.00	103	24	33.2%	111	38.8%	51	21.5%	1.66	137	122.7%	10	-2
	100.00 (Default)	1,297	434	10.8%	1,344	99.0%	319	25.5%	1.81	1,430	106.4%	300	-270
	Subtotal (exposure class)	21,400	16,276	34.3%	26,979	6.7%	19,567	30.7%	2.36	16,588	61.5%	435	-339
Institutions	0.00 to <0.15	64	93	25.8%	88	0.1%	16	51.6%	2.54	25	28.2%		
	0.00 to <0.10	63	73	31.3%	86	0.1%	9	52.3%	2.57	25	28.6%		
	0.10 to <0.15	1	21	6.8%	2	0.1%	7	25.3%	1.40		13.8%		
	0.15 to <0.25	21	129	53.6%	90	0.2%	7	38.5%	2.80	37	41.4%		
	0.25 to <0.50	31	2		31	0.3%	3	11.3%	1.00	4	12.9%		
	0.50 to <0.75												
	0.75 to <2.50			24.0%		1.1%	1	2.4%	0.66		5.3%		
	0.75 to <1.75			24.0%		1.1%	1	2.4%	0.66		5.3%		
	1.75 to <2.5												
	2.50 to <10.00	4			4	9.2%	1	15.8%	3.02	3	80.9%		
	2.5 to <5												
	5 to <10	4			4	9.2%	1	15.8%	3.02	3	80.9%		
	10.00 to <100.00	7	1	24.9%	8	26.6%	44	43.3%	0.81	20	265.0%	1	
	10 to <20												
	20 to <30	7	1	24.9%	8	26.6%	44	43.3%	0.81	20	265.0%	1	
	30.00 to <100.00												
	100.00 (Default)												
	Subtotal (exposure class)	128	226	41.5%	221	1.2%	72	39.7%	2.38	90	40.5%	1	-1
Retail - Secured by immovable property SME	0.00 to <0.15	28		0.8%	28	0.1%	125	3.1%			0.9%		
	0.00 to <0.10	21		0.8%	21	0.0%	95	0.3%			0.0%		
	0.10 to <0.15	7			7	0.1%	30	11.1%			3.5%		
	0.15 to <0.25	1,330	307	46.5%	1,506	0.2%	12,213	18.2%		147	9.8%	1	-2
	0.25 to <0.50	760	60	44.8%	803	0.4%	4,144	21.1%		140	17.5%	1	-1
	0.50 to <0.75	1			1	0.6%	14	11.1%			11.3%		
	0.75 to <2.50	532	77	34.9%	578	1.3%	4,129	18.9%		195	33.7%	1	-3
	0.75 to <1.75	418	67	36.0%	457	1.0%	3,459	18.3%		129	28.2%	1	-3
	1.75 to <2.5	115	10	27.6%	122	2.2%	670	21.2%		66	54.3%	1	-1
	2.50 to <10.00	177	15	14.4%	185	6.0%	1,094	19.5%		157	85.0%	2	-3
	2.5 to <5	108	10	16.7%	114	4.2%	670	19.5%		83	72.7%	1	-1
	5 to <10	68	4	9.2%	70	8.9%	424	19.5%		74	104.8%	1	-1
	10.00 to <100.00	39	3	11.4%	40	17.7%	237	20.2%		55	137.5%	1	-1
	10 to <20	39	3	11.4%	40	17.7%	237	20.2%		55	137.5%	1	-1
	20 to <30												
	30.00 to <100.00												
	100.00 (Default)	59	22	13.9%	59	100.0%	454	31.7%		63	105.9%	16	-8
	Subtotal (exposure class)	2,926	484	41.7%	3,201	2.9%	22,410	19.3%		758	23.7%	22	-19

	A	B	C	D	E	F	G	H	I	J	K	L	M
	30 June 2024												
	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 immovable property non-SME	0.00 to <0.15	53,878	25	75.6%	53,906	0.1%	274,787	11.4%		1,957	3.6%	8	-4
	0.00 to <0.10	2	3	37.3%	3	0.0%	47	19.3%			2.4%		
	0.10 to <0.15	53,876	22	81.0%	53,903	0.1%	274,740	11.4%		1,957	3.6%	8	-3
	0.15 to <0.25	17,941	4	84.3%	17,945	0.2%	74,007	15.0%		1,098	6.1%	5	-4
	0.25 to <0.50	48,460	63	85.7%	48,534	0.4%	214,274	12.5%		4,097	8.4%	22	-12
	0.50 to <0.75	23,049	8	78.9%	23,064	0.6%	97,495	12.6%		2,863	12.4%	18	-9
	0.75 to <2.50	10,296	4	81.1%	10,300	1.2%	45,816	13.5%		2,261	22.0%	18	-8
	0.75 to <1.75	9,215	3	80.2%	9,219	1.2%	42,329	13.2%		1,871	20.3%	14	-5
	1.75 to <2.5	1,081		88.5%	1,081	2.0%	3,487	15.9%		391	36.1%	3	-3
	2.50 to <10.00	2,955		79.0%	2,956	4.5%	9,936	15.1%		1,539	52.1%	20	-16
	2.5 to <5	2,203		71.2%	2,204	3.5%	7,171	15.3%		1,047	47.5%	12	-11
	5 to <10	752		100.0%	752	7.7%	2,765	14.4%		492	65.3%	8	-6
	10.00 to <100.00	1,168		74.3%	1,169	23.4%	4,532	14.1%		969	82.9%	39	-17
	10 to <20	733		72.4%	733	14.5%	2,805	14.2%		614	83.7%	15	-8
	20 to <30	217		95.1%	217	24.7%	924	12.6%		176	81.0%	7	-3
	30.00 to <100.00	218		1.9%	218	51.8%	803	15.4%		179	82.2%	17	-6
	100.00 (Default)	1,415	3	5.5%	1,418	100.0%	5,570	21.5%		1,650	116.4%	182	-119
	Subtotal (exposure class)	159,162	107	80.3%	159,292	1.5%	726,417	12.6%		16,435	10.3%	310	-189
	Retail - Qualifying revolving	0.00 to <0.15	153	4,224	23.2%	1,152	0.1%	1,424,666	39.2%		20	1.8%	
0.00 to <0.10		153	4,224	23.2%	1,152	0.1%	1,424,666	39.2%		20	1.8%		
0.10 to <0.15													
0.15 to <0.25		82	353	20.2%	162	0.2%	232,270	43.9%		7	4.6%		
0.25 to <0.50		116	167	15.7%	150	0.3%	39,632	47.4%		12	8.3%		
0.50 to <0.75		44	25	12.7%	49	0.6%	50,708	50.4%		7	14.0%		
0.75 to <2.50		82	64	14.6%	94	1.2%	42,001	50.8%		23	23.9%	1	
0.75 to <1.75		71	54	15.0%	82	1.0%	28,361	50.8%		18	22.0%		
1.75 to <2.5		11	10	12.3%	12	2.1%	13,640	50.8%		5	36.7%		
2.50 to <10.00		22	14	6.4%	23	4.6%	11,663	52.0%		15	64.2%	1	
2.5 to <5		13	10	8.3%	14	3.2%	8,061	51.4%		7	50.5%		
5 to <10		9	4	1.9%	9	6.8%	3,602	52.9%		8	85.8%		
10.00 to <100.00		6	2	0.9%	6	27.8%	3,413	55.5%		10	168.7%	1	
10 to <20		2	1	1.9%	2	12.8%	1,135	54.5%		2	128.2%		
20 to <30				8.1%		22.5%	84	61.0%			184.3%		
30.00 to <100.00	4	1	0.0%	4	35.2%	2,194	55.8%		7	187.6%	1		
100.00 (Default)	23			23	100.0%	15,359	49.4%		36	159.3%	8		
Subtotal (exposure class)	527	4,849	22.5%	1,659	1.7%	1,819,712	41.7%		131	7.9%	11		
Retail - Other SME	0.00 to <0.15	5			5	0.0%	100	2.2%			0.7%		
	0.00 to <0.10	4			4	0.0%	98	0.5%			0.1%		
	0.10 to <0.15	1			1	0.1%	2	12.3%			4.1%		
	0.15 to <0.25	322	523	44.6%	588	0.2%	6,914	29.9%		94	16.1%		-1
	0.25 to <0.50	334	97	49.3%	391	0.4%	3,862	31.1%		95	24.4%		-1
	0.50 to <0.75					0.7%	13	55.9%			49.7%		
	0.75 to <2.50	211	84	32.1%	255	1.4%	2,297	34.2%		121	47.3%	1	-3
	0.75 to <1.75	143	68	30.4%	176	1.0%	1,657	33.3%		74	41.9%	1	-2
	1.75 to <2.5	69	15	40.1%	79	2.2%	640	36.3%		47	59.4%	1	-1
	2.50 to <10.00	105	11	24.7%	112	5.3%	5,749	32.7%		66	59.2%	2	-2
	2.5 to <5	79	7	24.9%	84	4.1%	5,378	31.5%		45	54.4%	1	-1
	5 to <10	26	5	24.4%	29	8.9%	371	36.5%		21	73.4%	1	-1
	10.00 to <100.00	22	1	29.7%	23	19.7%	855	38.2%		23	101.4%	2	-1
	10 to <20	18	1	29.7%	19	17.8%	284	41.2%		20	108.7%	1	-1
	20 to <30	4			4	27.7%	571	25.7%		3	71.4%		
30.00 to <100.00													
100.00 (Default)	52	15	26.6%	53	99.9%	1,036	42.2%		133	249.7%	14	-18	
Subtotal (exposure class)	1,051	730	43.1%	1,427	4.9%	20,826	31.7%		534	37.4%	20	-26	
Retail - Other non-SME	0.00 to <0.15	11	9	33.6%	16	0.1%	208	28.0%		1	8.1%		
	0.00 to <0.10	2	6	36.9%	5	0.0%	48	27.4%			3.8%		
	0.10 to <0.15	9	2	25.1%	11	0.1%	160	28.2%		1	9.9%		
	0.15 to <0.25		1	49.3%	1	0.2%	71	36.9%			19.8%		

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	30 June 2024												
	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)
	0.25 to <0.50					0.3%	1	10.5%			6.1%		
	0.50 to <0.75	194		23.5%	207	0.7%	1,568	20.5%		39	19.1%		
	0.75 to <2.50	428		17.8%	430	1.7%	30,100	28.9%		170	39.5%	2	-1
	0.75 to <1.75	276		17.8%	279	1.5%	21,038	28.5%		104	37.4%	1	-1
	1.75 to <2.5	151			151	2.2%	9,062	29.5%		66	43.3%	1	
	2.50 to <10.00	313		27.6%	313	4.4%	15,416	29.2%		148	47.3%	4	-1
	2.5 to <5	238		28.3%	238	3.5%	12,515	29.3%		111	46.4%	2	-1
	5 to <10	75		5.0%	75	7.1%	2,901	29.1%		38	50.2%	2	
	10.00 to <100.00	50		9.5%	51	20.6%	2,792	29.4%		36	71.5%	3	-2
	10 to <20	24		9.5%	24	12.9%	1,412	29.3%		15	60.6%	1	-1
	20 to <30	26			26	27.5%	1,380	29.4%		22	81.5%	2	-2
	30.00 to <100.00												
	100.00 (Default)	29			29	99.1%	1,581	32.7%		42	148.2%	6	-24
	Subtotal (exposure class)	1,025	11	34.4%	1,046	5.9%	51,737	27.5%		438	41.8%	16	-29
	Total (all exposures classes)	213,970	29,494		223,970		2,668,098			48,644		1,172	-980

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

	A	B	C	D	E	F	G	H	I	J	K	L	M
	31 December 2023												
	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 government or 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)												
	Subtotal (exposure class)												
Corporates - SME	0.00 to <0.15	197	301	16.0%	245	0.1%	149	15.1%	1.69	21	8.4%		
	0.00 to <0.10	6	15	28.8%	10	0.1%	7	39.9%	3.22	2	20.7%		
	0.10 to <0.15	191	287	15.4%	235	0.1%	142	14.0%	1.62	19	7.9%		
	0.15 to <0.25	60	77	18.4%	74	0.2%	46	25.1%	3.06	17	22.9%		
	0.25 to <0.50	1,072	358	27.6%	1,171	0.4%	336	24.5%	2.69	404	34.5%	1	-3
	0.50 to <0.75	3,865	925	36.8%	4,205	0.7%	1,689	22.9%	2.71	1,565	37.2%	6	-15
	0.75 to <2.50	10,302	2,430	32.4%	11,091	1.4%	3,800	23.5%	2.72	5,490	49.5%	37	-51
	0.75 to <1.75	6,082	1,459	34.2%	6,581	1.1%	2,358	22.9%	2.71	2,968	45.1%	17	-28
	1.75 to <2.5	4,221	971	29.8%	4,510	1.8%	1,442	24.3%	2.74	2,521	55.9%	20	-23
	2.50 to <10.00	2,303	702	22.2%	2,459	4.1%	978	24.6%	2.40	1,667	67.8%	24	-47
	2.5 to <5	1,831	559	21.4%	1,951	3.3%	706	24.8%	2.51	1,285	65.9%	16	-31
	5 to <10	472	143	25.4%	508	6.8%	272	24.1%	1.99	382	75.2%	8	-16
	10.00 to <100.00	1,145	367	39.6%	1,292	24.4%	1,759	23.0%	2.44	1,455	112.7%	72	-76

	A	B	C	D	E	F	G	H	I	J	K	L	M
	31 December 2023												
	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)
	10 to <20	151	30	17.6%	156	13.5%	49	20.4%	1.89	141	90.2%	4	-12
	20 to <30	977	330	41.9%	1,117	25.8%	1,698	23.4%	2.55	1,293	115.8%	66	-63
	30.00 to <100.00	17	7	25.3%	19	31.6%	12	20.5%	0.99	21	112.8%	1	-1
	100.00 (Default)	1,126	242	5.5%	1,139	96.8%	615	21.2%	2.16	1,196	105.0%	194	-197
	Subtotal (exposure class)	20,069	5,403	29.7%	21,676	7.9%	9,372	23.3%	2.63	11,815	54.5%	334	-389
Corporates - Specialised lending	0.00 to <0.15												
	0.00 to <0.10												
	0.10 to <0.15												
	0.15 to <0.25	18	4	50.0%	20	0.2%	1	15.4%	1.95	2	12.4%		
	0.25 to <0.50	978	151	50.7%	1,054	0.4%	28	10.2%	3.44	199	18.8%		-1
	0.50 to <0.75	1,372	140	53.5%	1,447	0.7%	48	10.3%	3.13	324	22.4%	1	-1
	0.75 to <2.50	1,937	333	54.5%	2,118	1.2%	67	13.1%	3.29	741	35.0%	3	-3
	0.75 to <1.75	1,626	323	54.7%	1,802	1.1%	56	13.0%	3.23	607	33.7%	3	-2
	1.75 to <2.5	311	11	50.0%	316	1.8%	11	13.9%	3.61	134	42.4%	1	-1
	2.50 to <10.00	5,611	1,100	43.9%	6,094	4.7%	211	9.6%	2.75	1,899	31.2%	28	-10
	2.5 to <5	4,922	913	42.3%	5,308	4.5%	170	9.1%	2.88	1,576	29.7%	22	-9
	5 to <10	689	187	51.9%	786	5.6%	41	12.8%	1.84	322	41.0%	6	-1
	10.00 to <100.00	50	615	49.9%	357	42.0%	10	9.9%	3.62	204	57.0%	14	-1
	10 to <20	12			12	10.8%	1	9.5%	1.70	5	44.3%		
	20 to <30	11		50.0%	11	26.6%	3	31.0%	3.28	20	186.9%	1	
	30.00 to <100.00	28	615	49.9%	335	43.5%	6	9.2%	3.69	179	53.3%	13	
	100.00 (Default)	166			166	100.0%	10	6.0%	1.74	15	9.1%	26	-26
	Subtotal (exposure class)	10,131	2,343	48.0%	11,256	5.7%	375	10.4%	2.98	3,384	30.1%	73	-43
Corporates - Other	0.00 to <0.15	3,901	6,816	34.3%	6,236	0.1%	887	39.4%	2.85	1,955	31.3%	2	-8
	0.00 to <0.10	2,467	4,725	36.9%	4,212	0.1%	181	41.5%	3.12	1,269	30.1%	1	-7
	0.10 to <0.15	1,434	2,090	28.3%	2,025	0.1%	706	35.0%	2.29	686	33.9%	1	-1
	0.15 to <0.25	1,826	5,477	47.6%	4,434	0.2%	314	42.0%	2.27	1,828	41.2%	3	-2
	0.25 to <0.50	8,208	8,929	43.1%	12,057	0.4%	1,283	38.6%	2.46	6,849	56.8%	17	-6
	0.50 to <0.75	5,515	3,362	33.7%	6,647	0.6%	1,241	30.3%	2.29	3,815	57.4%	13	-7
	0.75 to <2.50	9,405	5,672	30.9%	11,156	1.4%	2,054	29.8%	2.20	8,237	73.8%	46	-23
	0.75 to <1.75	5,780	3,713	31.6%	6,953	1.1%	1,405	29.6%	2.16	4,728	68.0%	23	-8
	1.75 to <2.5	3,624	1,960	29.5%	4,203	1.8%	649	30.0%	2.27	3,509	83.5%	23	-15
	2.50 to <10.00	2,853	1,918	28.6%	3,402	3.9%	421	33.6%	2.32	3,918	115.2%	43	-24
	2.5 to <5	2,095	1,295	28.2%	2,461	3.2%	302	34.7%	2.37	2,809	114.1%	27	-16
	5 to <10	758	623	29.5%	941	5.9%	119	30.7%	2.20	1,109	117.8%	16	-8
	10.00 to <100.00	832	966	26.7%	1,095	22.8%	14,855	33.3%	2.06	1,962	179.2%	88	-32
	10 to <20	219	99	41.1%	260	11.3%	36	31.6%	1.93	394	151.6%	9	-17
	20 to <30	443	766	25.4%	642	23.9%	14,758	31.6%	1.70	1,152	179.3%	51	-14
	30.00 to <100.00	170	101	22.3%	193	34.6%	61	41.5%	3.46	416	215.8%	27	-2
	100.00 (Default)	1,484	1,008	10.2%	1,587	99.8%	347	26.0%	1.70	1,807	113.9%	382	-385
	Subtotal (exposure class)	34,023	34,149	36.9%	46,614	4.8%	21,402	34.8%	2.36	30,370	65.2%	594	-487
Institutions	0.00 to <0.15	81	203	25.2%	132	0.1%	14	56.1%	2.64	43	32.8%		-50
	0.00 to <0.10	64	73	31.3%	87	0.1%	11	57.6%	3.14	30	34.7%		
	0.10 to <0.15	17	131	21.9%	45	0.1%	3	53.2%	1.69	13	29.0%		-50
	0.15 to <0.25	221	130	53.0%	290	0.2%	7	43.8%	1.00	88	30.4%		
	0.25 to <0.50					0.4%	1	37.4%	1.00		44.5%		
	0.50 to <0.75												
	0.75 to <2.50	4		24.0%	4	2.2%	2	25.1%	3.33	4	88.5%		
	0.75 to <1.75			24.0%		1.1%	1	2.4%	0.67		5.3%		
	1.75 to <2.5	4			4	2.2%	1	25.3%	3.35	4	89.0%		
	2.50 to <10.00												
	2.5 to <5												
	5 to <10												
	10.00 to <100.00	86	1	25.0%	86	26.6%	45	58.4%	0.07	298	347.8%	13	
	10 to <20												

	A	B	C	D	E	F	G	H	I	J	K	L	M
	31 December 2023												
	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)
	20 to <30	86	1	25.0%	86	26.6%	45	58.4%	0.07	298	347.8%	13	
	30.00 to <100.00												
	100.00 (Default)												
	Subtotal (exposure class)	392	334	36.0%	512	4.6%	69	49.3%	1.29	433	84.5%	14	-50
Retail - Secured by immovable property SME	0.00 to <0.15	28		37.6%	28	0.0%	124	4.5%			1.1%		
	0.00 to <0.10	25		37.6%	25	0.0%	111	3.6%			0.7%		
	0.10 to <0.15	3			3	0.1%	13	13.5%			4.2%		
	0.15 to <0.25	1,373	305	47.1%	1,547	0.2%	11,875	18.3%		151	9.8%	1	-3
	0.25 to <0.50	789	64	45.8%	833	0.4%	4,236	21.2%		146	17.5%	1	-2
	0.50 to <0.75	1		16.2%	1	0.5%	11	13.0%			12.4%		
	0.75 to <2.50	551	86	33.5%	599	1.3%	4,026	19.0%		208	34.8%	2	-4
	0.75 to <1.75	417	71	34.9%	457	1.0%	3,315	18.3%		130	28.6%	1	-3
	1.75 to <2.5	134	15	26.9%	142	2.2%	711	21.4%		78	54.9%	1	-1
	2.50 to <10.00	211	14	15.2%	219	6.1%	1,230	19.7%		190	87.0%	3	-3
	2.5 to <5	124	10	17.7%	130	4.2%	762	19.5%		94	72.7%	1	-2
	5 to <10	87	4	8.6%	89	8.9%	468	20.1%		96	107.7%	2	-2
	10.00 to <100.00	42	3	15.1%	43	17.7%	221	20.7%		60	140.9%	2	-1
	10 to <20	42	3	15.1%	43	17.7%	221	20.7%		60	140.9%	2	-1
	20 to <30												
	30.00 to <100.00												
	100.00 (Default)	69	22	16.7%	70	100.0%	524	27.9%		42	61.0%	18	-9
		Subtotal (exposure class)	3,063	493	42.1%	3,339	3.2%	22,247	19.3%		799	23.9%	25
Retail - Secured by immovable property non-SME	0.00 to <0.15	67,748	44	59.9%	67,787	0.1%	329,047	12.4%		2,114	3.1%	8	-8
	0.00 to <0.10	40,281	19	36.8%	40,289	0.1%	191,976	12.4%		1,052	2.6%	4	-3
	0.10 to <0.15	27,467	25	77.4%	27,498	0.1%	137,071	12.5%		1,061	3.9%	4	-5
	0.15 to <0.25	15,174	3	89.5%	15,178	0.2%	70,735	14.9%		1,076	7.1%	5	-3
	0.25 to <0.50	39,889	66	85.3%	39,967	0.4%	175,035	12.2%		3,336	8.3%	18	-13
	0.50 to <0.75	16,063	5	75.8%	16,077	0.6%	71,804	12.1%		1,910	11.9%	12	-7
	0.75 to <2.50	12,732	5	78.4%	12,741	1.2%	61,442	12.1%		2,398	18.8%	19	-8
	0.75 to <1.75	11,596	5	77.6%	11,605	1.1%	57,891	11.7%		1,980	17.1%	15	-5
	1.75 to <2.5	1,135		88.5%	1,136	1.9%	3,551	16.7%		417	36.7%	4	-3
	2.50 to <10.00	2,998	1	31.1%	3,000	4.2%	10,287	15.4%		1,525	50.8%	19	-17
	2.5 to <5	2,244	1	27.9%	2,246	3.2%	7,363	15.7%		1,042	46.4%	11	-11
	5 to <10	754		67.5%	754	7.4%	2,924	14.4%		483	64.0%	8	-6
	10.00 to <100.00	1,297		73.4%	1,298	24.2%	5,049	14.4%		1,099	84.7%	45	-16
	10 to <20	738		78.2%	739	14.5%	2,910	14.3%		620	83.9%	15	-7
	20 to <30	359		69.7%	360	25.5%	1,382	14.3%		332	92.4%	13	-4
	30.00 to <100.00	199		68.2%	200	58.1%	757	14.7%		147	73.6%	17	-5
	100.00 (Default)	1,358	3	19.5%	1,361	100.0%	5,429	20.9%		1,497	110.0%	174	-123
		Subtotal (exposure class)	157,257	128	74.3%	157,409	1.5%	728,828	12.7%		14,954	9.5%	299
Retail - Qualifying revolving	0.00 to <0.15	139	4,176	17.2%	881	0.1%	1,463,507	40.1%		17	1.9%		
	0.00 to <0.10	139	4,176	17.2%	881	0.1%	1,298,150	40.1%		17	1.9%		
	0.10 to <0.15			12.2%		0.1%	165,357	45.3%			4.0%		
	0.15 to <0.25	78	359	15.5%	146	0.2%	133,320	44.8%		7	4.7%		
	0.25 to <0.50	118	177	11.6%	151	0.3%	73,158	48.5%		13	8.6%		
	0.50 to <0.75	48	24	6.7%	53	0.6%	30,790	51.7%		8	14.4%		
	0.75 to <2.50	95	63	7.1%	107	1.2%	51,181	52.4%		27	25.1%	1	
	0.75 to <1.75	81	51	7.3%	91	1.1%	40,868	52.3%		21	22.9%	1	
	1.75 to <2.5	14	12	6.3%	16	2.1%	10,313	52.5%		6	37.9%		
	2.50 to <10.00	26	16	3.6%	28	4.5%	14,128	53.0%		18	64.4%	1	
	2.5 to <5	16	11	4.6%	18	3.2%	9,658	52.5%		9	51.4%		
	5 to <10	10	5	1.0%	10	6.8%	4,470	53.9%		9	87.5%		
	10.00 to <100.00	7	2	1.1%	7	26.7%	3,461	55.7%		12	167.6%	1	
	10 to <20	2	1	1.6%	2	12.8%	2,183	55.4%		3	130.0%		
	20 to <30			3.8%		22.0%	892	61.9%			185.5%		

	A	B	C	D	E	F	G	H	I	J	K	L	M
	31 December 2023												
	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)
	30.00 to <100.00	5	1	0.8%	5	34.1%	386	55.8%		9	186.9%	1	
	100.00 (Default)	24			24	100.0%	117	48.9%		39	163.1%	9	
	Subtotal (exposure class)	535	4,817	16.6%	1,397	2.1%	1,769,662	43.4%		139	10.0%	12	
Retail - Other SME	0.00 to <0.15	3	5	36.4%	5	0.0%	494	19.0%			4.1%		
	0.00 to <0.10	2	4	37.0%	4	0.0%	436	14.0%			1.8%		
	0.10 to <0.15		1	33.0%	1	0.1%	58	49.2%			17.8%		
	0.15 to <0.25	318	565	44.6%	605	0.2%	7,303	30.1%		98	16.1%		-1
	0.25 to <0.50	349	118	50.2%	419	0.4%	4,254	30.8%		101	24.2%	1	-1
	0.50 to <0.75	5		21.0%	5	0.7%	672	26.1%		2	33.0%		
	0.75 to <2.50	538	90	32.0%	585	1.5%	11,745	25.7%		234	40.0%	2	-3
	0.75 to <1.75	417	70	31.4%	453	1.3%	10,083	24.8%		169	37.3%	1	-2
	1.75 to <2.5	121	20	34.2%	132	2.1%	1,662	29.0%		65	49.3%	1	-1
	2.50 to <10.00	449	16	23.3%	457	5.3%	16,420	23.9%		226	49.3%	6	-4
	2.5 to <5	222	11	21.1%	226	3.7%	10,626	23.5%		99	44.0%	2	-2
	5 to <10	228	5	28.1%	231	6.8%	5,794	24.2%		126	54.6%	4	-2
	10.00 to <100.00	143	4	19.0%	145	16.4%	3,255	27.1%		114	79.0%	7	-2
	10 to <20	114	4	19.0%	116	14.0%	2,056	26.8%		85	73.9%	5	-2
	20 to <30	29			29	25.8%	1,199	28.2%		29	99.1%	2	
	30.00 to <100.00												
	100.00 (Default)	91	15	25.1%	92	99.9%	2,611	24.4%		123	132.8%	15	-28
	Subtotal (exposure class)	1,896	813	43.1%	2,313	6.6%	46,754	27.4%		898	38.8%	31	-39
Retail - Other non-SME	0.00 to <0.15	51	148	35.4%	114	0.1%	3,707	31.1%		9	7.9%		
	0.00 to <0.10	22	127	36.7%	70	0.0%	2,787	24.1%		2	3.3%		
	0.10 to <0.15	29	20	27.5%	43	0.1%	920	42.3%		7	15.3%		
	0.15 to <0.25	3	2	49.6%	4	0.2%	141	21.3%			11.0%		
	0.25 to <0.50	1	1	29.2%	3	0.3%	524	43.9%		1	28.3%		
	0.50 to <0.75	232	5	25.6%	278	0.7%	4,216	29.5%		77	27.5%	1	
	0.75 to <2.50	441	3	24.6%	452	1.7%	30,939	29.5%		181	40.1%	2	-1
	0.75 to <1.75	254	3	24.6%	265	1.4%	19,656	29.6%		101	38.1%	1	-1
	1.75 to <2.5	187			187	2.1%	11,283	29.5%		80	43.0%	1	-1
	2.50 to <10.00	368	2	15.5%	374	4.1%	17,168	29.5%		177	47.3%	5	-2
	2.5 to <5	290	2	16.2%	294	3.4%	13,997	29.7%		138	46.8%	3	-1
	5 to <10	79	1	13.9%	80	6.9%	3,171	28.7%		39	49.2%	2	-1
	10.00 to <100.00	40		21.1%	41	20.0%	2,271	29.6%		29	71.6%	2	-2
	10 to <20	20		21.1%	21	13.6%	1,227	29.7%		13	62.5%	1	-1
	20 to <30	20			20	26.7%	1,044	29.5%		16	81.1%	2	-1
	30.00 to <100.00												
	100.00 (Default)	37	5	12.5%	37	99.6%	1,788	38.7%		65	175.7%	10	-25
	Subtotal (exposure class)	1,174	167	34.1%	1,302	5.4%	60,754	29.9%		539	41.4%	20	-30
Total (all exposures classes)		228,539	48,646		245,818		2,659,463			63,331		1,402	-1,256

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	M
	31 December 2024												
	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 government or 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)												
Corporates - SME	Subtotal (exposure class)												
	0.00 to <0.15	7		50.0%	7	0.1%	3	10.8%	2.50		7%		
	0.00 to <0.10			0.0%		0.0%		0.0%			0%		
	0.10 to <0.15	7		50.0%	7	0.1%	3	10.8%	2.50		7%		
	0.15 to <0.25	1	2	0.0%	1	0.2%	3	32.7%	2.50		26%		
	0.25 to <0.50	87	54	26.0%	101	0.4%	48	42.1%	2.50	52	51%		
	0.50 to <0.75	205	101	24.0%	229	0.7%	243	45.6%	2.50	166	72%	1	-1
	0.75 to <2.50	1,113	563	29.0%	1,278	1.4%	669	44.8%	2.50	1,158	91%	8	-5
	0.75 to <1.75	654	415	32.0%	787	1.1%	413	44.0%	2.50	662	84%	4	-2
	1.75 to <2.5	459	147	22.0%	491	1.8%	256	46.2%	2.50	496	101%	4	-3
	2.50 to <10.00	164	43	33.0%	178	3.9%	144	45.3%	2.50	212	119%	3	-2
	2.5 to <5	134	40	34.0%	148	3.3%	123	47.8%	2.50	181	123%	2	-1
	5 to <10	30	3	25.0%	30	6.6%	21	33.3%	2.50	31	102%	1	
	10.00 to <100.00	111	34	4.0%	112	16.6%	55	45.2%	2.50	262	233%	8	
	10 to <20	84	21	0.0%	84	13.3%	2	45.0%	2.50	198	235%	5	
	20 to <30	27	13	11.0%	28	26.6%	53	45.9%	2.50	64	226%	3	
	30.00 to <100.00			0.0%		0.0%		0.0%			0%		
	100.00 (Default)	108	21	44.0%	117	100.0%	63	51.8%	2.50		0%	61	-26
	Subtotal (exposure class)	1,797	817	28.0%	2,025	8.0%	1,228	45.1%	2.50	1,850	91%	81	-33

	A	B	C	D	E	F	G	H	I	J	K	L	M
	31 December 2024												
	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	3,694	1,203	47.0%	4,259	0.4%	78	45.1%	2.50	2,486	58%	7	-2
	0.50 to <0.75	2,913	2,207	52.0%	4,063	0.7%	79	45.0%	2.50	2,999	74%	13	-6
	0.75 to <2.50	329	269	47.0%	456	1.1%	12	45.0%	2.50	417	92%	2	-3
	0.75 to <1.75	329	269	47.0%	456	1.1%	12	45.0%	2.50	417	92%	2	-3
	1.75 to <2.5			0.0%		0.0%		0.0%			0%		
	2.50 to <10.00	12	10	50.0%	17	3.4%	1	45.0%	2.50	27	155%		
	2.5 to <5	12	10	50.0%	17	3.4%	1	45.0%	2.50	27	155%		
	5 to <10			0.0%		0.0%		0.0%			0%		
	10.00 to <100.00	6		50.0%	6	27.5%	1	45.0%	2.50	17	289%	1	
	10 to <20			0.0%		0.0%		0.0%			0%		
	20 to <30	6		50.0%	6	27.5%	1	45.0%	2.50	17	289%	1	
	30.00 to <100.00			0.0%		0.0%		0.0%			0%		
	100.00 (Default)	113	44	73.0%	145	100.0%	6	45.0%	2.50		0%	65	-52
	Subtotal (exposure class)	7,067	3,732	50.0%	8,946	2.2%	177	45.0%	2.50	5,946	66%	89	-62
Corporates - Other	0.00 to <0.15	4,486	6,872	63.0%	8,815	0.1%	240	44.5%	2.50	3,041	34%	3	-19
	0.00 to <0.10	2,345	4,044	58.0%	4,674	0.1%	134	44.1%	2.50	1,255	27%	1	-19
	0.10 to <0.15	2,141	2,828	71.0%	4,141	0.1%	106	44.9%	2.50	1,786	43%	2	
	0.15 to <0.25	2,078	2,996	66.0%	4,058	0.2%	150	43.7%	2.50	1,872	46%	3	-1
	0.25 to <0.50	3,163	6,529	60.0%	7,113	0.4%	217	44.6%	2.50	4,729	66%	12	-12
	0.50 to <0.75	1,704	1,689	57.0%	2,672	0.7%	131	43.1%	2.50	2,209	83%	8	-1
	0.75 to <2.50	2,958	2,443	55.0%	4,297	1.3%	289	44.2%	2.50	4,624	108%	24	-7
	0.75 to <1.75	2,078	1,737	55.0%	3,039	1.1%	167	44.2%	2.50	3,103	102%	14	-3
	1.75 to <2.5	880	707	53.0%	1,258	1.8%	122	44.3%	2.50	1,521	121%	10	-4
	2.50 to <10.00	972	946	49.0%	1,439	3.5%	113	44.4%	2.50	2,099	146%	22	-6
	2.5 to <5	805	806	47.0%	1,181	3.0%	83	44.6%	2.50	1,663	141%	16	-4
	5 to <10	167	140	66.0%	258	5.8%	30	43.8%	2.50	436	169%	7	-2
	10.00 to <100.00	391	798	49.0%	784	4.1%	116	42.4%	2.50	738	94%	11	-3
	10 to <20	26	51	73.0%	63	10.9%	10	36.2%	2.50	112	177%	3	
	20 to <30	219	567	45.0%	472	1.4%	85	43.8%	2.50	374	79%	3	-1
	30.00 to <100.00	145	180	57.0%	248	7.4%	21	41.4%	2.50	252	102%	5	-2
	100.00 (Default)	404	212	27.0%	461	100.0%	50	43.7%	2.50		0%	87	-134
	Subtotal (exposure class)	16,155	22,484	27.0%	29,639	2.2%	1,306	44.2%	2.50	19,311	65%	171	-182
Institutions	0.00 to <0.15	6,263	27	29.0%	6,271	0.1%	165	17.2%	2.50	700	11%	1	
	0.00 to <0.10	5,939	20	27.0%	5,944	0.1%	140	16.9%	2.50	623	10%	1	
	0.10 to <0.15	324	7	33.0%	326	0.1%	25	23.7%	2.49	77	23%		
	0.15 to <0.25	13	3	20.0%	13	0.2%	8	21.6%	2.50	4	30%		
	0.25 to <0.50	48	9	20.0%	50	0.5%	9	13.8%	2.50	12	23%		
	0.50 to <0.75	2	1	1.0%	2	0.7%	1	45.0%	2.50	2	87%		
	0.75 to <2.50	1	18	0.0%	1	1.3%	4	45.0%	2.50	1	107%		
	0.75 to <1.75	1		31.0%	1	1.3%	3	45.0%	2.50	1	107%		
	1.75 to <2.5		18	0.0%		2.1%	1	45.0%	2.50		153%		
	2.50 to <10.00	80	17	20.0%	84	3.9%	5	45.0%	2.50	124	148%	1	
	2.5 to <5	80	17	20.0%	84	3.9%	5	45.0%	2.50	124	148%	1	
	5 to <10			0.0%		0.0%		0.0%			0%		
	10.00 to <100.00	6	76	24.0%	24	8.8%	25	45.0%	2.50	30	126%	1	
	10 to <20	1	1	20.0%	2	15.6%	3	45.0%	2.50	4	237%		
	20 to <30	5	75	24.0%	23	8.3%	22	45.0%	2.50	27	118%	1	
	30.00 to <100.00			0.0%		0.0%		0.0%			0%		
	100.00 (Default)			0.0%		0.0%		0.0%			0%		
	Subtotal (exposure class)	6,413	151	21.0%	6,445	0.2%	217	17.7%	2.50	872	14%	3	

	A	B	C	D	E	F	G	H	I	J	K	L	M
	31 December 2024												
	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	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)												
Total (all exposures classes)		31,432	27,185	57.0%	47,054	2.2%	2,928	40.7%	2.50	27,979	59.5%	344	-278

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

	A	B	C	D	E	F	G	H	I	J	K	L	M
	30 June 2024												
	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 government or 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)												
	Subtotal (exposure class)												

	A	B	C	D	E	F	G	H	I	J	K	L	M
													30 June 2024
	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 - SME	0.00 to <0.15	110	58	41.0%	133	0.1%	6	45.0%	2.50	42	31%		
	0.00 to <0.10												
	0.10 to <0.15	110	58	41.0%	133	0.1%	6	45.0%	2.50	42	31%		
	0.15 to <0.25	168	161	68.0%	277	0.2%	25	46.7%	2.50	123	44%		
	0.25 to <0.50	147	141	48.0%	215	0.3%	60	49.3%	2.50	125	58%		
	0.50 to <0.75	300	150	23.0%	334	0.7%	279	47.1%	2.50	252	75%	1	-1
	0.75 to <2.50	947	417	23.0%	1,043	1.4%	716	47.2%	2.50	1,002	96%	7	-7
	0.75 to <1.75	516	295	24.0%	588	1.1%	437	47.3%	2.50	530	90%	3	-3
	1.75 to <2.5	431	122	19.0%	455	1.8%	279	47.1%	2.50	472	104%	4	-5
	2.50 to <10.00	248	81	31.0%	274	3.6%	158	48.8%	2.50	353	129%	5	-5
	2.5 to <5	223	72	34.0%	248	3.3%	129	49.1%	2.50	317	128%	4	-4
	5 to <10	25	9	4.0%	26	6.6%	29	45.8%	2.50	37	142%	1	-1
	10.00 to <100.00	124	37	4.0%	126	15.6%	718	41.2%	2.50	270	215%	8	-1
	10 to <20	104	22		104	13.3%	3	38.3%	2.50	207	200%	5	
	20 to <30	21	15	10.0%	22	26.6%	715	55.2%	2.50	63	285%	3	-1
	30.00 to <100.00												
	100.00 (Default)	90	19	45.0%	99	100.0%	58	53.0%	2.50			53	-35
	Subtotal (exposure class)	2,134	1,065	34.0%	2,501	5.9%	2,020	47.3%	2.50	2,165	87%	75	-50
Corporates - Specialised lending	0.00 to <0.15												
	0.00 to <0.10												
	0.10 to <0.15												
	0.15 to <0.25	18			18	0.2%	2	45.0%	2.50	9	48%		
	0.25 to <0.50	3,572	1,127	50.0%	4,136	0.4%	76	45.1%	2.50	2,451	59%	7	-3
	0.50 to <0.75	2,735	2,456	52.0%	4,014	0.7%	80	45.0%	2.50	2,854	71%	12	-7
	0.75 to <2.50	296	176	51.0%	385	1.1%	11	45.0%	2.50	358	93%	2	-2
	0.75 to <1.75	296	176	51.0%	385	1.1%	11	45.0%	2.50	358	93%	2	-2
	1.75 to <2.5												
	2.50 to <10.00	46	50	57.0%	74	6.6%	1	45.0%	2.50	91	122%	2	-8
	2.5 to <5												
	5 to <10	46	50	57.0%	74	6.6%	1	45.0%	2.50	91	122%	2	-8
	10.00 to <100.00		172	30.0%	52	26.6%	4	45.0%	2.50	133	253%	6	
	10 to <20												
	20 to <30		172	30.0%	52	26.6%	4	45.0%	2.50	133	253%	6	
	30.00 to <100.00												
	100.00 (Default)	107	14	54.0%	115	100.0%	5	45.0%	2.50			52	-39
	Subtotal (exposure class)	6,775	3,996	51.0%	8,795	2.1%	179	45.0%	2.50	5,895	67%	81	-60
Corporates - Other	0.00 to <0.15	4,598	7,019	64.0%	9,104	0.1%	264	45.0%	2.50	3,243	36%	4	-18
	0.00 to <0.10	2,414	3,975	58.0%	4,715	0.1%	140	44.6%	2.50	1,330	28%	2	-17
	0.10 to <0.15	2,183	3,044	72.0%	4,389	0.1%	124	45.4%	2.50	1,912	44%	2	-2
	0.15 to <0.25	1,619	3,801	68.0%	4,213	0.2%	139	44.2%	2.50	2,028	48%	3	-1
	0.25 to <0.50	3,800	5,599	61.0%	7,228	0.3%	181	44.6%	2.50	4,692	65%	11	-3
	0.50 to <0.75	1,969	1,951	63.0%	3,199	0.6%	133	43.3%	2.50	2,567	80%	9	-2
	0.75 to <2.50	2,708	2,745	49.0%	4,062	1.3%	290	44.6%	2.50	4,477	110%	24	-8
	0.75 to <1.75	1,743	1,995	49.0%	2,728	1.1%	173	44.0%	2.50	2,820	103%	13	-4
	1.75 to <2.5	965	750	49.0%	1,334	1.8%	117	45.7%	2.50	1,657	124%	11	-4
	2.50 to <10.00	1,198	867	49.0%	1,622	3.6%	121	42.5%	2.50	2,288	141%	25	-9
	2.5 to <5	965	612	47.0%	1,256	3.0%	82	42.4%	2.50	1,688	134%	16	-6
	5 to <10	233	255	52.0%	366	5.6%	39	42.8%	2.50	601	164%	9	-4
	10.00 to <100.00	266	410	57.0%	499	13.9%	571	42.5%	2.50	854	171%	26	-5
	10 to <20	5	94	75.0%	75	10.9%	6	46.1%	2.50	169	225%	4	-3
	20 to <30	201	203	63.0%	329	9.8%	545	45.1%	2.50	545	165%	14	
	30.00 to <100.00	60	113	30.0%	94	30.5%	20	30.8%	2.50	140	148%	8	-2
	100.00 (Default)	412	488	24.0%	531	99.4%	38	37.6%	2.50	2	0%	188	-203
	Subtotal (exposure class)	16,570	22,881	24.0%	30,458	2.5%	1,737	44.2%	2.50	20,150	66%	290	-250

	A	B	C	D	E	F	G	H	I	J	K	L	M
													30 June 2024
	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)
Institutions	0.00 to <0.15	6,904	219	21.0%	6,950	0.1%	162	22.1%	2.50	1,039	15%	1	
	0.00 to <0.10	5,567	218	21.0%	5,613	0.1%	136	21.8%	2.50	703	13%	1	
	0.10 to <0.15	1,336	2	24.0%	1,337	0.1%	26	23.1%	2.50	336	25%		
	0.15 to <0.25	1,231	10	20.0%	1,233	0.2%	20	23.0%	2.50	339	28%	1	
	0.25 to <0.50	69	7	54.0%	73	0.3%	10	18.6%	2.50	22	30%		
	0.50 to <0.75	47	6	33.0%	49	0.6%	8	14.1%	2.50	13	26%		
	0.75 to <2.50	75	44	10.0%	79	1.9%	11	45.0%	2.50	103	130%	1	
	0.75 to <1.75	12	18		12	1.2%	5	45.0%	2.50	16	138%		
	1.75 to <2.5	63	26	16.0%	67	2.0%	6	45.0%	2.50	86	128%	1	
	2.50 to <10.00												
	2.5 to <5												
	5 to <10												
	10.00 to <100.00	58	8	21.0%	59	26.8%	24	45.0%	2.50	178	300%	7	
	10 to <20		1	20.0%	1	17.3%	4	45.0%	2.50	2	246%		
	20 to <30	57	7	22.0%	59	26.9%	20	45.0%	2.50	176	300%	7	
	30.00 to <100.00												
	100.00 (Default)												
	Subtotal (exposure class)	8,384	295	20.0%	8,444	0.3%	235	22.5%	2.50	1,694	20%	9	
Retail	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)												
Total (all exposures classes)		33,863	28,236	58.0%	50,198	2.2%	4,171	40.9%	2.50	29,905	59.6%	455	-359

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

		A	B	C	D	E	F	G	H	I	J	K	L	M	
		31 December 2023													
		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 government or 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)															
	Subtotal (exposure class)														
Corporates - SME	0.00 to <0.15	58	12	50.0%	64	0.1%	2	45.0%	2.50	22	34%				
	0.00 to <0.10														
	0.10 to <0.15	58	12	50.0%	64	0.1%	2	45.0%	2.50	22	34%				
	0.15 to <0.25	283	193	66.0%	411	0.2%	28	46.2%	2.50	173	42%				
	0.25 to <0.50	128	151	72.0%	236	0.3%	21	49.6%	2.50	131	56%				
	0.50 to <0.75														
	0.75 to <2.50	5	6	75.0%	10	1.1%	1	45.0%	2.50	9	92%				
	0.75 to <1.75	5	6	75.0%	10	1.1%	1	45.0%	2.50	9	92%				
	1.75 to <2.5														
	2.50 to <10.00														
	2.5 to <5														
	5 to <10														
	10.00 to <100.00				0	25.7%	1	45.0%	2.50	0	248%				
	10 to <20														
	20 to <30				0	25.7%	1	45.0%	2.50	0	248%				
	30.00 to <100.00														
100.00 (Default)	1			1	100.0%	1	75.0%	2.50				1	-1		
	Subtotal (exposure class)	476	362	68.0%	723	0.3%	54	47.2%	2.50	335	46%	1	-1		
Corporates - Specialised lending	0.00 to <0.15														
	0.00 to <0.10														
	0.10 to <0.15														
	0.15 to <0.25	21			21	0.2%	1	45.0%	2.50	10	48%				
	0.25 to <0.50	3,086	1,215	49.0%	3,678	0.4%	67	45.1%	2.50	2,098	57%	6	-2		
	0.50 to <0.75	2,276	2,595	53.0%	3,648	0.7%	69	45.0%	2.50	2,565	70%	11	-11		
	0.75 to <2.50	297	40	59.0%	321	1.1%	11	45.0%	2.50	301	94%	2	-2		
	0.75 to <1.75	297	40	59.0%	321	1.1%	11	45.0%	2.50	301	94%	2	-2		
	1.75 to <2.5														
	2.50 to <10.00														
	2.5 to <5														
	5 to <10														
	10.00 to <100.00	28	20	33.0%	35	26.6%	1	45.0%	2.50	101	289%	4			
	10 to <20														
	20 to <30	28	20	33.0%	35	26.6%	1	45.0%	2.50	101	289%	4			
	30.00 to <100.00														
100.00 (Default)	123	20	42.0%	131	100.0%	6	45.0%	2.50				59	-55		
	Subtotal (exposure class)	5,832	3,889	51.0%	7,834	2.3%	155	45.0%	2.50	5,074	65%	82	-70		

Corporates - Other	0.00 to <0.15	2,924	3,691	62.0%	5,226	0.1%	181	45.1%	2.50	1,896	36%	2	-12
	0.00 to <0.10	944	865	31.0%	1,208	0.1%	85	45.0%	2.50	304	25%		-12
	0.10 to <0.15	1,980	2,826	72.0%	4,018	0.1%	96	45.1%	2.50	1,592	40%	2	
	0.15 to <0.25	652	745	71.0%	1,180	0.2%	62	45.3%	2.50	571	48%	1	
	0.25 to <0.50	310	293	59.0%	483	0.1%	29	45.2%	2.50	187	39%		
	0.50 to <0.75			20.0%	0	0.7%	5	45.0%	2.50	0	114%		
	0.75 to <2.50	9	5	20.0%	10	2.0%	9	45.0%	2.50	16	158%		
	0.75 to <1.75			47.0%		1.1%		75.0%	0.50		129%		
	1.75 to <2.5	9	5	20.0%	10	2.0%	9	45.0%	2.50	16	158%		
	2.50 to <10.00		4	20.0%	1	7.3%	6	45.0%	2.50	2	224%		
	2.5 to <5												
	5 to <10		4	20.0%	1	7.3%	6	45.0%	2.50	2	224%		
	10.00 to <100.00			20.0%	0	26.4%	7	45.0%	2.50	0	300%		
	10 to <20				0	14.6%	1	45.0%	2.50	0	279%		
	20 to <30			20.0%	0	28.8%	6	45.0%	2.50	0	304%		
	30.00 to <100.00												
	100.00 (Default)												
Subtotal (exposure class)		3,897	4,738		6,901	0.1%	299	45.1%	2.50	2,673	39%	3	-12
Institutions	0.00 to <0.15	5,200	46	22.0%	5,210	0.1%	168	19.0%	2.50	785	15%	1	
	0.00 to <0.10	3,377	37	23.0%	3,385	0.1%	116	18.5%	2.50	401	12%		
	0.10 to <0.15	1,823	10	21.0%	1,825	0.1%	52	19.8%	2.50	385	21%		
	0.15 to <0.25	943	10	20.0%	945	0.2%	29	12.0%	2.50	156	17%		
	0.25 to <0.50	102	6	20.0%	103	0.3%	15	19.8%	2.50	36	35%		
	0.50 to <0.75	5	5	29.0%	7	0.7%	4	45.0%	2.50	8	117%		
	0.75 to <2.50	59	13	21.0%	62	2.0%	11	45.0%	2.50	80	129%	1	
	0.75 to <1.75		1	20.0%	0	1.2%	4	45.0%	2.50	1	138%		
	1.75 to <2.5	59	12	21.0%	62	2.0%	7	45.0%	2.50	80	129%	1	
	2.50 to <10.00												
	2.5 to <5												
	5 to <10												
	10.00 to <100.00	23	7	20.0%	24	25.5%	13	19.2%	2.50	29	120%	1	
	10 to <20	2		20.0%	2	14.6%	4	45.0%	2.50	4	242%		
	20 to <30	21	7	20.0%	23	26.4%	9	17.0%	2.50	25	110%	1	
	30.00 to <100.00												
	100.00 (Default)												
Subtotal (exposure class)		6,332	87	22.0%	6,351	0.2%	240	18.2%	2.50	1,095	17%	3	
Retail	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)													
Total (all exposures classes)		16,537	9,077		21,809		748		2.50	9,178		90	-83

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

EU CR6-A – Scope of the use of IRB and SA approaches

This table provides, for each exposure class, the percentage of the total exposure value subject to the Standardised Approach and to the IRB approach, as well as the part of each exposure class subject to a roll-out plan. The movements are caused by the switch from the internal rating based (IRB) to the Standardised Approach (SA) over the year 2024, specifically in Retail - Other SMEs and Retail - Other non-SMEs.

	A	B	C	D	E
	31 December 2024				
(in millions)	Exposure value as defined in Article 166 CRR for exposures subject to IRB approach	Total exposure value for exposures subject to the Standardised approach and to the IRB approach	Percentage of total exposure value subject to the permanent partial use of the SA (%)	Percentage of total exposure value subject to IRB Approach (%)	Percentage of total exposure value subject to a roll-out plan (%)
1 Central governments or central banks		87,299	100%		
1.1 - of which Regional governments or local authorities		2,652	100%		
1.2 - of which Public sector entities		2,645	100%		
2 Institutions	7,699	9,479	30%	70%	
3 Corporates	97,682	111,366	6%	94%	
3.1 - of which Corporates - Specialised lending, excluding slotting approach		20,440		100%	
3.2 - of which Corporates - Specialised lending under slotting approach					
4 Retail	172,647	167,138	2%	98%	
4.1 - of which Retail – Secured by real estate SMEs		4,893		100%	
4.2 - of which Retail – Secured by real estate non-SMEs		156,519		100%	
4.3 - of which Retail – Qualifying revolving		1,009	4%	96%	
4.4 - of which Retail – Other SMEs		2,072	48%	52%	
4.5 - of which Retail – Other non-SMEs		2,644	94%	6%	
5 Equity	1,100	1,100		100%	
6 Other non-credit obligation assets	2,123	2,274	7%	93%	
7 Total	281,251	378,657	27%	73%	

	A	B	C	D	E
	31 December 2023				
(in millions)	Exposure value as defined in Article 166 CRR for exposures subject to IRB approach	Total exposure value for exposures subject to the Standardised approach and to the IRB approach	Percentage of total exposure value subject to the permanent partial use of the SA (%)	Percentage of total exposure value subject to IRB Approach (%)	Percentage of total exposure value subject to a roll-out plan (%)
1 Central governments or central banks		90,587	100%	0%	0%
1.1 - of which Regional governments or local authorities		2,929	100%	0%	0%
1.2 - of which Public sector entities		2,713	100%	0%	0%
2 Institutions	7,386	8,095	27%	73%	0%
3 Corporates	100,228	114,140	6%	94%	0%
3.1 - of which Corporates - Specialised lending, excluding slotting approach		19,896	0%	100%	0%
3.2 - of which Corporates - Specialised lending under slotting approach			0%	0%	0%
4 Retail	168,427	162,511	2%	98%	0%
4.1 - of which Retail – Secured by real estate SMEs		4,854	0%	100%	0%
4.2 - of which Retail – Secured by real estate non-SMEs		150,962	0%	100%	0%
4.3 - of which Retail – Qualifying revolving		1,071	5%	95%	0%
4.4 - of which Retail – Other SMEs		2,572	8%	92%	0%
4.5 - of which Retail – Other non-SMEs		3,053	77%	23%	0%
5 Equity	1,064	1,064	0%	100%	0%
6 Other non-credit obligation assets	2,063	2,119	3%	97%	0%
7 Total	279,168	378,515	27%	73%	0%

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

Exposure class A-IRB

The table shows that the majority of our exposures as at 31 December 2024 were covered by eligible collateral consisting mainly of immovable property and other physical collateral. Compared to 30 June 2024, IRB based RWEA decreased by EUR 2.6 billion. Underlying the biggest RWEA decrease was a decrease in Corporates of EUR 1.7 billion in total (the underlying categories combined). Institutions were responsible for a decrease of EUR 0.8 billion.

	A	B	C	D	E	F	G	H	I	J
	31 December 2024									
	Total exposures	Credit risk mitigation techniques								
	Funded credit protection (FCP)									
	Part of exposures covered by									
	Financial collaterals	Other eligible collaterals				Other funded credit protection				
			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	
(in millions)										
1 Central governments and central banks										
2 Institutions	322	10%	1%	1%		1%				
3 Corporates	55,858	6%	78%	46%	12%	21%				
3.1 - of which Corporates - SMEs	19,035	4%	95%	68%	18%	9%				
3.2 - of which Corporates - Specialised lending	10,355	1%	97%	49%		48%				
3.3 - of which Corporates - Other	26,468	10%	59%	28%	13%	18%				
4 Retail	167,760	4%	80%	79%						
4.1 - of which Retail - Immovable property SMEs	3,282		103%	92%	11%	1%				
4.2 - of which Retail - Immovable property non-SMEs	160,265	4%	81%	81%						
4.3 - of which Retail - Qualifying revolving	1,608									
4.4 - of which Retail - Other SMEs	1,088		62%		31%	32%				
4.5 - of which Retail - Other non-SMEs	1,516									
5 Total	223,940	5%	79%	71%	3%	5%				

	K	L	M	N
	31 December 2024			
	Credit risk mitigation techniques		Credit risk mitigation methods in the calculation of RWEA	
	Unfunded credit protection (UFCP)			
	Part of exposures covered by			
			RWEA without substitution effects (reduction effects only)	RWEA with substitution effects (both reduction and substitution effects)
(in millions)	Guarantees ¹	Credit derivatives		
1 Central governments and central banks				
2 Institutions			119	119
3 Corporates			29,708	29,708
3.1 - of which Corporates - SMEs			9,523	9,626
3.2 - of which Corporates - Specialised lending			3,054	2,936
3.3 - of which Corporates - Other			17,131	17,146
4 Retail	15%		18,495	18,495
4.1 - of which Retail - Immovable property SMEs	0%		728	728
4.2 - of which Retail - Immovable property non-SMEs	16%		16,641	16,641
4.3 - of which Retail - Qualifying revolving			153	153
4.4 - of which Retail - Other SMEs	5%		464	464
4.5 - of which Retail - Other non-SMEs			509	509
5 Total	11%		48,322	48,322

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

	A	B	C	D	E	F	G	H	I	J
	30 June 2024									
	Total exposures	Credit risk mitigation techniques								
		Funded credit protection (FCP)								
		Part of exposures covered by								
		Financial collaterals	Other eligible collaterals				Other funded credit protection			
			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	
(in millions)										
1 Central governments and central banks										
2 Institutions	221	12%	21%	20%		1%				
3 Corporates	57,497	7%	82%	48%	13%	21%				
3.1 - of which Corporates - SMEs	19,592	4%	96%	69%	19%	8%				
3.2 - of which Corporates - Specialised lending	10,552	1%	106%	59%	0%	47%				
3.3 - of which Corporates - Other	27,353	12%	63%	29%	13%	20%				
4 Retail	163,256	4%	81%	80%	1%	0%				
4.1 - of which Retail - Immovable property SMEs	3,201	0%	104%	92%	11%	1%				
4.2 - of which Retail - Immovable property non-SMEs	155,209	5%	82%	82%	0%					
4.3 - of which Retail - Qualifying revolving	1,659									
4.4 - of which Retail - Other SMEs	1,427	2%	73%	17%	30%	26%				
4.5 - of which Retail - Other non-SMEs	1,760	0%	13%	11%	2%					
5 Total	220,974	5%	81%	72%	4%	6%				

	K	L	M	N
	30 June 2024			
	Credit risk mitigation techniques		Credit risk mitigation methods in the calculation of RWEA	
	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				
2 Institutions			86	90
3 Corporates			30,336	30,330
3.1 - of which Corporates - SMEs			10,262	10,327
3.2 - of which Corporates - Specialised lending			3,402	3,309
3.3 - of which Corporates - Other			16,672	16,694
4 Retail	15%		18,608	18,608
4.1 - of which Retail - Immovable property SMEs	0%		758	758
4.2 - of which Retail - Immovable property non-SMEs	16%		16,645	16,645
4.3 - of which Retail - Qualifying revolving			130	130
4.4 - of which Retail - Other SMEs	4%		533	533
4.5 - of which Retail - Other non-SMEs	0%		543	543
5 Total	11%		49,029	49,028

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

	A	B	C	D	E	F	G	H	I	J
	31 December 2023									
	Total exposures	Credit risk mitigation techniques								
		Funded credit protection (FCP)								
		Part of exposures covered by								
		Financial Collaterals	Other eligible collaterals				Other funded credit protection			
			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	
(in millions)										
1 Central governments and central banks										
2 Institutions	512	1%	7%	4%		3%				
3 Corporates	80,794	5%	54%	31%	9%	14%				
3.1 - of which Corporates - SMEs	21,676	5%	82%	61%	15%	6%				
3.2 - of which Corporates - Specialised lending	11,256	0%	77%	46%	0%	32%				
3.3 - of which Corporates - Other	47,862	7%	36%	14%	9%	13%				
4 Retail	162,347	5%	82%	81%	0%	0%				
4.1 - of which Retail - Immovable property SMEs	3,339	0%	97%	86%	11%	1%				
4.2 - of which Retail - Immovable property non-SMEs	153,505	5%	84%	84%	0%					
4.3 - of which Retail - Qualifying revolving	1,397									
4.4 - of which Retail - Other SMEs	2,313	1%	40%	11%	14%	15%				
4.5 - of which Retail - Other non-SMEs	1,793	3%	16%	13%	2%	0%				
5 Total	243,654	5%	72%	64%	3%	5%				

	K	L	M	N
	31 December 2023			
	Credit risk mitigation techniques		Credit risk mitigation methods in the calculation of RWEAs	
	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				
2 Institutions			419	433
3 Corporates	0%		45,913	45,899
3.1 - of which Corporates - SMEs	0%		11,776	11,776
3.2 - of which Corporates - Specialised lending			3,401	3,372
3.3 - of which Corporates - Other	0%		30,736	30,752
4 Retail	16%		17,563	17,563
4.1 - of which Retail - Immovable property SMEs	0%		799	799
4.2 - of which Retail - Immovable property non-SMEs	16%		15,118	15,118
4.3 - of which Retail - Qualifying revolving			139	139
4.4 - of which Retail - Other SMEs	2%		896	896
4.5 - of which Retail - Other non-SMEs	0%		611	611
5 Total	10%		63,895	63,895

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

Exposure class F-IRB

	A	B	C	D	E	F	G	H	I	J
	31 December 2024									
Total exposures	Credit risk mitigation techniques									
	Funded credit protection (FCP)									
	Part of exposures covered by									
	Financial Collaterals	Other eligible collaterals			Other funded credit protection					
			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	
(in millions)										
1 Central governments and central banks										
2 Institutions	6,445									
3 Corporates	40,610	1%	12%	5%	2%	5%				
3.1 - of which Corporates - SMEs	2,025	1%								
3.2 - of which Corporates - Specialised lending	8,946									
3.3 - of which Corporates - Other	29,639	1%	17%	7%	3%	7%				
4 Total	47,054	1%	11%	4%	2%	4%				

	K	L	M	N
	31 December 2024			
	Credit risk mitigation techniques		Credit risk mitigation methods in the calculation of RWEAs	
	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 Institutions	14.80%		866	872
3 Corporates	4.30%		27,114	27,107
3.1 - of which Corporates - SMEs			1,850	1,850
3.2 - of which Corporates - Specialised lending	10.50%		6,160	5,946
3.3 - of which Corporates - Other	2.70%		19,104	19,311
4 Total	5.70%		27,979	27,979

	A	B	C	D	E	F	G	H	I	J
	30 June 2024									
Total exposures	Credit risk mitigation techniques									
	Funded credit protection (FCP)									
	Part of exposures covered by									
	Financial Collaterals	Other eligible collaterals				Other funded credit protection				
			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	
(in millions)										
1 Central governments and central banks										
2 Institutions	8,444									
3 Corporates	41,754	1%	12%	3%	4%	6%				
3.1 - of which Corporates - SMEs	2,501	2%								
3.2 - of which Corporates - Specialised lending	8,795		0%			0%				
3.3 - of which Corporates - Other	30,458	1%	17%	4%	5%	9%				
4 Total	50,198	1%	10%	2%	3%	5%				

	K	L	M	N
	30 June 2024			
	Credit risk mitigation techniques		Credit risk mitigation methods in the calculation of RWEAs	
	Unfunded credit protection (UFCP)			
	Part of exposures covered by			
	Guarantees	Credit Derivatives	RWEA without substitution effects (reduction effects only)	RWEA with substitution effects (both reduction and substitution effects)
(in millions)				
1 Central governments and central banks				
2 Institutions	5.90%		1,692	1,694
3 Corporates	4.20%		28,212	28,211
3.1 - of which Corporates - SMEs	0.90%		2,165	2,165
3.2 - of which Corporates - Specialised lending	10.40%		6,142	5,895
3.3 - of which Corporates - Other	2.70%		19,905	20,150
4 Total	5.60%		29,905	29,905

	A	B	C	D	E	F	G	H	I	J
	31 December 2023									
Total exposures	Credit risk mitigation techniques									
	Funded credit protection (FCP)									
	Part of exposures covered by									
	Financial Collaterals	Other eligible collaterals				Other funded credit protection				
			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	
(in millions)										
1 Central governments and central banks										
2 Institutions	6,352									
3 Corporates	15,458									
3.1 - of which Corporates - SMEs	723									
3.2 - of which Corporates - Specialised lending	7,834									
3.3 - of which Corporates - Other	6,901									
4 Total	21,810									

	K	L	M	N
	31 December 2023			
	Credit risk mitigation techniques		Credit risk mitigation methods in the calculation of RWEAs	
	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 Institutions	8.93%		1,095	1,095
3 Corporates	6.79%		8,115	8,115
3.1 - of which Corporates - SMEs	2.67%		335	335
3.2 - of which Corporates - Specialised lending	7.99%		5,216	5,065
3.3 - of which Corporates - Other	5.86%		2,564	2,716
4 Total	7.41%		9,210	9,210

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

As at 31 December 2024, credit risk RWEA under the IRB approach decreased to EUR 81.3 billion (30 September 2024: EUR 83.5 billion). This was mainly the result of asset quality improvements and, to a lesser extent, business movements (asset size) within Corporate Banking.

	A	B	C
	31 December 2024	30 September 2024	31 December 2023
(in millions)	RWEA	RWEA	RWEA
1 RWEA as at the end of the previous reporting period¹	83,486	84,086	77,588
2 Asset size (+/-)	-1,047	-619	-222
3 Asset quality (+/-)	-2,045	-81	1,121
4 Model updates (+/-)		239	
5 Methodology and policy (+/-)	110		
6 Acquisitions and disposals (+/-)	439		
7 Foreign exchange movements (+/-)	350	-139	-195
8 Other (+/-)			
9 RWEA as at the end of the reporting period	81,294	83,486	78,292

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

EU CR9 – IRB approach – Back-testing of PD per exposure class (fixed PD scale)

Exposure class A-IRB

This table provides more insight into the numbers of clients per PD bucket and the default rate during the year compared to the historical average annual default rate. The distribution is in line with other overviews, whereby central governments and central banks are mostly in the lowest buckets, followed by institutions with a slightly higher average PD. Corporate exposures are concentrated in the middle to high PD buckets with Corporate - Other concentrated in the higher PD buckets. Retail exposures are mostly concentrated in the lower PD buckets, specifically the qualifying revolving exposures that are secured by immovable properties.

	A	B	C	D	E	F	G	H
	31 December 2024							
	PD range	Number of obligors at the end of previous year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)	
	Of which: number of obligors which defaulted in the year							
Exposure class								
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							

A	B	C	D	E	F	G	H
						31 December 2024	
	PD range	Number of obligors at the end of previous year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
		Of which: number of obligors which defaulted in the year					
	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	0.00 to <0.15	14			0.1%	0.0%	0.9%
	0.00 to <0.10	11			0.1%	0.0%	1.2%
	0.10 to <0.15	3			0.1%	0.0%	
	0.15 to <0.25	7			0.2%	0.2%	
	0.25 to <0.50	1			0.3%		
	0.50 to <0.75				0.5%		
	0.75 to <2.50	2			1.1%	1.6%	
	0.75 to <1.75	1			1.1%	1.1%	
	1.75 to <2.5	1				2.2%	
	2.50 to <10.00						
	2.5 to <5						
	5 to <10						
	10.00 to <100.00	48			26.6%	48.8%	
	10 to <20						
	20 to <30	48			26.6%	48.8%	
	30.00 to <100.00						
	100.00 (Default)						100.0%
Corporates - SME	0.00 to <0.15	152			0.1%	0.1%	0.1%
	0.00 to <0.10	10			0.1%	0.1%	0.6%
	0.10 to <0.15	142			0.1%	0.1%	0.0%
	0.15 to <0.25	46			0.2%	0.2%	1.5%
	0.25 to <0.50	349	3	0.9%	0.4%	0.4%	0.7%
	0.50 to <0.75	1,747	18	1.0%	0.7%	0.7%	1.0%
	0.75 to <2.50	3,901	80	2.1%	1.4%	1.4%	2.0%
	0.75 to <1.75	2,419	43	1.8%	1.1%	1.1%	1.4%
	1.75 to <2.5	1,482	37	2.5%	1.8%	1.9%	3.0%
	2.50 to <10.00	1,003	71	7.1%	4.1%	4.3%	5.9%
	2.5 to <5	723	53	7.3%	3.4%	3.4%	4.9%
	5 to <10	280	18	6.4%	6.9%	6.8%	8.4%
	10.00 to <100.00	1,840	28	1.5%	24.6%	27.3%	3.0%
	10 to <20	51	3	5.9%	13.4%	13.6%	15.4%
	20 to <30	1,777	24	1.4%	25.4%	27.7%	1.6%
	30.00 to <100.00	12	1	8.3%	36.2%	34.8%	6.3%
	100.00 (Default)	636	183	28.8%	98.6%	100.0%	14.2%
Corporates - Specialised lending	0.00 to <0.15						
	0.00 to <0.10						
	0.10 to <0.15						
	0.15 to <0.25	1			0.2%	0.2%	
	0.25 to <0.50	30			0.4%	0.4%	1.0%
	0.50 to <0.75	56			0.7%	0.6%	0.8%
	0.75 to <2.50	88			1.3%	1.0%	0.7%
	0.75 to <1.75	74			1.1%	0.9%	0.4%
	1.75 to <2.5	14			1.8%	1.4%	1.3%
	2.50 to <10.00	237	2	0.8%	3.8%	5.0%	2.3%
	2.5 to <5	193	2	1.0%	3.7%	4.7%	1.8%
	5 to <10	44			7.3%	6.0%	3.8%

A	B	C	D	E	F	G	H
31 December 2024							
	PD range	Number of obligors at the end of previous year	Of which: number of obligors which defaulted in the year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)
							Average historical annual default rate (%)
Corporates - Other	10.00 to <100.00	11				27.6%	36.3%
	10 to <20	1					21.6%
	20 to <30	4				27.6%	19.9%
	30.00 to <100.00	6				43.8%	49.7%
	100.00 (Default)	11	4	36.4%	100.0%	90.9%	6.0%
	0.00 to <0.15	934	1	0.1%	0.1%	0.1%	0.5%
	0.00 to <0.10	222	1	0.5%	0.1%	0.1%	1.2%
	0.10 to <0.15	712			0.1%	0.1%	0.1%
	0.15 to <0.25	334	2	0.6%	0.2%	0.2%	0.6%
	0.25 to <0.50	1,354	7	0.5%	0.3%	0.4%	0.6%
	0.50 to <0.75	1,337	16	1.2%	0.7%	0.7%	1.1%
	0.75 to <2.50	2,175	51	2.3%	1.4%	1.5%	2.7%
	0.75 to <1.75	1,475	24	1.6%	1.1%	1.2%	1.8%
	1.75 to <2.5	700	27	3.9%	1.8%	2.2%	4.2%
	2.50 to <10.00	457	39	8.5%	4.0%	5.2%	9.3%
	2.5 to <5	327	21	6.4%	3.3%	4.1%	7.7%
	5 to <10	130	18	13.8%	6.0%	7.8%	13.8%
	10.00 to <100.00	14,962	20	0.1%	22.2%	28.3%	0.1%
	10 to <20	39	5	12.8%	14.2%	15.3%	12.5%
	20 to <30	14,856	12	0.1%	22.3%	28.2%	0.1%
Retail - Secured by immovable property SME	30.00 to <100.00	67	3	4.5%	36.1%	50.1%	6.0%
	100.00 (Default)	362	197	54.4%	96.1%	100.0%	22.6%
	0.00 to <0.15	124	1	0.8%	0.1%	0.0%	0.1%
	0.00 to <0.10	111	1	0.9%	0.0%	0.0%	0.4%
	0.10 to <0.15	13			0.1%	0.1%	0.1%
	0.15 to <0.25	11,875	77	0.6%	0.2%	0.2%	0.5%
	0.25 to <0.50	4,236	9	0.2%	0.4%	0.4%	0.4%
	0.50 to <0.75	11			0.6%	0.6%	0.2%
	0.75 to <2.50	4,026	66	1.6%	1.3%	1.3%	1.6%
	0.75 to <1.75	3,315	56	1.7%	1.0%	1.0%	1.5%
	1.75 to <2.5	711	10	1.4%	2.2%	2.2%	1.9%
	2.50 to <10.00	1,230	73	5.9%	6.2%	6.0%	2.4%
	2.5 to <5	762	44	5.8%	4.2%	4.2%	2.1%
	5 to <10	468	29	6.2%	8.9%	8.9%	3.6%
	10.00 to <100.00	221	13	5.9%	17.7%	17.7%	10.3%
	10 to <20	221	13	5.9%	17.7%	17.7%	10.2%
	20 to <30						
	30.00 to <100.00						75.0%
	100.00 (Default)	524	14	2.7%	100.0%	100.0%	7.6%
Retail - Qualifying revolving	0.00 to <0.15	1,463,507	2,474	0.2%	0.1%	0.1%	0.1%
	0.00 to <0.10	1,298,150	1,903	0.1%	0.0%	0.1%	0.1%
	0.10 to <0.15	165,357	571	0.3%	0.1%	0.1%	0.2%
	0.15 to <0.25	133,320	1,002	0.8%	0.2%	0.2%	0.4%
	0.25 to <0.50	73,158	1,001	1.4%	0.4%	0.4%	0.7%
	0.50 to <0.75	30,790	728	2.4%	0.6%	0.6%	1.3%
	0.75 to <2.50	51,181	2,611	5.1%	1.5%	1.6%	1.8%
	0.75 to <1.75	40,868	1,762	4.3%	1.2%	1.5%	1.5%
	1.75 to <2.5	10,313	849	8.2%	2.3%	2.1%	3.2%
	2.50 to <10.00	14,128	2,278	16.1%	4.2%	5.7%	6.1%
	2.5 to <5	9,658	1,132	11.7%	3.4%	3.8%	4.6%
	5 to <10	4,470	1,146	25.6%	6.5%	9.6%	10.2%
	10.00 to <100.00	3,461	1,470	42.5%	23.7%	17.7%	19.9%
	10 to <20	2,183	866	39.7%	12.4%	13.1%	16.7%
	20 to <30	892	482	54.0%	24.2%	22.0%	27.4%
	30.00 to <100.00	386	122	31.6%	38.0%	34.1%	31.6%
	100.00 (Default)	117	13	11.1%	100.0%	100.0%	0.0%

A	B	C	D	E	F	G	H
						31 December 2024	
	PD range	Number of obligors at the end of previous year	Of which: number of obligors which defaulted in the year	Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
Retail - Secured by immovable property non-SME	0.00 to <0.15	329,047	406	0.1%	0.1%	0.1%	0.2%
	0.00 to <0.10	191,976	180	0.1%	0.0%	0.1%	0.2%
	0.10 to <0.15	137,071	226	0.2%	0.1%	0.1%	0.1%
	0.15 to <0.25	70,735	179	0.3%	0.2%	0.2%	0.3%
	0.25 to <0.50	175,035	621	0.4%	0.4%	0.4%	0.4%
	0.50 to <0.75	71,804	376	0.5%	0.6%	0.6%	0.6%
	0.75 to <2.50	61,442	553	0.9%	1.3%	1.1%	1.1%
	0.75 to <1.75	57,891	483	0.8%	1.2%	1.1%	0.9%
	1.75 to <2.5	3,551	70	2.0%	2.0%	1.9%	3.2%
	2.50 to <10.00	10,287	439	4.3%	4.5%	4.4%	6.1%
	2.5 to <5	7,363	245	3.3%	3.4%	3.2%	4.1%
	5 to <10	2,924	194	6.6%	7.7%	7.5%	8.6%
	10.00 to <100.00	5,049	984	19.5%	23.7%	24.3%	19.6%
	10 to <20	2,910	383	13.2%	14.6%	14.5%	14.0%
	20 to <30	1,382	231	16.7%	24.7%	25.4%	18.1%
	30.00 to <100.00	757	370	48.9%	50.8%	60.2%	46.4%
	100.00 (Default)	5,429	279	5.1%	100.0%	100.0%	12.3%
Retail - Other SME	0.00 to <0.15	494	4	0.8%	0.0%	0.1%	0.3%
	0.00 to <0.10	436	4	0.9%	0.0%	0.0%	0.5%
	0.10 to <0.15	58				0.1%	0.2%
	0.15 to <0.25	7,303	51	0.7%	0.2%	0.2%	0.6%
	0.25 to <0.50	4,254	17	0.4%	0.4%	0.4%	0.4%
	0.50 to <0.75	672				0.7%	0.9%
	0.75 to <2.50	11,745	202	1.7%	1.5%	1.4%	2.1%
	0.75 to <1.75	10,083	166	1.6%	1.0%	1.3%	2.1%
	1.75 to <2.5	1,662	36	2.2%	2.2%	2.1%	1.8%
	2.50 to <10.00	16,420	728	4.4%	5.8%	4.8%	14.4%
	2.5 to <5	10,626	371	3.5%	4.1%	3.7%	15.3%
	5 to <10	5,794	357	6.2%	8.9%	6.7%	12.9%
	10.00 to <100.00	3,255	388	11.9%	19.5%	18.5%	16.1%
	10 to <20	2,056	154	7.5%	17.7%	13.7%	8.2%
	20 to <30	1,199	234	19.5%	27.9%	26.8%	35.6%
	30.00 to <100.00						53.0%
	100.00 (Default)	2,611	94	3.6%	99.9%	100.0%	14.9%
Retail - Other non-SME	0.00 to <0.15	3,707	1	0.0%	0.1%	0.1%	0.2%
	0.00 to <0.10	2,787	1	0.0%	0.0%	0.0%	0.1%
	0.10 to <0.15	920			0.1%	0.1%	0.9%
	0.15 to <0.25	141			0.2%	0.2%	0.6%
	0.25 to <0.50	524	2	0.4%	0.4%	0.4%	1.0%
	0.50 to <0.75	4,216	14	0.3%	0.6%	0.7%	1.5%
	0.75 to <2.50	30,939	390	1.3%	1.8%	1.7%	11.8%
	0.75 to <1.75	19,656	206	1.0%	1.5%	1.4%	9.7%
	1.75 to <2.5	11,283	184	1.6%	2.2%	2.2%	39.5%
	2.50 to <10.00	17,168	512	3.0%	4.4%	4.1%	28.9%
	2.5 to <5	13,997	347	2.5%	3.5%	3.4%	28.6%
	5 to <10	3,171	165	5.2%	7.1%	7.1%	31.3%
	10.00 to <100.00	2,271	467	20.6%	19.6%	20.1%	36.1%
	10 to <20	1,227	159	13.0%	13.0%	13.9%	30.0%
	20 to <30	1,044	308	29.5%	27.5%	27.3%	48.4%
	30.00 to <100.00						25.0%
	100.00 (Default)	1,788	103	5.8%	99.4%	100.0%	4.0%

A	B	C	D	E	F	G	H
	31 December 2023						
	PD range	Number of obligors at the end of previous year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
		Of which: number of obligors which defaulted in the year					
Exposure class							
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)							
Institutions	0.00 to <0.15	12			0.1%	0.1%	0.6%
	0.00 to <0.10	9			0.1%	0.1%	0.8%
	0.10 to <0.15	3			0.1%	0.1%	
	0.15 to <0.25	1			0.2%	0.2%	
	0.25 to <0.50	6			0.4%	0.3%	
	0.50 to <0.75				0.0%		
	0.75 to <2.50	1			2.2%	1.1%	
	0.75 to <1.75	1			1.1%	1.1%	
	1.75 to <2.5				2.2%		
	2.50 to <10.00	1			0.0%	3.7%	
	2.5 to <5	1			0.0%	3.7%	
	5 to <10				0.0%		
	10.00 to <100.00	56			26.6%	22.7%	
	10 to <20				0.0%		
	20 to <30	56			26.6%	22.7%	
30.00 to <100.00				0.0%			
100.00 (Default)				0.0%		100.0%	
Corporates - SME	0.00 to <0.15	676			0.1%	0.1%	0.1%
	0.00 to <0.10	22			0.1%	0.0%	0.4%
	0.10 to <0.15	654			0.1%	0.1%	0.0%
	0.15 to <0.25	449	7	1.6%	0.2%	0.2%	1.3%
	0.25 to <0.50	1,197	6	0.5%	0.4%	0.4%	0.6%
	0.50 to <0.75	2,308	16	0.7%	0.7%	0.6%	0.9%
	0.75 to <2.50	5,720	123	2.2%	1.4%	1.3%	1.7%
	0.75 to <1.75	3,690	41	1.1%	1.1%	1.1%	1.1%
	1.75 to <2.5	2,030	82	4.0%	1.8%	1.8%	2.6%
	2.50 to <10.00	1,434	75	5.2%	4.1%	4.1%	5.3%
	2.5 to <5	1,074	56	5.2%	3.3%	3.3%	4.1%
	5 to <10	360	19	5.3%	6.8%	6.6%	8.3%
	10.00 to <100.00	2,116	28	1.3%	24.4%	22.3%	4.6%
	10 to <20	150	12	8.0%	13.5%	13.5%	17.3%
	20 to <30	1,965	16	0.8%	25.8%	23.0%	2.0%
30.00 to <100.00	1			31.6%	30.9%		
100.00 (Default)	812	86	10.6%	96.8%	96.1%	8.6%	

A	B	C	D	E	F	G	H
						31 December 2023	
	PD range	Number of obligors at the end of previous year	Of which: number of obligors which defaulted in the year	Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
Corporates - Specialised lending	0.00 to <0.15						
	0.00 to <0.10						
	0.10 to <0.15						
	0.15 to <0.25	4			0.2%	0.1%	
	0.25 to <0.50	28			0.4%	0.3%	1.1%
	0.50 to <0.75	67			0.7%	0.4%	1.3%
	0.75 to <2.50	110			1.2%	1.0%	1.2%
	0.75 to <1.75	77			1.1%	0.9%	0.8%
	1.75 to <2.5	33			1.8%	1.4%	2.1%
	2.50 to <10.00	323	11	3.4%	4.7%	4.1%	2.1%
	2.5 to <5	260	8	3.1%	4.5%	3.9%	1.5%
	5 to <10	63	3	4.8%	5.6%	5.1%	4.5%
	10.00 to <100.00	9			42.0%	20.6%	1.2%
	10 to <20	2			10.8%	14.2%	3.7%
	20 to <30	7			26.6%	22.4%	
	30.00 to <100.00				43.5%		
	100.00 (Default)	13	1	7.7%	100.0%	100.0%	2.4%
Corporates - Other	0.00 to <0.15	618	3	0.5%	0.1%	0.1%	0.4%
	0.00 to <0.10	251			0.1%	0.0%	0.5%
	0.10 to <0.15	367	3	0.8%	0.1%	0.1%	0.2%
	0.15 to <0.25	243			0.2%	0.2%	0.6%
	0.25 to <0.50	824	6	0.7%	0.4%	0.3%	0.6%
	0.50 to <0.75	978	8	0.8%	0.6%	0.6%	1.1%
	0.75 to <2.50	2,094	52	2.5%	1.4%	1.3%	2.6%
	0.75 to <1.75	1,331	27	2.0%	1.1%	1.0%	1.8%
	1.75 to <2.5	763	25	3.3%	1.8%	1.7%	3.9%
	2.50 to <10.00	644	44	6.8%	3.9%	3.7%	9.1%
	2.5 to <5	489	28	5.7%	3.2%	3.1%	7.9%
	5 to <10	155	16	10.3%	5.9%	5.8%	12.5%
	10.00 to <100.00	14,321	14	0.1%	22.8%	23.8%	0.2%
	10 to <20	52	6	11.5%	11.3%	11.4%	13.5%
	20 to <30	14,267	7	0.0%	23.9%	23.8%	0.1%
	30.00 to <100.00	2	1	50.0%	34.6%	37.3%	66.7%
	100.00 (Default)	451	71	15.7%	99.8%	96.5%	13.6%
Retail - Secured by immovable property SME	0.00 to <0.15	133	1	0.8%	0.0%	0.0%	0.1%
	0.00 to <0.10	114	1	0.9%	0.0%	0.0%	0.2%
	0.10 to <0.15	19			0.1%	0.1%	0.1%
	0.15 to <0.25	12,217	95	0.8%	0.2%	0.2%	0.4%
	0.25 to <0.50	4,403	35	0.8%	0.4%	0.4%	0.5%
	0.50 to <0.75	9			0.5%	0.6%	0.2%
	0.75 to <2.50	4,232	81	1.9%	1.3%	1.3%	1.5%
	0.75 to <1.75	3,411	65	1.9%	1.0%	1.0%	1.4%
	1.75 to <2.5	821	16	1.9%	2.2%	2.2%	2.1%
	2.50 to <10.00	1,106	65	5.9%	6.1%	6.2%	2.0%
	2.5 to <5	624	34	5.4%	4.2%	4.2%	1.7%
	5 to <10	482	31	6.4%	8.9%	8.9%	3.2%
	10.00 to <100.00	323	56	17.3%	17.7%	17.7%	9.5%
	10 to <20	322	56	17.4%	17.7%	17.7%	9.4%
	20 to <30						
	30.00 to <100.00	1			0.0%	33.3%	85.7%
	100.00 (Default)	556	16	2.9%	100.0%	100.0%	6.7%

A	B	C	D	E	F	G	H
						31 December 2023	
	PD range	Number of obligors at the end of previous year	Of which: number of obligors which defaulted in the year	Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
Retail - Qualifying revolving	0.00 to <0.15	1,442,095	2,004	0.1%	0.1%	0.1%	0.1%
	0.00 to <0.10	1,291,155	1,595	0.1%	0.1%	0.1%	0.1%
	0.10 to <0.15	150,940	409	0.3%	0.1%	0.1%	0.2%
	0.15 to <0.25	128,389	709	0.6%	0.2%	0.2%	0.4%
	0.25 to <0.50	74,251	828	1.1%	0.3%	0.4%	0.7%
	0.50 to <0.75	31,248	593	1.9%	0.6%	0.6%	1.2%
	0.75 to <2.50	50,575	2,105	4.2%	1.2%	1.7%	1.6%
	0.75 to <1.75	40,154	1,409	3.5%	1.1%	1.5%	1.3%
	1.75 to <2.5	10,421	696	6.7%	2.1%	2.1%	2.7%
	2.50 to <10.00	14,831	1,895	12.8%	4.5%	5.6%	5.7%
	2.5 to <5	10,429	1,018	9.8%	3.2%	3.9%	4.3%
	5 to <10	4,402	877	19.9%	6.8%	9.6%	9.1%
	10.00 to <100.00	3,929	2,015	51.3%	26.7%	20.4%	19.4%
	10 to <20	2,065	796	38.5%	12.8%	12.8%	14.6%
	20 to <30	943	539	57.2%	22.0%	21.6%	27.5%
	30.00 to <100.00	921	680	73.8%	34.1%	36.4%	48.2%
	100.00 (Default)	15,715			100.0%	100.0%	
Retail - Secured by immovable property non-SME	0.00 to <0.15	338,200	387	0.1%	0.1%	0.1%	0.2%
	0.00 to <0.10	194,702	201	0.1%	0.1%	0.1%	0.2%
	0.10 to <0.15	143,498	186	0.1%	0.1%	0.1%	0.1%
	0.15 to <0.25	74,452	218	0.3%	0.2%	0.2%	0.4%
	0.25 to <0.50	181,423	665	0.4%	0.4%	0.4%	0.5%
	0.50 to <0.75	72,285	365	0.5%	0.6%	0.6%	0.7%
	0.75 to <2.50	66,737	580	0.9%	1.2%	1.1%	1.3%
	0.75 to <1.75	63,171	483	0.8%	1.1%	1.1%	1.1%
	1.75 to <2.5	3,566	97	2.7%	1.9%	1.9%	3.3%
	2.50 to <10.00	11,170	486	4.4%	4.2%	4.9%	7.1%
	2.5 to <5	6,190	179	2.9%	3.2%	3.3%	4.6%
	5 to <10	4,980	307	6.2%	7.4%	6.9%	9.7%
	10.00 to <100.00	4,383	791	18.0%	24.2%	24.9%	21.1%
	10 to <20	2,221	235	10.6%	14.5%	14.0%	15.7%
	20 to <30	1,337	190	14.2%	25.5%	23.4%	22.3%
	30.00 to <100.00	825	366	44.4%	58.1%	56.6%	47.3%
	100.00 (Default)	4,867	190	3.9%	100.0%	100.0%	12.3%
Retail - Other SME	0.00 to <0.15	644			0.0%	0.1%	0.2%
	0.00 to <0.10	490			0.0%	0.0%	0.3%
	0.10 to <0.15	154			0.1%	0.1%	0.1%
	0.15 to <0.25	8,013	61	0.8%	0.2%	0.2%	0.6%
	0.25 to <0.50	4,774	30	0.6%	0.4%	0.4%	0.4%
	0.50 to <0.75	812			0.7%	0.7%	0.7%
	0.75 to <2.50	14,408	225	1.6%	1.5%	1.4%	1.8%
	0.75 to <1.75	12,247	179	1.5%	1.3%	1.2%	1.8%
	1.75 to <2.5	2,161	46	2.1%	2.1%	2.1%	1.7%
	2.50 to <10.00	22,038	710	3.2%	5.3%	4.6%	9.1%
	2.5 to <5	15,375	406	2.6%	3.7%	3.7%	8.6%
	5 to <10	6,663	304	4.6%	6.8%	6.6%	9.7%
	10.00 to <100.00	2,886	443	15.3%	16.4%	19.7%	13.5%
	10 to <20	1,591	123	7.7%	14.0%	13.5%	7.9%
	20 to <30	1,295	320	24.7%	25.8%	27.3%	30.4%
	30.00 to <100.00				0.0%		40.8%
	100.00 (Default)	2,747	1,058	38.5%	99.9%	100.0%	14.0%

A	B	C	D	E	F	G	H
31 December 2023							
	PD range	Number of obligors at the end of previous year	Of which: number of obligors which defaulted in the year	Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
Retail - Other non-SME	0.00 to <0.15	3,589	14	0.4%	0.1%	38.5%	0.1%
	0.00 to <0.10	2,814	1	0.0%	0.0%	41.8%	0.1%
	0.10 to <0.15	775	13	1.7%	0.1%	26.4%	0.6%
	0.15 to <0.25	135			0.2%	0.2%	0.4%
	0.25 to <0.50	548	3	0.5%	0.3%	37.7%	0.8%
	0.50 to <0.75	1,994	17	0.9%	0.7%	0.7%	1.1%
	0.75 to <2.50	30,078	413	1.4%	1.7%	1.7%	3.3%
	0.75 to <1.75	18,465	218	1.2%	1.4%	1.4%	3.3%
	1.75 to <2.5	11,613	195	1.7%	2.1%	2.2%	2.1%
	2.50 to <10.00	15,604	466	3.0%	4.1%	4.1%	9.0%
	2.5 to <5	12,692	334	2.6%	3.4%	3.4%	9.0%
	5 to <10	2,912	132	4.5%	6.9%	7.1%	8.4%
	10.00 to <100.00	2,138	404	18.9%	20.0%	19.9%	22.0%
	10 to <20	1,177	134	11.4%	13.6%	13.9%	18.6%
	20 to <30	961	270	28.1%	26.7%	27.3%	30.7%
	30.00 to <100.00						25.0%
	100.00 (Default)	1,845	83	4.5%	99.6%	100.0%	3.2%

Exposure class F-IRB

A	B	C	D	E	F	G	H
31 December 2024							
	PD range	Number of obligors at the end of previous year	Of which: number of obligors which defaulted in the year	Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
Exposure class 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)						
Institutions	0.00 to <0.15	303		0.0%	0.1%	0%	0%
	0.00 to <0.10	218		0.0%	0.1%	0%	0%
	0.10 to <0.15	85		0.0%	0.1%	0%	0%
	0.15 to <0.25	51		0.0%	0.2%	0%	0%
	0.25 to <0.50	61		0.0%	0.5%	0%	0%
	0.50 to <0.75	7		0.0%	0.7%	1%	0%
	0.75 to <2.50	13		0.0%	1.3%	2%	0%
	0.75 to <1.75	4		0.0%	1.3%	2%	0%
	1.75 to <2.5	9		0.0%	2.1%	2%	0%
	2.50 to <10.00			0.0%	3.9%	0%	0%

A	B	C	D	E	F	G	H
31 December 2024							
	PD range	Number of obligors at the end of previous year	Of which: number of obligors which defaulted in the year	Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
	2.5 to <5			0.0%	3.9%	0%	0%
	5 to <10			0.0%	0.0%	0%	0%
	10.00 to <100.00	18		0.0%	8.8%	21%	0%
	10 to <20	4		0.0%	15.6%	15%	0%
	20 to <30	14		0.0%	8.3%	23%	0%
	30.00 to <100.00			0.0%	0.0%	0%	0%
	100.00 (Default)			0.0%	0.0%	0%	0%
Corporates - SME	0.00 to <0.15	2		0.0%	0.1%	0%	0%
	0.00 to <0.10			0.0%	0.0%	0%	0%
	0.10 to <0.15	2		0.0%	0.1%	0%	0%
	0.15 to <0.25	28		0.0%	0.2%	0%	0%
	0.25 to <0.50	21		0.0%	0.4%	0%	0%
	0.50 to <0.75			0.0%	0.7%	0%	0%
	0.75 to <2.50	1		0.0%	1.4%	1%	0%
	0.75 to <1.75	1		0.0%	1.1%	1%	0%
	1.75 to <2.5			0.0%	1.8%	0%	0%
	2.50 to <10.00			0.0%	3.9%	0%	0%
	2.5 to <5			0.0%	3.3%	0%	0%
	5 to <10			0.0%	6.6%	0%	0%
	10.00 to <100.00	1		0.0%	16.6%	51%	0%
	10 to <20			0.0%	13.3%	0%	0%
	20 to <30	1		0.0%	26.6%	51%	0%
	30.00 to <100.00			0.0%	0.0%	0%	0%
	100.00 (Default)	1	1	100.0%	100.0%	100%	100%
Corporates - Specialised lending	0.00 to <0.15			0.0%	0.0%	0%	0%
	0.00 to <0.10			0.0%	0.0%	0%	0%
	0.10 to <0.15			0.0%	0.0%	0%	0%
	0.15 to <0.25	1		0.0%	0.0%	0%	0%
	0.25 to <0.50	120		0.0%	0.4%	0%	0%
	0.50 to <0.75	107	3	2.8%	0.7%	1%	2%
	0.75 to <2.50	17	2	11.8%	1.1%	1%	8%
	0.75 to <1.75	17	2	11.8%	1.1%	1%	8%
	1.75 to <2.5			0.0%	0.0%	0%	0%
	2.50 to <10.00			0.0%	3.4%	0%	0%
	2.5 to <5			0.0%	3.4%	0%	0%
	5 to <10			0.0%	0.0%	0%	0%
	10.00 to <100.00	2		0.0%	27.5%	27%	0%
	10 to <20			0.0%	0.0%	0%	0%
	20 to <30	2		0.0%	27.5%	27%	0%
	30.00 to <100.00			0.0%	0.0%	0%	0%
	100.00 (Default)	7	3	42.9%	100.0%	71%	67%
Corporates - Other	0.00 to <0.15	320		0.0%	0.1%	0%	0%
	0.00 to <0.10	190		0.0%	0.1%	0%	0%
	0.10 to <0.15	130		0.0%	0.1%	0%	0%
	0.15 to <0.25	111		0.0%	0.2%	0%	0%
	0.25 to <0.50	71		0.0%	0.4%	0%	0%
	0.50 to <0.75	21		0.0%	0.7%	0%	0%
	0.75 to <2.50	12		0.0%	1.3%	2%	0%
	0.75 to <1.75	2		0.0%	1.1%	1%	0%
	1.75 to <2.5	10		0.0%	1.8%	2%	0%
	2.50 to <10.00	6		0.0%	3.5%	7%	0%
	2.5 to <5			0.0%	3.0%	0%	0%
	5 to <10	6		0.0%	5.8%	7%	0%
	10.00 to <100.00	10		0.0%	4.1%	44%	0%
	10 to <20	1		0.0%	10.9%	15%	0%
	20 to <30	9		0.0%	1.4%	47%	0%

A	B	C	D	E	F	G	H
						31 December 2024	
	PD range	Number of obligors at the end of previous year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
		Of which: number of obligors which defaulted in the year					
	30.00 to <100.00			0.0%	7.4%	0%	0%
	100.00 (Default)			0.0%	100.0%	0%	67%
Retail - Secured by immovable property SME	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)						
Retail - Qualifying revolving	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)						
Retail - Secured by immovable property non-SME	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)						
Retail - Other SME	0.00 to <0.15						
	0.00 to <0.10						
	0.10 to <0.15						

A	B	C	D	E	F	G	H
						31 December 2024	
	PD range	Number of obligors at the end of previous year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
		Of which: number of obligors which defaulted in the year					
	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)						
Retail - Other non-SME	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)						

A	B	C	D	E	F	G	H
						31 December 2023	
	PD range	Number of obligors at the end of previous year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
		Of which: number of obligors which defaulted in the year					
Exposure class							
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						

A	B	C	D	E	F	G	H
31 December 2023							
	PD range	Number of obligors at the end of previous year	Of which: number of obligors which defaulted in the year	Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
	10 to <20						
	20 to <30						
	30.00 to <100.00						
	100.00 (Default)						
Institutions	0.00 to <0.15	424	2	0.5%	0.1%	0%	1%
	0.00 to <0.10	299	2	0.7%	0.1%	0%	1%
	0.10 to <0.15	125			0.1%	0%	
	0.15 to <0.25	51			0.2%	0%	
	0.25 to <0.50	55			0.3%	0%	
	0.50 to <0.75	14			0.7%	1%	
	0.75 to <2.50	14			2.0%	1%	
	0.75 to <1.75	7			1.2%	1%	
	1.75 to <2.5	7			2.0%	1%	
	2.50 to <10.00	5				5%	
	2.5 to <5	3				4%	
	5 to <10	2				7%	
	10.00 to <100.00	20			25.5%	14%	
	10 to <20	8			14.6%	15%	
	20 to <30	12			26.4%	14%	
	30.00 to <100.00						
	100.00 (Default)						
Corporates - SME	0.00 to <0.15	6			0.1%	0%	
	0.00 to <0.10						
	0.10 to <0.15	6			0.1%	0%	
	0.15 to <0.25	22			0.2%	0%	
	0.25 to <0.50	18			0.3%	0%	
	0.50 to <0.75						
	0.75 to <2.50	2			1.1%	1%	
	0.75 to <1.75	2			1.1%	1%	
	1.75 to <2.5						
	2.50 to <10.00						
	2.5 to <5						
	5 to <10						
	10.00 to <100.00				25.7%		
	10 to <20						
	20 to <30				25.7%		
	30.00 to <100.00						
	100.00 (Default)	1	1	100.0%	100.0%	100%	100%
Corporates - Specialised lending	0.00 to <0.15						
	0.00 to <0.10						
	0.10 to <0.15						
	0.15 to <0.25	2			0.2%	0%	
	0.25 to <0.50	94			0.4%	0%	
	0.50 to <0.75	83			0.7%	0%	
	0.75 to <2.50	22			1.1%	1%	
	0.75 to <1.75	22			1.1%	1%	
	1.75 to <2.5						
	2.50 to <10.00						
	2.5 to <5						
	5 to <10						
	10.00 to <100.00	1			26.6%	24%	
	10 to <20						
	20 to <30	1			26.6%	24%	
	30.00 to <100.00						
	100.00 (Default)	12	5	41.7%	100.0%	67%	63%

A	B	C	D	E	F	G	H
						31 December 2023	
	PD range	Number of obligors at the end of previous year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
			Of which: number of obligors which defaulted in the year				
Corporates - Other	0.00 to <0.15	393			0.1%	0%	
	0.00 to <0.10	227			0.1%	0%	
	0.10 to <0.15	166			0.1%	0%	
	0.15 to <0.25	92			0.2%	0%	
	0.25 to <0.50	148			0.1%	0%	
	0.50 to <0.75	23			0.7%	0%	
	0.75 to <2.50	7			2.0%	2%	
	0.75 to <1.75				1.1%		
	1.75 to <2.5	7			2.0%	2%	
	2.50 to <10.00	12			7.3%	6%	
	2.5 to <5	3			0.0%	4%	
	5 to <10	9			7.3%	7%	
	10.00 to <100.00	12			26.4%	20%	
	10 to <20	1			14.6%	15%	
	20 to <30	11			28.8%	21%	
	30.00 to <100.00						
	100.00 (Default)	2	2	100.0%	0.0%	100%	100%
Retail - Secured by immovable property SME	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)						
Retail - Qualifying revolving	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)						
Retail - Secured by immovable property non-SME	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						

A	B	C	D	E	F	G	H
						31 December 2023	
	PD range	Number of obligors at the end of previous year		Observed average default rate (%)	Exposures weighted average PD (%)	Average PD (%)	Average historical annual default rate (%)
		Of which: number of obligors which defaulted in the year					
	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)						
Retail - Other SME	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)						
Retail - Other non-SME	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)						

The disclosure of the CR9 tables for FIRB exposures classes were inadvertently omitted in the prior period Pillar 3 report.

Specialised lending

EU CR10.5 – Equity exposures under the simple risk-weighted approach

At 31 December 2024, the exposure value for positions for which the bank applied the simple risk weight approach to calculate RWEA remained relatively stable at EUR 1.1 billion. EUR 0.1 billion of the decline in exposure was in the 190% risk weight category and was spread across several investments. The off-balance sheet exposure decreased because of a reclassification of some equity exposures to exposures in the form of units or shares in CIUs. The off-balance exposure at 30 June 2024 related mostly to these positions. RWEA reduction was limited due to some exposure increases in the higher risk weight buckets, including for the Clearing business.

	A	B	C	D	E	F
	31 December 2024					
(in millions)	On-balance sheet exposure	Off-balance sheet exposure	Risk weight	Exposure amount	RWEA	Expected loss amount
1 Private equity exposures	847	1	190%	848	1,611	7
2 Exchange-traded equity exposures	58		290%	58	169	
3 Other equity exposures	193		370%	193	715	5
4 Total	1,098	1		1,100	2,496	12

	30 June 2024					
1 Private equity exposures	830	90	190%	920	1,748	7
2 Exchange-traded equity exposures	47		290%	47	135	
3 Other equity exposures	177		370%	177	653	4
4 Total	1,053	90		1,143	2,536	12

	31 December 2023					
1 Private equity exposures	767	90	190%	858	1,630	7
2 Exchange-traded equity exposures	42		290%	42	123	
3 Other equity exposures	164		370%	164	606	4
4 Total	974	90		1,064	2,358	11

Counterparty credit risk

EU CCRA – Qualitative disclosure related to counterparty credit risk (CCR)

Specific counterparty credit risk

Counterparty credit risk (CCR) refers to the risk that the counterparty to a transaction defaults before final settlement of the transaction's cash flows. In line with the regulatory definition of CCR, ABN AMRO incurs counterparty credit risk in two business activities, firstly through over-the-counter (OTC) derivatives and securities financing transactions with corporate clients and financial institutions (including positions taken to manage our interest rate hedging and liquidity position) and secondly in the business of ABN AMRO Clearing. These two main sources of CCR are managed separately and are subject to various different features of risk management.

ABN AMRO has implemented Counterparty Credit Risk policies that stipulate the rules and requirements for identifying, measuring, monitoring and managing CCR within ABN AMRO and covering all third-party exposures, including Central Counterparties (CCP) exposures.

OTC derivative instruments

OTC derivatives are financial instruments that are used to hedge current and/or future financial risks or to achieve additional return on an investment. They consist of transactions entered into between two parties where the value is based on an underlying reference value (such as interest rates, foreign exchange rates, commodities or equities).

Securities financing transactions

The balance sheet item Securities Financing refers to securities borrowing and lending, a market activity whereby securities are temporarily transferred from a lender to a borrower, subject to the commitment to redeliver the securities, usually in the short term. The borrower collateralises the transaction with cash or other securities of equal or greater value than the borrowed securities in order to protect the lender against counterparty credit risk. As an intermediary between clients and the market, we act both as lender and borrower.

Limit setting

Limit setting for positions subject to counterparty credit risk is specifically addressed in ABN AMRO's risk management policy. With respect to CCR, this policy provides the principles for setting specific risk limits for each derivative portfolio and for each counterparty, subject to further specifications. Limits for CCR are set within the general risk management framework for counterparty limits.

These limits take into account a range of factors, including the mark-to-market of transactions and the potential future exposure of transactions. The limits for CCR (pre-settlement stage) are monitored on a daily basis. For exposures to CCP, ABN AMRO sets limits following standard credit risk processes for potential future exposures, Default Fund (DF) exposures and Initial Margin (IM) exposures. The (credit) decision for CCP exposure limits is based on a thorough quantitative and qualitative analysis of the various risk elements of a CCP, such as the CCP's annual financial figures, the risk and control framework of the CCP, membership criteria, margin models of the CCP, default management, investment risk, liquidity risk, operational risk, concentration risk and capital requirement.

Master netting agreements and collateral management

Master netting agreements and collateral support annexes are an important aspect of the risk management of positions that give rise to CCR for both ABN AMRO Bank and ABN AMRO Clearing. Where master netting agreements are relevant, measurement of the net position takes place at least at the netting set level and, where relevant and possible, at sublevels (such as the level for collateral). Collateral received under collateral support annexes to master netting agreements provides additional risk mitigation.

ABN AMRO has centralised its collateral management with respect to derivative contracts per legal entity of the group (i.e. ABN AMRO Bank and ABN AMRO Clearing). This includes management of initial margins and variation margins, both for bilateral derivative trades and for cleared trades with a central clearing party. The main risk factors for ABN AMRO Bank that drive the collateral requirements are interest rate risks and foreign exchange risks. For ABN AMRO Clearing, equity is an additional risk factor. Any additional collateral payments to counterparties due to a rating downgrade of ABN AMRO are monitored. Two main types of clauses may result in a liquidity outflow linked to ABN AMRO's external credit rating:

- Ratings tables linked to threshold and minimum transfer amounts in credit support annexes to the ISDA master agreements (or other similar collateral addenda) may result in additional collateral postings in a downgrade scenario.
- The triggering of an additional downgrade in a termination event clause in the schedule to the ISDA master agreement may result in the termination of the underlying derivative contracts and payment of an early termination amount.

Currently a one-notch downgrade does not have any material impact on the collateral outflow. The collateral impact associated with any downgrade of three notches or fewer is taken into account in the liquidity coverage ratio calculation.

Wrong-way risk

This risk refers to transactions where the counterparty credit exposure arising from OTC or securities lending transactions is positively correlated to the counterparty's probability of default. In other words, the credit exposure increases when the credit quality of the counterparty deteriorates. In general, we do not engage in such wrong-way risk transactions. We are also prudent in considering transactions in which this correlation is less obvious, such as transactions with a general wrong-way risk component, or where a counterparty and the underlying issuer are in a similar industry, or in the same country or geographical region.

Regulatory and economic exposure calculation for specific counterparty credit risk

Regulatory capital requirements for derivative transactions within ABN AMRO are calculated in line with the Standardised Approach for Counterparty Credit Risk (SA-CCR) method specified in the CRR. The Exposure at Default under SA-CCR reflects both the current exposure and the potential future exposure, thereby offering a comprehensive measure of risk.

Credit Valuation Adjustments (CVA) are taken into account for non-collateralised OTC derivative transactions, to reflect the cost associated with the risk of the counterparty with whom ABN AMRO has closed a transaction failing to honour its contractual obligations.

For economic capital (EC) purposes, counterparty credit risk exposure forms part of the Credit Risk EC calculations process. For CVA these calculations are based on the methodology used for the calculation of the capital credit valuation adjustment as described in the CRR, taking into account the full scope of the OTC derivative book.

For the purpose of determining capital requirements for securities financing transactions (SFT), ABN AMRO uses the Financial Collateral Comprehensive Method (FCCM) specified in the CRR. ABN AMRO does not use the options provided for in the CRR to apply internal models to estimate market risk effects related to SFT or master netting agreements. For economic counterparty exposure calculations, ABN AMRO applies the FCCM calculation with additional conservatism.

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
	31 December 2024							
(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
EU1 EU - Original Exposure Method (for derivatives)								
EU2 EU - Simplified SA-CCR (for derivatives)								
1 SA-CCR (for derivatives)	748	2,570		1.4	9,908	4,997	4,973	2,878
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)					35,077	8,153	8,153	2,566
5 VaR for SFTs								
6 Total					44,985	13,150	13,126	5,445

1. The increase in the exposure value pre-CRM -compared to Q2 2024- mainly follows from the improvement in the calculation and the presentation of this amount taking into account the clarifications provided in the EBA Q&A 2021_6300. Based on the guidance provided in the said EBA Q&A, "exposure value pre-CRM" amount for securities financing transactions does not consider the security leg when collateral is received and therefore the collateral does not decrease the exposure value pre-CRM.

	30 June 2024							
EU1 EU - Original Exposure Method (for derivatives)								
EU2 EU - Simplified SA-CCR (for derivatives)								
1 SA-CCR (for derivatives)	4,010	4,102		1.4	7,601	6,387	6,363	3,593
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)					9,973	9,973	9,973	3,103
5 VaR for SFTs								
6 Total					17,574	16,360	16,336	6,696

	31 December 2023							
EU1 EU - Original Exposure Method (for derivatives)								
EU2 EU - Simplified SA-CCR (for derivatives)								
1 SA-CCR (for derivatives)	3,047	2,839		1.4	6,185	5,003	4,977	3,027
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)					7,863	7,863	7,863	2,492
5 VaR for SFTs								
6 Total					14,047	12,865	12,840	5,519

EU CCR2 – Transactions subject to own funds requirements for CVA risk

ABN AMRO's credit value adjustment (CVA) is calculated using the Standardised Approach (SA). In the second half of 2024 we observed a decrease in RWEA due to additional hedges in place.

(in millions)	A	B	C	D	E	F
	31 December 2024		30 June 2024		31 December 2023	
	Exposure value	RWEA	Exposure value	RWEA	Exposure value	RWEA
1 Total transactions subject to the Advanced method						
2 (i) VaR component (including the 3x multiplier)						
3 (ii) Stressed VaR component (including the 3x multiplier)						
4 Transactions subject to the Standardised method	1,302	122	1,321	246	1,028	261
EU4 Transactions subject to the Alternative approach (Based on the Original Exposure Method)						
5 Total transactions subject to own funds requirements for CVA risk	1,302	122	1,321	246	1,028	261

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

The table below shows CCR exposures by regulatory exposure class and risk weights for the Standardised Approach.

In the second half of 2024, exposures decreased, albeit with different flows in the separate exposure classes and risk weight buckets. Total risk-weighted exposures increased in the 0%, 2%, 20%, 50%, 100% and 150% buckets. The relatively highest decrease in comparison with 30 June 2024 is observed in the 150% bucket.

(in millions)	A	B	C	D	E	F	G	H	I	J	K	L
	31 December 2024											
	Risk weight											Total
	0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	
Exposure classes												
1 Central governments or central banks	137				1							139
2 Regional governments or local authorities												
3 Public sector entities	8				6							13
4 Multilateral development banks	13											13
5 International organisations	21											21
6 Institutions		3,710			4,276	2						7,989
7 Corporates						9			2,266			2,275
8 Retail												
9 Institutions and corporates with a short-term credit assessment												
10 Other items												
11 Total exposure value	179	3,710			4,283	11			2,266			10,450

	A	B	C	D	E	F	G	H	I	J	K	L
	30 June 2024											
	Risk weight											Total
(in millions)	0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	
Exposure classes												
1 Central governments or central banks	154				2							156
2 Regional governments or local authorities												
3 Public sector entities	59				4							63
4 Multilateral development banks	11											11
5 International organisations	44											44
6 Institutions		3,964			5,953	51						9,968
7 Corporates						40			2,994			3,034
8 Retail												
9 Institutions and corporates with a short-term credit assessment												
10 Other items										81		81
11 Total exposure value	269	3,964			5,959	91			2,994	81		13,358

	A	B	C	D	E	F	G	H	I	J	K	L
	31 December 2023											
	Risk weight											Total
(in millions)	0%	2%	4%	10%	20%	50%	70%	75%	100%	150%	Others	
Exposure classes												
1 Central governments or central banks	200				8							208
2 Regional governments or local authorities												
3 Public sector entities	17				5							22
4 Multilateral development banks	19											19
5 International organisations	18											18
6 Institutions		3,855			4,326	157						8,337
7 Corporates						11			2,234			2,245
8 Retail												
9 Institutions and corporates with a short-term credit assessment												
10 Other items										1		1
11 Total exposure value	254	3,855			4,339	168			2,234	1		10,851

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

The table below discloses the counterparty credit risk (CCR) exposure under the IRB approach. In the second half of 2024, the total exposure value and total RWEA in the CCR A-IRB disclosure decreased, and the total exposure values and total RWEA in the CCR F-IRB increased.

The Corporates - Other portfolio constitutes the majority of the bank's CCR A-IRB exposure (at 31 December 2024 EUR 602 million out of EUR 6,711 million; at 30 June 2024 EUR 524 million out of EUR 591 million).

The CCR F-IRB disclosure is highly exposed to the Corporates - Other portfolio (at 31 December 2024 EUR 2,527 million out of EUR 5,739 million; at 30 June 2024 EUR 2,453 million out of EUR 6,375 million) and the Institutions portfolio (at 31 December 2024 EUR 2,863 million out of EUR 5,739 million; at 30 June 2024 EUR 3,688 million out of EUR 6,375 million).

The majority of the portfolio exposures in the CCR A-IRB are concentrated in the lower PD scale, except for Corporates-SME and Institutions with an RWEA density above 100%, as these portfolios had exposures in higher PD scales. For CCR F-IRB, all the portfolios had a RWEA below 100%, as they were concentrated within low to mid-range PD scales.

Exposure class A-IRB

		A	B	C	D	E	F	G	
		31 December 2024							
		PD scale	Exposure value	Exposure-weighted average PD	Numbers of obligors	Exposure-weighted average LGD	Exposure-weighted average maturity	RWEA	RWEA density
		(in millions)	(in %)	(in units)	(in %)	(in years)	(in millions)	(in %)	
Exposure class									
1	Central government or 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	Corporates - SME	0.00 to <0.15	1	0.06%	3	59.82%	0.89	18.25%	
11		0.15 to <0.25							
12		0.25 to <0.50	1	0.34%	10	45.72%	3.21	65.75%	
13		0.50 to <0.75	13	0.66%	51	42.65%	2.51	62.99%	
14		0.75 to <2.50	10	1.52%	84	39.82%	2.59	87.10%	
15		2.50 to <10.00	1	4.99%	26	47.17%	1.78	145.54%	
16		10.00 to <100.00	2	26.54%	58	75.00%	0.42	360.71%	
17		100.00 (Default)	2	100.00%	17	12.23%	1.20	159.01%	
18		Subtotal	31	10.23%	249	42.89%	2.23	32	104.21%
19	Corporates - Specialised Lending	0.00 to <0.15							
20		0.15 to <0.25	1	0.18%	1	32.25%	5.00	50.04%	
21		0.25 to <0.50	1	0.43%	3	24.71%	4.20	51.26%	
22		0.50 to <0.75	5	0.66%	13	19.95%	3.81	41.41%	
23		0.75 to <2.50	7	1.39%	18	16.78%	4.62	54.06%	
24		2.50 to <10.00	17	3.54%	17	8.85%	3.50	27.95%	
25		10.00 to <100.00	2	29.64%	2	3.20%	5.00	20.66%	
26		100.00 (Default)	1	100.00%	1	40.60%	1.00	3	527.80%
27		Subtotal	33	5.76%	55	13.29%	3.86	15	44.83%
28	Corporates - Other	0.00 to <0.15	312	0.06%	32	65.38%	2.38	107	34.32%
29		0.15 to <0.25	28	0.18%	5	71.96%	1.17	13	47.27%
30		0.25 to <0.50	86	0.34%	50	54.29%	3.49	74	86.23%
31		0.50 to <0.75	22	0.65%	43	50.12%	2.41	23	102.95%
32		0.75 to <2.50	65	1.55%	71	42.06%	2.03	68	105.30%
33		2.50 to <10.00	29	4.42%	25	52.87%	3.44	57	198.93%
34		10.00 to <100.00	60	12.00%	99	67.40%	0.39	96	160.75%
35		100.00 (Default)	1	100.00%	10	14.78%	1.25	3	192.19%
36		Subtotal	602	1.92%	335	60.52%	2.30	441	73.23%
37	Institutions	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	4	26.59%	7	54.91%	0.45	14	331.13%
44		100.00 (Default)							
45		Subtotal	4	26.59%	7	54.91%	0.45	14	331.13%
46	Total		671	2.65%	646	57.32%	2.36	502	74.89%

ABN AMRO previously reported a broader range of PD scales which has now been aligned with EBA's instructions for this template.

		A	B	C	D	E	F	G	
		30 June 2024							
		PD scale	Exposure value	Exposure-weighted average PD	Numbers of obligors	Exposure-weighted average LGD	Exposure-weighted average maturity	RWEA	RWEA density
			(in millions)	(in %)	(in units)	(in %)	(in years)	(in millions)	(in %)
Exposure class									
1	Central government or 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	Corporates - SME	0.00 to <0.15	1	0.06%	3	82.50%	1.36		30.56%
11		0.15 to <0.25							
12		0.25 to <0.50	1	0.34%	13	49.86%	3.51		67.72%
13		0.50 to <0.75	6	0.66%	48	40.46%	2.28	3	56.30%
14		0.75 to <2.50	11	1.29%	90	41.83%	2.71	9	85.78%
15		2.50 to <10.00	1	5.57%	28	44.11%	1.33	2	134.33%
16		10.00 to <100.00	3	26.14%	78	59.45%	0.62	7	285.26%
17		100.00 (Default)	1	100.00%	19	27.64%	1.88	2	359.35%
18	Subtotal		22	7.13%	279	44.82%	2.22	24	110.32%
19	Corporates - Specialised Lending	0.00 to <0.15							
20		0.15 to <0.25							
21		0.25 to <0.50	2	0.44%	3	20.24%	4.64	1	43.64%
22		0.50 to <0.75	2	0.66%	7	28.45%	2.64	1	55.70%
23		0.75 to <2.50	12	1.28%	19	24.99%	4.77	9	79.48%
24		2.50 to <10.00	10	4.44%	53	8.58%	3.91	3	29.52%
25		10.00 to <100.00		10.65%	1	100.00%	1.25		450.78%
26		100.00 (Default)		100.00%	1	40.60%	1.50	1	527.80%
27	Subtotal		26	3.42%	84	18.85%	4.23	16	61.13%
28	Corporates - Other	0.00 to <0.15	204	0.05%	37	70.74%	2.47	93	45.57%
29		0.15 to <0.25	181	0.19%	12	53.88%	1.14	81	44.88%
30		0.25 to <0.50	49	0.37%	46	48.72%	3.11	39	79.91%
31		0.50 to <0.75	13	0.64%	57	51.57%	1.73	13	96.96%
32		0.75 to <2.50	42	1.72%	72	42.79%	1.62	44	105.14%
33		2.50 to <10.00	8	3.49%	20	52.95%	1.65	12	159.06%
34		10.00 to <100.00	24	22.33%	105	51.89%	1.52	64	263.31%
35		100.00 (Default)	4	100.00%	15	9.86%	1.17	6	128.24%
36	Subtotal		524	2.18%	364	58.53%	1.92	351	66.91%
37	Institutions	0.00 to <0.15		0.06%	1	45.06%			6.78%
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	18	26.59%	8	45.23%	0.41	50	273.13%
44		100.00 (Default)							
45	Subtotal		18	26.59%	9	45.23%	0.41	50	273.12%
46	Total		591		736		1.99	441	

ABN AMRO previously reported a broader range of PD scales which has now been aligned with EBA's instructions for this template.

		A	B	C	D	E	F	G
		31 December 2023						
	PD scale	Exposure value (in millions)	Exposure-weighted average PD (in %)	Numbers of obligors (in units)	Exposure-weighted average LGD (in %)	Exposure-weighted average maturity (in years)	RWEA (in millions)	RWEA density (in %)
Exposure class								
1	Central government or 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	Corporates - SME	0.00 to <0.15	1	0.05%	3	82.50%	1.73	31.90%
11		0.15 to <0.25						
12		0.25 to <0.50	1	0.35%	13	50.53%	3.45	68.50%
13		0.50 to <0.75	10	0.66%	58	52.71%	1.09	64.81%
14		0.75 to <2.50	10	1.37%	101	43.36%	2.18	85.93%
15		2.50 to <10.00	2	4.06%	25	46.38%	1.16	116.64%
16		10.00 to <100.00	5	26.59%	81	59.14%	0.63	284.01%
17		100.00 (Default)	1	100.00%	21	22.62%	1.58	294.12%
18	Subtotal	30	10.09%	302	49.67%	1.53	37	121.06%
19	Corporates - Specialised Lending	0.00 to <0.15						
20		0.15 to <0.25						
21		0.25 to <0.50	2	0.46%	2	15.36%	4.72	34.64%
22		0.50 to <0.75	3	0.66%	8	24.01%	3.80	55.39%
23		0.75 to <2.50	27	1.25%	21	20.28%	4.05	60.01%
24		2.50 to <10.00	18	4.63%	26	10.17%	4.05	34.42%
25		10.00 to <100.00	1	26.59%	1	32.25%	5.00	205.68%
26		100.00 (Default)	1	100.00%	1	3.07%	2.00	39.94%
27	Subtotal	51	4.14%	59	16.73%	4.06	27	52.22%
28	Corporates - Other	0.00 to <0.15	436	0.05%	47	68.53%	3.50	53.05%
29		0.15 to <0.25	167	0.19%	20	50.61%	2.24	51.57%
30		0.25 to <0.50	110	0.36%	71	51.84%	3.23	89.01%
31		0.50 to <0.75	36	0.66%	96	48.15%	1.81	85.17%
32		0.75 to <2.50	113	1.45%	121	45.63%	2.09	106.77%
33		2.50 to <10.00	75	3.53%	36	53.85%	3.40	189.81%
34		10.00 to <100.00	11	33.05%	107	50.12%	0.79	279.10%
35		100.00 (Default)	8	100.00%	15	64.64%	0.77	840.31%
36	Subtotal	955	1.82%	513	58.62%	2.96	808	84.61%
37	Institutions	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	3	26.59%	3	48.20%	0.01	286.51%
44		100.00 (Default)						
45	Subtotal	3	26.59%	3	48.20%	0.01	10	286.51%
46	Total	1,040		877		2.96	881	

Exposure class F-IRB

		A	B	C	D	E	F	G
		31 December 2024						
		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 government or 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	Corporates - SME	0.00 to <0.15						
11		0.15 to <0.25						
12		0.25 to <0.50	4	0.41%	2	45.00%	2.50	3
13		0.50 to <0.75						
14		0.75 to <2.50	2	1.14%	3	45.00%	2.50	2
15		2.50 to <10.00						
16		10.00 to <100.00						
17		100.00 (Default)						
18		Subtotal	6	0.65%	5	45.00%	2.50	4
19	Corporates - Specialised Lending	0.00 to <0.15						
20		0.15 to <0.25						
21		0.25 to <0.50	156	0.36%	56	45.00%	2.50	105
22		0.50 to <0.75	182	0.69%	53	45.00%	2.50	165
23		0.75 to <2.50	5	1.14%	8	45.00%	2.50	5
24		2.50 to <10.00						
25		10.00 to <100.00						
26		100.00 (Default)						
27		Subtotal	343	0.54%	117	45.00%	2.50	275
28	Corporates - Other	0.00 to <0.15	1,833	0.06%	162	45.00%	1.48	439
29		0.15 to <0.25	167	0.18%	51	45.00%	0.76	62
30		0.25 to <0.50	196	0.34%	72	45.00%	1.31	115
31		0.50 to <0.75	187	0.48%	43	45.00%	0.89	116
32		0.75 to <2.50	81	1.34%	56	45.00%	2.24	89
33		2.50 to <10.00	52	3.69%	14	45.00%	2.50	78
34		10.00 to <100.00	5	27.36%	11	45.00%	2.50	16
35		100.00 (Default)	6	100.00%	3	45.00%	2.50	
36		Subtotal	2,527	0.53%	412	45.00%	1.42	916
37	Institutions	0.00 to <0.15	2,326	0.06%	155	45.00%	1.14	442
38		0.15 to <0.25	99	0.21%	13	45.00%	0.73	39
39		0.25 to <0.50	414	0.12%	19	45.00%	0.74	112
40		0.50 to <0.75						
41		0.75 to <2.50	25	1.30%	4	45.00%	0.53	25
42		2.50 to <10.00						
43		10.00 to <100.00						
44		100.00 (Default)						
45		Subtotal	2,863	0.09%	191	45.00%	1.07	618
46	Total		5,739	0.31%	725	45.00%	1.31	1,814

ABN AMRO previously reported a broader range of PD scales which has now been aligned with EBA's instructions for this template.

		A	B	C	D	E	F	G	
		30 June 2024							
		PD scale	Exposure value	Exposure-weighted average PD	Numbers of obligors	Exposure-weighted average LGD	Exposure-weighted average maturity	RWEA	RWEA density
		(in millions)	(in %)	(in units)	(in %)	(in years)	(in millions)	(in %)	
Exposure class									
1	Central government or 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	Corporates - SME	0.00 to <0.15							
11		0.15 to <0.25							
12		0.25 to <0.50							
13		0.50 to <0.75	1	0.66%	3	45.00%	2.50	1	78.86%
14		0.75 to <2.50		1.83%	1	45.00%	2.50		114.56%
15		2.50 to <10.00							
16		10.00 to <100.00							
17		100.00 (Default)							
18	Subtotal		1	0.81%	4	45.00%	2.50	1	83.34%
19	Corporates - Specialised Lending	0.00 to <0.15							
20		0.15 to <0.25							
21		0.25 to <0.50	107	0.34%	56	45.00%	2.50	70	65.92%
22		0.50 to <0.75	114	0.66%	47	45.00%	2.50	101	89.12%
23		0.75 to <2.50	5	1.11%	6	45.00%	2.50	6	111.20%
24		2.50 to <10.00	8	6.65%	1	45.00%	2.50	13	163.13%
25		10.00 to <100.00							
26		100.00 (Default)		100.00%	1	45.00%	2.50		
27	Subtotal		234	0.80%	111	45.00%	2.50	191	81.59%
28	Corporates - Other	0.00 to <0.15	1,600	0.06%	181	45.00%	1.55	358	22.36%
29		0.15 to <0.25	371	0.17%	63	45.00%	0.73	134	36.19%
30		0.25 to <0.50	167	0.33%	71	45.00%	1.51	103	61.48%
31		0.50 to <0.75	195	0.44%	36	45.00%	0.70	113	57.77%
32		0.75 to <2.50	67	1.26%	41	45.00%	2.23	71	105.78%
33		2.50 to <10.00	39	3.08%	18	45.00%	2.50	55	142.48%
34		10.00 to <100.00	10	21.68%	9	45.00%	2.50	24	248.07%
35		100.00 (Default)	3	100.00%	4	45.00%	2.50		
36	Subtotal		2,453	0.43%	423	45.00%	1.40	858	34.99%
37	Institutions	0.00 to <0.15	2,636	0.06%	146	45.00%	1.15	549	20.83%
38		0.15 to <0.25	84	0.18%	22	45.00%	1.75	41	49.07%
39		0.25 to <0.50	945	0.12%	38	45.00%	0.65	237	25.04%
40		0.50 to <0.75		0.59%	2	45.00%	2.50		79.66%
41		0.75 to <2.50	23	1.45%	6	45.00%	0.68	24	108.09%
42		2.50 to <10.00							
43		10.00 to <100.00							
44		100.00 (Default)							
45	Subtotal		3,688	0.09%	214	45.00%	1.04	852	23.09%
46	Total		6,375		752			1,901	

ABN AMRO previously reported a broader range of PD scales which has now been aligned with EBA's instructions for this template.

		A	B	C	D	E	F	G	
		31 December 2023							
		PD scale	Exposure value	Exposure-weighted average PD	Numbers of obligors	Exposure-weighted average LGD	Exposure-weighted average maturity	RWEA	RWEA density
		(in millions)	(in %)	(in units)	(in %)	(in years)	(in millions)	(in %)	
Exposure class									
1	Central government or 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	Corporates - SME	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	Corporates - Specialised Lending	0.00 to <0.15							
20		0.15 to <0.25							
21		0.25 to <0.50	127	0.34%	53	45.00%	2.50	80	62.76%
22		0.50 to <0.75	164	0.66%	38	45.00%	2.50	145	88.33%
23		0.75 to <2.50	6	1.11%	6	45.00%	2.50	6	110.92%
24		2.50 to <10.00							
25		10.00 to <100.00		26.59%	1	45.00%	2.50		288.60%
26		100.00 (Default)		100.00%	1	45.00%	2.50		
27		Subtotal	298	0.61%	99	45.00%	2.50	232	77.82%
28	Corporates - Other	0.00 to <0.15	1,762	0.05%	139	45.00%	1.41	339	19.26%
29		0.15 to <0.25	205	0.18%	49	45.00%	0.58	73	35.43%
30		0.25 to <0.50	126	0.31%	42	45.00%	1.01	72	56.74%
31		0.50 to <0.75	79	0.38%	16	45.00%	0.50	41	51.78%
32		0.75 to <2.50	53	1.71%	3	45.00%	0.63	51	96.07%
33		2.50 to <10.00							
34		10.00 to <100.00	1	26.25%	3	45.00%	2.50	2	279.92%
35		100.00 (Default)							
36		Subtotal	2,225	0.14%	252	45.00%	1.26	577	25.92%
37	Institutions	0.00 to <0.15	1,627	0.06%	135	45.00%	1.15	341	20.94%
38		0.15 to <0.25	209	0.18%	22	45.00%	1.77	108	51.46%
39		0.25 to <0.50	430	0.16%	46	45.00%	0.70	135	31.53%
40		0.50 to <0.75	3	0.73%	3	45.00%	2.50	4	116.73%
41		0.75 to <2.50	30	1.90%	2	45.00%	0.50	36	120.37%
42		2.50 to <10.00							
43		10.00 to <100.00	6	26.59%	5	45.00%	2.50	19	294.24%
44		100.00 (Default)							
45		Subtotal	2,306	0.19%	213	45.00%	1.12	642	27.86%
46	Total		4,829		564			1,451	

EU CCR5 – Composition of collateral for exposures to CCR

Collateral composition

The table provides an overview of the collateral composition for counterparty credit risk exposures. In the second half of 2024 (31 December 2024 compared to 30 June 2024), total collateral used in derivative transactions increased while total collateral used in SFTs decreased, mainly due to movements at ALM/Markets.

	A	B	C	D	E	F	G	H
					31 December 2024			
	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	5,023	6,318		2,501	1,286	11,797		15,530
2 Cash – other currencies	3,546	658		205	371	17,901		24,035
3 Domestic sovereign debt		428	7	262		1,581		1,466
4 Other sovereign debt		253	23	1,393		34,971		28,505
5 Government agency debt						252		254
6 Corporate bonds				109		6,281		6,264
7 Equity securities	19,119				24,775	10,299		4,944
8 Other collateral						3,481		3,485
9 Total	27,689	7,657	30	4,469	26,432	86,561		84,482

	A	B	C	D	E	F	G	H
					30 June 2024			
	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	5,318	8,780		2,912	1,807	20,909		24,320
2 Cash – other currencies	2,225	633		204	392	20,403		25,576
3 Domestic sovereign debt		540		307		3,556		4,181
4 Other sovereign debt	34	201	34	1,232		31,955		30,456
5 Government agency debt						562		556
6 Corporate bonds				186		6,426		7,332
7 Equity securities	17,745				28,680	16,645		4,342
8 Other collateral						3,350		3,350
9 Total	25,322	10,155	34	4,841	30,879	103,805		100,113

	A	B	C	D	E	F	G	H
					31 December 2023			
	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	7,265	8,285		3,940	1,271	13,275		16,943
2 Cash – other currencies	2,229	466		182	84	18,197		23,453
3 Domestic sovereign debt	1	273		212		3,175		2,676
4 Other sovereign debt	43	256	37	1,099		28,388		23,992
5 Government agency debt						321		321
6 Corporate bonds				151		6,482		7,069
7 Equity securities	25,706				25,237	8,478		3,522
8 Other collateral						6,046		6,046
9 Total	35,243	9,280	37	5,583	26,592	84,362		84,022

EU CCR6 – Credit derivatives exposures

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

	A	B	C	D	E	F
	31 December 2024		30 June 2024		31 December 2023	
(in millions)	Protection bought	Protection sold	Protection bought	Protection sold	Protection bought	Protection sold
Notionals						
1 Single-name credit default swaps						
2 Index credit default swaps	485	10	385	70	285	40
3 Total return swaps						
4 Credit options						
5 Other credit derivatives						
6 Total notionals	485	10	385	70	285	40
Fair values						
7 Positive fair value (asset)				1		1
8 Negative fair value (liability)	-11		-7		-5	

EU CCR8 – Exposures to CCPs

The table shows exposures to several CCPs, primarily attributable to ABN AMRO's Clearing business. In the second half of 2024, the RWEA of exposures to QCCPs increased, mainly for prefunded default fund contributions.

	A	B	C	D	E	F
	31 December 2024		30 June 2024		31 December 2023	
(in millions)	Exposure value	RWEA	Exposure value	RWEA	Exposure value	RWEA
1 Exposures to QCCPs (total)¹		790		740		713
2 Exposures for trades at QCCPs (excluding initial margin and default fund contributions)	2,156	43	2,409	48	2,455	49
3 - of which (i) OTC derivatives	1,144	23	1,178	24	1,283	26
4 - of which (ii) Exchange-traded derivatives						
5 - of which (iii) SFTs	1,013	20	1,231	25	1,171	23
6 - of which (iv) Netting sets where cross-product netting has been approved						
7 Segregated initial margin						
8 Non-segregated initial margin	1,554	31	1,555	31	1,400	28
9 Prefunded default fund contributions	2,231	716	1,965	661	1,912	636
10 Unfunded default fund contributions						
11 Exposures to non-QCCPs (total)¹						
12 Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions)						
13 - of which (i) OTC derivatives						
14 - of which (ii) Exchange-traded derivatives						
15 - of which (iii) SFTs						
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.

4. Securitisation, market & operational risk

Exposures to securitisation positions

EU SECA - Qualitative disclosure requirements related to securitisation exposures

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 only as an investor and does not hold any securitisations as an originator or sponsor of securitisations.

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. The majority 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

ABN AMRO currently does not have any outstanding own-originated securitisations. The last securitisation programme for residential mortgages (Dolphin Master Issuer B.V) was terminated in September 2022.

Risks associated with the roles in the securitisation process

Through our role in the securitisation process, ABN AMRO is exposed to credit risk and liquidity risk.

Credit risk relates to the risk of credit losses on securitised assets. ABN AMRO may be exposed to credit risk through various channels, including its securitisation lending activities, retaining first loss tranches in originator securitisations and offering hedging arrangements and/or related products. Regulatory capital is held for all securitisation positions in accordance with the applicable regulations.

Liquidity risk relates to the risk that ABN AMRO may incur additional cash outflows. Any potential future cash outflows relating to these positions, including collateral requirements, are taken into account in stress tests and are integrated into the liquidity ratios where required. This includes the potential impact of the liquidity facilities or swap agreements that form part of certain securitisation transactions.

EU SEC1 - Securitisation exposures in the non-trading book

Details of total notes outstanding per structured entity

The following table only provides details of the securitisation positions in which ABN AMRO acts as an investor, as ABN AMRO currently does not hold any securitisations as originator or as a sponsor of 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. The total invested exposure value increased to EUR 2.9 billion (30 June 2024: EUR 2.6 billion), mainly as a result of new investments in retail funding within residential mortgages.

	A	B	C	D	E	F	G
	31 December 2024						
	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
					31 December 2024			
	Bank acts as sponsor				Bank acts as investor			
	Traditional		Synthetic	Subtotal	Traditional		Synthetic	Subtotal
(in millions)	STS	Non-STS			STS	Non-STS		
1 Total exposures					2,030	839		2,869
2 Retail (total)					1,253	610		1,863
3 - of which residential mortgage					397	610		1,007
4 - of which credit card					200			200
5 - of which other retail exposures					656			656
6 - of which re-securitisation								
7 Wholesale (total)					777	229		1,006
8 - of which loans to corporates								
9 - of which commercial mortgages								
10 - of which lease and receivables					777	229		1,006
11 - of which other wholesale								
12 - of which re-securitisation								

	A	B	C	D	E	F	G
	30 June 2024						
	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 2024			
	Bank acts as sponsor				Bank acts as investor			
	Traditional	Synthetic	Subtotal		Traditional	Synthetic	Subtotal	
(in millions)	STS	Non-STS			STS	Non-STS		
1 Total exposures					1,725	869		2,594
2 Retail (total)					977	709		1,685
3 - of which residential mortgage					199	709		908
4 - of which credit card					200			200
5 - of which other retail exposures					578			578
6 - of which re-securitisation								
7 Wholesale (total)					749	160		909
8 - of which loans to corporates								
9 - of which commercial mortgages								
10 - of which lease and receivables					749	160		909
11 - of which other wholesale								
12 - of which re-securitisation								

	A	B	C	D	E	F	G
					31 December 2023		
	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
					31 December 2023			
	Bank acts as sponsor				Bank acts as investor			
	Traditional	Synthetic	Subtotal		Traditional	Synthetic	Subtotal	
(in millions)	STS	Non-STS			STS	Non-STS		
1 Total exposures					1,417	788		2,205
2 Retail (total)					757	659		1,416
3 - of which residential mortgage					479	659		1,138
4 - of which credit card					200			200
5 - of which other retail exposures					78			78
6 - of which re-securitisation								
7 Wholesale (total)					660	129		789
8 - of which loans to corporates								
9 - of which commercial mortgages								
10 - of which lease and receivables					660	129		789
11 - of which other wholesale								
12 - of which re-securitisation								

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

The total invested exposure value increased to EUR 2.6 billion (30 June 2024: EUR 2.2 billion). The increase was mainly attributable to residential mortgages 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
						31 December 2024			
	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	2,637	232					345	2,524	
2 Traditional securitisation	2,637	232					345	2,524	
3 Securitisation	2,637	232					345	2,524	
4 <i>Of which: retail underlying</i>	1,863							1,863	
5 <i>- of which STS</i>	1,253							1,253	
6 <i>Of which: wholesale</i>	774	232					345	661	
7 <i>- of which STS</i>	702	75					188	589	
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
					31 December 2024			
	RWEA (by regulatory approach)				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		65	307			5	25	
2 Traditional securitisation		65	307			5	25	
3 Securitisation		65	307			5	25	
4 <i>Of which: retail underlying</i>			217				17	
5 <i>- of which STS</i>			125				10	
6 <i>Of which: wholesale</i>		65	90			5	7	
7 <i>- of which STS</i>		26	79			2	6	
8 Re-securitisation								
9 Synthetic securitisation								
10 Securitisation								
11 <i>Of which: retail underlying</i>								
12 <i>Of which: wholesale</i>								
13 Re-securitisation								

	A	B	C	D	E	F	G	H	I
						30 June 2024			
	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	2,434	160					312	2,283	
2 Traditional securitisation	2,434	160					312	2,283	
3 Securitisation	2,434	160					312	2,283	
4 <i>Of which: retail underlying</i>	1,685							1,685	
5 <i>- of which STS</i>	977							977	
6 <i>Of which: wholesale</i>	749	160					312	597	
7 <i>- of which STS</i>	749						160	589	
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 2024			
	RWEA (by regulatory approach)				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		60	273			5	22	
2 Traditional securitisation		60	273			5	22	
3 Securitisation		60	273			5	22	
4 <i>Of which: retail underlying</i>			204				16	
5 <i>- of which STS</i>			98				8	
6 <i>Of which: wholesale</i>		60	69			5	6	
7 <i>- of which STS</i>		22	66			2	5	
8 Re-securitisation								
9 Synthetic securitisation								
10 Securitisation								
11 <i>Of which: retail underlying</i>								
12 <i>Of which: wholesale</i>								
13 Re-securitisation								

	A	B	C	D	E	F	G	H	I
						31 December 2023			
	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	2,076	129					292	1,913	
2 Traditional securitisation	2,076	129					292	1,913	
3 Securitisation	2,076	129					292	1,913	
4 <i>Of which: retail underlying</i>	1,416							1,416	
5 <i>- of which STS</i>	757							757	
6 <i>Of which: wholesale</i>	660	129					292	497	
7 <i>- of which STS</i>	660						171	489	
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
					31 December 2023			
	RWEA (by regulatory approach)				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		47	230			4	18	
2 Traditional securitisation		47	230			4	18	
3 Securitisation		47	230			4	18	
4 <i>Of which: retail underlying</i>			175				14	
5 <i>- of which STS</i>			76				6	
6 <i>Of which: wholesale</i>		47	55			4	4	
7 <i>- of which STS</i>		23	52			2	4	
8 Re-securitisation								
9 Synthetic securitisation								
10 Securitisation								
11 <i>Of which: retail underlying</i>								
12 <i>Of which: wholesale</i>								
13 Re-securitisation								

Market risk

EU MRA – Qualitative disclosure requirements related to market risk

ABN AMRO presents its market risk in its banking book and its trading book.

Market risk in the banking book

Market risk in the banking book is the risk that the economic value of equity or the income of the bank declines because of unfavourable market movements. Market risk in the banking book consists predominantly of interest rate risk and credit spread risk. Funding spread risk and foreign exchange risk are also recognised as market risks in the banking book; however, these are not significant.

Market risk management for the banking book

ABN AMRO has a detailed risk management framework in place to identify, measure and control market risk in the banking book. This framework provides assurance that the banking book activities remain consistent with the bank's strategy and strict risk focus. The day-to-day management is delegated from the Asset & Liability Committee (ALCO) to the Asset and Liability Management and Treasury department (ALM/Treasury). Their activities include the execution of hedge transactions. ALM/Treasury forms the first line of defence. Market & ALM/T Risk Management acts as the second line of defence.

The risk appetite is articulated in terms of net interest income, the economic value of equity and the economic capital for market risk in the banking book, and expresses the maximum loss the bank is willing to accept. The risk appetite is cascaded into a limit framework.

ABN AMRO uses a combination of portfolio (macro) hedges and specific asset or liability (micro) hedges to manage the interest rate sensitivity in the banking book and keep it in line with the bank's strategy and risk appetite. Micro hedges are used to swap fixed funding transactions and fixed investments in the liquidity buffer for floating interest rate positions. In addition, macro hedging is applied in order to align with the bank's strategy to contribute to a stable NII while protecting the economic value of equity.

The metrics used for market risk in the banking book are dependent upon the assumptions made in the behavioural models. Models must therefore be based on extensive research, including historical data regarding observed client behaviour, and must be independently validated and approved by the mandated risk committees. Models are periodically assessed to determine whether they behave appropriately and are statistically sound; if required, they are adjusted.

Market risk measurement for the banking book

Market risk in the banking book consists predominantly of interest rate risk, followed by credit spread risk, funding spread risk and foreign exchange risk.

Interest rate risk in the banking book

Interest rate risk is the risk of losses in the economic value of equity or the bank's net interest income (NII) due to yield curve developments. In order to measure interest rate risk, models are used and assumptions on client behaviour are made, most importantly with respect to the maturity of savings and the prepayment of mortgages. These assumptions influence the anticipated interest cash flow pattern. Interest rate risk is continuously managed in line with the risk appetite because the profile of assets and liabilities on the balance sheet can change if client behaviour changes.

More details on how we measure and manage interest rate risk in the banking book are provided in EU IRRBBA - Interest rate risks of non-trading book activities.

Credit spread risk in the banking book

Credit spread risk is the risk of losses due to adverse movements in the credit spread in the balance sheet. A main source is from bonds held for liquidity purposes. It is measured as the impact on economic value of a 1bp change in

spreads to a swap rate. The sensitivity is measured for individual term points, as well as for a parallel shift of the curve. Additionally, if funding spreads widen, it costs more to fund assets on the balance sheet. Unless this increased spread is passed on to clients by raising client rates, the projected net interest income will decrease. This risk is measured using an NII-at-risk approach whereby the funding spread increases.

Foreign exchange risk

Foreign exchange (FX) risk is the risk arising from adverse movements in FX spot and forward rates and/or FX volatility. It is managed within the bank by ALM/Treasury. As a general rule, foreign exchange risk is hedged by using cross-currency swaps to swap the exposure in foreign currency to euros. If, for operational reasons, it is inefficient to hedge exposures in foreign currencies, an open currency position (OCP) remains. This is measured by the aggregated net position per currency, except for the euro.

Economic capital

Economic capital for market risk in the banking book is calculated using a parametric Monte Carlo simulation model that determines the economic capital needed to absorb losses resulting from adverse movements in interest rates, client behaviour for mortgages and non-maturing deposits, volatility, credit spreads and foreign exchange rates.

Market risk in the trading book

Positions held with trading intent and hedges for positions held with trading intent must be included in the bank's trading book. The Central Trading Risk policy describes the positions included in the trading book and the criteria for transferring risk and positions between the trading and banking books. As part of its business strategy, ABN AMRO facilitates client orders as principal in key financial markets where our clients are active. Market risk in the trading book is the risk of losses in market value due to adverse market movements. The following market risks are inherent in the trading book:

- interest rate risk, arising from adverse changes in interest rate risk curves and/or interest rate volatilities
- credit spread risk, arising from adverse changes in the term structure of credit spreads and/or from changes in the credit quality of debt securities or CDS reference entities, with an impact on default probabilities
- foreign exchange risk, arising from adverse changes in FX spot and forward rates and/or FX volatility

Market risk management for the trading book

ABN AMRO has in place a detailed risk management framework to identify, measure and control market risk in the trading book. This risk management framework is in line with the 3LoD model and provides assurance that the bank's trading activities are consistent with its client-focused business strategy and strict risk focus. In accordance with the strategy, the Business Risk Committee Trading annually approves trading mandates and limits, which define the nature and amount of the permitted transactions and risks, as well as the associated constraints. The limit utilisation is monitored and discussed by the first and second LoD on a daily basis. The Business Risk Committee Trading is a subsidiary committee of the Group Risk Committee.

Market risk measurement for the trading book

ABN AMRO measures and manages market risk in the trading book on a daily basis. The key metrics used are economic capital, regulatory capital, Value-at-Risk (VaR), Stressed VaR (SVaR) and Incremental Risk Charge (IRC), together with a wide array of stress and scenario tests, sensitivity measures, concentration limits and notional limits. These metrics are measured and monitored on a daily basis. Appropriate limits are set at bank level in the Risk Appetite Statement and at bank and business-line levels in the limit framework, in line with the general risk principles in the Central Trading Risk policy.

Metrics and models are managed, reviewed, assessed and, if required, adjusted in a similar way as in the banking book. Other important tools to ensure the adequacy of the models, alongside the formal validation and review of models, are the daily explanation of risk reporting figures, periodic portfolio reviews and regular back-testing.

More information on the key metrics VaR, SVaR and IRC can be found in EU MRB - Qualitative disclosure requirements for institutions using the internal Market Risk Models.

Economic capital

The calculation of economic capital for market risk in the trading book is based on the daily VaR, SVaR and IRC at a 99.9% confidence level.

EU MR1 – Market risk under the Standardised Approach

	A	B	C
	31 December 2024	30 June 2024	31 December 2023
(in millions)	RWEA	RWEA	RWEA
Outright products			
1 Interest rate risk (general and specific)			
2 Equity risk (general and specific)		2	2
3 Foreign exchange risk			
4 Commodity risk			
Options			
5 Simplified approach			
6 Delta-plus method			
7 Scenario approach			
8 Securitisation (specific risk)			
9 Total		2	2

EU MRB – Qualitative disclosure requirements for institutions using the Internal Market Risk Models

On 5 March 2018, the ECB granted ABN AMRO permission to continue using the Internal Model Approach (IMA) for calculating the own funds requirements for market risk. The bank uses the IMA to calculate market risk capital for its trading book, which includes all positions held with trading intent and hedges for those positions. The Central Trading Risk policy describes the positions included in the trading book and the criteria for transferring risk and positions between the trading and banking books, in line with CRR Article 104. This policy applies to ABN AMRO Bank N.V. as well as its subsidiaries, branches, representative offices and legal entities under its control.

As an exception to the above, residential mortgage-backed securities and repo products/reverse repo products are excluded from the IMA capital and calculated by means of the Standardised Approach (SA).

The next section explains the main components of the IMA approach. The key metrics used are Value at Risk (VaR), Stressed VaR (SVaR) and Incremental Risk Charge (IRC), together with a wide array of stress and scenario tests, sensitivity measures, concentration limits and notional limits. These metrics are measured and monitored on a daily basis. Other important tools to ensure the adequacy of the models, alongside the formal validation and review of models, are the daily explanation of risk reporting figures, periodic portfolio reviews and regular back-testing.

Value-at-Risk (VaR)

ABN AMRO uses the historical simulation VaR methodology as one of its primary risk measures. The VaR for market risk quantifies, with a one-sided confidence level of 99%, the maximum one-day loss that could occur due to changes in risk factors if positions remained unchanged for a period of one day. The VaR also incorporates market data movements for specific movements in the underlying issuer of securities. The impact of historical market movements on today's portfolio is estimated on the basis of equally weighted market movements observed in the previous 300 days, using a full revaluation method for the majority of risk factors. The market data for VaR is updated on a weekly basis, i.e. five out of the 300 scenarios are updated every week.

Depending on the risk factor, our forecasting is based on either relative or absolute changes. For instance, our rate shocks are absolute changes rather than relative. Our implementation is limited to relative or absolute changes because a dynamic set-up is considered overly complex. Moreover, shocks scaled by volatility are not used. Where data are not available for risk factors, we have to rely on proxies, which are assumed to be fair representations of the proxied risk factors. Aggregation is performed by adding all P&L vectors from the different risk systems used. The bank uses the VaR with a one-day horizon for internal risk measurement, control and back-testing, and the VaR with a ten-day horizon to determine regulatory capital. The latter is derived by scaling the one-day VaR by the square root of ten. This assumption is tested on a regular basis. The daily VaR is back-tested against the actual mark-to-market changes

calculated for each subsequent trading day, as well as against hypothetical mark-to-market changes assuming no trading activities over the same horizon. The number of outliers is used to assess the reliability of the VaR model.

Stressed Value at Risk (SVaR)

The purpose of the SVaR is to replicate a VaR calculation that would be generated on the bank's current portfolio with inputs calibrated to historical data for a continuous 12-month period of significant financial stress relevant to the bank's portfolio. To calculate the SVaR, ABN AMRO uses the same model as those used for the VaR, based on historical simulation. The current historical data period includes the credit crisis of 2008 and is reviewed at least annually. In this annual review, the VaR is approximated for the current portfolios over a long historical period.

Incremental Risk Charge (IRC)

The Incremental Risk Charge (IRC) represents an estimate of the default and migration risks in the trading book for the purpose of IMA regulatory capital calculation. The IRC model calculates the potential losses due to migrations and defaults in the portfolios over a one-year time horizon and at a 99.9% confidence level. All ABN AMRO trading book positions subject to an own funds requirement for specific risk are in scope of the model.

The IRC model simulates scenarios for how issuer credit ratings, including possible defaults, might change over a given liquidity horizon. Correlations between issuers are taken into account in the simulation, and P&L scenarios are obtained by repricing the positions under different rating scenarios. For positions where the liquidity horizon is less than one year, rebalancing is applied at the end of the liquidity horizon and P&L scenarios are obtained by repeating the simulation until the one-year time horizon is reached.

Validation procedure

A model risk policy is in place for all models, including market risk models. This policy requires model assumptions and limitations to be documented and independently validated by Model Validation. For material changes, the regulator performs an on-site investigation before such a model change is applied in production.

Stress testing and scenario analysis

Stress testing and scenario analysis are designed to focus specifically on the impact of tail events that are outside the VaR confidence interval. We perform daily stress tests for large movements in risk factors. Scenario analyses are also conducted frequently to evaluate the impacts of extreme market events that cover multiple risk factors, and the results of these tests are monitored. These scenarios can be based on historical or hypothetical events, or on a combination of the two.

For each risk type, sensitivities are monitored against limits. This includes all risk types mentioned above and the base risks in the trading portfolio. In addition, the holding period is monitored as a measure of the liquidity of the positions.

Valuation adjustments

For the trading book, we take into account adjustments for counterparty risk on our clients (credit valuation adjustment), ABN AMRO funding costs (funding valuation adjustment) and ABN AMRO credit risk (debit valuation adjustment).

Trading book positions are subject to prudent valuation standards in accordance with regulatory requirements (CRR Article 105). The prudent value is derived from IFRS accounting fair value and includes additional valuation adjustments. ABN AMRO has developed models for additional valuation adjustments, for instance regarding bid-ask spreads and model risk. These models are subject to model validation, which includes an assessment of adherence to the regulation. To ensure robust reporting, the IFRS and additional valuation adjustments are subject to a control framework, the four-eyes principle and sign-off by the validating party.

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

	A	B	C	D	E	F
	31 December 2024		30 June 2024		31 December 2023	
(in millions)	RWEA	Own funds requirements	RWEA	Own funds requirements	RWEA	Own funds requirements
1 VaR	487	39	600	48	497	40
a Previous day's VaR		16		16		10
b Multiplication factor (mc) x average of previous 60 working days (VaRavg)		39		48		40
2 SVaR	1,009	81	1,087	87	829	66
a Latest available SVaR		31		24		14
b Multiplication factor (mc) x average of previous 60 working days (sVaRavg)		81		87		66
3 IRC	620	50	1,147	92	628	50
a Most recent IRC measure		45		72		35
b 12 weeks average IRC measure		50		92		50
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	2,115	169	2,833	227	1,954	156

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

Market Risk RWEA under the Internal Model Approach RWEA remained stable, totalling EUR 2.1 billion as at 31 December 2024 compared to 30 September 2024. The increase in the VaR and SVaR (driven by IR basis exposure) was offset by the decrease in the IRC (due to the active steering of the Credit Trading portfolio).

Note that for VaR and SVaR the capital multipliers are 3.0 and 3.0 respectively, in line with the CRR. This results in the 12-week average, multiplied by capital multipliers, always exceeding the latest observations. This is reflected in the regulatory adjustments.

	A	B	C	D	E	F	G	H	I	J	K
	31 December 2024						30 September 2024		31 December 2023		
(in millions)	VaR	SVaR	IRC	Comprehensive risk measure	Other	Total RWEA	Total own funds requirements	Total RWEA	Total own funds requirements	Total RWEA	Total own funds requirements
1 RWEA at the previous quarter-end	463	842	810			2,115	169	2,833	227	2,189	175
1a <i>Regulatory adjustment</i>	-346	-601	-307			-1,255	-100	-1,436	-115	-1,103	-88
1b <i>RWEA at the previous quarter-end (end of the day)</i>	117	241	503			860	69	1,397	112	1,086	87
2 Movement in risk levels	83	143	56			282	23	-537	-43	-354	-28
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>	200	384	559			1,142	91	860	69	732	59
8b <i>Regulatory adjustment</i>	287	625	61			973	78	1,255	100	1,222	98
8 RWEA at the end of the disclosure period	487	1,009	620			2,115	169	2,115	169	1,954	156

EU MR3 – IMA values for trading portfolios

(in millions)	A		B	C
	31 December 2024		30 June 2024	31 December 2023
	VaR (10 day 99%)		VaR (10 day 99%)	VaR (10 day 99%)
1 Maximum value	17		23	24
2 Average value	13		12	13
3 Minimum value	8		4	6
4 Period end	16		16	10
	SVaR (10 day 99%)		SVaR (10 day 99%)	SVaR (10 day 99%)
5 Maximum value	32		37	35
6 Average value	25		25	22
7 Minimum value	15		12	12
8 Period end	31		24	13
	IRC (99.9%)		IRC (99.9%)	IRC (99.9%)
9 Maximum value	98		95	64
10 Average value	57		71	38
11 Minimum value	25		44	25
12 Period end	45		72	25
	Comprehensive risk capital charge (99.9%)		Comprehensive risk capital charge (99.9%)	Comprehensive risk capital charge (99.9%)
13 Maximum value				
14 Average value				
15 Minimum value				
16 Period end				

1. The IRC values in template MR3 for December 2024 now include regulatory add-ons, which explains the increase compared to December 2023.

EU MR4 – Comparison of VaR estimates with gains/losses

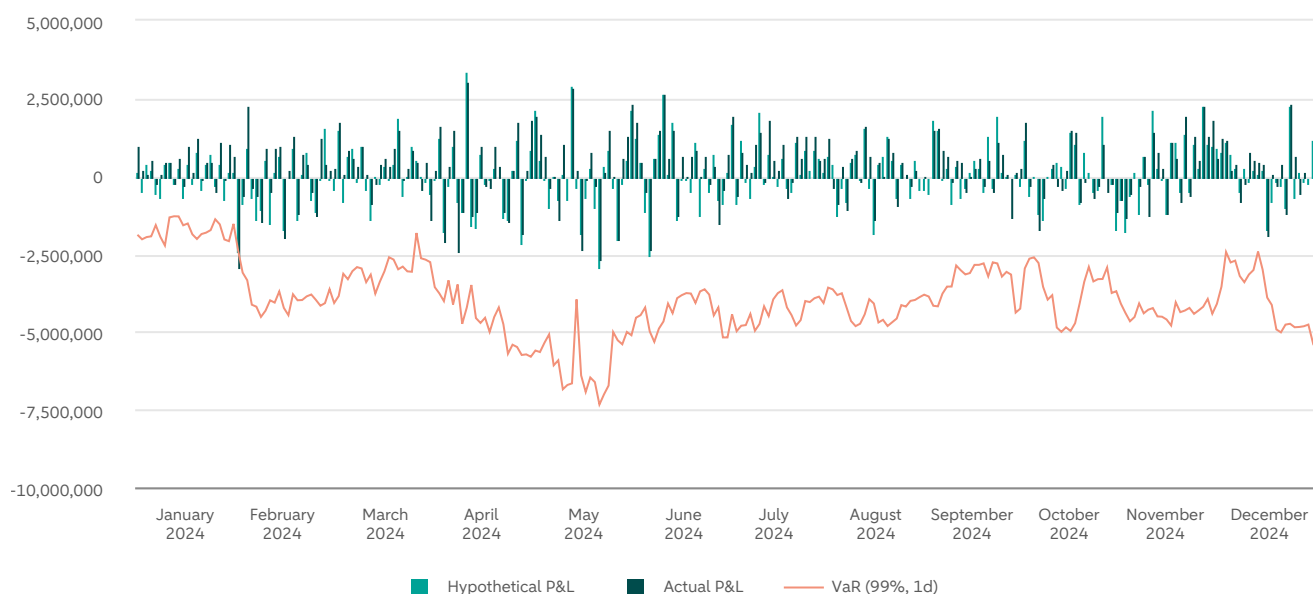
Analysis of outliers

The total number of overshootings in the time series of the 250 most recent business days is one. This has no further impact on the multiplication factors. As of March 2024, the VaR and SVaR multiplication factors changed from 3.25 and 3.5 respectively to 3.0, as the related IMI findings have been remediated.

ABN AMRO reported one outlier during the 250 days ending on 31 December 2024. This is a decrease of one outlier compared to the 250 days ending on 30 June 2024.

- 1 February 2024: overshooting of the actual and hypothetical P&L caused by significant upward shocks in major EUR and USD curves, driven by US and EU signals on the slowing down of interest rate cuts in Q1 2024.

Comparison of VaR estimates with gains/losses 2024



EU IRRBBA - Qualitative information on interest rate risk of non-trading book activities

Interest rate risk is the risk of losses in the economic value of equity or the bank's net interest income (NII) due to yield curve developments. In order to measure interest rate risk, models are used and assumptions on client behaviour are made, most importantly with respect to the maturity of savings and the prepayment of mortgages. These assumptions influence the anticipated interest cash flow pattern.

The main sources of interest rate risk are:

- the maturity mismatch between assets and liabilities. ABN AMRO provides mortgages and commercial loans with fixed interest terms. These assets are funded by non-maturing deposits and wholesale funding with a shorter average interest maturity than the assets
- client behaviour, which determines the maturity profile of some of our products. As we use models to predict this behaviour, we are exposed to model risk

Key assumptions for modelling client behaviour

From an interest rate risk perspective, the following aspects of client behaviour are the most important:

- client behaviour with respect to early redemption of residential mortgages. This has a significant impact on the average interest maturity of the mortgage portfolio. Clients have the option to fully or partially prepay mortgages before maturity. Prepayments may be triggered by, for example, relocation, redemption or curtailment. An important driver of prepayments is the interest rate incentive, i.e. the difference between a client's current mortgage rate and prevailing mortgage rates. Future mortgage rates are simulated using a Monte Carlo approach. In addition to the interest rate incentive, other drivers such as loan age, seasonality and house price developments are also taken into account
- client acceptance of the residential mortgage volume offered and the deviation between the offered rate and the actual coupon
- client behaviour with respect to non-maturing deposits that are callable on demand. Future client rates for savings and current accounts are modelled using a replicating portfolio model. Modelled client rates depend on current or lagged yield curves and funding costs. A maximum maturity of 10 years is assumed. The resulting duration depends on product type and client behaviour

Risk measurement for interest rate risk

Interest rate risk is measured by net interest income (NII) at risk, the present value of one basis point (PV01) and the economic value of equity (EVE) at risk.

NII-at-Risk is the difference in NII between a base scenario and an alternative scenario observed over a 1-year horizon. This is calculated for a 200bps instantaneous increase in interest rates (parallel move up) and for a 200bps instantaneous decrease in interest rates (parallel move down). NII-at-Risk includes all expected cash flows, including

commercial margins and other spread components, from all interest rate-sensitive assets, liabilities and off-balance sheet items in the banking book. The NII-at-Risk assumes a constant balance sheet.

EVE-at-Risk is the loss in economic value of equity as a result of various yield curve shocks. This is also calculated for a 200bps instantaneous increase in interest rates and for a 200bps instantaneous decrease in interest rates. The impact is calculated for cash flows from all interest-bearing assets, liabilities and off-balance sheet items in the banking book. An assumption of a run-off balance sheet is made, where banking book positions amortise and are not replaced by new business. The projected cash flows include commercial margins and other spread components and are discounted at the risk-free rate.

To ensure a comprehensive approach to risk management and identify potential weaknesses, the metrics are complemented by stress testing and scenario analysis. Stress testing and scenario analyses go beyond determining the impact of alternative developments of interest rates and include testing assumptions with respect to modelling and client behaviour. A combination of market and product floors is applied. These floors are reviewed periodically.

For management purposes, the interest rate risk position is monitored by the Asset & Liability Committee (ALCO) on a monthly basis. The above metrics are also regularly reported to the Executive Board.

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. Also shown are the changes in net interest income (NII), i.e. the difference in NII between a base scenario and an alternative scenario, calculated under the two supervisory shock scenarios. The scenarios have been aligned with the EBA guidelines. 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 change in EVE is higher in absolute terms, in comparison with December 2023. This increase was the aggregate result of various developments in the balance sheet and in the market, such as decreasing interest rates. ABN AMRO actively manages interest rate risk to keep it within its risk appetite.

The NII-at-Risk as of 31 December 2024 was EUR 106 million negative, reflecting a decrease of NII in the parallel down scenario. The slight decrease is mainly attributable to decreased cash positions and decreased interest rate risk steering as a result of lower rates.

	A	B	C	D	E	F
	Changes of the economic value of equity			Changes of the net interest income		
(in millions)	31 December 2024	30 June 2024 ¹	31 December 2023	31 December 2024	30 June 2024	31 December 2023
Supervisory shock scenarios						
1 Parallel up	-1,916	-1,567	-1,126	277	147	216
2 Parallel down	210	122	-679	-106	-46	-139
3 Steepener	240	487	778			
4 Flatteners	-775	-935	-1,169			
5 Short rates up	-1,030	-1,123	-1,174			
6 Short rates down	1,030	1,144	1,192			

1. The figures from June 2024 have been revised in this annual report to correct a previous overstatement in the half-year report.

Operational risk

EU ORA - Qualitative information on operational risk

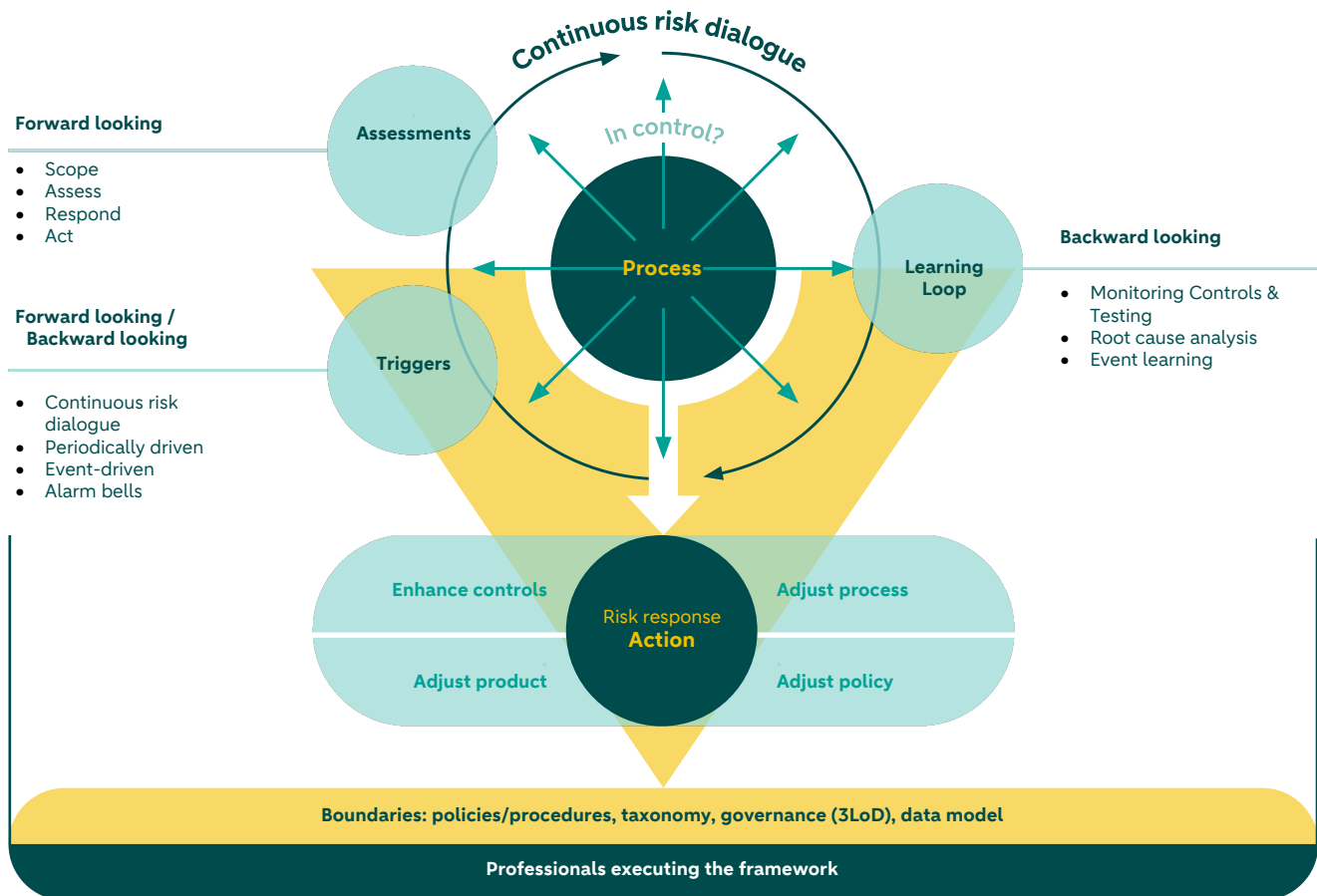
Non-financial risks (NFRs) refer to the category of risks that could result in loss due to inadequate or failed internal processes, people and systems or due to external events. This definition is in line with the definition applied by the Basel Committee on Banking Supervision (BCBS).

ABN AMRO defines 11 non-financial sub-risk types (see below), as well as an overall NFR generic category, to provide a holistic profile of non-financial risks. The bank has in place dedicated functional areas with specific knowledge and expertise to deal with each material type of NFR. The NFR risk category and individual non-financial risk types are governed by the broader Enterprise Risk Management approach to ensure that structured, coherent, systematic and consistent risk management processes are applied throughout the bank's three lines of defence.

ABN AMRO has a holistic approach to managing non-financial risks (NFRs), providing the business with a clear and fair view on these risks, their relevance to the bank and how they should be managed. For this purpose, ABN AMRO has in place a framework that enables non-financial risks to be managed with a strict risk focus. The Information and Operational Risk Management (I&ORM) department with ABN AMRO sets this framework for the bank in line with applicable rules and regulations. The main components of the framework are shown in the following diagram.

Non-financial risk types			
Compliance risk	Data risk	Third-party and outsourcing risk	ICT risk
Change risk	Fraud risk	Legal risk	HR risk
Tax risk	Model risk		Behavioural risk

Framework for operational (non-financial) risk



Framework for management of operational (non-financial) risks

We deploy our NFR framework to make sure that we stay in control of all the bank's NFRs and adhere to all existing laws and regulations of relevance. ABN AMRO's NFR framework may be partly described as a toolkit of assessments, alarm bells and feedback. The bank itself may also be understood as a collection of processes. But while processes and tools are consequently at the heart of the NFR framework, they are not enough in themselves. We rely on professionals to execute the NFR framework, especially in a continuous dialogue about risks. The activities performed in executing the NFR framework are contextualised by boundaries established through a range of NFR policies and procedures; a taxonomy of material risks, roles and responsibilities for professionals working according to 3LoD model practices and behaviours, and data management systems.

Assessments are conducted to identify non-financial risks and assess risk exposures. They are performed either periodically or when concerns arise as a result, for example, of changes in internal processes or external developments that pose risks to strategic priorities. We also rely on alarm bells from internal and external sources, such as the effectiveness of the internal control environment, the status of key risk indicators (KRIs) relative to established risk thresholds and complaints from clients, to understand what actions are necessary to continue maturing the efficacy of the NFR framework. Despite preventive measures being in place, incidents and operational losses are inherent to our business. ABN AMRO systematically tracks and analyses these events as part of feedback mechanisms that enable us to learn from operational failures and use them as early warnings. We also scan external developments and identify emerging risks for further assessment.

During our continuous risk dialogues, risk professionals from the first (1LoD) and second (2LoD) lines of defence evaluate the level of threat from NFRs and determine appropriate responses to keep control. Our risk professionals combine relevant internal data (e.g. scale of changes to processes), external data (e.g. climate science) and professional judgements to arrive at a holistic risk view. Once NFR exposures are agreed by 1LoD and 2LoD, and evaluated against risk thresholds, an appropriate risk response can be implemented. Common risk responses include

enhancing controls by expanding coverage to capture new and evolving areas of risks, as well as adjusting processes to reduce opportunities for errors.

The results of the risk dialogues executed in line with the NFR framework are provided in risk reports at various levels within the bank, up to the Executive Board and Supervisory Board. This enables senior management to steer the bank's overall profile of NFRs.

Operational (non-financial) risk measurement

Under the Standardised Approach (TSA), the own funds requirement for operational risk is calculated as a percentage of the three-year average income of the bank. Depending on the type of business line, the percentage applied to the average income varies between 12%, 15% and 18%.

For economic capital, a simple Pillar 2 approach is in place. This approach takes the bank's operational risk Pillar 1 capital levels as a starting point, but also adds risk-based elements from historical loss data, stress testing and control effectiveness data to the calculation.

Capital for operational (non-financial) risk

In 2024 operational risk RWA increased by EUR 0.5 billion – up from EUR 15.5 billion (2023) to EUR 16.0 billion. This RWA increase is simply explained by the bank's increasing income over the last years, which is the basis for the RWA calculation. ABN AMRO's current operational risk capital level (measured against the bank's gross income) is still roughly in line with that of peer banks with a moderate risk profile.

EU OR1 - Operational risk own funds requirements and risk-weighted exposure amounts

Operational risk RWEA increased slightly to EUR 16.0 billion as compared to a year before (31 December 2023: EUR 15.5 billion). This RWA increase is explained by the bank's increasing income over the last years, which is the basis for the RWA calculation.

	A	B	C	D	E
	31 December 2024				
	Relevant indicator			Own funds requirements	RWEA
(in millions)	Year-3	Year-2	Last year		
Banking activities					
1 Banking activities subject to basic indicator approach (BIA)					
2 Banking activities subject to standardised (TSA) / alternative standardised (ASA) approaches	7,560	7,878	8,648	1,278	15,977
3 Subject to TSA:	7,560	7,878	8,648		
4 Subject to ASA:					
5 Banking activities subject to advanced measurement approaches AMA					

	A	B	C	D	E
	31 December 2023				
	Relevant indicator			Own funds requirements	RWEA
(in millions)	Year-3	Year-2	Last year		
Banking activities					
1 Banking activities subject to basic indicator approach (BIA)					
2 Banking activities subject to standardised (TSA) / alternative standardised (ASA) approaches	7,692	7,560	7,878	1,237	15,465
3 Subject to TSA:	7,692	7,560	7,878		
4 Subject to ASA:					
5 Banking activities subject to advanced measurement approaches AMA					

5. Remuneration

Remuneration policy

The Remuneration policy section presents the amounts paid in the financial year in accordance with the EBA requirement.

EU REMA - Remuneration policy



Letter from the Chair of the Remuneration Committee

Dear reader,

We hereby present our remuneration report for the year 2024. In this letter, I would like to reflect briefly on some key topics and considerations for the Remuneration Committee in the past year.

Annual performance management process

One of the most important topics for the Remuneration Committee is the annual performance management process. Annually, KPIs are set for various groups of staff, including the Executive Board, CLA+ employees (i.e. staff with a job level exceeding ABN AMRO's collective labour agreement (CLA)) and CLA Identified staff employees (i.e. staff in scope of the CLA in positions that have a material impact on ABN AMRO's risk profile). After the year-end, the performance of each group of staff is assessed against the predefined targets and the performance scores are determined. On this basis, salary increases (if applicable) and variable remuneration (if applicable) are determined. In this context, a so-called malus and gatekeeper process is also performed, as described later in this report, to assess if there are any reasons to withhold or decrease any variable remuneration (which may include a decrease of deferred variable remuneration awarded for previous years).

The frameworks for the Executive Board, Identified Staff in CLA+ positions and Identified Staff in scope of ABN AMRO's CLA were largely consistent with the previous year, with some changes. The KPIs for the Executive Board have been set in line with the updated framework of the Executive Board Remuneration Policy, as applicable since 1 January 2024.

Risk assessment remuneration incentives

A joint meeting with the Risk & Capital Committee was held in November 2024 to discuss the risk assessment of remuneration incentives. In this assessment, the main risks related to remuneration policies and practices were linked to the various areas of the strategic risk appetite. The joint meeting assessed the main risks related to remuneration, such as the risk of non-compliance with remuneration legislation, being able to attract and retain the right talent, and having incentives that are not client centric and/or do not contribute to the bank's strategy. It was concluded that the bank's remuneration set-up was generally regulatory compliant. Proposed enhancements focused on being able to attract and retain staff with the right skills and talent by offering a competitive remuneration package, especially in the current tight labour market, and having a performance management system that awards and recognises staff performance on the basis of impact and individual contribution.

Remuneration restrictions

As also mentioned in the 2023 Remuneration Report, the Supervisory Board is increasingly concerned about the impact of the Bonus Prohibition on the remuneration of the Executive Board and specific groups of senior management. The Bonus Prohibition prohibits the awarding of variable remuneration and individual salary increases, and is applicable as long as the Dutch State holds a stake in ABN AMRO. Although ABN AMRO is currently still able to attract suitable Executive Board members and senior management, the Supervisory Board has explicitly addressed its concerns to various stakeholders.

Formal discussions take place with the regulator regarding alleged violations of remuneration restrictions for a number of employees. The regulator may impose financial penalties, but no formal decisions have been taken yet. ABN AMRO has presented facts and circumstances, as well as its views on the matters, to the regulator and is awaiting the decision of the regulator regarding possible regulatory measures. Currently, there is not yet any clarity as to whether the regulator will take enforcement measures, and the amounts involved cannot be reliably estimated.

Composition of the Executive Board and Supervisory Board

As mentioned in the 2023 Remuneration Report, Tanja Cuppen informed the Supervisory Board that she would not be available for a third term as Chief Risk Officer. Tanja Cuppen completed her term at the Annual General Meeting of 2024, as from which moment Caroline Oosterloo was appointed Chief Risk Officer on an interim basis. With effect from 1 October 2024, Serena Fioravanti was appointed Chief Risk Officer. It was also announced that Robert Swaak would step down as CEO in the first half of 2025. We have since announced that ABN AMRO intends to nominate Marguerite Bérard as the new CEO at the general meeting of shareholders on 23 April 2025, subject to regulatory approval. Wouter Devriendt resigned from the Supervisory Board on 5 February 2024.

On behalf of the Remuneration Committee, I would like to express my appreciation for the contributions of Robert Swaak, Tanja Cuppen, Caroline Oosterloo and Wouter Devriendt. I am pleased to welcome Serena Fioravanti to the Executive Board and look forward to the appointment of Marguerite Bérard as the new CEO, subject to regulatory approval.

Collective Labour Agreements

From 1 July 2024 until 1 July 2026, a new collective labour agreement (CLA) applies to ABN AMRO in the Netherlands. The CLA entails salary increases with effect from 1 July 2024 and 1 July 2025, and introduces a recognition premium and a fixed annual increase within the salary scale. Furthermore, a pay-per-use mobility scheme has been introduced, which contributes to sustainable mobility choices by providing higher allowances for bicycle travel than for car travel, as well as free public transport for work and private use. The Friday after Ascension Day will be a day off, and the period during which employees receive their full salary during sick leave has been increased from 6 to 12 months. Furthermore, the employer contribution for the CDC pension scheme and the net pension agreement is decreased with effect from 1 January 2025. The Social Plan was extended from 1 January 2025 to 1 July 2026.

Diversity, inclusion & equal pay

We aim to provide a working environment where everyone can be themselves and feel safe, regardless of their race, ethnicity, gender, religion, age, disability, sexual orientation, gender identity or gender expression. We aim to create a culture in which people truly feel involved, seen and valued. We have set clear objectives on diversity and inclusion for the entire organisation, at all levels.

At year-end 2024, three of the eight board positions on the Executive Board and four of the seven board positions on the Supervisory Board were held by women. The current composition of the Supervisory Board complies with the Dutch Act on Gender Balance in Management and Supervisory Boards (Wet Evenwichtiger verhouding tussen mannen en vrouwen in bestuur en raden van commissarissen). The Supervisory Board also aims for a gender balance in the Executive Board.

Equal pay for equal work and work of equal value is an important principle at ABN AMRO and our progress in this area is continually monitored. We published details of the results and our progress on this topic on our website on 14 November 2024. The relative gender pay gap decreased slightly in 2024 and ABN AMRO continues to achieve good results on equal pay for its CLA and CLA+ population in the Netherlands. The gender pay gap and equal pay developments in our offices abroad are also monitored annually. The general view is that we should continue to focus on this topic to ensure we reduce the overall gender pay gap and maintain our current results with regard to equal pay. Our research also continually monitors cultural diversity and diversity percentages.

The gender diversity of the Extended Leadership Team decreased from 41% female employees as at 31 December 2023 to 39% female employees as at 31 December 2024. Although the diversity percentages at ELT level are still high, we will continue to focus on further strengthening the diversity balance in the Extended Leadership Team.

Employee Engagement

A bank-wide Employee Engagement Survey (EES) is performed annually. The Executive Board and Supervisory Board consider employee engagement and employee satisfaction to be key topics and monitor the results of this periodic survey. At 80%, the response rate in 2024 was higher than in 2023 (77%).

The outcomes of the 2024 EES show that the sense of engagement is stable and high, at the same level as in 2023 (83 score). ABN AMRO does well in the areas of Client focus, My Team, Talent & Development and Inclusivity.

Collaboration with teams from other departments remains an element to improve. In addition, employees are critical about vision & direction (-3) and senior management (-1). The EES also includes statements about the working environment at ABN AMRO and covering topics such as Clarity, Transparency, Discussability and Achievability. The feedback on this last topic included statements that employees experience pressure to achieve their objectives or feel they have to walk a tightrope between achieving objectives and complying with rules and procedures. The most frequent replies to the question of where ABN AMRO could improve as an employer were salary, career, growth prospects and collaboration.

On behalf of the Remuneration Committee of the Supervisory Board,

Arjen Dorland

Chair of the Remuneration Committee

Remuneration principles and policies

General

Our purpose – Banking for better, for generations to come – underpins the execution of our strategy and is based on three strategic pillars: customer experience, sustainability and future-proof bank. Through our purpose and strategy, we aim to create value for society, not only as a provider of financial services to our clients, but also as an employer. We therefore aim to create conditions in which all our employees can use their talents and develop or acquire the right skills to contribute to our goals. In striving to achieve a future-proof workforce, we also focus on an excellent employee experience and inspiring leadership, alongside efficient organisational structures, processes and IT systems that help our employees work more effectively. This report describes the remuneration policies, principles and remuneration elements for ABN AMRO as a whole, both within and outside the Netherlands.

Remuneration principles



Key in achieving a future-proof workforce is a remuneration framework that enables ABN AMRO to meet its responsibilities towards clients, society, employees, investors and other stakeholders, now and in the future. Our remuneration policy and principles are set out in the Global Reward Policy, which provides a framework for effectively managing reward and performance in relation to and in support of the purpose, business strategy, risk strategy, objectives, core values and long-term interests of the bank. The Global Reward Policy applies to all employees within

ABN AMRO and at all group companies, subsidiaries, branches, representative offices and legal entities inside and outside the Netherlands.

The Executive Board and Supervisory Board approve the Global Reward Policy and are responsible for its maintenance and implementation. The policy is reviewed regularly, taking into consideration the bank's strategy and desired culture, as well as factors such as risk awareness, targets, corporate values and any updates due to laws and regulations.

Composition of remuneration packages

ABN AMRO aims to award a remuneration package, aligned with the relevant (local) market. Outside the Netherlands, the package consists of an annual base salary (of which the ranges differ per country), annual variable remuneration and fringe benefits. Within the Netherlands, the remuneration package consists in general of an annual base salary, fringe benefits and a recognition premium governed by ABN AMRO's CLA. Variable remuneration is awarded for specific roles or in specific situations. Remuneration levels are positioned around the median of the relevant labour market, based on benchmarking, while keeping labour costs balanced.

Gender pay gap

The gender pay gap is the difference in average gross salaries between men and women. ABN AMRO calculates the unadjusted gender pay gap, as well as the gender pay gap corrected per job level (whereby each job level is linked to a salary scale), for its employees in the Netherlands. For ABN AMRO employees working in the Netherlands, the gender pay gap corrected per job level in 2024 amounted to 0.66% in favour of men (compared to 0.75% in 2023). The unadjusted gender pay gap (i.e. uncorrected per job level) in 2024 amounted to 14.9% in favour of men (compared to 16.0% in 2023). The unadjusted gender pay gap is mainly attributable to more men being in higher job level positions than women. ABN AMRO's unadjusted gender pay gap was slightly higher than the unadjusted gender pay gap in the Netherlands in 2024 of 11.6% (source: CBS). We will continue to focus on increasing gender diversity in higher job levels, enabling a reduction of the unadjusted gender pay gap. Our ambition is demonstrated by our D&I targets, which are set in our D&I policies for our entire workforce. With regard to the gender pay gap, reference is also made to the Our employees at a glance section in the Sustainability Statements of the Integrated Annual Report 2024, which contains the international bank-wide gender pay gap disclosure in line with the ESRS requirements.

Equal pay

We are committed to the principle of equal pay for equal work or work of equal value. The New Job Model (NJM) is our generic job profile methodology, which maps out all Dutch CLA jobs and is also implemented in other countries ABN AMRO operates in. Each NJM job profile has a job grade that is determined in line with the Hay methodology, which is recognised as a gender-neutral, objective and verifiable job-grading methodology. In the Netherlands, each job level at CLA and CLA+ level has its own salary scale. Our remuneration policy contains guidelines for various moments of remuneration, i.e. salary-setting for new hires, annual salary increases, incidental salary increases, promotion and variable remuneration. We periodically review the development of equal pay in our remuneration policies and practices, comparing salaries of men and women (at CLA and CLA+ level), as well as cultural background. This internal study shows a consistent practice of equal pay, as also confirmed by a gender pay gap (corrected per per job level) of less than 1%. The results of our 2024 internal study in the Netherlands were published on our website on 14 November 2024 (Equal Pay Day).

Employment conditions supporting environmental and social awareness

Sustainability is an important aspect of our strategy and purpose. That is why our employment conditions and practices aim to promote environmental and social awareness.

ABN AMRO's employment conditions promote and support social aspects of sustainability, such as the D&I policy and equal pay as mentioned above, but also social well-being and vitality inside and outside the office. Examples include the following (this list is non-exhaustive and may differ per country):

- the possibility of hybrid working and working from offices closer to home, thus contributing to reducing CO₂ emissions and helping to improve the work-life balance
- free public transport to encourage sustainable daily commuting

- bicycle scheme, a tax-friendly contribution for buying or leasing an electric or other bicycle so as to stimulate sustainable commuting, whereby a higher reimbursement per kilometre is set for travel by bicycle than for travel by car
- Banking for Better (B4B) days, giving staff the opportunity to take up to one week of B4B days to make a contribution to society
- cross-sector mobility to help staff transition to other sectors (such as the 'Bank voor de klas' programme, facilitating people who want to transfer from a bank job to a teaching job)
- reskilling and developing staff and making optimal use of in-house knowledge and experience in the organisation
- personal development budget, supporting staff employability now and in the future

Sustainable KPI-setting

Various forms of variable remuneration apply within ABN AMRO. The award of individually linked variable remuneration is based on the employee's performance on predefined KPIs set at the beginning of the year. For CLA+ and CLA Identified Staff, sustainability is directly included in these KPIs via the Sustainability Assets and climate strategy, while for CLA staff, sustainability is included in the calculation of the pool for discretionary variable remuneration. For the Executive Board, sustainability is taken into account via the Dow Jones Sustainability Index and climate strategy KPIs.

Performance management and KPI-setting

A performance management process is in place in order to pursue ABN AMRO's purpose and strategy by managing the employee's performance. Our performance management process helps us align our objectives with the bank's strategy, purpose and core values. It stimulates accountability, development and collaboration, and it is the basis for (variable) remuneration (where applicable). ABN AMRO's performance management process is called Together & Better and it applies to all employees globally, with an adjusted version for Identified Staff. Besides being a tool for steering performance, employees are encouraged to take control of their performance, development and careers in a mature employment relationship. As part of Together & Better, employees take the initiative to set objectives. It is the joint responsibility of the manager and the employee to agree on the applicable objectives. Within Together & Better, objectives are set around the themes of Results ('What is the deliverable of your work?'), Behaviour ('How do you perform your work?') and Development ('What talents do you want to develop?'). Employees are requested to align at least one objective to risk and compliance ('Banking licence'). Individual or team objectives must be related to purpose, strategy, business objectives and core values ('values@work'). Our performance management aims, where possible and relevant, to have a clear link between performance (including development and behaviour) and reward. The KPIs used are both financial and non-financial, as well as qualitative and quantitative.

Developments and business events in 2024

Collective Labour Agreements

In the Netherlands, ABN AMRO has two CLAs: the Employment Conditions CLA and the Social Plan. The Employment Conditions CLA applied from 1 July 2022 to 1 July 2024. In 2024, a new CLA was agreed, applying from 1 July 2024 until 1 July 2026. Its main elements are salary increases of 6% from 1 July 2024 and 3.75% from 1 July 2025. A recognition premium of 2.5% (good performance) or 5% (outstanding performance) was introduced (or 0% if performance is not up to standard). Employees who are not yet at the end of their salary scale will receive a fixed annual salary increase of 2.5% from 1 April (or the percentage up to the end of the salary scale, if less than 2.5%). In addition, a pay-per-use mobility scheme was introduced with effect from 1 January 2025, which allows employees to choose their means of transport on a daily basis, with a higher allowance for bicycle travel than for car travel. Employees also receive free public transportation throughout the Netherlands, both for work and private use. The Friday after Ascension Day has become a day off and full pay during sick leave has been extended from 6 months to 12 months. The employer contribution for the CDC pension scheme decreased to 24.5% and for the net pension agreement employer contribution is decreased to 23.75%. These new employer contributions will be applicable from 1 January 2025. In 2024, the Social Plan was extended from 1 January 2025 to 1 July 2026.

CLAs are also applicable in France, Germany and Belgium. In France, a new CLA was signed in December 2024, resulting in salary increases from 1 January 2025 for employees with at least one year of service. The salary increases vary from 1% to 2.5%, depending on the base salary (the lower the salary, the higher the salary increase). This new CLA also includes an increase in the monthly homeworking allowance (EUR 1 per month for each day per week worked from home), an increase in the employer's contribution to the employee savings plan (EUR 100 per year) and a

one-off agreement entailing the freezing of the cost increase in the mandatory health insurance scheme for 2025. In Germany, the trade unions agreed on a CLA for the banking industry that will apply from June 2024 until the end of September 2026 (28 months). Wages were increased by 5.5% from August 2024, and will be increased by 3% from August 2025 and by 2% from July 2026. The CLA for the German banking industry is not applicable to Corporate Banking and Clearing, which have discretionary salary increase arrangements. In Belgium, the annually agreed 'CLA 90' contains the conditions of the annual collective variable remuneration. The targets set are in line with the objectives of the Energy & Collaboration Plan and consist of targets for (i) financials, (ii) diversity, equity & inclusion and (iii) collaboration. The mandatory salary increases throughout 2024 amounted to a total of 3.52%.

Remuneration restrictions

Formal discussions take place with the regulator regarding alleged violations of remuneration restrictions for a number of employees. The regulator may impose financial penalties, but no formal decisions have been taken yet. ABN AMRO has presented facts and circumstances, as well as its views on the matters, to the regulator and is awaiting the decision of the regulator regarding possible regulatory measures. Currently, there is not yet any clarity as to whether the regulator will take enforcement measures, and the amounts involved cannot be reliably estimated.

Relevant regulatory developments

The rules applying to remuneration in the Dutch financial sector are mainly based on European rules that apply in all EU Member States. The Netherlands has opted for a wider scope of the remuneration rules and a variable remuneration cap of 20% (instead of the European cap of 100%), with some exceptions. The Dutch Financial Supervision Act (Wet op het financieel toezicht or 'Wft') sets additional requirements for variable remuneration, including a cap on variable remuneration, rules relating to retention payments, welcome and severance packages and publication obligations. The Act on Further Remuneration Measures (Wet nadere beloningsmaatregelen financiële sector) was implemented in the Dutch Financial Supervision Act as at 1 January 2023, with transition arrangements until 1 January 2024. The most important changes in this respect are the introduction of a retention period of 5 years for shares and comparable financial instruments, stricter application of the exception to deviate from the bonus cap (and the notification obligation), and the obligation to justify the balance between the remuneration and the position in society of financial institutions.

On 30 June 2022, the EBA published Guidelines on the remuneration benchmarking exercise and Guidelines for collecting data on high earners. Benchmarking data under the Guidelines on the remuneration benchmarking exercise was collected in 2024 for the financial year 2023.

Where necessary, ABN AMRO adjusts its remuneration policies to ensure compliance with applicable legislation and regulations, and requests shareholders' approval where required.

Forecast for 2025

Legislation expected in 2025

Various European sustainability-related regulations, guidelines and other publications, including requirements regarding the awarding of variable remuneration and the reporting on remuneration issues, have come into force in recent years or will come into force in 2025 and beyond. Examples include the Pay Transparency Directive, Taxonomy Regulation, Sustainable Finance Disclosure Regulation (SFDR), Corporate Sustainability Reporting Directive (CSRD), Capital Requirements Directive VI (CRD VI), Capital Requirements Regulation III (CRR III), European Banking Authority (EBA) guidelines and reports, European Central Bank (ECB) guidance and reports and the European Commission's proposals and delegated acts. The regulations with the most notable impact on our remuneration policies and reporting include the CSRD and the European Sustainability Reporting Standards (ESRS), which ABN AMRO has implemented in order to provide more transparency on its sustainability performance and which include specific provisions on incentive schemes and remuneration reports.

Remuneration for all staff and Identified Staff

Remuneration for all staff

In general, the remuneration packages for all staff are structured in accordance with the applicable remuneration regulations and restrictions applying to the financial sector. A remuneration package for all staff may consist of the following components (depending on local market practice):

- fixed remuneration
- variable remuneration
- pension contribution
- benefits and other entitlements

ABN AMRO takes into account relevant business dynamics (e.g. market conditions, local labour legislation and tax legislation) when deciding on the composition of remuneration packages. Globally, our variable remuneration is capped at 100% of fixed remuneration, whereas the Netherlands has capped variable remuneration at 20% of fixed remuneration, unless the average 20% exception is applicable.

The awarding of non-CLA performance-related variable remuneration is linked to the performance of the bank and the underlying client units and functions. The performance-related variable remuneration – including performance-related variable remuneration for Identified Staff – amounted to EUR 62 million in 2024 (2023: EUR 64 million). Due to the introduction of the CLA recognition premium of EUR 38 million in the Netherlands, the total amount for performance-related variable remuneration increased to EUR 100 million. Total retention payments in 2024 amounted to EUR 2 million (2023: EUR 13 million), whereby the decrease related mainly to completion of the wind-down of certain non-European Corporate Banking activities at the end of 2023. In addition, sign-on and buy-out payments in 2024 amounted to EUR 1 million (2023: EUR 1 million). Total variable remuneration awarded to all staff globally in 2024 (consisting of various types of variable remuneration, of which the relevant amounts are described above) amounted to EUR 103 million (2023: EUR 78 million).

Remuneration details of Identified Staff

Variable remuneration is awarded to Identified Staff in line with the terms and conditions of ABN AMRO's Variable Compensation Plan, which implements the applicable remuneration restrictions on variable remuneration. The variable remuneration is split into an upfront award of 60% and a deferred award of 40%. Deferred variable remuneration in the current Variable Compensation Plan (current version applicable since 29 December 2020) vests in equal instalments in the four years after the first payment. Both the upfront award and the deferred award consist of a 50% cash award and a 50% non-cash award. The instrument underlying the non-cash award consists of performance certificates, the value of which depends on the share price of ABN AMRO and therefore fluctuates in line with the market. The value of the performance certificates is paid out in cash. A one-year retention period applies to the non-cash award.

Malus assessment in 2024

ABN AMRO has several risk-mitigating measures in place that apply to variable remuneration. As part of our end-of-year process, an ex-ante and ex-post risk assessment are conducted. A malus (downward adjustment of variable remuneration that has not yet been paid out) and/or clawback (clawing back variable remuneration that has already been paid out) may be applied in full or partial. To this extent, the following criteria are used:

- failure to meet the appropriate standards of competence and correct behaviour (e.g. compliance with the principles of the Banker's Oath, internal procedures and policies, internal codes of conduct, relevant laws and regulations)
- a significant downturn in the financial performance of the institution or client unit/function (based on specific indicators)
- responsibility for conduct that has resulted in a considerable deterioration of the institution's financial position
- payment was based on incorrect information on the fulfilment of the criteria and/or conditions for payment
- a significant failure of risk management in the institution or client unit/function in which the Identified Staff member works
- significant changes in the institution's economic or regulatory capital base

The Executive Board and Supervisory Board decide on the application of a malus based on the advice of Risk, Compliance and Audit, with input from other ABN AMRO departments (such as HR and Finance).

The malus assessment for 2024 relates to the vesting of:

- the first tranche of deferred variable compensation for the 2023 performance period
- the second tranche of deferred variable compensation for the 2022 performance period
- the third tranche of deferred variable compensation for the 2021 performance period

- the fourth tranche of deferred variable remuneration for the 2020 performance period

The Supervisory Board concluded, after an assessment against the malus criteria set out above, that no situations had been identified that would justify application of a malus for the 2024 performance year.

Performance indicators for Identified Staff

The Together & Better performance management process has been slightly adjusted for Identified Staff (at CLA and CLA+ level) to meet specific legal requirements for this group. A specific KPI framework applies to Identified Staff (CLA and CLA+); this is linked to ABN AMRO's bank-wide strategic KPIs and has been approved by the Executive Board and Supervisory Board. As required by law, at least 50% of the targets are non-financial. For 2024, the group non-financial KPIs consisted of Sustainability Assets, the Climate Plan, Growth and the relational Net Promoter Score (rNPS). The group financial KPI was the cost/income ratio. The non-financial KPIs for the client units and functions were the results of the Employee Engagement Survey, Growth (i.e. growth of primary clients, for Personal & Business Banking) and rNPS, and the financial KPIs were the absolute cost base, Growth (growth in operating income or new assets, for Wealth Management and Corporate Banking), Segment ROE and Climate Plan. At individual level, objectives were set for results, behaviour and development. Identified Staff members receive a final performance score after each performance year, conveying the desired compliance and risk culture, which is taken into account at client unit/function and individual level. From a job level perspective, as specified in the table below, there are three groups of Identified Staff, each of which has its own KPI weight bandwidths and allocation between financial and non-financial KPIs.

Executive Board

Executive Board Remuneration Policy

The Executive Board Remuneration Policy is published on our website, was adopted by the Annual General Meeting on 24 April 2024 and took effect on 1 January 2024. The remuneration of the Executive Board is in line with this policy.

The 2024 Executive Board Remuneration Policy has an updated KPI framework to facilitate ABN AMRO's Executive Board composition and to further enhance the link with the current strategy and sustainability objectives. The KPI framework takes into account the composition of the Executive Board since 21 November 2021, when commercial roles were added to the Executive Board. Therefore, the former Executive Board Remuneration Policy did not include KPIs for commercial Executive Board positions that head the client units, which has been adjusted. In addition, weight bandwidths in the KPI framework have been amended, for example to allow for a higher weighting of sustainable long-term strategy related KPIs. The maximum 20% percentage for variable remuneration has been, in principle, maintained in the 2024 Executive Board Remuneration Policy. Currently, the bonus prohibition does not allow for the award of variable remuneration. If and when variable remuneration can be awarded, we will assess which amount of variable remuneration is justified, taking into account all restrictions with regard to remuneration.

The policy provides for a collective indexation of salaries for the Executive Board members in line with the CLA for the Dutch banking sector (CLA Banken).

The remuneration policy was established with due observance of the feedback received from internal and external stakeholders, including our Employee Council, various clients, the general public (via an IPSOS questionnaire), a representative number of shareholders and depositary receipt holders, NLFI, Eumedion, VEB and proxy advisor ISS, following constructive engagements. This approach enabled ABN AMRO to take into account the views of a broad range of stakeholder groups in a consultative capacity. The Chair of the Remuneration Committee was thus able to obtain valuable feedback and explore ways of implementing our new remuneration policy to address areas of concern. This is in line with our continued commitment to good governance.

Executive Board Remuneration Policy - scenario analyses

Scenario analyses of the possible outcomes of the variable remuneration components and their effect on the remuneration of the Executive Board are conducted in accordance with the Dutch Corporate Governance Code. In line with the Dutch Banking Code (Code Banken), the total target remuneration of the Executive Board members is set below the median of comparable positions in and outside the financial sector, taking into account the relevant international context.

The Supervisory Board notes that the total remuneration of the Executive Board is lagging behind the market. However, no adjustments can be made due to the bonus prohibition. As a result, the scenario analysis did not change this outcome. In light of this, further scenario analyses are considered less relevant.

The ongoing applicability of the fixed salary freeze and lack of variable remuneration due to the bonus prohibition may hamper the retention and future attraction of expert leaders (as well as other senior staff and other highly qualified employees). Upon establishing the 2024 Executive Board Remuneration Policy, a benchmark was performed against the relevant peer groups in and outside the financial sector.

The peer group is published on the ABN AMRO website. The benchmark confirms that there is a growing discrepancy between the current remuneration levels of the Executive Board and the relevant benchmarking populations. This is a matter of increasing concern for the Supervisory Board.

Contractual elements

All members of the Executive Board have a services agreement (overeenkomst van opdracht) with ABN AMRO for an unlimited period of time, which constitutes the contractual relationship between ABN AMRO and the Executive Board member. All Executive Board members are paid directly by ABN AMRO. The Executive Board member may terminate the agreement subject to a notice period of three months, whereas ABN AMRO must observe a notice period of six months. In the event of death or when the Executive Board member reaches the Dutch state pension age (AOW), the services agreement automatically ends by operation of law.

Fixed remuneration

As long as the Dutch State holds an interest in ABN AMRO, the Executive Board members (and a specific group of senior staff) are not entitled to any increases in their fixed salary other than the increases provided for in the CLA for the Dutch banking sector. The fixed remuneration of the Executive Board was raised by 4% from 1 January 2024, in line with the CLA for the Dutch banking sector.

From 1 January 2024 to 31 December 2024, the fixed remuneration was:

- Member of the Executive Board: EUR 704,175
(EUR 829,493 for the CEO).

Details of the remuneration of the individual members of the Executive Board are provided in Note 36 and Note 38 of the Consolidated Annual Financial Statements chapter in the Integrated Annual Report 2024.

Variable remuneration

Due to the above-mentioned bonus prohibition, the Executive Board members (and a specific group of senior staff) are not entitled to variable remuneration. As the bonus prohibition continued to apply in the 2024 performance year, the Executive Board did not receive any variable remuneration. The Executive Board members therefore received only their fixed remuneration.

Benefits

The Executive Board participates in ABN AMRO's pension schemes applicable to all employees in the Netherlands. For pensionable salary up to the applicable threshold, which for 2024 amounted to EUR 137,800, a collective defined contribution (CDC) pension scheme applies. The total pension contribution is 37%, of which 5.5% is an employee contribution. The intended pension accrual is 1.875%, based on a pension age of 68. In 2024, the pension accrual was 1.875%. For pensionable salary in excess of EUR 137,800, Executive Board members (just like employees of ABN AMRO) receive a net pension allowance that can be used to accrue a net pension in a group defined contribution (DC) plan. The net pension allowance amounted to 30% in 2024.

In addition to pension benefits, Executive Board members are eligible for benefits such as a company car or a chauffeur.

Severance

The remuneration policy for Executive Board members provides for a severance payment up to a maximum of one year's gross salary if their contract is terminated at ABN AMRO's initiative. The current Executive Board members all have the same contractual right to a severance payment equal to three months' gross fixed salary. No severance was

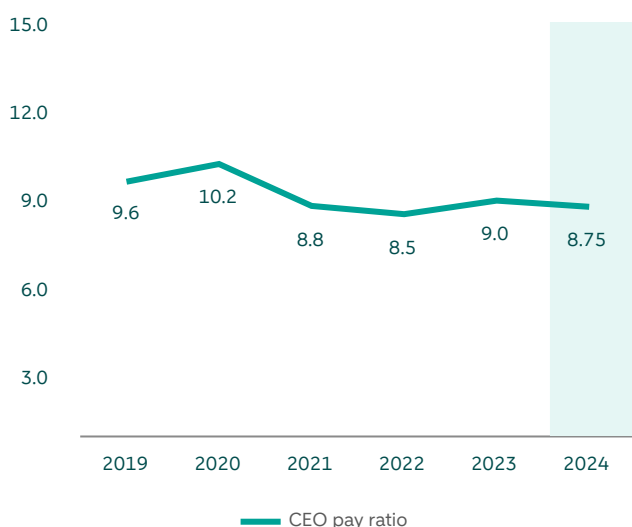
awarded to Executive Board members in 2024. As Tanja Cuppen announced that she would not be available for a third term of appointment, she was not entitled to a severance payment. In 2024, it was also announced that Robert Swaak will step down in 2025, and the relevant elements of the termination arrangements will be disclosed in the 2025 Remuneration Report.

Pay ratio

The pay ratio is the comparison between the total annual remuneration of the CEO and the average salary of all ABN AMRO employees. In line with our overall remuneration philosophy, we strive for a moderate pay ratio. The salary of our CEO does not fluctuate as it has been set in line with the Executive Board Remuneration Policy and does not contain any variable elements. The ratio of the mean annual employee remuneration and the total annual remuneration of the CEO has been calculated in line with the Corporate Governance Code 2022, excluding temporary agency workers and external contractors. The ratio in 2024 was 8.75. The ratio represents the CEO's total remuneration, including pension costs and social security charges, divided by the mean employee remuneration including pension costs and social security charges during 2024. The average annual remuneration of the employees is determined by dividing the total wage costs in the financial year (as included in the consolidated financial statements) by the average number of FTEs during the financial year. Our employees at a glance section in the Sustainability Statements of the Integrated Annual Report 2024.

Since 2021, in line with the Guidance from the Corporate Governance Code Monitoring Committee, social security charges have been taken into account, whereas these charges were not taken into account in previous years. The pay ratio at ABN AMRO is substantially lower than in other AEX and AMX companies, but it is considered to be a correct reflection of ABN AMRO's current position, also considering the specific remuneration restrictions that are applicable. The ABN AMRO ratios published in 2019, 2020, 2021, 2022 and 2023 were 9.6, 10.2, 8.8, 8.5 and 9.0, respectively. In the Our employees at a glance section in the Sustainability Statements, the pay gap in line with the ESRS requirements is included.

CEO pay ratio



2024 Performance of the Executive Board

Although no variable remuneration is awarded, a KPI framework is used to assess the performance of the Executive Board. The annual KPI framework for the Executive Board is approved by the Supervisory Board. The performance criteria for Executive Board members are based on financial and non-financial measures at organisational, client unit/function and individual level, as set out in the Executive Board Remuneration Policy. The performance criteria and targets reflect and contribute to key elements of ABN AMRO's strategy and sustainable long-term value creation, especially Sustainability and Licence to Operate. Annual targets are set for all KPIs. The KPI setting is in line with the legal requirement to have at least 50% non-financial KPIs.

In consultation with all relevant ABN AMRO departments, the Supervisory Board continually monitors and assesses the Executive Board members' performance on these KPIs and the targets set.

KPI-setting and performance

In 2024, all the financial KPIs were focused on sustainable long-term profitable growth, a healthy balance of capital and the need to control our costs in order to be sustainable. The scores are given within a 1-5 bandwidth, with a score of 1 being the lowest score, a score of 3 being defined as 'meets requirements' and a score of 5 being the highest score.

At an organisational level, the targets for the financial KPIs (ROE and cost/income ratio) were exceeded. The non-financial KPIs were Sustainability (DJSI and Climate Plan), Employee Engagement and Risk & Regulatory (Licence to Operate). The KPI for Sustainability and its targets and measures are linked to the Climate Plan and the S&P Global ESG Dow Jones Sustainability Index (DJSI). The DJSI tracks the sustainability performance of leading companies per sector.

Our result on the DJSI indicates to which extent ABN AMRO deviates from the industry leader, which was 20% in 2024. This places us in the top 20% but also quite far from our ambitious target of scoring within 5% of the industry leader. This resulted in a score of 1. Since we set this target in 2018, we have noticed increased attention for sustainability performance in the sector, which has made it a more challenging KPI for us. The performance of the Executive Board is also assessed against the Climate Plan, which includes targets on carbon footprint reduction. Targets for this KPI were exceeded, which led to a score of 5.

The KPI for Employee Engagement and its targets and measures are linked to the results obtained in the relevant annual employee engagement survey and focused on both short- and long-term achievements.

The bank-wide Employee Engagement score of 82% resulted in a score of 3, compared with a score of 4 in 2023 (82% score). The KPI for Risk & Regulatory (Licence to Operate) means actively conveying the desired compliance and risk culture, effective risk management and solution management. This target was exceeded, resulting in a score of 4. The underlying targets of the KPI have largely been achieved. These targets have been drawn up to address the regulatory challenges the bank currently faces, and also employee regulatory compliance.

At a client unit/function level, strict targets have been set to reduce costs. On average, the predefined financial targets were exceeded in 2024. Employee Engagement is measured at a client unit and function level, with an average score of 3 in 2024. With respect to the Growth score, the average score on organisational level was 4. At an individual level, KPIs are set with regard to individual objectives on strategic themes, Behaviour and Risk & Regulatory (Licence to Operate). The average individual score of all Executive Board members was 3.

The overall assessment of the Supervisory Board is that, on average, all members of the Executive Board had good overall performance ratings in 2024. Nevertheless, the Supervisory Board expects enhanced focus from the Executive Board on risk and regulatory topics in 2025.

Supervisory Board

Supervisory Board remuneration policy

The 2024 Supervisory Board Remuneration Policy is published on our website and was adopted by the Annual General Meeting on 24 April 2024 and took effect on 1 January 2024.

The 2024 Supervisory Board Remuneration Policy continues the approach of the 2020 Supervisory Board Remuneration Policy for fixed and variable remuneration, in line with the applicable Remuneration Restrictions. The principles of the Supervisory Board Remuneration Policy are based on the remuneration principles in our Global Reward Policy that applies to all employees within ABN AMRO as a whole. Our Global Reward Policy is designed to support the bank's strategy, objectives, values and long-term interest as explained above in the chapter on Remuneration principles and Policies. The Supervisory Board Remuneration Policy takes into account the special position which Supervisory Board members have in a two-tier board.

There is one significant change compared with the 2020 Remuneration Policy, which is that the self-imposed limitation on the reimbursement of a maximum of two committee memberships has been changed to a maximum of three committee memberships. The self imposed limitation on the reimbursement of two committee memberships was no longer considered to be market practice. In addition, the Supervisory Board established a separate committee focusing on sustainability, which advises the Supervisory Board on matters within its area of responsibility and

prepares the decisions of the Supervisory Board on such matters. The Sustainability Supervisory Committee for instance plays a key role in monitoring sustainability-focused business development initiatives and the effective and timely execution of ESG related plans within ABN AMRO. The establishment of the additional Supervisory Board Committee means an increase of time spent on participation in the committee for each member. The remuneration of the Supervisory Board is set in line with the Supervisory Board Remuneration Policy by determining the applicable amounts within the bandwidths of the Supervisory Board Remuneration Policy. Consequently, a 4% indexation of the annual fees was applied with effect from 1 January 2024, in accordance with the CLA for the banking sector.

Fixed remuneration

The annual fees from 1 January 2024 until 31 December 2024 were as follows:

- Member of the Supervisory Board: EUR 61,441 (EUR 79,873 for the Chair)
- Member of a Committee: EUR 15,360 (EUR 18,432 for the Chair)

ABN AMRO pays its Supervisory Board members directly and does not grant any variable remuneration or equity to Supervisory Board members. Supervisory Board members are appointed by the General Meeting upon nomination by the Supervisory Board. The initial appointment period is four years unless a shorter period is set at the time of appointment. Supervisory Board members can be reappointed.

Stakeholder views

Annual General Meeting 2024

During the Annual General Meeting of 24 April 2024, the 2023 remuneration report was put to an advisory vote, with 98.36% of the votes cast being in favour of a positive advice. ABN AMRO was pleased to note the positive advisory vote on the 2023 remuneration report and aims to continue meeting shareholders' expectations in this regard.

Employee Council in 2024

In addition to the Central Employee Council, employee participation consists of a Commercial Council for the three client units, an Enabler Council for the other parts of the Dutch banking business, and several Employee Councils or Committees for the subsidiaries and other countries.

Staff in the Netherlands, Belgium, Germany, France and the United Kingdom are also represented in the European Staff Council, which is a forum for information, consultation and dialogue on questions of an economic, financial and social nature that, due to their strategic importance or European character, are of interest to all establishments of ABN AMRO or its subsidiaries.

The Employee Councils within ABN AMRO have an appointment term of three years. The current members have been appointed until 1 July 2026. Due to retirements and job changes, mid-term elections have been held for the Commercial Council and ICS.

In 2024, the Dutch Employee Councils received a total of 14 requests for advice, 3 requests for consent, 5 information memoranda and 2 notifications. The requests for advice from the Central Employee Council related to subjects such as the proposed appointments of the new CRO Serena Fioravanti and the intended nomination of the new CEO Marguerite Bérard.

Additional Pillar 3 disclosures

In 2024, ABN AMRO received external advice on the remuneration policies for the Executive Board and Supervisory Board in preparation for the submission of these policies to the Annual General Meeting in 2025. In addition, as part of normal day-to-day business with regard to application of the remuneration framework, legal advice has been obtained from a law firm specialised in remuneration restrictions for financial institutions. This law firm is commissioned for advice, whenever needed, by the HR and Legal departments. In addition, job grading – also as part of normal day-to-day business – took place with regard to new or changed positions. In line with our Global Reward Policy, ABN AMRO requires performance criteria for employees in control functions to be unrelated to the business unit they oversee.

EU REM1 - Remuneration awarded for the financial year

2024

The total variable remuneration consists of different elements, including sign-on, severance payments and profit sharing (France). In 2024, the total amount of EUR 13,425 thousand includes sign-on (EUR 204 thousand), severance payments (EUR 2,423 thousand) and profit sharing (EUR 51 thousand). The sign-on, severance payments and profit sharing are due to their specific nature paid out directly in cash and therefore not granted in line with the terms and conditions of ABN AMRO's Variable Compensation Plan, which implements the applicable remuneration restrictions on variable remuneration.

2023

The total variable remuneration consists of different elements, including sign-on, severance payments and profit sharing (France). In 2023, the total amount of EUR 15,604 thousand included sign-on (EUR 125 thousand), severance payments (EUR 4,063 thousand) and profit sharing (EUR 90 thousand). The sign-on, severance and profit sharing are paid out directly in cash and therefore not granted as a share-linked instrument. The remaining amount EUR 11,326 thousand was subject to deferrals. From these deferrals, 50% was non-cash as a share-linked instrument, resulting in an amount of EUR 2,265 thousand.

(in thousands)	31 December 2024				31 December 2023			
	A	B	C	D	E	F	G	H
	MB Supervisory function	MB Management function	Other senior management	Other identified staff	MB Supervisory function	MB Management function	Other senior management	Other identified staff
Fixed remuneration								
1 Number of identified staff ¹	8	9	5	358	9	10	5	318
2 Total fixed remuneration	778	8,253	2,829	87,497	683	7,056	2,658	82,342
3 Of which: cash-based	778	6,497	2,193	70,732	683	5,520	2,057	66,620
EU-4a Of which: shares or equivalent ownership interests								
5 Of which: share-linked instruments or equivalent non-cash instruments								
EU-5x Of which: other instruments								
7 Of which: other forms		1,756	636	16,765		1,536	601	15,722
Variable remuneration								
9 Number of identified staff				312				178
10 Total variable remuneration				13,451				15,604
11 Of which: cash-based				8,065				9,941
12 - of which deferred				2,154				2,265
EU-13a Of which: shares or equivalent ownership interests								
EU-14a - of which deferred								
EU-13b Of which: share-linked instruments or equivalent non-cash instruments				5,386				5,663
EU-14b - of which deferred				2,154				2,265
EU-14x Of which: other instruments								
EU-14y - of which deferred								
15 Of which: other forms								
16 - of which deferred								
17 Total remuneration (2 + 10)	778	8,253	2,829	100,948	683	7,056	2,658	97,946

The number of identified staff is defined as the number of FTE throughout the year.

EU REM2 - Special payments to staff whose professional activities have a material impact on institutions' risk profile (identified staff)

	A	B	C	D	E	F	G	H
	31 December 2024				31 December 2023			
	MB Supervisory function	MB Management function	Other senior management	Other identified staff	MB Supervisory function	MB Management function	Other senior management	Other identified staff
(in thousands)								
Guaranteed variable remuneration awards								
1 Guaranteed variable remuneration awards - Number of identified staff								
2 Guaranteed variable remuneration awards - Total amount								
3 - of which guaranteed variable remuneration awards paid during the financial year, that are not taken into account in the bonus cap								
Severance payments awarded in previous periods, that have been paid out during the financial year								
4 Severance payments awarded in previous periods, that have been paid out during the financial year - Number of identified staff				7		1		4
5 Severance payments awarded in previous periods, that have been paid out during the financial year - Total amount				1,908		169		709
Severance payments awarded during the financial year								
6 Severance payments awarded during the financial year - Number of identified staff				8				8
7 Severance payments awarded during the financial year - Total amount				961				3,185
8 - of which paid during the financial year				515				3,185
9 - of which deferred								
10 - of which severance payments paid during the financial year, that are not taken into account in the bonus cap								
11 - of which highest payment that has been awarded to a single person ¹				281		169		675

1. Data point 11 was previously omitted. This data point is now added, also for historical figures.

EU REM3 - Deferred remuneration

	A	B	C	D	E	F	G	H
	31 December 2024							
	Total amount of deferred remuneration awarded for previous performance periods	Of which: due to vest in the financial year	Of which: vesting in subsequent financial years	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the financial year	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in future performance years	Total amount of adjustment during the financial year due to ex post implicit adjustments (i.e. changes of value of deferred remuneration due to the changes of prices of instruments)	Total amount of deferred remuneration awarded before the financial year actually paid out in the financial year	Total of amount of deferred remuneration awarded for previous performance period that has vested but is subject to retention periods
(in thousands)								
1 MB Supervisory function								
2 Cash-based								
3 Shares or equivalent ownership interests								
4 Share-linked instruments or equivalent non-cash instruments								
5 Other instruments								
6 Other forms								
7 MB Management function	20	14	6			2	13	7
8 Cash-based								
9 Shares or equivalent ownership interests	20	14	6			2	13	7
10 Share-linked instruments or equivalent non-cash instruments								
11 Other instruments								
12 Other forms								
13 Other senior management	189	82	107			11	79	29
14 Cash-based	62	23	39				23	
15 Shares or equivalent ownership interests	19	13	6			2	12	5
16 Share-linked instruments or equivalent non-cash instruments	108	46	62			10	44	24
17 Other instruments								
18 Other forms								
19 Other identified staff	21,041	7,578	13,463			1,192	8,222	4,302
20 Cash-based	7,886	3,621	4,265				3,621	
21 Shares or equivalent ownership interests	1,825	1,274	551			159	1,172	551
22 Share-linked instruments or equivalent non-cash instruments	11,329	2,683	8,646			1,032	3,429	3,751
23 Other instruments								
24 Other forms								
25 Total amount	21,250	7,674	13,576			1,205	8,314	4,338

	A	B	C	D	E	F	G	H
	31 December 2023							
(in thousands)	Total amount of deferred remuneration awarded for previous performance periods	Of which due to vest in the financial year	Of which vesting in subsequent financial years	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in the financial year	Amount of performance adjustment made in the financial year to deferred remuneration that was due to vest in future performance years	Total amount of adjustment during the financial year due to ex post implicit adjustments (i.e. changes of value of deferred remuneration due to the changes of prices of instruments)	Total amount of deferred remuneration awarded before the financial year actually paid out in the financial year	Total of amount of deferred remuneration awarded for previous performance period that has vested but is subject to retention periods
1 MB Supervisory function								
2 Cash-based								
3 Shares or equivalent ownership interests								
4 Share-linked instruments or equivalent non-cash instruments								
5 Other instruments								
6 Other forms								
7 MB Management function	47	27	20			1	25	14
8 Cash-based	7	7					7	
9 Shares or equivalent ownership interests	40	20	20			1	18	14
10 Share-linked instruments or equivalent non-cash instruments								
11 Other instruments								
12 Other forms								
13 Other senior management	259	106	153			5	121	59
14 Cash-based	95	51	44				51	
15 Shares or equivalent ownership interests	37	18	19			1	17	13
16 Share-linked instruments or equivalent non-cash instruments	127	37	90			4	53	46
17 Other instruments								
18 Other forms								
19 Other identified staff	19,395	8,419	10,976			408	8,921	3,980
20 Cash-based	6,453	3,242	3,211				3,242	
21 Shares or equivalent ownership interests	4,066	2,232	1,834			107	1,921	1,282
22 Share-linked instruments or equivalent non-cash instruments	8,876	2,945	5,931			301	3,758	2,698
23 Other instruments								
24 Other forms								
25 Total amount	19,701	8,552	11,149			414	9,067	4,053

EU REM4 - Remuneration of EUR 1 million or more per year

	A	B
	31 December 2024	31 December 2023
(in units)	Identified staff that are high earners as set out in Article 450(i) CRR	Identified staff that are high earners as set out in Article 450(i) CRR
1 EUR 1,000,000 to below EUR 1,500,000	1	3
2 EUR 1,500,000 to below EUR 2,000,000		2
3 EUR 2,000,000 to below EUR 2,500,000		1
4 EUR 2,500,000 to below EUR 3,000,000		
5 EUR 3,000,000 to below EUR 3,500,000		
6 EUR 3,500,000 to below EUR 4,000,000		
7 EUR 4,000,000 to below EUR 4,500,000		
8 EUR 4,500,000 to below EUR 5,000,000		
9 EUR 5,000,000 to below EUR 6,000,000		
10 EUR 6,000,000 to below EUR 7,000,000		
11 EUR 7,000,000 to below EUR 8,000,000		

EU REM5 - Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff)

	A	B	C	D	E	F	G	H	I	J
				31 December 2024						
	Management body remuneration			Business areas						
(in thousands)	MB Super- visory function	MB Manage- ment function	Total MB	Invest- ment banking	Retail banking	Asset manage- ment	Corporate functions	Indepen- dent internal control functions	All other	Total
1 Total number of identified staff										380
2 - of which members of the MB	8	9	17							
3 - of which other senior management										
4 - of which other identified staff				95	94		61	113		
5 Total remuneration of identified staff	778	8,253	9,031	34,626	24,262		20,952	23,936		
6 - of which variable remuneration				6,207	3,160		2,913	1,170		
7 - of which fixed remuneration ¹	778	8,253	9,031	28,419	21,102		18,039	22,766		

1. The severance payment is included in fixed remuneration.

	A	B	C	D	E	F	G	H	I	J
				31 December 2023						
	Management body remuneration			Business areas						
(in thousands)	MB Super- visory function	MB Manage- ment function	Total MB	Invest- ment banking	Retail banking	Asset manage- ment	Corporate functions	Indepen- dent internal control functions	All other	Total
1 Total number of identified staff										342
2 - of which members of the MB	9	10	19							
3 - of which other senior management								5		
4 - of which other identified staff				90	76		66	86		
5 Total remuneration of identified staff	683	7,225	7,908	39,536	22,674		20,832	17,393		
6 - of which variable remuneration		169	169	9,348	3,567		2,248	272		
7 - of which fixed remuneration ¹	683	7,056	7,739	30,187	19,107		18,584	17,121		

1. The severance payment is included in fixed remuneration.

6. Encumbered and unencumbered assets

Encumbered and unencumbered assets

EU AE1 - Encumbered and unencumbered assets

		A	B	C	D	E	F	G	H
		31 December 2024							
(in millions)		Carrying amount of encumbered assets	Of which: notionally eligible EHQLA and HQLA	Fair value of encumbered assets	Of which: notionally eligible EHQLA and HQLA	Carrying amount of unencumbered assets	Of which: EHQLA and HQLA	Fair value of unencumbered assets	Of which: EHQLA and HQLA
010	Assets of the reporting institution	58,177	6,375			336,481	79,188		
030	Equity instruments	2	2	2	2	936		936	
040	Debt securities	6,495	6,374	6,495	6,288	45,264	42,898	45,264	42,898
050	- of which covered bonds	152	131	152	131	5,875	5,560	5,875	5,560
060	- of which securitisations								
070	- of which issued by general governments	6,303	6,182	6,303	6,182	30,268	29,009	30,268	29,009
080	- of which issued by financial corporations	290	254	290	254	10,566	9,294	10,566	9,294
090	- of which issued by non-financial corporations					176	15	176	15
120	Other assets	51,681				290,281	36,291		

		31 December 2023							
010	Assets of the reporting institution	66,412	6,497			331,282	90,698		
030	Equity instruments	2	2	2	2	755		755	
040	Debt securities	6,538	6,495	6,538	6,495	32,512	30,698	32,512	30,698
050	- of which covered bonds	147	116	147	116	4,652	4,354	4,652	4,354
060	- of which securitisations								
070	- of which issued by general governments	6,458	6,415	6,458	6,415	23,838	23,189	23,838	23,189
080	- of which issued by financial corporations	125	125	125	125	8,439	7,443	8,439	7,443
090	- of which issued by non-financial corporations					166	14	137	14
120	Other assets	59,872				298,014	60,001		

EU AE2 - Collateral received and own debt securities issued

	A	B	C	D
	31 December 2024			
	Fair value of encumbered collateral received or own debt securities issued	Of which: notionally eligible EHQLA and HQLA	Unencumbered: Fair value of collateral received or own debt securities issued available for encumbrance	Of which: EHQLA and HQLA
(in millions)				
130 Collateral received by the disclosing institution	43,272	38,048	35,993	30,908
140 Loans on demand				
150 Equity instruments	23,731	19,915	19,952	16,271
160 Debt securities	19,221	18,315	16,089	14,645
170 - of which covered bonds	1,746	1,732	720	720
180 - of which securitisations	3,351	3,351		
190 - of which issued by general governments	12,739	12,689	13,158	12,423
200 - of which issued by financial corporations	5,698	4,946	2,153	1,790
210 - of which issued by non-financial corporations	469	394	777	432
220 Loans and advances other than loans on demand				
230 Other collateral received	229		565	
240 Own debt securities issued other than own covered bonds or securitisations				
241 Own covered bonds and securitisation issued and not yet pledged				
250 Total, collateral received and own debt securities issued	102,504	39,979		

	31 December 2023			
130 Collateral received by the disclosing institution	42,671	35,773	29,963	23,683
140 Loans on demand				
150 Equity instruments	20,259	15,075	15,899	11,516
160 Debt securities	21,905	20,179	13,793	12,097
170 - of which covered bonds	1,827	1,812	162	162
180 - of which securitisations	5,580	5,105	75	6
190 - of which issued by general governments	16,194	15,641	11,511	10,831
200 - of which issued by financial corporations	5,766	4,955	1,165	838
210 - of which issued by non-financial corporations	309	270	653	190
220 Loans and advances other than loans on demand				
230 Other collateral received	93		64	
240 Own debt securities issued other than own covered bonds or securitisations				
241 Own covered bonds and securitisation issued and not yet pledged				
250 Total, collateral received and own debt securities issued	109,083	42,270		

EU AE3 - Sources of encumbrance

	A	B	C	D
	31 December 2024		31 December 2023	
	Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered	Matching liabilities, contingent liabilities or securities lent	Assets, collateral received and own debt securities issued other than covered bonds and securitisations encumbered
(in millions)				
1 Carrying amount of selected financial liabilities	42,161	62,156	49,546	74,012

EU AE4 - Accompanying narrative information

Encumbered assets are assets pledged or assets subject to any arrangement aimed at securing funding, collateralising or credit enhancing a transaction on condition that they cannot be withdrawn freely.

The asset encumbrance report provides insight into the on- and off-balance sheet collateral used for funding or other purposes. Encumbered assets on the bank's balance sheet consist primarily of mortgages, which are used in the cover pool for the external covered bond programme and the retained covered bond programme. Retained covered bonds can be pledged as collateral, e.g. for participation under central bank programmes, and can be used in securities financing transactions.

Mortgages underlying retained covered bonds which are not used as collateral are not considered to be encumbered and, as a consequence, the retained notes are part of the liquidity buffer. External and retained covered bonds involve over-collateralisation in their cover pool, meaning that the volume of encumbered mortgages exceeds the notional principal of the covered bond. Assets are also encumbered as a result of cash and securities posted as margin under derivative and clearing transactions, as well as when collateral is pledged for collateral swap transactions with bilateral counterparties. Repurchase agreements and activities related to securities lending also result in encumbrance of assets, but these transactions are largely conducted using securities received in reverse repurchase or collateral swap transactions. These received securities are not recognised on the balance sheet and are considered part of the off-balance sheet collateral, available for encumbrance. As part of its overall liquidity and funding planning framework, over-reliance on secured funding is monitored and controlled through a Risk Appetite Statement on the overall level of on-balance encumbrance.

The average on-balance sheet asset encumbrance ratio for 2024 was 14.8% (2023: 16.9%). This decrease is mainly related to the repayment of TLTRO, with the final repayment in June 2024.

7. ESG disclosures

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

Basis of preparation

This disclosure is prepared based on the Sustainability statements in our Integrated Annual Report 2024. Results of our double materiality assessment (DMA) constitutes the backbone of the disclosures.

Our materiality assessment

We conduct multiple materiality assessments, each serving distinct yet interconnected purposes. These include:

- the Integrated Reporting (IR) materiality assessment,
- the European Sustainability Reporting Standards (ESRS) materiality assessment,
- the European Central Bank (ECB) climate-related and environmental risks (CER) materiality assessment as integrated in the Enterprise Risk Management framework.

Each of these assessments has its own specific methodology, which we explain in detail below. This year, the ECB Guide CER materiality assessment has been integrated into the ESRS materiality assessment. To advance our ESG risk management practices and comply with the expectations of the ECB Guide on CER we made many improvements in 2024, for example in the Environmental and Social Heatmaps, the CASY tool for client assessment and the risk appetite framework.

The 2024 CER materiality assessment results fed into the double materiality assessment as financial materiality input.

Time horizons

We assess material impacts, risks and opportunities 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 impacts, risks and opportunities in the Sustainability Statements, 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 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.

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 that 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. We aim to be transparent in our disclosures on 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

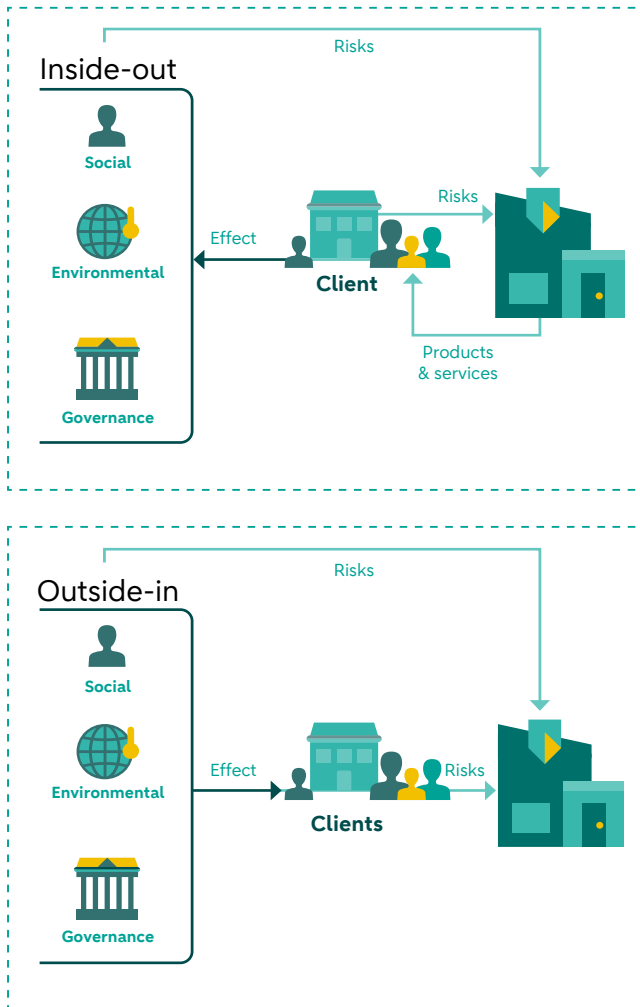
Sustainability risk is defined in our risk taxonomy and sustainability risk policy as the risk that Environmental, Social or Governance-related (ESG) factors have a negative financial and/or non-financial impact on ABN AMRO or the wider society, either directly or via other risk types. As sustainability 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 by which sustainability risk affects the bank's individual clients, resulting in financial risks for ABN AMRO.
- Macroeconomic transmission channels are causal chains by 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

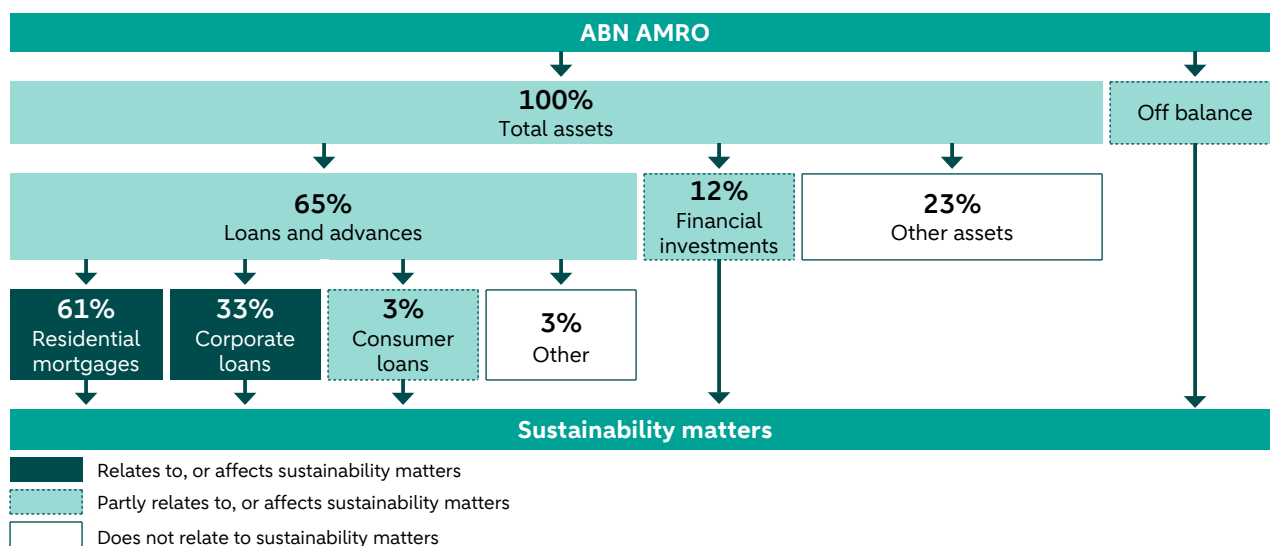
Sustainability in relation to our strategy and business model

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 Sustainability 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 are made regarding, for example, privacy, financial inclusion and access to services. This is described in more detail in the Social section of the Integrated Annual Report 2024.

Linking our business model to sustainability matters



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 CSRD.

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 DMA assessment (such as climate change and circular economy), but was not developed for the purpose of measuring the progress of the identified material matters and should not be considered a metric under ESRS. The value of SAS as a KPI is that it aims to enable and stimulate clients (and bankers) in their transition to become more sustainable.

ABN AMRO does not solely steer its sustainability efforts on SAS. We have also set climate targets to reduce our impact on climate, and are working to identify impact-related metrics for other material matters.

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 first 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

ABN AMRO's strategy incorporates the material matters identified in the DMA through three focus areas: climate, nature and social impact. Since no new material matters were identified, and no previously identified matters lost their relevance, the 2024 outcomes confirmed the relevance of our current focus areas, requiring no immediate adjustments to our approach. In the following sections we explain how each material topic impacts ABN AMRO and 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 ER and other risks over

a five-year horizon, concluding that the effects are well within our loss-absorbing capacity. This confirms 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.

Current and anticipated effects of impacts

Climate and environmental effects

ABN AMRO primarily impacts the environment through its clients. These impacts include climate change, air and water pollution, biodiversity loss and challenges related to the circular economy, each of which can have cascading effects. Most environmental effects arise from the financing, investment products and other services we provide, while our own operations have a very small environmental footprint. As we finance a diverse range of economic activities, describing the effect, or potential effect, of material matters on people and the environment in a comprehensive way is challenging. For example, climate change may lead to short-term economic costs through more frequent and severe extreme weather events. These economic costs can further increase in the long term due to persistent climate change impacts, including further temperature rise, glacial and ice sheet melting and ocean acidification. Air pollution can harm ecosystems, contribute to respiratory and chronic diseases and reduce agricultural yields.

ABN AMRO strives to be its clients' first-choice partner in sustainability by offering financing and expertise to support their transition to more sustainable business models. We also align our operations and client engagement with climate and environmental objectives.

Social effects

The bank's approach to social impact aims to foster equality and protect human rights. We address social impacts both within our operations and through our clients' activities. ABN AMRO recognises the positive and negative effects of social impacts; for example, equal treatment and opportunities for all can have positive effects such as improved team dynamics, but also negative effects such as mental health strains if treatment is perceived as unequal.

ABN AMRO has launched various initiatives to enhance workplace inclusivity and contribute to broader societal goals. We integrate social considerations into our operations to create a more inclusive and resilient bank. These efforts include initiatives targeting diverse groups, such as women, individuals from minority cultural or ethnic backgrounds, people with disabilities, asylum seekers with refugee status, different generations and the LGBTIQ+ community. Activities focusing, for example, on neurodiversity and our Reboot and B-able programmes reflect our objectives in these respects. More details can be found in the Social section of the Sustainability statements chapter in Integrated Annual Report 2024.

Current and anticipated effects of risks and opportunities

The DMA also highlighted significant climate-related opportunities. The energy transition requires substantial early-stage capital, with ABN AMRO planning to allocate up to EUR 1 billion by 2030 through direct equity, fund investments and hybrid debt. In addition, ABN AMRO aims to increase its lending exposure to renewable energy and decarbonisation technologies to EUR 10 billion by 2030.

Risk management of sustainability matters

Sustainability risk management framework relating to ABN AMROs 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 and 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 such 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 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 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 Framework into practice by outlining the main principles and requirements for managing the sustainability risks adversely impacting ABN AMRO in relation to our clients (new and existing) for the duration of their lifecycle (i.e. from client acceptance, through ongoing due diligence and 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 of 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 of their impact 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 United Nations (UN) Guiding Principles on Business and Human Rights (UNGPs) and the Organisation for Economic Co-operation and Development (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 Corporate Sustainability Reporting Directive (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 the setting of 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 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)

The risk identification part of the ERM cycle relies to a large extent on our Environmental and Social Risk heatmaps. These heatmaps inform, for example, the CER materiality assessment, the CER stress testing and the 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.

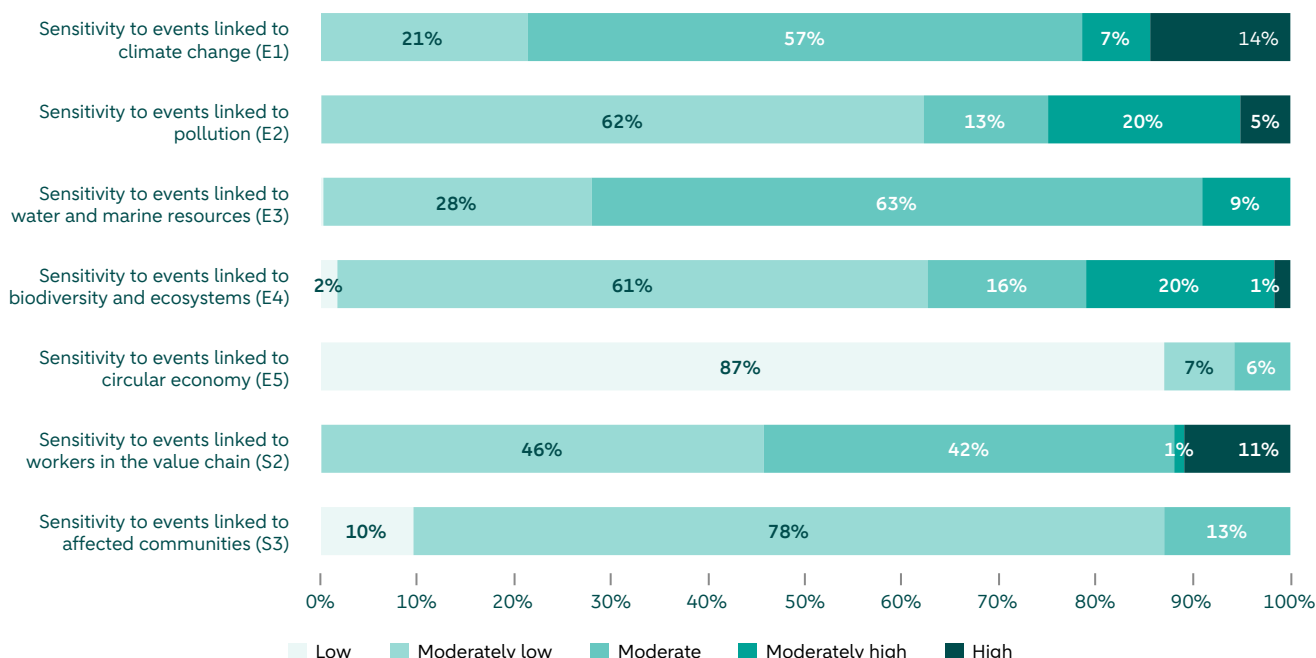
The Environmental and Social Risk heatmaps identify sub-sectors' inherent sensitivity to sustainability events. These are sub-sectors in which we operate through our corporate lending and residential real estate portfolios (i.e. business environment). The business environment is analysed under both a sectoral lens (64 distinct sub-sectors) and a geographical lens (regions and countries to which we have exposure, either directly or through sub-sectors' 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 heatmap below shows an aggregated¹ score of negative impact, transition risk and physical risk scores in order to provide an overview of sensitivities across sectors broken down by topic.

¹ The aggregated score takes into account the following factors for each topic: negative impact, transition risk and physical risk. We then use the most sensitive factor (i.e. most conservative approach) for our heatmaps.

Overview of environmental and social risk heatmaps for corporate loans^{1,2}



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. In 2024, climate scenario analyses were performed for 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: sustainability risk of corporate clients is assessed using (i) the Client Assessment on Sustainability (CASY) questionnaire (if they have a lending relationship above EUR 1 million), which addresses clients' compliance with the bank's Sustainability Risk Framework; (ii) the Transition Readiness Assessment (TRA), which focuses on sectors and clients in scope of our climate strategy and measures clients' maturity in terms of transition readiness; and (iii) the Climate and Environmental Risk Classification Tool (RCT), which focuses on corporate clients with non-programme lending and classifies clients based on their vulnerability to climate and environmental risks. The CASY and RCT output are included in the credit risk assessment, second-line validation and credit risk decision.

In addition, we made further enhancements during 2024 to our CASY tool, which applies to corporate clients seeking loan financing. This tool is used in the first line of defence to assess these corporate clients' ESG performance against our Generic Principles, which have been translated into requirements for corporate clients in sectors with a higher risk sensitivity. The substantial enhancements made to our CASY tool in 2024 have allowed us to improve our sector-specific view on potential ESG risks and also to have a better-informed assessment of clients' performance against risks seen in every sector.

Based on the improved methodology, sectors have been assigned a risk level across six different ESG themes (such as environmental and social impact) ranging from low to high risk. Social risk for some sectors can be low, while climate or environmental risks may be high. Based on the risk level across the six ESG themes, our corporate clients are

¹ These values take into account the negative impact of each individual ESG topic relative to the other ESG matters shown in the table, enabling cross-topic comparison. For topics E1 to E4, this takes into account sensitivity to transition and physical risks. For E5, S2 and S3, this takes into account sensitivity of negative impact related to transition risks.

² E3 and S3 are included in this overview as they were part of our identification process, but in the subsequent double materiality assessment these topics were assessed not to be material for ABN AMRO.

expected to have risk mitigants, policies and measures in place appropriate to the assigned risk level. This means we expect better performance from clients where a certain ESG risk is deemed high. If we believe a corporate client is not performing in line with what we regard as appropriate for the identified risk levels, we will consider engaging with the client in order to seek to improve its performance.

In anticipation of a new version of CASY in 2025, we already started assessing clients on the basis of the Generic Principles in 2024. Clients active in sectors with higher ESG sensitivity were assessed on typical ESG risks, such as climate impact, biodiversity, human rights and workers in their value chains. In 2025 we plan to continue rolling out this tooling for sectors with lower ESG risk profiles.

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 sub-sectors 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 Sector 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.

- 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 oversights 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. In 2024, for example, we performed a thematic engagement on the shipping sector.

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 a sustainability risk identified 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.
- In 2024, 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	●	
	Sustainable and Acceleration Standard volume change	●	
	Green Asset Ratio (EU Taxonomy-aligned volume)		●
Climate risk	Change in carbon footprint in lending and investment portfolio	●	
	Coverage of bank's commitments to Net Zero Banking Alliance decarbonisation targets	●	
	Climate strategy sector performance		●
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	●	
	Exposure to 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, as stated under EU OVA.

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 CER materiality assessment methodology and scenarios are explained in the Our materiality assessment section earlier under this disclosure.

The scope of the assessment was the entire balance sheet of the bank. 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. 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 risk type assessments are provided below.

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 on a 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 in 2024. 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

In 2024, 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 funding plan of the bank 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, both for 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 operating result of the bank. To assess the CER business risk in 2024, 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 will be integrated into the stress testing framework in the future.

Adverse stress test methodology and scope

As described in the EU OVA - stress testing and scenario analysis section, 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 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 the business model is sufficiently resilient to cover the risks in our adverse scenario.

CER in our strategy and business model

Next 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, 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 CERs 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 of the 2023 assessment.

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 at 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, and the outcomes of the 2023 materiality assessment regarding these events were still considered applicable 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) is still material, and the outcomes of the 2023 assessment continued to apply 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

continuously safeguard proper business conduct on the account of 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.

The second line of defence will assess in the coming period whether to integrate this tool into the credit risk management process.

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 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 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 to 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)

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

- 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 at the early stages of this process with the help of our 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 framework.

If a client is not fully compliant with the sustainability risk 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 sustainability risk 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 framework and does not demonstrate sufficient capacity or commitment to achieve compliance, the sustainability risk advice will be negative and the 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.

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 both with 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 responsibilities of the Group Disclosure Committee (GDC) include advising and supporting the Executive Board in 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.

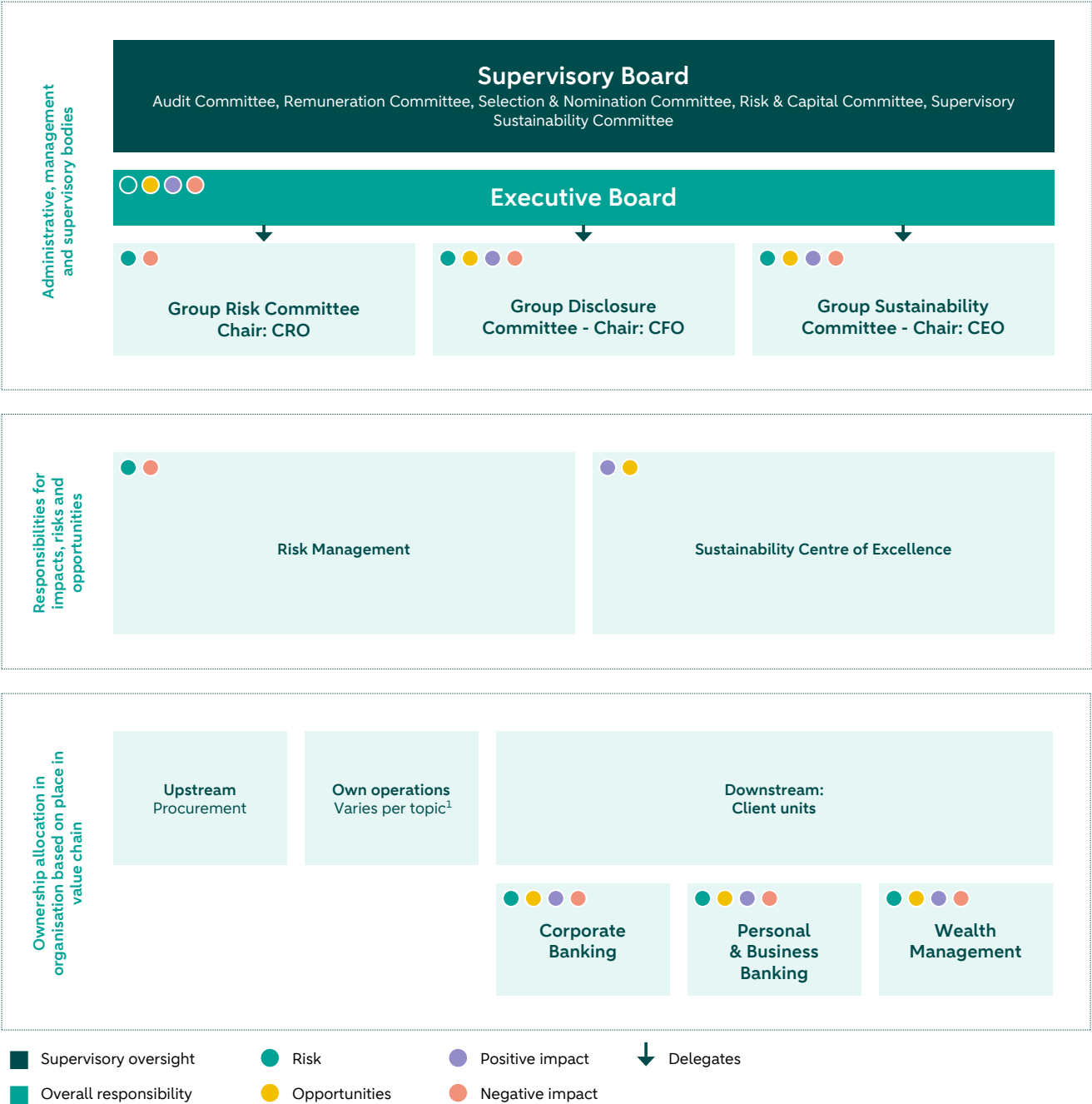
Each of the Supervisory Board committees addresses sustainability aspects within its area of expertise. The Supervisory Sustainability Committee supervises sustainability aspects of our strategy and policies. These cover a broad range of topics, including those covered in the European Sustainability Reporting Standards (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 is responsible for supervision in relation to financial and sustainability reporting, which supervision includes monitoring 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.

In 2024, we further enhanced the mandates of the GSC, the Chief Sustainability Officer and the Sustainability Centre of Excellence by amending the GSC’s procedural rules and establishing additional internal policies focusing, for example, on the reporting lines and agenda-setting of the GSC.

Sustainability governance structure



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

Environment

Through our double materiality assessment, we have identified four material environmental topics: climate change, pollution, biodiversity & ecosystems, and resource use & circular economy. The former two have been identified as material for risks, and the latter as material from an impact perspective. Below we will focus on the material risks.

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. We are continuing to assess how to further develop our policies relating to the management of impacts and opportunities in the future.

Managing our operations

We aim to reduce the climate impact of our own operations. To achieve this, we have adopted policies targeting carbon emissions and energy use. The Environmental and Energy Policy is designed to reduce energy usage in our buildings and increase the use of renewable energy through changes to procurement practices. The Chief Operations Officer (COO) oversees the implementation of the policy. Similarly, the Travel and Mobility policy is focused on electrifying our lease fleet, reducing emissions from business travel, and encouraging alternative travel options. Implementation of this policy is overseen by the CHRO.

While these policies currently apply to operations in the Netherlands, we are working on extending them to other countries.

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 commitments under the Dutch Financial Sector Climate Agreement and the NZBA, we have prioritised sector-specific targets for high-emitting industries. The NZBA framework provides internationally recognised, science-based guidance for our decarbonisation efforts.

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.

This year, building on the priorities from 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 tool, covering the majority of our climate strategy portfolio across six sectors and involving approximately 2,100 clients in 2024. Second, we 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 update 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. Lastly, we engage with industry and governments to raise awareness and promote sector-wide change, thus reinforcing our dedication to supporting our clients in their transitions.

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.

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. For setting 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 DPM 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. 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. Our approach is to define materiality by assessing sector exposures, considering sectors with drawn exposures of less than 0.25% of the corporate loan book as immaterial. 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). Our targets currently cover 95% of our total exposure to NZBA carbon-intensive sectors, based on the outstanding exposure captured (in gross carrying amount) by our climate targets divided by the exposure to the NZBA carbon-intensive sectors. The remaining 5%, which is not yet covered by a target, will either be incorporated into subsequent updates of our climate strategy or is excluded due to methodological assumptions.

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, with each sector individually contributing less than 0.25%. We remain committed to monitoring the exposure to these sectors and will 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 for client assets, we have chosen science-based benchmarks that are aligned with 1.5°C scenario reference pathways (including CRREM, the IEA and DNV), covering 93% of our total exposure to NZBA sectors. 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 agricultural sector accounts for 2% of our total exposure to NZBA sectors. 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.

The year 2024 was the second year since the introduction of our climate strategy, and we continued to manage our portfolio and implement commercial initiatives in line with this strategy throughout the year. However, 2024 also represented a turning point as we moved into a new phase of our strategy. We are now refining and revising targets to reflect new information, such as additional available data, new climate strategy insights and updated methodologies. 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 done 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 chart below highlights sectors with moderately high or high sensitivity to one or more of the three key factors: physical risk sensitivity, transition risk sensitivity and negative impact.

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 on 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. Correspondingly, 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 (e.g. floods, foundation problems, wildfires, heat stress) and transition (e.g. policy changes and technological shifts impacting industries) risk events 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, customers with high loan-to-value and loan-to-income ratios and/or a risk stage 2 (increased risk) classification during the past 12 months were defined as vulnerable, while 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 customers' 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 to 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.

Climate-related opportunities

Investments in equity and hybrid debt

As part of our climate strategy in 2022, a growth target was established for early-stage capital by 2030. The energy transition requires investing in early-stage companies that have climate change mitigation as a business objective. Many technologies that can drive the transition to a low-carbon economy either already exist or are being developed, but often face a financing gap between research and development, early-stage adoption and full-scale commercialisation. The equity division of corporate banking aims to provide the necessary capital to help these technologies scale up to achieve (broader) commercial application. By investing in these scale-up companies, we can accelerate the development, deployment and adoption of innovative decarbonisation solutions.

By 2030, up to EUR 1 billion will be allocated to accelerate the transition to a decarbonised economy. We started in 2022, with EUR 145 million, and the cumulative capital deployed so far totals EUR 333 million. In 2024, we deployed EUR 31 million in direct equity and allocated EUR 49 million to fund investments in progressing towards our EUR 1 billion early-stage capital target. No interim targets for capital deployment by 2030 have yet been set. Progress is monitored quarterly by the corporate investments management team, as well as by the climate strategy team. To provide clarity on our sustainability metrics, we relate them to key financial statement line items. In the statement of financial position these are primarily reflected in Other equity associates within Equity accounted investments and Financial investments. This funding is deployed through direct equity, fund investments and hybrid debt. Direct equity participations are made via the Sustainable Impact Fund (SIF), which focuses on three areas: the energy transition, built environment and sustainable consumption. While SIF emphasises these areas, we also invest in third-party climate-focused funds to ensure diversification in the climate transition. These are funds that are covered either by Article 8 or 9 in the Sustainable Finance Disclosure Regulation (SFDR) and whose objective is to address climate change and a just transition. Additionally, hybrid debt is offered to a select number of scale-up companies seeking to mitigate climate

change, with the target being innovative firms with near-term positive cash flows, and this assessment is made on a case-by-case basis.

Renewable energy and decarbonisation technologies

In 2022, as part of the climate strategy, a target was set for a lending commitment (drawn and undrawn amounts) of at least EUR 4 billion for renewables and decarbonisation technologies by December 2025 to support our clients' transition to green energy. In 2022, the baseline value of EUR 3.1 billion became part of our climate strategy, and we achieved our goal two years ahead of schedule, reaching a total commitment of EUR 5.4 billion by the end of 2024. Progress is monitored quarterly by management, as well as in the Group Sustainability Committee. In 2024, we increased our target for 2030 to EUR 10 billion.

The methodology to determine the financing in scope encompasses two components: renewable energy and decarbonisation technologies. Renewable energy covers activities, assets, infrastructure and projects in the field of and companies dedicated to the development, construction, installation, manufacturing, maintenance, operation of and/or advice on renewable energy sources and storage techniques. Decarbonisation technologies are activities related to renewable energy generation, manufacturing of hydrogen, energy storage, clean transport and infrastructure deals across ABN AMRO Corporate Bank's financing activities and which are not already part of the renewable energy component.

To achieve our financing target for new energy, ABN AMRO is focusing on financing companies delivering products and services that are key for the energy transition. Leveraging our advisory expertise and financing capabilities, we are collaborating with new and existing clients to support a diverse range of solutions, including renewable energy generation, manufacturing of clean fuels, low-carbon hydrogen production, energy storage, clean transportation and related infrastructure.

Our own operations

The primary climate impact of our own operations stems from energy use and carbon emissions generated by day-to-day activities. While our influence as a bank is much greater through the financing of business activities and models, we remain dedicated to minimising our own operational footprint.

We are ISO 14001-certified for Environmental Management Systems, thus ensuring continuous monitoring, updates and the implementation of control measures to address climate risks and opportunities in our own operations. Significant risks and opportunities are assigned to owners, and relevant stakeholders are actively engaged. A dedicated team meets monthly to discuss climate issues, with quarterly reviews focused on identifying and addressing new risks and opportunities.

We have set a target for net-zero emission reductions by 2030. To achieve this, we measure, monitor and actively work to reduce GHG emissions across our operations.

- Energy efficiency and renewable energy deployment in our buildings
We are upgrading all our Dutch offices to energy label A and aligning their energy efficiency with the Paris Agreement. By 2030, our Dutch offices will consume less than 50 kWh per square metre annually. Additionally, we are transitioning to 100% renewable energy in all our offices, both domestically and internationally, while working to reduce overall energy consumption.

- Electrification and reduction of our mobility and business travel
To decarbonise mobility, we are electrifying our lease car fleet in the Netherlands. In 2018, we joined the Anders Reizen Coalition, a collaboration between 70 large Dutch organisations working to reduce emissions from commuting and business travel.

Internationally, we are implementing policies to ensure only electric vehicle options for lease fleets. This approach is already in place in the Netherlands, Belgium and Germany, while still pending in France and Greece. Since the electric-lease-car-only policy has not yet been implemented in the latter two countries, new gas or diesel car contracts initiated in 2025 could result in vehicle emissions in 2030 if these contracts span five years. We are actively exploring solutions to meet our target of a fully electric international lease fleet by 2030.

To decarbonise business travel, we are replacing short-distance air travel with rail travel, procuring sustainable aviation fuel and setting a maximum annual travel budget for each department. ABN AMRO has installed internal monitoring mechanisms and dashboards to allow departments to gain insight into their business travel behaviour and proactively steer on their maximum and remaining travel budgets. We are currently working on department-specific reduction plans. However, in 2023 and 2024 our business travel emissions exceeded what we strived for. Cascading travel budgets down to department level has not yet yielded the necessary results, but the matter has our continuous attention.

Nature: biodiversity, pollution and circular economy

We have identified the ESRS sub-topics of E2 (air and water pollution), E4 (drivers of biodiversity loss) and E5 (resource use and the circular economy) as material from an impact perspective through our double materiality assessment. From risk perspective, the material risk is assessed to be limited to pollution.

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 considered a time horizon to 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.

In relation to pollution risks, and specifically the Dutch government's nitrogen-reducing measures, we have taken management overlays.

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 sub-sector 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

Through our double materiality assessment of the Social standards, we have 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. The results in the heatmap show that in 2024, the highest sensitivities (Moderately high and High) for workers in the value chain were mostly in the mining (B), transport (H), accommodation and food service activities (I) and financial and insurance activities (K) sectors. Most sectors scoring Moderately high or High have links to forced labour in their own operations and/or in their supply chain.

Own workforce

Based on the Double Materiality Assessment (DMA), we identified the impact of diversity and inclusion 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 and Inclusion (D&I) best practices in line with the Dutch Corporate Governance Code.

Diversity and Inclusion Policy

ABN AMRO's D&I 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 D&I 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 D&I 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 D&I 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. Additionally, ABN AMRO 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 provides 'speak-up' channels for employees to 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. 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.

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 D&I policy, accessible to our workforce, outlines the organisation's involvement in driving inclusive policies, interventions, and activities. Engagement with employees on D&I 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 D&I 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 uphold labour rights and its aim 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 individually linked variable remuneration is based on the employee's performance on predefined KPIs set at the beginning of the year. For CLA+ and CLA Identified Staff, sustainability is directly included in these KPIs via the Sustainability Assets and climate strategy, while for CLA staff, sustainability is included in the calculation of the pool for discretionary variable

remuneration. For the Executive Board, sustainability is taken into account via the Dow Jones Sustainability Index and climate strategy KPIs.

Our targets related to own workforce

ABN AMRO NL D&I targets for 2025:

Gender representation

- Ensure at least 48% of the Extended Leadership Team are women
- Target for 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
- 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 key risk indicators (KRIs) on human rights. Following the UNGPs' recommendations, we will update our human rights saliency assessment in 2025.

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 risks for specific high-risk sectors 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 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.

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

¹ Please refer to [D&I Target-setting](#) on our website for further information.

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 will also actively engage 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 risk sustainability department within Credit Risk, 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 Code. The 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 does also impact 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 differs between the various 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.

In late 2024, as part of our policy review process, we initiated consultation rounds with expert NGOs specialising in various domains, including human rights. These consultations were designed to gather their perspectives on sustainability considerations, with a particular focus on the positive and negative human rights impacts affecting vulnerable groups such as mining workers. The consultation process was managed by a specialised team including colleagues with expertise in environmental, biodiversity and social issues. This team coordinated roundtable discussions to ensure a comprehensive understanding of potential human rights impacts and opportunities, contributing to more effective prevention and mitigation strategies.

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 update on compliance efforts and allows trade union representatives to share insights, ensuring that employee and value chain worker perspectives are considered.

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.

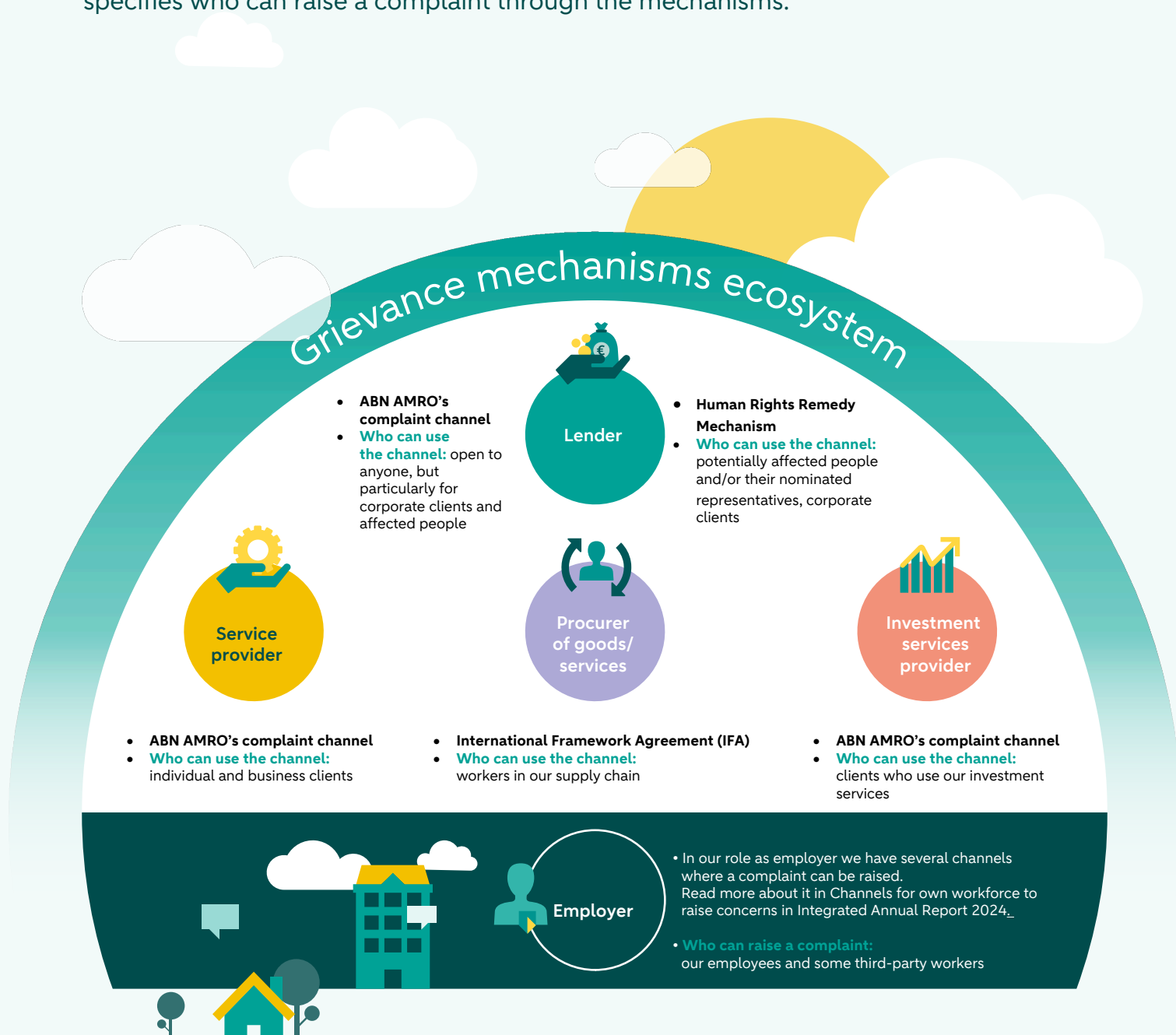
Tracking performance

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.

The development of metrics and targets is still in its early stages and will be guided by a gap analysis and a roadmap informed by the CSRD exercise. We are dedicated to progressing this work and anticipate being able to share more detailed information in our next integrated annual report.

ABN AMRO grievance mechanism

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 specifies 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 are committed to 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 exercising 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 complaint 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 Policies.

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

The bank's primary focus with regard to engagements on privacy is on reactive engagement channels to handle data breaches, privacy complaints, and GDPR-related rights requests. 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. For example, this year we ran a pilot in partnership with an external company to test a new payment feature with a small group of clients. 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 has worked 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 complaint trends, 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 and services and social inclusion:

- Strengthening privacy foundations with the expansion of the first line of defence
- Privacy programme implementation
- Further improvement of privacy management
- Developing enhanced privacy risk management insights

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 of 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. The resulting data is integrated into key risk reports and assessments.

Targets related to consumers and end-users

In 2024, 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, CTF 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, in addition to the ongoing Client Integrity training for all staff.

In April 2021, ABN AMRO agreed to a settlement with the Netherlands Public Prosecution Service regarding shortcomings in the bank's AML processes in the Netherlands. To address these shortcomings, ABN AMRO is continuing to enhance its internal AML processes and systems for the prevention of financial crime. Additionally, ABN AMRO is dedicated to increasing the effectiveness of its measures and is working towards an adequate and sustainable level that meets regulatory AML requirements. Currently, the main attention is focusing on the effectiveness of our monitoring processes and the quality of our client due diligence. ABN AMRO engages in ongoing dialogue with the Dutch Central Bank. The Dutch Central Bank is regularly informed, continues to monitor progress and provides observations. DNB has recently identified shortcomings in our event-driven review processes. These shortcomings relate to updating of client files, for example due to changes in a client's circumstances. DNB has indicated that these findings may lead to enforcement measures. A potential financial impact cannot be reliably estimated, and no provision has been recorded.

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, we also focus on employees and third-parties, and are looking to improve relevant internal policies, processes and 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. The 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, the relationship being terminated.

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

The table below shows the bank's exposure to non-financial corporates in carbon-related sectors, as well the scope 1, 2 and 3 emissions of our counterparties. Compared to 30 June 2024, the bank's exposure to sectors contributing to climate change decreased to EUR 46.7 billion (30 June 2024: EUR 48.3 billion). This explains a large part of the decrease of the financed emissions for corporate loans, which amounted to approximately 20.6 mtCO₂e on 31 December 2024 (30 June 2024: 22.8 mtCO₂e). The main contributors to the increase in GHG emissions are the mining and quarrying sector and real estate activities.

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

	A	B	C	D	E	F	G	H
						31 December 2024		
	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 change¹	46,675	1,514	145	5,463	2,262	-719	-86	-561
2 A - Agriculture, forestry and fishing	5,087			644	204	-68	-17	-30
3 B - Mining and quarrying	1,593	1,395		62		-2	-1	
4 B.05 - Mining of coal and lignite								
5 B.06 - Extraction of crude petroleum and natural gas	303	303						
6 B.07 - Mining of metal ores								
7 B.08 - Other mining and quarrying	180			9		-1		
8 B.09 - Mining support service activities	1,110	1,092		53		-1	-1	
9 C - Manufacturing	6,867	15	12	1,028	746	-157	-14	-135
10 C.10 - Manufacture of food products	2,216		1	184	250	-20	-3	-16
11 C.11 - Manufacture of beverages	79			1		-1		
12 C.12 - Manufacture of tobacco products								
13 C.13 - Manufacture of textiles	157			39	12	-3		-3
14 C.14 - Manufacture of wearing apparel	10			1	1			
15 C.15 - Manufacture of leather and related products	15				1	-1		-1
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	217			6	74	-18		-18
17 C.17 - Manufacture of pulp, paper and paperboard	183			7	29	-9		-8
18 C.18 - Printing and service activities related to printing	106			3	4	-1		
19 C.19 - Manufacture of coke oven products	15	15			6			
20 C.20 - Production of chemicals	666		6	173	49	-5	-2	-2

	A	B	C	D	E	F	G	H
						31 December 2024		
	Gross carrying amount (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
21 C.21 - Manufacture of pharmaceutical preparations	187			5	59	-4		-4
22 C.22 - Manufacture of rubber products	330			71	46	-9	-1	-8
23 C.23 - Manufacture of other non-metallic mineral products	136			71	8	-1	-1	
24 C.24 - Manufacture of basic metals	275			68	47	-6	-1	-5
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	711			104	27	-19	-3	-15
26 C.26 - Manufacture of computer, electronic and optical products	306		4	4	31	-1		
27 C.27 - Manufacture of electrical equipment	75			4		-1		
28 C.28 - Manufacture of machinery and equipment n.e.c.	524			190	31	-10	-2	-9
29 C.29 - Manufacture of motor vehicles, trailers and semi-trailers	211			7	4	-1		-1
30 C.30 - Manufacture of other transport equipment	156		1	30	56	-42		-41
31 C.31 - Manufacture of furniture	63			5	3	-1		-1
32 C.32 - Other manufacturing	64			20	7	-1		-1
33 C.33 - Repair and installation of machinery and equipment	167			34	2	-1	-1	
34 D - Electricity, gas, steam and air conditioning supply	2,341	104	20	44	122	-49	-1	-47
35 D35.1 - Electric power generation, transmission and distribution	2,134	2	20	44	122	-49	-1	-47
36 D35.11 - Production of electricity	1,639	2	19	44	121	-47	-1	-46
37 D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	103	103			1			
38 D35.3 - Steam and air conditioning supply	104							
39 E - Water supply; sewerage, waste management and remediation activities	677			173	43	-14	-2	-12
40 F - Construction	2,717		95	311	223	-56	-7	-44
41 F.41 - Construction of buildings	1,971		67	208	136	-23	-5	-15
42 F.42 - Civil engineering	233		28	13	70	-23	-1	-22
43 F.43 - Specialised construction activities	513			91	18	-10	-2	-6
44 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	8,514		1	1,415	627	-281	-26	-243
45 H - Transportation and storage	8,625		18	613	145	-36	-7	-22
46 H.49 - Land transport and transport via pipelines	1,460			211	69	-11	-3	-6
47 H.50 - Water transport	5,968		2	317	5	-12	-3	-6
48 H.51 - Air transport	9				7	-1		-1
49 H.52 - Warehousing and support activities for transportation	1,160		16	73	63	-11	-1	-9
50 H.53 - Postal and courier activities	28			13	1	-1		-1

	A	B	C	D	E	F	G	H
						31 December 2024		
	Gross carrying amount (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
51 I - Accommodation and food service activities ³	1,656			332	72	-25	-13	-10
52 L - Real estate activities	10,254			1,173	153	-54	-12	-28
53 Exposures towards sectors other than those that highly contribute to climate change ¹	19,395		104	2,195	673	-296	-63	-202
54 K - Financial and insurance activities	4,074		38	416	115	-77	-23	-46
55 Exposures to other sectors (NACE codes J, M - U)	13,665		66	1,447	486	-194	-27	-146
56 TOTAL	66,070	1,514	249	7,658	2,935	-1,015	-149	-763

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
		31 December 2024							
		GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions: gross carrying amount percentage of the portfolio derived from company- specific reporting		Of which: Scope 3 financed emissions		Average weighted maturity	
						≤ 5 years	> 5 year ≤ 10 years	> 10 year ≤ 20 years	> 20 years
Sector/subsector									
1	Exposures towards sectors that highly contribute to climate change¹	20,594,835	12,294,761	24%	39,651	4,413	2,181	429	3
2	A - Agriculture, forestry and fishing	5,043,978	2,708,579		4,401	604	76	6	3
3	B - Mining and quarrying	1,463,664	864,025	31%	912	325	356		6
4	B.05 - Mining of coal and lignite			0%					
5	B.06 - Extraction of crude petroleum and natural gas	132,762	106,196	100%	303				4
6	B.07 - Mining of metal ores			0%					
7	B.08 - Other mining and quarrying	135,740	98,670	0%	165	15			2
8	B.09 - Mining support service activities	1,195,161	659,159	17%	444	311	356		8
9	C - Manufacturing	6,078,433	4,723,983	6%	6,250	441	152	23	2
10	C.10 - Manufacture of food products	3,102,153	2,445,393	1%	2,149	62	6		1
11	C.11 - Manufacture of beverages	75,554	73,307	1%	58	21			4
12	C.12 - Manufacture of tobacco products	7	6	0%					
13	C.13 - Manufacture of textiles	29,722	26,581	0%	150	7			2
14	C.14 - Manufacture of wearing apparel	1,593	1,478	1%	8	1		1	3
15	C.15 - Manufacture of leather and related products	2,651	2,445	0%	2	13			6
16	C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	108,353	102,404	16%	202	15			2
17	C.17 - Manufacture of pulp, paper and paperboard	67,896	56,371	0%	165	18			2
18	C.18 - Printing and service activities related to printing	42,612	34,096	0%	102	4			1
19	C.19 - Manufacture of coke oven products	6,149	4,170	0%	11	4			2
20	C.20 - Production of chemicals	1,224,274	769,122	25%	528	13	119	6	4
21	C.21 - Manufacture of pharmaceutical preparations	65,576	48,356	0%	169	1		16	3
22	C.22 - Manufacture of rubber products	137,061	111,845	0%	296	30	4		2
23	C.23 - Manufacture of other non- metallic mineral products	53,524	39,007	0%	120	14	2		2
24	C.24 - Manufacture of basic metals	241,269	175,003	11%	226	43	6		2
25	C.25 - Manufacture of fabricated metal products, except machinery and equipment	482,037	446,213	3%	644	64	3		2
26	C.26 - Manufacture of computer, electronic and optical products	73,031	66,522	7%	294	13			2
27	C.27 - Manufacture of electrical equipment	18,354	17,292	7%	70	5			2
28	C.28 - Manufacture of machinery and equipment n.e.c.	152,393	127,606	1%	482	33	9		2
29	C.29 - Manufacture of motor vehicles, trailers and semi-trailers	89,559	79,178	32%	207	3			1
30	C.30 - Manufacture of other transport equipment	35,505	33,528	1%	142	13			3
31	C.31 - Manufacture of furniture	14,861	13,559	0%	56	7			2
32	C.32 - Other manufacturing	12,296	11,026	16%	53	9	1		2
33	C.33 - Repair and installation of machinery and equipment	42,005	39,475	1%	116	49	2		3
34	D - Electricity, gas, steam and air conditioning supply	797,797	472,220	3%	1,367	257	629	88	7

	I	J	K	L	M	N	O	P
	31 December 2024							
	GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 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
35 D35.1 - Electric power generation, transmission and distribution	668,063	418,838	3%	1,195	222	629	88	7
36 D35.11 - Production of electricity	341,071	306,412	4%	740	220	591	88	
37 D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	40,534	26,685	0%	103				3
38 D35.3 - Steam and air conditioning supply	89,200	26,698	0%	69	35			5
39 E - Water supply; sewerage, waste management and remediation activities	241,521	146,302	6%	516	58	104		5
40 F - Construction	481,904	424,525	39%	2,348	306	53	11	3
41 F.41 - Construction of buildings	275,327	232,666	53%	1,695	216	50	10	3
42 F.42 - Civil engineering	65,999	61,257	1%	215	17			2
43 F.43 - Specialised construction activities	140,579	130,602	4%	437	72	3	1	3
44 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	1,526,291	1,404,380	2%	8,048	412	24	30	2
45 H - Transportation and storage	4,758,144	1,492,958	41%	7,052	1,139	434		4
46 H.49 - Land transport and transport via pipelines	561,750	289,491	4%	1,197	205	58		3
47 H.50 - Water transport	3,753,253	994,084	55%	4,782	821	364		4
48 H.51 - Air transport	8,781	2,296	0%	9				1
49 H.52 - Warehousing and support activities for transportation	433,283	206,176	17%	1,036	112	12		3
50 H.53 - Postal and courier activities	1,078	912	3%	27	1			2
51 I - Accommodation and food service activities ³	347,744	282,408	5%	1,495	134	15	11	3
52 L - Real estate activities	203,101	57,789	52%	8,756	872	354	271	4
53 Exposures towards sectors other than those that highly contribute to climate change ¹				16,017	2,580	327	471	4
54 K - Financial and insurance activities				3,375	398	67	234	4
55 Exposures to other sectors (NACE codes J, M - U)				11,147	2,047	244	227	4
56 TOTAL	20,594,835	12,294,761	20%	55,668	6,993	2,508	901	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.

	A	B	C	D	E	F	G	H
	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	48,295	1,723	167	6,318	2,317	-793	-109	-571
2 A - Agriculture, forestry and fishing	5,045			684	212	-89	-21	-25
3 B - Mining and quarrying	1,753	1,524		13	63	-1		
4 B.05 - Mining of coal and lignite								
5 B.06 - Extraction of crude petroleum and natural gas	315	315						
6 B.07 - Mining of metal ores								
7 B.08 - Other mining and quarrying	193			13				
8 B.09 - Mining support service activities	1,245	1,209			63	-1		
9 C - Manufacturing	7,395	10	25	1,164	751	-173	-24	-137
10 C.10 - Manufacture of food products	2,014		1	220	236	-23	-5	-16
11 C.11 - Manufacture of beverages	109			2		-1		
12 C.12 - Manufacture of tobacco products								
13 C.13 - Manufacture of textiles	182			22	10	-4	-1	-3
14 C.14 - Manufacture of wearing apparel	12			2	1	-1		-1
15 C.15 - Manufacture of leather and related products	23			21	2	-1		-1
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	228			7	73	-18		-17
17 C.17 - Manufacture of pulp, paper and paperboard	218			25	15	-2	-1	-1
18 C.18 - Printing and service activities related to printing	102			4	4	-1		
19 C.19 - Manufacture of coke oven products	10	10			7	-1		-1
20 C.20 - Production of chemicals	659		4	197	70	-5	-3	-1
21 C.21 - Manufacture of pharmaceutical preparations	232			48	58	-5		-5
22 C.22 - Manufacture of rubber products	376		1	125	7	-5	-3	-1
23 C.23 - Manufacture of other non-metallic mineral products	189			47	12	-1		
24 C.24 - Manufacture of basic metals	276			67	57	-6	-1	-6
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	831			79	38	-22	-2	-18
26 C.26 - Manufacture of computer, electronic and optical products	376		6	8	18	-2	-1	
27 C.27 - Manufacture of electrical equipment	288		13	11	1	-1		
28 C.28 - Manufacture of machinery and equipment n.e.c.	581			196	29	-9	-2	-5
29 C.29 - Manufacture of motor vehicles, trailers and semi-trailers	189			11	3	-2	-1	-1
30 C.30 - Manufacture of other transport equipment	176			34	51	-24		-24
31 C.31 - Manufacture of furniture	70			5	2	-1		
32 C.32 - Other manufacturing	60			12	5	-3	-3	
33 C.33 - Repair and installation of machinery and equipment	194			23	51	-37	-1	-35
34 D - Electricity, gas, steam and air conditioning supply	2,312	188	17	269	101	-45	-3	-40

	A	B	C	D	E	F	G	H
	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
35 D35.1 - Electric power generation, transmission and distribution	2,074	36	17	240	101	-45	-2	-40
36 D35.11 - Production of electricity	1,582	36	17	226	100	-43	-2	-39
37 D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	152	152			1			
38 D35.3 - Steam and air conditioning supply	86			29		-1		
39 E - Water supply; sewerage, waste management and remediation activities	773			89	38	-13	-1	-11
40 F - Construction	3,064		100	314	274	-95	-6	-84
41 F.41 - Construction of buildings	2,114		67	200	134	-26	-4	-18
42 F.42 - Civil engineering	437		34	9	120	-61	-1	-60
43 F.43 - Specialised construction activities	513			105	20	-8	-2	-5
44 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	9,274		1	1,745	571	-273	-28	-224
45 H - Transportation and storage	8,649		19	933	118	-36	-11	-13
46 H.49 - Land transport and transport via pipelines	1,700			355	54	-12	-3	-7
47 H.50 - Water transport	5,821		2	458	21	-12	-4	
48 H.51 - Air transport	8			7		-1	-1	
49 H.52 - Warehousing and support activities for transportation	1,086		17	99	43	-10	-3	-5
50 H.53 - Postal and courier activities	34			14	1	-1		
51 I - Accommodation and food service activities ³	1,824			528	69	-25	-13	-8
52 L - Real estate activities	10,030		4	1,107	188	-68	-15	-38
53 Exposures towards sectors other than those that highly contribute to climate change ¹	21,241		66	2,251	674	-246	-42	-160
54 K - Financial and insurance activities	4,428		36	398	114	-36	-6	-23
55 Exposures to other sectors (NACE codes J, M - U)	14,990		30	1,325	491	-185	-23	-129
56 TOTAL	69,536	1,723	233	8,569	2,991	-1,039	-151	-731

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.

Impairments amount are shown as negative numbers.

	I	J	K	L	M	N	O	P
	30 June 2024							
	GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions: gross carrying amount percentage of the portfolio derived from company- specific reporting	≤ 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 change ¹	22,788,906	13,837,927	23%	41,211	4,312	1,930	842	3
2 A - Agriculture, forestry and fishing	5,313,571	2,792,127		4,373	609	56	7	3
3 B - Mining and quarrying	2,081,788	1,054,058	18%	1,159	316	278		5
4 B.05 - Mining of coal and lignite			0%					
5 B.06 - Extraction of crude petroleum and natural gas	353,118	107,796	2%	315				4
6 B.07 - Mining of metal ores			0%					
7 B.08 - Other mining and quarrying	397,629	329,335	38%	174	19			1
8 B.09 - Mining support service activities	1,331,041	616,927	19%	670	297	278		6
9 C - Manufacturing	5,475,455	4,256,427	7%	6,785	424	104	83	2
10 C.10 - Manufacture of food products	2,731,940	2,193,716	2%	1,957	55	1	1	1
11 C.11 - Manufacture of beverages	100,766	96,926	1%	102	1		5	5
12 C.12 - Manufacture of tobacco products	18	15	40%					1
13 C.13 - Manufacture of textiles	35,332	31,211	0%	174	8			1
14 C.14 - Manufacture of wearing apparel	2,047	1,753	3%	10	1		1	3
15 C.15 - Manufacture of leather and related products	4,218	3,853	0%	23				2
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	119,791	108,534	15%	211	16			2
17 C.17 - Manufacture of pulp, paper and paperboard	82,933	64,854	0%	200	18			2
18 C.18 - Printing and service activities related to printing	43,259	34,905	0%	87	15			1
19 C.19 - Manufacture of coke oven products	4,124	3,170	0%	6	4			3
20 C.20 - Production of chemicals	661,929	292,972	21%	545	16	85	13	3
21 C.21 - Manufacture of pharmaceutical preparations	69,028	46,513	0%	185	4		43	5
22 C.22 - Manufacture of rubber products	158,792	126,022	1%	343	30	3		2
23 C.23 - Manufacture of other non-metallic mineral products	72,611	51,909	1%	174	16			3
24 C.24 - Manufacture of basic metals	255,775	174,353	9%	235	40			2
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	580,698	539,365	2%	754	65	3	9	2
26 C.26 - Manufacture of computer, electronic and optical products	89,684	80,561	6%	345	24		7	2
27 C.27 - Manufacture of electrical equipment	142,371	135,049	55%	277	8		3	1
28 C.28 - Manufacture of machinery and equipment n.e.c.	165,187	139,164	0%	544	29	8		2
29 C.29 - Manufacture of motor vehicles, trailers and semi-trailers	32,289	21,895	41%	186	3			2
30 C.30 - Manufacture of other transport equipment	39,460	36,942	1%	164	11	1		3
31 C.31 - Manufacture of furniture	17,948	15,605	1%	64	6			3
32 C.32 - Other manufacturing	13,593	11,307	13%	52	8			2
33 C.33 - Repair and installation of machinery and equipment	51,662	45,834	1%	147	46	1		3
34 D - Electricity, gas, steam and air conditioning supply	834,023	407,176	11%	1,291	298	491	232	7

	I	J	K	L	M	N	O	P
	30 June 2024							
	GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)	Of which: Scope 3 financed emissions	GHG emissions: gross carrying amount percentage of the portfolio derived from company- specific reporting	≤ 5 years	> 5 year ≤ 10 years	> 10 year ≤ 20 years	> 20 years	Average weighted maturity
35 D35.1 - Electric power generation, transmission and distribution	714,508	367,659	7%	1,080	272	491	232	8
36 D35.11 - Production of electricity	413,462	279,073	9%	606	270	474	232	
37 D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	38,873	17,286	76%	152				3
38 D35.3 - Steam and air conditioning supply	80,642	22,231	0%	60	26			5
39 E - Water supply; sewerage, waste management and remediation activities	385,670	115,734	0%	488	114	139	32	6
40 F - Construction	938,965	869,514	34%	2,758	237	53	16	3
41 F.41 - Construction of buildings	657,062	609,083	49%	1,911	142	51	9	3
42 F.42 - Civil engineering	131,657	121,831	0%	401	36	1		2
43 F.43 - Specialised construction activities	150,246	138,601	4%	446	59	1	7	3
44 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	1,944,418	1,788,276	4%	8,776	397	29	71	2
45 H - Transportation and storage	4,945,086	1,861,890	40%	7,226	1,019	402	2	3
46 H.49 - Land transport and transport via pipelines	669,203	324,325	0%	1,379	254	68		3
47 H.50 - Water transport	3,952,760	1,331,366	58%	4,902	651	267		4
48 H.51 - Air transport	7,681	1,940	0%	8				2
49 H.52 - Warehousing and support activities for transportation	314,055	203,156	7%	906	111	67	1	3
50 H.53 - Postal and courier activities	1,387	1,103	4%	32	2			2
51 I - Accommodation and food service activities ²	439,117	342,756	4%	1,642	159	4	18	1
52 L - Real estate activities	869,930	692,725	50%	8,354	898	378	400	4
53 Exposures towards sectors other than those that highly contribute to climate change ¹				16,358	3,436	396	1,051	3
54 K - Financial and insurance activities				3,553	283	63	529	5
55 Exposures to other sectors (NACE codes J, M - U)				11,163	2,995	329	503	4
56 TOTAL	22,788,906	13,837,927	21%	57,569	7,749	2,326	1,893	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.

	A	B	C	D	E	F	G	H
	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	47,770	1,718	149	7,144	2,220	-844	-136	-590
2 A - Agriculture, forestry and fishing	5,264			796	274	-90	-24	-27
3 B - Mining and quarrying	1,744	1,538	2	33	68	-2		
4 B.05 - Mining of coal and lignite								
5 B.06 - Extraction of crude petroleum and natural gas	377	377						
6 B.07 - Mining of metal ores								
7 B.08 - Other mining and quarrying	165			11				
8 B.09 - Mining support service activities	1,202	1,161	2	22	68	-1		
9 C - Manufacturing	6,979	22	29	1,239	697	-170	-24	-133
10 C.10 - Manufacture of food products	1,885		3	226	218	-12	-4	-5
11 C.11 - Manufacture of beverages	87			24	1	-1		-1
12 C.12 - Manufacture of tobacco products								
13 C.13 - Manufacture of textiles	202			52	37	-6	-1	-5
14 C.14 - Manufacture of wearing apparel	27			2	1	-1		-1
15 C.15 - Manufacture of leather and related products	25			21	2	-2		-2
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	151			11	69	-17		-17
17 C.17 - Manufacture of pulp, paper and paperboard	218			25	15	-4	-1	-3
18 C.18 - Printing and service activities related to printing	112			3	14	-1		-1
19 C.19 - Manufacture of coke oven products	13	7			7			
20 C.20 - Production of chemicals	641	15		188	76	-10	-3	-7
21 C.21 - Manufacture of pharmaceutical preparations	211			55	45	-10	-2	-7
22 C.22 - Manufacture of rubber products	380		2	99	38	-8	-2	-4
23 C.23 - Manufacture of other non-metallic mineral products	170			66	14	-1	-1	
24 C.24 - Manufacture of basic metals	248			90	27	-2	-1	-1
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	829			98	43	-22	-2	-18
26 C.26 - Manufacture of computer, electronic and optical products	266		4	37	25	-1	-1	
27 C.27 - Manufacture of electrical equipment	319		18	16	1	-1		
28 C.28 - Manufacture of machinery and equipment n.e.c.	553			70	28	-18	-2	-13
29 C.29 - Manufacture of motor vehicles, trailers and semi-trailers	164			21	1	-1	-1	
30 C.30 - Manufacture of other transport equipment	226		3	89	1	-7	-2	-5
31 C.31 - Manufacture of furniture	46			9	2	-1		
32 C.32 - Other manufacturing	63			19	3	-1	-1	
33 C.33 - Repair and installation of machinery and equipment	144			20	27	-43	-1	-42
34 D - Electricity, gas, steam and air conditioning supply	2,147	158	13	203	115	-60	-2	-56

	A	B	C	D	E	F	G	H
	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
35 D35.1 - Electric power generation, transmission and distribution	1,969	11	13	179	115	-59	-2	-56
36 D35.11 - Production of electricity	1,396	11	13	171	112	-56	-2	-54
37 D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	148	147			1			
38 D35.3 - Steam and air conditioning supply	30			24				
39 E - Water supply; sewerage, waste management and remediation activities	717			94	4	-4		-3
40 F - Construction	3,096		103	462	230	-129	-9	-113
41 F.41 - Construction of buildings	2,103		71	358	84	-35	-6	-24
42 F.42 - Civil engineering	453		32	9	115	-71	-1	-70
43 F.43 - Specialised construction activities	540			94	30	-23	-3	-19
44 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	8,973			1,915	534	-280	-31	-224
45 H - Transportation and storage	8,716			953	177	-56	-31	-13
46 H.49 - Land transport and transport via pipelines	1,579			267	30	-14	-8	-4
47 H.50 - Water transport	5,886			448	117	-14	-3	-4
48 H.51 - Air transport	10			7		-1	-1	
49 H.52 - Warehousing and support activities for transportation	1,209			220	28	-25	-19	-5
50 H.53 - Postal and courier activities	32			11	1	-1		
51 I - Accommodation and food service activities ³	54			9				
52 L - Real estate activities	10,133			1,448	123	-55	-13	-22
53 Exposures towards sectors other than those that highly contribute to climate change ¹	19,832		24	2,136	584	-254	-59	-146
54 K - Financial and insurance activities	4,260		20	468	82	-35	-4	-24
55 Exposures to other sectors (NACE codes J, M - U)	15,518		4	1,658	502	-219	-54	-122
56 TOTAL	67,602	1,718	173	9,280	2,804	-1,098	-195	-736

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.

Impairments amount are shown as negative numbers.

	I	J	K	L	M	N	O	P
	31 December 2023							
	GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 equivalent)		GHG emissions: gross carrying amount percentage of the portfolio derived from company- specific reporting	≤ 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 change ¹	21,633,335	12,979,186	24%	40,240	5,040	1,824	665	3
2 A - Agriculture, forestry and fishing	5,494,491	2,891,153	6%	4,537	661	59	8	3
3 B - Mining and quarrying	1,993,667	954,197	16%	1,095	414	235		5
4 B.05 - Mining of coal and lignite			0%					
5 B.06 - Extraction of crude petroleum and natural gas	409,295	124,991	2%	294	83			5
6 B.07 - Mining of metal ores			0%					
7 B.08 - Other mining and quarrying	283,588	237,507	32%	143	22			2
8 B.09 - Mining support service activities	1,300,784	591,699	18%	658	309	235		6
9 C - Manufacturing	4,440,457	3,807,736	7%	6,291	584	66	38	2
10 C.10 - Manufacture of food products	2,079,289	1,966,183	9%	1,807	77	2		2
11 C.11 - Manufacture of beverages	84,799	81,991	2%	53	34			2
12 C.12 - Manufacture of tobacco products	12	10	58%					2
13 C.13 - Manufacture of textiles	38,764	34,362	0%	197	5			1
14 C.14 - Manufacture of wearing apparel	6,690	6,185	1%	25	1		1	4
15 C.15 - Manufacture of leather and related products	4,653	4,252	0%	25				2
16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials	76,538	69,209	23%	132	18	1		2
17 C.17 - Manufacture of pulp, paper and paperboard	82,254	64,271	0%	203	15	1		2
18 C.18 - Printing and service activities related to printing	49,178	40,394	0%	98	13			1
19 C.19 - Manufacture of coke oven products	5,233	3,854	0%	8	5			3
20 C.20 - Production of chemicals	530,589	291,168	13%	573	35	33		2
21 C.21 - Manufacture of pharmaceutical preparations	65,071	46,875	0%	175	7	1	28	4
22 C.22 - Manufacture of rubber products	182,599	152,830	3%	339	39	3		2
23 C.23 - Manufacture of other non-metallic mineral products	67,974	48,746	1%	152	17			2
24 C.24 - Manufacture of basic metals	190,193	122,772	9%	209	39			2
25 C.25 - Manufacture of fabricated metal products, except machinery and equipment	547,818	499,626	0%	737	88	4		2
26 C.26 - Manufacture of computer, electronic and optical products	66,693	60,441	5%	245	13		8	2
27 C.27 - Manufacture of electrical equipment	42,505	35,090	50%	311	8			1
28 C.28 - Manufacture of machinery and equipment n.e.c.	158,579	133,219	1%	479	64	10		3
29 C.29 - Manufacture of motor vehicles, trailers and semi-trailers	46,889	43,674	0%	160	4			2
30 C.30 - Manufacture of other transport equipment	51,094	47,892	1%	179	37	9		3
31 C.31 - Manufacture of furniture	11,559	9,958	1%	35	11			3
32 C.32 - Other manufacturing	13,130	10,683	12%	55	8		1	2
33 C.33 - Repair and installation of machinery and equipment	38,353	34,050	1%	94	48	2		4
34 D - Electricity, gas, steam and air conditioning supply	953,126	415,057	5%	1,229	313	438	167	6

	I	J	K	L	M	N	O	P
	31 December 2023							
	GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO2 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
35 D35.1 - Electric power generation, transmission and distribution	803,932	365,392	5%	1,074	291	438	167	6
36 D35.11 - Production of electricity	420,512	262,761	7%	580	289	438	89	
37 D35.2 - Manufacture of gas; distribution of gaseous fuels through mains	129,168	41,863	0%	147				4
38 D35.3 - Steam and air conditioning supply	20,026	7,801	0%	8	22			6
39 E - Water supply; sewerage, waste management and remediation activities	354,611	106,851	0%	469	70	129	50	7
40 F - Construction	945,148	877,725	35%	2,654	378	57	8	3
41 F.41 - Construction of buildings	652,010	606,366	51%	1,824	221	54	5	3
42 F.42 - Civil engineering	135,424	125,218	1%	406	45	1		2
43 F.43 - Specialised construction activities	157,715	146,141	3%	423	112	2	3	3
44 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	1,911,989	1,758,764	3%	8,411	472	28	61	2
45 H - Transportation and storage	5,214,915	2,019,660	46%	7,286	1,043	386	2	4
46 H.49 - Land transport and transport via pipelines	621,888	311,102	2%	1,277	241	62		4
47 H.50 - Water transport	4,245,434	1,475,182	67%	4,983	658	245		3
48 H.51 - Air transport	9,523	2,406	0%	10				2
49 H.52 - Warehousing and support activities for transportation	336,809	229,933	5%	986	141	80	2	3
50 H.53 - Postal and courier activities	1,260	1,037	5%	30	2			2
51 I - Accommodation and food service activities ²	3,399	1,625	2%	36	11		7	6
52 L - Real estate activities	324,932	148,042	50%	8,269	1,105	426	332	4
53 Exposures towards sectors other than those that highly contribute to climate change ¹				14,612	3,836	431	934	4
54 K - Financial and insurance activities				3,377	450	26	406	5
55 Exposures to other sectors (NACE codes J, M - U)				11,213	3,381	404	521	4
56 TOTAL	21,633,335	12,979,186	21%	54,866	8,882	2,255	1,598	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 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, the identification of such companies was performed 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 have been 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 are 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 is 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, either client-specific information was used or, if not available, the CBS and the PCAF databases were used.

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 sub-sectors, we used the CBS database, which provides country and sector-specific carbon intensity information.

GHG emissions for shipping loans

The Poseidon Principles framework has been 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, process the data and calculate the performance of the vessels in our portfolio. The Kennisinstituut voor Mobiliteitsbeleid (KiM) and emissiefactoren.nl database was 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 are used in instances where carbon intensity and production data are 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, as well as 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 has been 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 has been applied; this is the ratio of the gross carrying amount and the property value at origination.

For the commercial real estate financing portfolio, the GHG emissions calculations (scope 1 and 2) are 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 entirely 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 gross carrying amount 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 has been 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

Specifically 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 Rijksdienst voor Ondernemend Nederland (RVO). While both old and new regulation EPC labels are considered 'official' in column H-N, only the new regulation EP score is considered 'official' in column B-G. The new regulation EPC label is provided with an accompanying EP score, while this is not the case for the old regulation EPC label where 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 subsequently columns B-G, are higher than the gross carrying amounts of the estimated EPC labels in row 1 column P-O.

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 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

As part of its climate strategy, ABN AMRO has set targets to reduce its carbon footprint. ABN AMRO continues to work towards this goal by seeking to increase the A and higher-than-A-labels and lowering the exposure to D-G energy labels. In line with this strategy, the distribution of official energy labels showed a slight improvement compared to Q2 2024, with an increase in official energy labels from 52% to 55%, the majority being A labels and 76% of the portfolio having an energy label of C or higher (30 June 2024: 74%).

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. In addition, new-build houses based on the Building Decree (Besluit Bouwwerken Leefomgeving) have at least an A+++ label.

	A	B	C	D	E	F	G
	31 December 2024						
	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	185,952	55,847	91,668	16,449	3,087	2,092	1,072
2 - of which Loans collateralised by commercial immovable property	26,767	1,752	4,409	4,415	2,704	1,815	1,012
3 - of which Loans collateralised by residential immovable property	159,185	54,095	87,259	12,034	383	277	61
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	130,934	39,222	75,181	12,609	2,143	1,732	47
6 Total non-EU area	182						
7 - of which Loans collateralised by commercial immovable property	159						
8 - of which Loans collateralised by residential immovable property	23						
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
	31 December 2024								
	Total gross carrying amount								
	Level of energy efficiency (EPC label of collateral)							Without EPC label of collateral	
								Of which: level of energy efficiency estimated ²	
(in millions)	A ¹	B	C	D	E	F	G		
Counterparty sector									
1 Total EU area	44,915	13,046	18,868	9,085	6,059	4,848	4,928	84,202	81%
2 - of which Loans collateralised by commercial immovable property	6,008	918	1,418	541	374	279	484	16,745	36%
3 - of which Loans collateralised by residential immovable property	38,908	12,128	17,450	8,544	5,685	4,569	4,444	67,458	92%
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								68,465	100%
6 Total non-EU area								181	0%
7 - of which Loans collateralised by commercial immovable property								159	0%
8 - of which Loans collateralised by residential immovable property								22	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.

	A	B	C	D	E	F	G
	30 June 2024						
	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	184,091	52,834	91,656	16,678	3,118	2,341	103
2 - of which Loans collateralised by commercial immovable property	27,907	1,688	4,767	4,386	2,726	2,039	67
3 - of which Loans collateralised by residential immovable property	156,174	51,143	86,886	12,291	389	302	36
4 - of which Collateral obtained by taking possession: residential and commercial immovable properties	9	3	3	1	2		
5 - of which Level of energy efficiency (EP score in kWh/m ² of collateral) estimated	134,182	40,000	77,375	12,789	2,013	1,925	80
6 Total non-EU area	210		1				
7 - of which Loans collateralised by commercial immovable property	187						
8 - of which Loans collateralised by residential immovable property	23						
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						

	H	I	J	K	L	M	N	O	P
	30 June 2024								
	Total gross carrying amount								
	Level of energy efficiency (EPC label of collateral)							Without EPC label of collateral	
									Of which: level of energy efficiency estimated ²
(in millions)	A ¹	B	C	D	E	F	G		
Counterparty sector									
1 Total EU area	41,010	12,398	18,147	8,992	6,058	4,905	4,982	87,599	80%
2 - of which Loans collateralised by commercial immovable property	5,871	1,002	1,521	653	445	319	523	17,574	32%
3 - of which Loans collateralised by residential immovable property	35,135	11,395	16,626	8,338	5,612	4,585	4,459	70,025	93%
4 - of which Collateral obtained by taking possession: residential and commercial immovable properties	5	1		1	1	1			
5 - of which Level of energy efficiency (EP score in kWh/m ² of collateral) estimated								70,421	100%
6 Total non-EU area								209	0%
7 - of which Loans collateralised by commercial immovable property								187	0%
8 - of which Loans collateralised by residential immovable property								22	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.

	A	B	C	D	E	F	G
	31 December 2023						
	Total gross carrying amount						
	Level of energy efficiency (EP score in kWh/m² of collateral)						
(in millions)	0; ≤ 100	> 100; ≤ 200	> 200; ≤ 300	> 300; ≤ 400	> 400; ≤ 500	> 500	
Counterparty sector							
1 Total EU area	182,322	50,358	90,384	17,235	3,203	2,470	113
2 - of which Loans collateralised by commercial immovable property	28,716	1,884	5,039	4,641	2,799	2,167	66
3 - of which Loans collateralised by residential immovable property	153,597	48,472	85,341	12,592	403	303	47
4 - of which Collateral obtained by taking possession: residential and commercial immovable properties	9	2	3	2	1		
5 - of which Level of energy efficiency (EP score in kWh/m² of collateral) estimated	71,485	39,956	78,112	13,354	2,010	2,033	77
6 Total non-EU area	120			4	1		
7 - of which Loans collateralised by commercial immovable property	98			4			
8 - of which Loans collateralised by residential immovable property	22				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/m² of collateral) estimated							

	H	I	J	K	L	M	N	O	P
	31 December 2023								
	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	38,623	11,689	17,320	8,577	5,852	4,883	4,981	90,397	79%
2 - of which Loans collateralised by commercial immovable property	5,850	998	1,567	737	497	362	595	18,110	32%
3 - of which Loans collateralised by residential immovable property	32,769	10,690	15,752	7,838	5,354	4,521	4,386	72,287	91%
4 - of which Collateral obtained by taking possession: residential and commercial immovable properties	4	2	1	1	1	1			
5 - of which Level of energy efficiency (EP score in kWh/m ² of collateral) estimated								71,485	100%
6 Total non-EU area	3							116	0%
7 - of which Loans collateralised by commercial immovable property	3							95	0%
8 - of which Loans collateralised by residential immovable property								21	0%
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									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.

ABN AMRO 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 prescribed 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 ABN AMRO'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 disclosures, as a substantial share of our agriculture portfolio 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 ABN AMRO'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 year's delay to ensure that all data used for calculations are sourced from the same year. In Q4 2024 the emissions intensity of this portfolio was 3.5 kgCO₂/MWh. This intensity is well below the 2030 target and the distance to the IEA NZE2050 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 2024 to EUR 804 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

Since our target for oil and gas upstream and midstream will be first published in the 2024 Integrated Annual Report, the processes to actively drive the target have only just begun. The operational emission intensity figures reported are done with one year's delay. Please refer to the Integrated Annual Report for additional information on the methodology for this portfolio.

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

Automotive

Trucks and vans

Our targets for trucks and vans for road transport are based on our asset-based financing lease portfolio and were published in the 2024 Interim Report. The reported financed emissions intensity for trucks is 79.8 gCO₂/tkm and there is a distance (in %) to the NZE 2050 scenario of 31%. The reported financed emissions intensity for vans is 218.6 gCO₂/vkm and there is a distance (in %) to the NZE 2050 scenario of 55%.

Passenger cars

Our target for passenger cars is based on our asset-based financing direct lease portfolio as well as our ALFAM consumer loan portfolio. Since the target will be first published in the 2024 Integrated Annual Report, the processes to actively drive the target have only just begun. The figures reported are based on the 31 December 2023 which is used as the base year. Please refer to the Integrated Annual Report for additional information on the methodology on our passenger cars portfolio.

Maritime transport

Deep sea shipping

For deep sea shipping, ABN AMRO uses the verified data submitted through the Poseidon Principles framework, however there is a one-year delay in reporting. In 2024 we adopted the Det Norske Veritas (DNV) 1.5°C trajectory (Scenario 10), as the previously used Poseidon Principles trajectories are not yet fully 1.5 °C -aligned. The climate strategy alignment delta for shipping in 2024 is -2%. The target is to be fully aligned with DNV 1.5°C trajectory (Scenario 10).

Inland freight water

For inland freight water transport (inland shipping) the intensity metric for Q4 2024 was 25.1 gCO₂/tkm, and is a slight decrease from Q2 2024 intensity of 26.6 gCO₂/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 due to the calculation of financed emissions, resulting in a value lower than the target.

Commercial real estate

For commercial real estate, in Q4 2024 our portfolio emission intensity was 58.2 kgCO₂/m², which is a slight decrease from the Q2 2024 intensity of 61.9 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
						31 December 2024
(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	1,444	3.5 kgCO ₂ /MWh	2023	0%	329.7 kgCO ₂ /MWh
2 Fossil fuel combustion		2,238				
Oil and gas - upstream	0610, 0620	303	EUR 804 million ⁵	2024	0%	EUR 1.081 million
Oil and gas - upstream and midstream	06.10, 06.20, 09.10, 35.12, 35.21, 49.50, 52.10.1, 52.21	1,935	16.0 kgCO ₂ /boe	2023	78%	42.3 kgCO ₂ /boe
3 Automotive		889				
-of which Road transport trucks		343	79.8 gCO ₂ /tkm	2024	31%	69.8 gCO ₂ /tkm
-of which Road transport vans		105	218.6 gCO ₂ /vkm	2024	55%	176.9 gCO ₂ /vkm
-of which Road transport passenger cars		441 ⁹	96.3 gCO ₂ /vkm	2024	53% ¹⁰	138.9 gCO ₂ /vkm
4 Maritime transport		3,131				
-of which Sea and coastal water transport	5020	2,922	-2.0% weighted climate alignment	2023	Target is to be fully aligned with DNV 1.5 trajectory, (Scenario 10) ⁶	0% weighted climate alignment
-of which Inland freight water transport	5040	209	25.1 gCO ₂ /tkm	2024	37%	21.5 gCO ₂ /tkm
5 Agriculture	0113, 0125, 0128, 0130, 0141, 0142, 0146	2,796	1.2 mtCO ₂ e/mln EUR financed	2024	0% ⁷	1.6 mtCO ₂ e/mln EUR financed
6 Commercial Real Estate		8,039	58.2 kgCO ₂ /m ²	2024	63% ⁸	42.3 kgCO ₂ /m ²

1. Please refer to the Glossary of other sustainability terms in our Integrated Annual Report 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. 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. In 2024, responding to the IMO's revised strategy for net-zero emissions by 2050 and our commitment to the NZBA, we adopted the Det Norske Veritas (DNV) 1.5°C trajectory (Scenario 10) for the shipping sector.

7. Our agriculture target is based on the Dutch Coalition Accord.

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

9. For the passenger cars sector, the counterparty scope is not restricted to non-financial corporations, and the GCA encompasses all counterparties.

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

	A	B	C	D	E	F
						30 June 2024
(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	1,448	15.6 kgCO ₂ /MWh	2022	0%	365.3 kgCO ₂ /MWh
2 Fossil fuel combustion	0610, 0620	315	EUR 909 million ⁵	2024	0%	EUR 1.100 million
3 Automotive		421				
-of which Road transport trucks		331	81.7 gCO ₂ /tkm	2023	34%	72.8 gCO ₂ /tkm
-of which Road transport vans		90	224.9 gCO ₂ /vkm	2023	60%	188.8 gCO ₂ /vkm
4 Maritime transport		3,412				
-of which Sea and coastal water transport	5020	3,183	7% alignment delta	2022	Target is to be fully aligned with IMO Initial GHG strategy ⁶	0% alignment delta
-of which Inland freight water transport	5040	229	26.6 gCO ₂ e/tkm	2024	46%	21.5 gCO ₂ e/tkm
5 Agriculture	0113, 0125, 0128, 0130, 0141, 0142, 0146	2,798	1.2 mtCO ₂ e/mln EUR	2024	0% ⁷	1.6 mtCO ₂ e/mln EUR
6 Commercial Real Estate		8,828	61.9 kgCO ₂ /m ²	2024	73% ⁸	42.3 kgCO ₂ /m ²

1. Please refer to the Glossary of other sustainability terms in our Integrated Annual Report 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. 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. For shipping, we make use of the Poseidon Principles (PP) methodology, which follows the 2018 Initial International Maritime Organization (IMO) GHG strategy. This is a global framework for financial institutions for assessing and disclosing the climate alignment of their shipping portfolio.

7. Our agriculture target is based on the Dutch Coalition Accord.

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

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. We chose this source as it is a reputable source which provides a clear methodological explanation and it also includes Scope 3 GHG emissions data. For each counterparty included in the CDP list, the full group related to the counterparty has been assessed.

	A	B	C	D	E
					31 December 2024
(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%		1	3

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

	A	B	C	D	E
					30 June 2024
(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	7	0.01%		1	3

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

	A	B	C	D	E
	31 December 2023				
	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
(in millions)					
1 CDP	5	0.01%		3	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 “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 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 linked to acute risk are flooding, hurricanes & typhoons, wildfires and sea level rise.

Compared to 30 June 2024, our exposure sensitive to impact from climate change events increased slightly, mainly due to methodology update for mortgages, while the total exposure decreased slightly. 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 the 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, also 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
	31 December 2024						
	Gross carrying amount						
	Of which: exposures sensitive to impact from climate change physical events						
	Breakdown by maturity bucket ¹					Of which: exposures sensitive to impact from chronic climate change events	
	≤ 5 years	> 5 year ≤ 10 years	> 10 year ≤ 20 years	> 20 years	Average weighted maturity		
(in millions)							
Geographical area subject to climate change physical risk - acute and chronic events							
1 A - Agriculture, forestry and fishing	5,087	2,665	385	54	3	3	2,510
2 B - Mining and quarrying	1,593	335	74	16		4	3
3 C - Manufacturing	6,867	2,156	158	11		2	858
4 D - Electricity, gas, steam and air conditioning supply	2,341	420	127	415	67	10	110
5 E - Water supply; sewerage, waste management and remediation activities	677	279	45	1		3	272
6 F - Construction	2,717	541	50	9	1	2	202
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	8,514	2,664	164	13		2	1,041
8 H - Transportation and storage	8,625	1,801	214	23		3	610
9 L - Real estate activities	10,254	2,248	224	64	6	3	923
10 Loans collateralised by residential immovable property	159,208	909	1,019	3,010	10,787	21	11,514
11 Loans collateralised by commercial immovable property	26,926	9,461	1,443	188	11	3	5,704
12 Repossessed collaterals	3					21	
13 Other relevant sectors (breakdown below where relevant)	19,395	4,327	659	76	17	3	1,371

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
	31 December 2024						
	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		
					Of which: Stage 2 exposures	Of which: non-performing exposures	
(in millions)							
Geographical area subject to climate change physical risk - acute and chronic events							
1 A - Agriculture, forestry and fishing	288	310	424	135	-39	-13	-15
2 B - Mining and quarrying	355	67	8		-1		
3 C - Manufacturing	854	613	368	129	-38	-5	-31
4 D - Electricity, gas, steam and air conditioning supply	591	328	8	1	-2		-1
5 E - Water supply; sewerage, waste management and remediation activities	3	50	66	42	-12	-1	-11
6 F - Construction	347	52	90	54	-26	-2	-23
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	1,505	295	492	233	-104	-12	-85
8 H - Transportation and storage	871	557	270	40	-13	-4	-8
9 L - Real estate activities	1,441	177	335	27	-10	-3	-4
10 Loans collateralised by residential immovable property	3,936	275	1,246	195	-29	-6	-20
11 Loans collateralised by commercial immovable property	4,534	865	1,345	478	-93	-31	-41
12 Repossessed collaterals							
13 Other relevant sectors (breakdown below where relevant)	3,131	577	444	273	-83	-14	-59

	B	C	D	E	F	G	H
	30 June 2024						
	Gross carrying amount						
	Of which: exposures sensitive to impact from climate change physical events						
	Breakdown by maturity bucket ¹						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	Average weighted maturity		
Geographical area subject to climate change physical risk - acute and chronic events							
1 A - Agriculture, forestry and fishing	5,045	2,571	367	30	3	3	2,432
2 B - Mining and quarrying	1,753	398	80			3	6
3 C - Manufacturing	7,395	2,227	136	10	4	2	850
4 D - Electricity, gas, steam and air conditioning supply	2,312	254	146	164	67	9	381
5 E - Water supply; sewerage, waste management and remediation activities	773	153	65	70	29	9	260
6 F - Construction	3,064	609	64	4	8	2	266
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	9,274	2,695	154	14		2	1,033
8 H - Transportation and storage	8,649	1,617	272	36		3	469
9 L - Real estate activities	10,030	2,342	217	24	53	3	740
10 Loans collateralised by residential immovable property	156,197	885	1,303	3,714	10,488	3	3,250
11 Loans collateralised by commercial immovable property	28,094	9,769	1,416	170	23	21	5,487
12 Repossessed collaterals	3					3	
13 Other relevant sectors (breakdown below where relevant)	21,241	4,167	1,025	79	210	3	1,525

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. The average weighted maturity has been estimated based on the average of each maturity bucket.

	I	J	K	L	M	N	O
	30 June 2024						
	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	320	219	403	125	-60	-14	-16
2 B - Mining and quarrying	440	32	11	63			
3 C - Manufacturing	1,000	528	376	196	-80	-11	-65
4 D - Electricity, gas, steam and air conditioning supply	198	52	133	1	-3	-1	-1
5 E - Water supply; sewerage, waste management and remediation activities	55	2	44		-7	-1	-6
6 F - Construction	368	51	102	66	-61	-3	-57
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	1,580	251	521	191	-88	-12	-48
8 H - Transportation and storage	1,133	322	360	42	-10	-3	-4
9 L - Real estate activities	1,724	173	202	25	-15	-4	-7
10 Loans collateralised by residential immovable property	12,889	252	1,211	205	-36	-7	-24
11 Loans collateralised by commercial immovable property	5,096	796	1,327	427	-160	-37	-52
12 Repossessed collaterals							
13 Other relevant sectors (breakdown below where relevant)	3,616	340	617	265	-79	-18	-41

	B	C	D	E	F	G	H
	31 December 2023						
	Gross carrying amount						
	Of which: exposures sensitive to impact from climate change physical events						
	Breakdown by maturity bucket ¹						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	Average weighted maturity		
Geographical area subject to climate change physical risk - acute and chronic events							
1 A - Agriculture, forestry and fishing	5,264	2,620	404	31	4	3	2,505
2 B - Mining and quarrying	1,744	370	84			4	6
3 C - Manufacturing	6,979	1,956	182	12		2	914
4 D - Electricity, gas, steam and air conditioning supply	2,147	386	150	117	137	7	494
5 E - Water supply; sewerage, waste management and remediation activities	717	156	41	70	50	9	260
6 F - Construction	3,096	680	86	1	3	2	291
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	8,973	2,685	171	12	1	2	1,118
8 H - Transportation and storage	8,716	1,542	329	29		3	502
9 L - Real estate activities	10,133	2,441	243	36	30	3	878
10 Loans collateralised by residential immovable property	153,619	674	717	1,903	4,492	20	2,948
11 Loans collateralised by commercial immovable property	28,815	9,890	1,587	168	14	3	5,800
12 Repossessed collaterals	3						
13 Other relevant sectors (breakdown below where relevant)							

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. The average weighted maturity has been estimated based on the average of each maturity bucket.

	I	J	K	L	M	N	O
	31 December 2023						
	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	322	232	432	157	-53	-14	-17
2 B - Mining and quarrying	414	35	31	64	-1		
3 C - Manufacturing	1,082	153	417	158	-93	-7	-76
4 D - Electricity, gas, steam and air conditioning supply	295		176	3	-5	-1	-2
5 E - Water supply; sewerage, waste management and remediation activities	54	2	14	3			
6 F - Construction	428	51	122	76	-63	-3	-58
7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles	1,507	245	557	169	-67	-12	-46
8 H - Transportation and storage	1,113	286	345	49	-12	-3	-6
9 L - Real estate activities	1,716	156	263	35	-13	-5	-3
10 Loans collateralised by residential immovable property	4,657	183	666	108	-24	-5	-15
11 Loans collateralised by commercial immovable property	5,062	797	1,320	387	-123	-31	-44
12 Repossessed collaterals							
13 Other relevant sectors (breakdown below where relevant)							

Methodology and Data Sources

Physical risk is categorised as acute when it arises from extreme events, such as droughts, floods, and storms. Physical risk is categorised as chronic when it arises from progressive shifts, such as increasing temperatures, water stress, biodiversity loss, and resource scarcity. The assessment of whether there is exposures to physical risk takes into account the location of counter parties 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 from the Climate Impact Atlas (CIA) and information on foundation risks from the Kennis Centrum Aanpak Funderingsproblematiek; ii) other locations in the Netherlands, which includes flooding data from the CIA and information on wildfires, heat stress, water stress, hurricanes and typhoons and sea level rise 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 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 dependence.

Hazard	Data Source		
	Loans in the Netherlands, collateralised by residential immovable property	Loans in the Netherlands, collateralised 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 in 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 buildings in the NUTS region are exposed to flooding of more than half a metre.

ESG6 - Summary of GAR KPIs

	31 December 2024			
	KPI			% coverage (over total assets) ¹
	Climate change mitigation	Climate change adaptation	Total (Climate change mitigation + Climate change adaptation)	
GAR stock	11%	0%	11%	80%
GAR flow	23%	0%	23%	

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.

	30 June 2024			
	KPI			% coverage (over total assets) ¹
	Climate change mitigation	Climate change adaptation	Total (Climate change mitigation + Climate change adaptation)	
GAR stock	9%	0%	9%	81% ³
GAR flow ²				

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

2. The figures regarding EU Taxonomy Flow are left blank. We will start reporting this from Q4 2024 in order to ensure alignment with the approach taken for the EU Taxonomy disclosures in the Integrated Annual Report 2024.

3. The significant difference in the % coverage percentage is due to a change in the formula as a result of additional guidance. Last year in Q4 2023 we compared the alignment with the total assets. This year in Q2 2024 it is updated to covered assets compared with total assets.

	31 December 2023			
	KPI			% coverage (over total assets) ¹
	Climate change mitigation	Climate change adaptation	Total (Climate change mitigation + Climate change adaptation)	
GAR stock	10%	0%	10%	8%
GAR flow ²				

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

2. The figures regarding EU Taxonomy Flow are left blank. We will start reporting this from Q4 2024 in order to ensure alignment with the approach taken for the EU Taxonomy disclosures in the Integrated Annual Report 2024.

ESG7 - Mitigating actions: Assets for the calculation of GAR

	A	B	C	D	E	F	G	H	I	J	K
	31 December 2024										
	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)				
	Total gross carrying amount			Of which: specialised lending	Of which: transitional	Of which: enabling		Of which: specialised lending	Of which: 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	189,352	162,426	35,859	35,282	18	125	158,122	6		6	1
2 Financial corporations	26,586	3,469	329		11	88	8	6		6	1
3 Credit institutions	10,629	2,179	139		10	9	1				
4 Loans and advances	4,220	1,076	52		3	7	1				
5 Debt securities, including UoP	6,409	1,103	87		6	2	1				
6 Equity instruments											
7 Other financial corporations	15,957	1,290	189		1	79	7	6		5	1
8 <i>Of which: investment firms</i>	113										
9 <i>- of which Loans and advances</i>	12										
10 Debt securities, including UoP											
11 Equity instruments	101										
12 <i>of which management companies</i>	1										
13 Loans and advances	1										
14 Debt securities, including UoP											
15 Equity instruments											
16 <i>of which insurance undertakings</i>	1,492	395	44		1	2	2	2		1	1
17 Loans and advances	1,492	395	44		1	2	2	2		1	1
18 Debt securities, including UoP											
19 Equity instruments											
20 Non-financial corporations (subject to NFRD disclosure obligations)	4,385	576	249		7	37	9				

	A	B	C	D	E	F	G	H	I	J	K
	31 December 2024										
	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)				
	Total gross carrying amount			Of which: specialised lending	Of which: transitional	Of which: enabling		Of which: specialised lending	Of which: adaptation	Of which: enabling	
(in millions)											
21 Loans and advances	4,338	576	249		7	37	9				
22 Debt securities, including UoP	31										
23 Equity instruments	16										
24 Households	158,378	158,378	35,282	35,282			158,105				
25 <i>of which loans collateralised by residential immovable property</i>	<i>157,536</i>	<i>157,536</i>	<i>35,282</i>	<i>35,282</i>			<i>157,536</i>				
26 <i>of which building renovation loans</i>	<i>568</i>	<i>568</i>					<i>568</i>				
27 <i>of which motor vehicle loans</i>	<i>273</i>	<i>273</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	189,352	162,426	35,859	35,282	18	125	158,122	6		6	1
Assets excluded from the numerator for GAR calculation (covered in the denominator)											
33 EU Non-financial corporations (not subject to NFRD disclosure obligations)	49,863										
34 Loans and advances	49,712										
35 Debt securities											
36 Equity instruments	152										
37 Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)	11,822										
38 Loans and advances	11,809										
39 Debt securities											
40 Equity instruments	14										
41 Derivatives	4,347										
42 On demand interbank loans	1,166										
43 Cash and cash-related assets	414										
44 Other assets (e.g. Goodwill, commodities etc.) ¹	58,265										
45 TOTAL ASSETS IN THE DENOMINATOR (GAR)	315,230										

	A	B	C	D	E	F	G	H	I	J	K
	31 December 2024										
	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)				
	Total gross carrying amount	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	30,607										
47 Central banks exposure	46,297										
48 Trading book	2,503										
49 TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR	79,408										
50 TOTAL ASSETS	394,638										

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
	31 December 2024				
	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	162,583	35,866	35,282	18	126
2 Financial corporations	3,478	335		11	89
3 Credit institutions	2,181	140		10	9
4 Loans and advances	1,077	52		3	7
5 Debt securities, including UoP	1,104	87		6	2
6 Equity instruments					
7 Other financial corporations	1,297	195		1	79
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>	397	46		1	2
17 Loans and advances	397	46		1	2
18 Debt securities, including UoP					
19 Equity instruments					
20 Non-financial corporations (subject to NFRD disclosure obligations)	724	249		7	37
21 Loans and advances	724	249		7	37
22 Debt securities, including UoP					
23 Equity instruments					
24 Households	158,378	35,282	35,282		
25 <i>- of which loans collateralised by residential immovable property</i>	157,536	35,282	35,282		
26 <i>- of which building renovation loans</i>	568				
27 <i>- of which motor vehicle loans</i>	273				
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	162,583	35,866	35,282	18	126
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
	31 December 2024				
	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)					
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).

	A	B	C	D	E	F	G	H	I	J	K
	30 June 2024										
	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)					
	Total gross carrying amount			Of which: specialised lending	Of which: transitional	Of which: enabling		Of which: specialised lending	Of which: 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	184,511	160,551	31,150	30,578	57	128	31	4		4	
2 Financial corporations	24,958	4,290	339		50	86	13	3		3	
3 Credit institutions	16,087	3,268	220		45	9	3	1		1	
4 Loans and advances	9,084	2,145	127		38	6	2				
5 Debt securities, including UoP	7,003	1,123	93		7	3	1				
6 Equity instruments											
7 Other financial corporations	8,871	1,022	119		5	77	10	3		3	
8 Of which: investment firms	1,063	246	8		5	2	1				
9 - of which Loans and advances	1,063	246	8		5	2	1				

	A	B	C	D	E	F	G	H	I	J	K
	30 June 2024										
	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
10 Debt securities, including UoP											
11 Equity instruments											
12 of which management companies	4										
13 Loans and advances	4										
14 Debt securities, including UoP											
15 Equity instruments											
16 of which insurance undertakings	668	111	14				9	3		3	
17 Loans and advances	668	111	14				9	3		3	
18 Debt securities, including UoP											
19 Equity instruments											
20 Non-financial corporations (subject to NFRD disclosure obligations)	3,916	624	233		7	42	18				
21 Loans and advances	3,869	624	233		7	42	18				
22 Debt securities, including UoP											
23 Equity instruments	47										
24 Households	155,637	155,637	30,578	30,578							
25 of which loans collateralised by residential immovable property	154,839	154,839	30,578	30,578							
26 of which building renovation loans	543	543									
27 of which motor vehicle loans	255	255									
28 Local governments financing											
29 Housing financing											
30 Other local governments financing											
31 Collateral obtained by taking possession: residential and commercial immovable properties											
32 TOTAL GAR ASSETS	184,511	160,551	31,150	30,578	57	128	31	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)	53,850										

	A	B	C	D	E	F	G	H	I	J	K
	30 June 2024										
	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)				
	Total gross carrying amount		Of which: specialised lending	Of which: transitional	Of which: enabling		Of which: specialised lending	Of which: adaptation	Of which: enabling		
(in millions)											
34 Loans and advances	53,262										
35 Debt securities	8										
36 Equity instruments	579										
37 Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)	11,771										
38 Loans and advances	11,763										
39 Debt securities											
40 Equity instruments	8										
41 Derivatives	4,576										
42 On demand interbank loans	1,324										
43 Cash and cash-related assets	366										
44 Other assets (e.g. Goodwill, commodities etc.) ¹	72,049										
45 TOTAL ASSETS IN THE DENOMINATOR (GAR)	328,447										
Other assets excluded from both the numerator and denominator for GAR calculation											
46 Sovereigns	32,392										
47 Central banks exposure	43,504										
48 Trading book	2,109										
49 TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR	78,004										
50 TOTAL ASSETS	406,452										

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.

	L	M	N	O	P
	30 June 2024				
	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
GAR - Covered assets in both numerator and denominator					
1 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	160,582	31,154	30,578	57	128
2 Financial corporations	4,303	343		50	86
3 Credit institutions	3,271	221		45	9
4 Loans and advances	2,147	128		38	6
5 Debt securities, including UoP	1,124	93		7	3
6 Equity instruments					
7 Other financial corporations	1,032	122		5	77
8 <i>Of which: investment firms</i>	247	8		5	2
9 <i>- of which Loans and advances</i>	247	8		5	2
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>	120	16			
17 Loans and advances	120	16			
18 Debt securities, including UoP					
19 Equity instruments					
20 Non-financial corporations (subject to NFRD disclosure obligations)	642	233		7	42
21 Loans and advances	642	233		7	42
22 Debt securities, including UoP					
23 Equity instruments					
24 Households	155,637	30,578	30,578		
25 <i>- of which loans collateralised by residential immovable property</i>	154,839	30,578	30,578		
26 <i>- of which building renovation loans</i>	543				
27 <i>- of which motor vehicle loans</i>	255				
28 Local governments financing					
29 Housing financing					
30 Other local governments financing					
31 Collateral obtained by taking possession: residential and commercial immovable properties					
32 TOTAL GAR ASSETS	160,582	31,154	30,578	57	128
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)					
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)					

	L	M	N	O	P
	30 June 2024				
	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
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				

	A	B	C	D	E	F	G	H	I	J	K
	31 December 2023										
	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	166,341	155,470	31,151	30,954	5	55	22	1		1
2	Financial corporations	9,763	1,740	24			21	21			
3	Credit institutions	6,706	1,429								
4	Loans and advances	1,650	226								
5	Debt securities, including UoP	5,052	1,203								
6	Equity instruments	4									
7	Other financial corporations	5,999	311	23			21	21			
8	<i>Of which: investment firms</i>	<i>1</i>									
9	<i>- of which Loans and advances</i>	<i>1</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>113</i>	<i>5</i>					<i>13</i>			
17	Loans and advances	113	5					13			
18	Debt securities, including UoP										
19	Equity instruments										

	A	B	C	D	E	F	G	H	I	J	K
	31 December 2023										
	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)					
	Total gross carrying amount		Of which: specialised lending	Of which: transitional	Of which: enabling		Of which: specialised lending	Of which: adaptation	Of which: enabling		
(in millions)											
20 Non-financial corporations (subject to NFRD disclosure obligations)											
21 Loans and advances	3,287	488	173		5	34	1	1		1	
22 Debt securities, including UoP											
23 Equity instruments	46										
24 Households	153,242	153,242	30,954	30,954							
25 <i>of which loans collateralised by residential immovable property</i>	152,434	152,434	30,954	30,954							
26 <i>of which building renovation loans</i>	556	556									
27 <i>of which motor vehicle loans</i>	252	252									
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	163,008	154,982	30,978	30,954		21	21				
Assets excluded from the numerator for GAR calculation (covered in the denominator)											
33 EU Non-financial corporations (not subject to NFRD disclosure obligations)	53,560										
34 Loans and advances	52,944										
35 Debt securities	77										
36 Equity instruments	540										
37 Non-EU Non-financial corporations (not subject to NFRD disclosure obligations)	10,714										
38 Loans and advances	10,702										
39 Debt securities											
40 Equity instruments	12										
41 Derivatives	4,403										
42 On demand interbank loans	1,404										
43 Cash and cash-related assets	299										

	A	B	C	D	E	F	G	H	I	J	K
	31 December 2023										
	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)				
	Total gross carrying amount		Of which: specialised lending	Of which: transitional	Of which: enabling		Of which: specialised lending	Of which: adaptation	Of which: enabling		
(in millions)											
44	Other assets (e.g. Goodwill, commodities etc.) ¹	67,836									
45	TOTAL ASSETS IN THE DENOMINATOR (GAR)	304,557									
	Other assets excluded from both the numerator and denominator for GAR calculation										
46	Sovereigns	28,626									
47	Central banks exposure	55,205									
48	Trading book	1,371									
49	TOTAL ASSETS EXCLUDED FROM NUMERATOR AND DENOMINATOR	85,202									
50	TOTAL ASSETS	389,759									

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.

	L	M	N	O	P	
	31 December 2023					
	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	155,493	31,152	30,954	55	5
2	Financial corporations	1,762	24		21	
3	Credit institutions	1,429				
4	Loans and advances	226				
5	Debt securities, including UoP	1,203				
6	Equity instruments					
7	Other financial corporations	332	23		21	
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>	18				
17	Loans and advances	18				
18	Debt securities, including UoP					

Continued ►

	L	M	N	O	P
				31 December 2023	
				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
19 Equity instruments					
20 Non-financial corporations (subject to NFRD disclosure obligations)					
21 Loans and advances	489	174		34	5
22 Debt securities, including UoP					
23 Equity instruments					
24 Households	153,242	30,954	30,954		
25 - of which loans collateralised by residential immovable property	152,434	30,954	30,954		
26 - of which building renovation loans	556				
27 - of which motor vehicle loans	252				
28 Local governments financing					
29 Housing financing					
30 Other local governments financing					
31 Collateral obtained by taking possession: residential and commercial immovable properties					
32 TOTAL GAR ASSETS	155,004	30,978	30,954	21	
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)					
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					

ESG8 - GAR (%)

	A	B	C	D	E	F	G	H	I	J
	31 December 2024									
	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				
	Of which: specialised lending					Of which: specialised lending				
	Of which: transitional					Of which: transitional				
	Of which: enabling					Of which: enabling				
% (compared to total covered assets in the denominator)										
1 GAR	52%	11%	11%			50%				
2 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	86%	19%	19%			84%				
3 Financial corporations	13%	1%								
4 Credit institutions	21%	1%								
5 Other financial corporations	8%	1%								
6 - of which investment firms										
7 - of which management companies										
8 - of which insurance undertakings	26%	3%								
9 Non-financial corporations subject to NFRD disclosure obligations	13%	6%			1%					
10 Households	100%	22%	22%			100%				
11 - of which loans collateralised by residential immovable property	100%	22%	22%			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
	31 December 2024										
	KPIs on stock						KPIs on flows				
	TOTAL (CCM + CCA)						Climate Change Mitigation (CCM)				
	Proportion of eligible assets funding taxonomy relevant sectors					Proportion of total assets covered	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				Of which: specialised lending	Of which: transitional	Of which: enabling	
1 GAR	52%	11%	11%			80%	100%	23%	23%		
2 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	86%	19%	19%			48%	100%	23%	23%		
3 Financial corporations	13%	1%				7%	100%	13%			5%
4 Credit institutions	21%	1%				3%	100%	8%			
5 Other financial corporations	8%	1%				4%	100%	15%			8%
6 - of which investment firms						0%					
7 - of which management companies											
8 - of which insurance undertakings	27%	3%				0%	74%	74%			
9 Non-financial corporations subject to NFRD disclosure obligations	17%	6%			1%	1%	69%	15%		1%	2%
10 Households	100%	22%	22%			40%	100%	24%	24%		
11 - of which loans collateralised by residential immovable property	100%	22%	22%			40%	100%	24%	24%		
12 - of which building renovation loans	100%					0%	100%				
13 - of which motor vehicle loans	100%					0%	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%										

- 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.
- 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).

	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF
	31 December 2024										
	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	94%				100%	23%	23%				100%
2 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	94%				100%	23%	23%				
3 Financial corporations					100%	13%	0%	5%			4%
4 Credit institutions					100%	8%	0%				1%
5 Other financial corporations					100%	16%	0%	8%			3%
6 - of which investment firms											
7 - of which management companies											
8 - of which insurance undertakings	26%	26%	0%	26%	0%	100%	100%				
9 Non-financial corporations subject to NFRD disclosure obligations					69%	15%		1%	2%		1%
10 Households	99%				100%	24%	24%				94%
11 - of which loans collateralised by residential immovable property	100%				100%	24%	24%				93%
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).

	A	B	C	D	E	F	G	H	I	J
	30 June 2024									
	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	49%	9%	9%							
2 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	87%	17%	17%							
3 Financial corporations	17%	1%								
4 Credit institutions	20%	1%								
5 Other financial corporations	12%	1%			1%					
6 - of which investment firms	23%	1%								
7 - of which management companies	1%	1%								
8 - of which insurance undertakings	17%	2%				1%				
9 Non-financial corporations subject to NFRD disclosure obligations	16%	6%			1%					
10 Households	100%	20%	20%		0%					
11 - of which loans collateralised by residential immovable property	100%	20%	20%		0%					
12 - of which building renovation loans	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										

	K	L	M	N	O	P	Q	R	S	T	U
	KPIs on stock										30 June 2024
	KPIs on flows ¹										
	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	49%	9%	9%		100%						
2 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	87%	17%	17%		56%						
3 Financial corporations	17%	1%			8%						
4 Credit institutions	20%	1%			5%						
5 Other financial corporations	12%	1%		1%	3%						
6 - of which investment firms	23%	1%									
7 - of which management companies	1%	1%									
8 - of which insurance undertakings	18%	2%									
9 Non-financial corporations subject to NFRD disclosure obligations	16%	6%		1%	1%						
10 Households	100%	20%	20%		47%						
11 - of which loans collateralised by residential immovable property	100%	20%	20%		47%						
12 - of which building renovation loans	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											

1. The figures regarding EU Taxonomy Flow are left blank. We will start reporting this from Q4 2024 in order to ensure alignment with the approach taken for the EU Taxonomy disclosures in the Integrated Annual Report 2024.

	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF
											30 June 2024
											Disclosure reference date T: KPIs on flows ¹
											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
											Of which: specialised lending
											Of which: transitional /adaptation
											Of which: enabling
											Proportion of total new assets covered
1											GAR
2											Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation
3											Financial corporations
4											Credit institutions
5											Other financial corporations
6											- of which investment firms
7											- of which management companies
8											- of which insurance undertakings
9											Non-financial corporations subject to NFRD disclosure obligations
10											Households
11											- of which loans collateralised by residential immovable property
12											- of which building renovation loans
13											- of which motor vehicle loans
14											Local government financing
15											Housing financing
16											Other local governments financing
17											Collateral obtained by taking possession: residential and commercial immovable properties

1. The figures regarding EU Taxonomy Flow are left blank. We will start reporting this from Q4 2024 in order to ensure alignment with the approach taken for the EU Taxonomy disclosures in the Integrated Annual Report 2024.

	A	B	C	D	E	F	G	H	I	J
	31 December 2023									
	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	51%	10%	10%							
2 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	93%	19%	19%							
3 Financial corporations	18%									
4 Credit institutions	21%									
5 Other financial corporations	5%									
6 - of which investment firms	20%									
7 - of which management companies										
8 - of which insurance undertakings	4%					11%				
9 Non-financial corporations subject to NFRD disclosure obligations										
10 Households	100%	20%	20%							
11 - of which loans collateralised by residential immovable property	100%	20%	20%							
12 - of which building renovation loans	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										

	K	L	M	N	O	P	Q	R	S	T	U
	31 December 2023										
	KPIs on stock						KPIs on flows ¹				
	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	51%	10%	10%			100%					
2 Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation	93%	19%	19%			55%					
3 Financial corporations	18%					3%					
4 Credit institutions	21%					2%					
5 Other financial corporations	6%					2%					
6 - of which investment firms	20%										
7 - of which management companies											
8 - of which insurance undertakings	16%										
9 Non-financial corporations subject to NFRD disclosure obligations											
10 Households	100%	20%	20%			50%					
11 - of which loans collateralised by residential immovable property	100%	20%	20%			50%					
12 - of which building renovation loans	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											

1. The figures regarding EU Taxonomy Flow are left blank. We will start reporting this from Q4 2024 in order to ensure alignment with the approach taken for the EU Taxonomy disclosures in the Integrated Annual Report 2024.

	V	W	X	Y	Z	AA	AB	AC	AD	AE	AF
	31 December 2023										
	Disclosure reference date T: KPIs on flows ¹										
	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
	Of which: specialised lending					Of which: adaptation	Of which: enabling	Of which: specialised lending		Of which: transitional /adaptation	Of which: enabling
1	GAR										
2	Loans and advances, debt securities and equity instruments not HfT eligible for GAR calculation										
3	Financial corporations										
4	Credit institutions										
5	Other financial corporations										
6	- of which investment firms										
7	- of which management companies										
8	- of which insurance undertakings										
9	Non-financial corporations subject to NFRD disclosure obligations										
10	Households										
11	- of which loans collateralised by residential immovable property										
12	- of which building renovation loans										
13	- of which motor vehicle loans										
14	Local government financing										
15	Housing financing										
16	Other local governments financing										
17	Collateral obtained by taking possession: residential and commercial immovable properties										

1. The figures regarding EU Taxonomy Flow are left blank. We will start reporting this from Q4 2024 in order to ensure alignment with the approach taken for the EU Taxonomy disclosures in the Integrated Annual Report 2024.

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

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

	C	D	E	F
				31 December 2024
(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	439	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	1,910	Yes	Yes	This includes sovereign and government guaranteed Green Bonds from the (regional) governments of Austria, Germany, Finland, France, Ireland, Luxemburg, Netherlands, Philippines, Sweden and the European Union.
Loans¹				
8 Financial corporations	1,665	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	14,329	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>	5,317	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.
11 Households	16,508	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>	15,278	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.
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.

	C	D	E	F
				30 June 2024
(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	480	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	1,845	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	1,535	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	13,819	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>	5,247	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.
11 Households	18,378	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>	17,177	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.
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.

	C	D	E	F
				31 December 2023
(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	436	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	2,089	Yes	Yes	This includes sovereign and government guaranteed Green Bonds from the (regional) governments of Austria, Denmark, Germany, Finland, France, Ireland, Netherlands, Sweden and the European Union.
Loans¹				
8 Financial corporations	1,837	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	13,093	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>	5,309	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.
11 Households	15,561	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>	14,351	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.
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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