

ABN AMRO Bank N.V.

# Pillar 3 Report 2025

# Table of contents

|   |           |
|---|-----------|
| Pillar 3 intro  | 5         |
| <b>Notes to the reader</b>  | <b>6</b>  |
| <b>Key metrics and overview of RWEA</b>   | <b>9</b>  |
| EU KM1 - Key metrics template   | 9         |
| EU KM2 – Key metrics - MREL and, where applicable, G-SII requirement for own funds and eligible liabilities   | 11        |
| EU TLAC1 – Composition - MREL and, where applicable, G-SII requirement for own funds and eligible liabilities   | 12        |
| EU TLAC3B – Creditor ranking - resolution entity (ABN AMRO Bank N.V.)   | 13        |
| EU OV1 – Overview of total risk exposure amounts  | 14        |
| EU OVC - ICAAP information  | 16        |
| EU CMS1 – Comparison of modelled and standardised risk weighted exposure amounts at risk level  | 16        |
| EU CMS2 – Comparison of modelled and standardised risk weighted exposure amounts for credit risk at asset class level   | 17        |
| <b>Risk management objectives and policies</b>  | <b>19</b> |
| EU OVA – Institution risk management approach & EU OVB – Information on governance arrangements   | 19        |
| <b>Scope of application</b>   | <b>32</b> |
| EU LI1 - Differences between the accounting scope and the scope of prudential consolidation and mapping of financial statement categories with regulatory risk categories | 32        |
| EU LI2 - Main sources of differences between regulatory exposure amounts and carrying values in financial statements  | 33        |
| EU LI3 - Outline of the differences in the scopes of consolidation (entity by entity)   | 34        |
| EU LIA – Explanations of differences between accounting and regulatory exposure amounts   | 35        |
| EU LIB - Other qualitative information on the scope of application  | 36        |
| EU PV1 - Prudent valuation adjustments (PVA)  | 36        |
| <b>Own funds, leverage &amp; liquidity</b>  | <b>38</b> |
| <b>Own funds</b>  | <b>39</b> |
| EU CC1 - Composition of regulatory own funds  | 39        |
| EU CC2 - Reconciliation of regulatory own funds to balance sheet in the audited financial statements  | 43        |
| EU CCA - Main features of regulatory own funds instruments and eligible liabilities instruments   | 44        |
| <b>Countercyclical capital buffer</b>   | <b>50</b> |
| EU CCyB1 - Geographical distribution of credit exposures relevant for the calculation of the countercyclical capital buffer   | 50        |
| EU CCyB2 - Amount of institution-specific countercyclical capital buffer  | 51        |
| <b>Leverage ratio</b>   | <b>52</b> |
| EU LR1 - LRSum: Summary reconciliation of accounting assets and leverage ratio exposures  | 52        |
| EU LR3 - LRSpI: Split-up of on-balance sheet exposures (excluding derivatives, SFTs and exempted exposures)   | 52        |
| EU LR2 - LRCom: Leverage ratio common disclosure  | 53        |
| EU LRA - Disclosure of leverage ratio qualitative information   | 55        |
| <b>Liquidity requirements</b>   | <b>56</b> |
| EU LIQA - Liquidity risk management   | 56        |
| EU LIQ1 - Quantitative information of LCR   | 58        |

|  |            |
|--|------------|
| EU LIQB - Qualitative information on LCR that complements template EU LIQ1   | 59         |
| EU LIQ2 - Net Stable Funding Ratio   | 60         |
| <b>Credit risk</b>   | <b>61</b>  |
| <b>Credit risk quality</b>   | <b>62</b>  |
| EU CRA – General qualitative information about credit risk   | 62         |
| EU CRB – Additional disclosures related to the credit quality of assets  | 65         |
| EU CR1 - Performing and non-performing exposures and related provisions  | 70         |
| EU CR1-A - Maturity of exposures   | 71         |
| EU CR2 - Changes in the stock of non-performing loans and advances   | 72         |
| EU CQ1 - Credit quality of forborne exposures  | 72         |
| EU CQ3 - Credit quality of performing and non-performing exposures by past due days  | 73         |
| EU CQ4 - Quality of non-performing exposures by geography  | 75         |
| EU CQ5 - Credit quality of loans and advances to non-financial corporations by industry  | 76         |
| EU CQ7 - Collateral obtained by taking possession and execution processes  | 77         |
| <b>Use of credit risk mitigation techniques</b>  | <b>78</b>  |
| EU CRC – Qualitative disclosure requirements related to CRM techniques   | 78         |
| EU CR3 – CRM techniques overview: Disclosure of the use of CRM techniques  | 80         |
| <b>Use of the Standardised Approach</b>  | <b>81</b>  |
| EU CRD – Qualitative disclosure requirements related to Standardised Approach  | 81         |
| EU CR4 – Standardised approach – Credit risk exposure and CRM effects  | 81         |
| EU CR5 – Standardised Approach   | 83         |
| <b>Use of the IRB approach to credit risk</b>  | <b>86</b>  |
| EU CRE – Qualitative disclosure requirements related to IRB approach   | 86         |
| EU CR6 – IRB approach – Credit risk exposures by exposure class and PD range   | 88         |
| EU CR6-A – Scope of the use of IRB and SA approaches   | 95         |
| EU CR7-A - IRB approach - Disclosure of the extent of the use of CRM techniques  | 95         |
| EU CR8 – RWEA flow statements of credit risk exposures under the IRB approach  | 98         |
| EU CR9 – IRB approach – Back-testing of PD per exposure class (fixed PD scale)   | 98         |
| <b>Counterparty credit risk</b>  | <b>105</b> |
| EU CCRA – Qualitative disclosure related to counterparty credit risk (CCR)   | 105        |
| EU CCR1 – Analysis of CCR exposure by approach   | 107        |
| EU CCR3 – Standardised approach – CCR exposures by regulatory exposure class and risk weights  | 107        |
| EU CCR4 – IRB approach – CCR exposures by exposure class and PD scale  | 108        |
| EU CCR5 – Composition of collateral for exposures to CCR   | 109        |
| EU CCR6 – Credit derivatives exposures   | 110        |
| EU CCR8 – Exposures to CCPs  | 110        |
| <b>Securitisation, market &amp; operational risk</b>   | <b>111</b> |
| <b>Exposures to securitisation positions</b>   | <b>112</b> |
| EU SECA - Qualitative disclosure requirements related to securitisation exposures  | 112        |
| EU SEC1 - Securitisation exposures in the non-trading book   | 113        |
| EU SEC3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor | 114        |
| EU SEC4 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as investor                 | 115        |
| EU SEC5 - Exposures securitised by the institution - Exposures in default and specific credit risk adjustments   | 116        |

|  |            |
|--|------------|
| <b>Market risk</b>   | <b>117</b> |
| EU MRA – Qualitative disclosure requirements related to market risk  | 117        |
| EU MR1 – Market risk under the Standardised Approach   | 119        |
| EU MRB – Qualitative disclosure requirements for institutions using the Internal Market Risk Models  | 119        |
| EU MR2-A – Market risk under the Internal Model Approach (IMA)   | 121        |
| EU MR2-B – RWEA flow statements of market risk exposures under the IMA   | 121        |
| EU MR3 – IMA values for trading portfolios   | 122        |
| EU MR4 – Comparison of VaR estimates with gains/losses   | 122        |
| EU IRRBBA - Qualitative information on interest rate risk of non-trading book activities   | 123        |
| EU IRRBB1 - Interest rate risks of non-trading book activities   | 124        |
| <b>Credit valuation adjustment risk</b>  | <b>125</b> |
| EU CVAA - Qualitative disclosure requirements related to credit valuation adjustment risk  | 125        |
| EU CVA 2 – Credit valuation adjustment risk under the Full Basic Approach (F-BA)   | 125        |
| <b>Operational risk</b>  | <b>126</b> |
| EU ORA - Qualitative information on operational risk   | 126        |
| EU OR1 - Operational risk losses   | 129        |
| EU OR2 - Business Indicator, components and subcomponents  | 130        |
| EU OR3 - Operational risk own funds requirements and risk exposure amounts   | 130        |
| <b>Remuneration</b>  | <b>131</b> |
| <b>Remuneration policy</b>   | <b>132</b> |
| EU REMA - Remuneration policy  | 132        |
| EU REM1 - Remuneration awarded for the financial year  | 142        |
| EU REM2 - Special payments to staff whose professional activities have a material impact on institutions' risk profile (Identified Staff)            | 143        |
| EU REM3 - Deferred remuneration  | 144        |
| EU REM4 - Remuneration of EUR 1 million or more per year   | 145        |
| EU REM5 - Information on remuneration of staff whose professional activities have a material impact on institutions' risk profile (identified staff) | 145        |
| <b>Encumbered and unencumbered assets</b>  | <b>146</b> |
| EU AE1 - Encumbered and unencumbered assets  | 147        |
| EU AE2 - Collateral received and own debt securities issued  | 147        |
| EU AE3 - Sources of encumbrance  | 148        |
| EU AE4 - Accompanying narrative information  | 148        |
| <b>ESG disclosures</b>   | <b>149</b> |
| Tables 1, 2 and 3 - Qualitative information on Environmental, Social and Governance (ESG) risk   | 150        |
| ESG1 - Banking book - Climate Change transition risk: Credit quality of exposures by sector, emissions and residual maturity                         | 173        |
| ESG2 - Banking book - Climate change transition risk: Loans collateralised by immovable property - Energy efficiency of the collateral               | 180        |
| ESG3 – Banking book - Climate change transition risk: Alignment metrics  | 182        |
| ESG4 - Banking book - Climate change transition risk: Exposures to top 20 carbon-intensive firms   | 184        |
| ESG5 - Banking book - Climate change physical risk: Exposures subject to physical risk   | 185        |
| <b>Disclaimer &amp; cautionary statements</b>  | <b>188</b> |

# Pillar 3 intro

# About this report

## Welcome to ABN AMRO's 2025 Pillar 3 Report.

The purpose of this report is to provide information about ABN AMRO's regulatory capital adequacy, risk exposure, risk management 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 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 Annual Report, but should not be seen as a substitute for it.

As from January 2026, the Pillar 3 information is also publicly available via the Pillar 3 Data Hub. The Pillar 3 Data Hub will facilitate centralised access by all stakeholders to prudential data from all EEA institutions. On the European Data Access Portal (EDAP), you can easily access Pillar 3 disclosures of all institutions across the EU and EEA. This data is freely available to investors, analysts, regulators and the general public. Making it possible for all interested users to easily access this data, use it and compare prudential information of different institutions will strengthen the transparency and market discipline of the EU banking sector.

## Notes to the reader

This Pillar 3 Report provides the consolidated disclosures of ABN AMRO Bank N.V. required by Capital Requirements Regulation (CRR) (EU) No 575/2013 on prudential requirements for credit institutions and investment firms (Part Eight) and the 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 2025 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.

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

### Waiver policy (omitting templates and tables)

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

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. Template EU CR10.5 is meant for equity exposures under Articles 133(3) to (6) and 495a(3) CRR. The bank applies the transitional arrangement laid down in Article 495(1) CRR and currently does not have any equity exposures for which Article 495a(3) determines the risk weight. All risk weights for equity exposures are currently still based on the risk weights as applied under the simple risk weight approach. Over time, this will change and the risk weights as defined in Article 133(3) to (6) will become applicable. Currently, the bank therefore omits the presentation of template EU CR10.5.
- **EU CCR4 – IRB approach – CCR exposures by exposure class and PD scale:** The CCR4 template for A-IRB is not presented in this report. In Q3 2025, we completed the transition of certain portfolios from the A-IRB approach to the standardised approach. This reflects the absence of relevant exposures for this reporting period.
- **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 material exposure to securitisation positions in its trading book.
- **EU CVA1, EU CVAB and EU CVA3** templates are not applicable to ABN AMRO. Under CRR III, ABN AMRO applies the Full Basic Approach; templates referring to the Reduced Basic Approach or Standardised Approach for CVA risk will therefore not be applicable for ABN AMRO.
- **EU CVA4 – RWEA flow statements of credit valuation adjustment risk under the Standardised Approach (SA):** ABN AMRO does not use the Standardised Approach under CRR III but applies the ‘full Basic Approach’. Therefore, this template is not applicable.
- **EU CAE1 – Exposures to crypto-assets:** This template is currently not applicable to ABN AMRO, as the bank has no exposures to crypto assets.
- **ESG disclosures:** In alignment with the EBA no-action letter issued on 6 August 2025 and the transitional provisions outlined in the Consultation Paper on Pillar 3 ESG ITS amendments, we have decided not to disclose information pertaining to ESG templates 6–10, Template 1 column c, and Template 4 column c in our Pillar 3 report as of 31 December 2025. This decision follows the EBA’s recommendation that supervisors should not prioritise enforcement of these templates during the transitional period until the revised Implementing Technical Standards (ITS) are adopted and come into effect. We will actively monitor regulatory developments to ensure compliance once the amended ESG disclosure requirements have been finalised and implemented.

## 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 updated 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

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

As part of the continuous improvement of the Pillar 3 reporting framework, the implementation of the Pillar 3 Data Hub continued during Q4 2025. This initiative is designed to enhance data governance and the consistency and transparency of Pillar 3 disclosures.

## Executive Board approval of the report

ABN AMRO's Executive Board has approved this report and acknowledges that the institution has followed the relevant formal policies and internal processes, systems and controls to comply with the disclosure requirements as required under the CRR.

# Key metrics and overview of RWEA

## Highlights

- The CET1 ratio under Basel IV increased to 15.4% as at 31 December 2025 (30 September 2025: 14.2%, excluding interim profits), mainly due the decrease in Total Risk Exposure Amount (TREA) and addition of the year-end net profit after deduction of AT1 coupons and distributions. Unrealised gains on investments in debt securities due to market movements also contributed positively to the CET1 capital.
- TREA closed at EUR 135.4 billion at the end of 2025, a drop of EUR 7.7 billion against the previous quarter (30 September 2025: EUR 143.1 billion), mainly driven by a reduction of EUR 7.9 billion in credit risk RWEA. This reduction was the result of tangible advances in the optimisation of our RWA, the ongoing down-steering of the Asset Based Finance portfolio and a decline in Clearing exposures. The decrease was partly offset by an increase of EUR 0.5 billion in our risk exposure amount for operational risk in Q4 2025 due to the update of the three-year average of our operating income after the inclusion of our 2025 financial results.
- The leverage ratio increased to 5.3% as at 31 December 2025 (30 September 2025: 5.1%, excluding interim profits). This was primarily due to the increase in Tier 1 capital and the decrease in exposure measure.
- The consolidated LCR amounted to 153% at the end of December 2025, based on a 12-month rolling average (30 September 2025: 149%).
- The NSFR amounted to 141% at the end of 2025 (30 September 2025: 138%). The increase was mainly observed in available stable funding from retail deposits.

### EU KM1 - Key metrics template

As at 31 December 2025, the CET1 ratio was 15.4% (30 September 2025: 14.2%, excluding interim profits). In comparison with Q3 2025, the CET1 ratio increased, mainly due the decrease in total risk exposure amount (TREA) and the increase in CET1 capital. This quarter, the amount of CET1 capital increased to EUR 20.9 billion (30 September 2025: EUR 20.4 billion, excluding interim profits). This mainly reflected the addition of the year-end net profit after deduction of AT1 coupons and distributions. Unrealised gains on investments in debt securities due to market movements also contributed positively to the CET1 capital. TREA decreased by EUR 7.7 billion compared with 30 September 2025, mainly reflecting a decrease in credit risk RWEA. Credit risk RWEA decreased mainly due to realised RWEA optimisation initiatives, business steering and the execution of a significant risk transfer for a corporate loans portfolio. 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 2025 | 30 September 2025 | 30 June 2025 | 31 March 2025 | 31 December 2024 |
| <b>Available own funds (amounts)</b>   |                  |                   |              |               |                  |
| 1 Common Equity Tier 1 (CET1) capital  | 20,899           | 20,385            | 20,321       | 20,416        | 20,357           |
| 2 Tier 1 capital   | 24,127           | 23,613            | 24,542       | 24,637        | 23,831           |
| 3 Total capital  | 28,241           | 27,768            | 28,763       | 29,096        | 28,477           |
| <b>Risk-weighted exposure amounts (RWEA)</b>   |                  |                   |              |               |                  |
| 4 Total risk exposure amount   | 135,398          | 143,143           | 139,789      | 141,710       | 140,871          |
| 4a Total risk exposure pre-floor   | 135,398          | 143,143           | 139,789      | 141,710       |                  |
| <b>Capital ratios (as % of RWEA)</b>   |                  |                   |              |               |                  |
| 5 Common Equity Tier 1 ratio (%)   | 15.4%            | 14.2%             | 14.5%        | 14.4%         | 14.5%            |
| 5b Common Equity Tier 1 ratio considering unfloored TREA (%)   | 15.4%            | 14.2%             | 14.5%        | 14.4%         |                  |
| 6 Tier 1 ratio (%)   | 17.8%            | 16.5%             | 17.6%        | 17.4%         | 16.9%            |
| 6b Tier 1 ratio considering unfloored TREA (%)   | 17.8%            | 16.5%             | 17.6%        | 17.4%         |                  |
| 7 Total capital ratio (%)  | 20.9%            | 19.4%             | 20.6%        | 20.5%         | 20.2%            |
| 7b Total capital ratio considering unfloored TREA (%)  | 20.9%            | 19.4%             | 20.6%        | 20.5%         |                  |
| <b>Additional own funds requirements to address risks other than the risk of excessive leverage (as % of RWEA)</b> |                  |                   |              |               |                  |
| EU 7d Additional own funds requirements to address risks other than the risk of excessive leverage (%)             | 2.25%            | 2.25%             | 2.25%        | 2.25%         | 2.25%            |
| EU 7e - of which to be made up of CET1 capital (percentage points)   | 1.27%            | 1.27%             | 1.27%        | 1.27%         | 1.27%            |
| EU 7f - of which to be made up of Tier 1 capital (percentage points)   | 1.69%            | 1.69%             | 1.69%        | 1.69%         | 1.69%            |
| EU 7g Total SREP own funds requirements (%)  | 10.25%           | 10.25%            | 10.25%       | 10.25%        | 10.25%           |
| <b>Combined buffer and overall capital requirement (as % of RWEA)</b>  |                  |                   |              |               |                  |
| 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 (%)  | 1.65%            | 1.65%             | 1.74%        | 1.74%         | 1.73%            |
| EU 9a Systemic risk buffer (%)   | 0.04%            | 0.04%             | 0.02%        | 0.02%         |                  |
| 10 Global Systemically Important Institution buffer (%)  |                  |                   |              |               |                  |
| EU 10a Other Systemically Important Institution buffer (%)   | 1.25%            | 1.25%             | 1.25%        | 1.25%         | 1.25%            |
| 11 Combined buffer requirement (%)   | 5.43%            | 5.43%             | 5.51%        | 5.51%         | 5.48%            |
| EU 11a Overall capital requirements (%)  | 15.68%           | 15.68%            | 15.76%       | 15.76%        | 15.73%           |
| 12 CET1 available after meeting the total SREP own funds requirements (%)  | 9.67%            | 8.48%             | 8.77%        | 8.64%         | 8.68%            |
| <b>Leverage ratio</b>  |                  |                   |              |               |                  |
| 13 Total exposure measure  | 453,650          | 463,530           | 448,941      | 440,170       | 420,932          |
| 14 Leverage ratio (%)  | 5.3%             | 5.1%              | 5.5%         | 5.6%          | 5.7%             |
| <b>Additional own funds requirements to address risks of excessive leverage (as % of total exposure measure)</b>   |                  |                   |              |               |                  |
| 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%             |
| <b>Leverage ratio buffer and overall leverage ratio requirement (as % of total exposure measure)</b>               |                  |                   |              |               |                  |
| EU 14d Leverage ratio buffer requirement (%)   |                  |                   |              |               |                  |
| EU 14e Overall leverage ratio requirement (%)  | 3.0%             | 3.0%              | 3.0%         | 3.0%          | 3.0%             |
| <b>Liquidity Coverage Ratio</b>  |                  |                   |              |               |                  |
| 15 Total high-quality liquid assets (HQLA) (Weighted value-average)  | 100,643          | 96,963            | 92,660       | 89,809        | 88,486           |
| EU 16a Cash outflows - Total weighted value  | 101,036          | 99,026            | 96,767       | 96,209        | 95,525           |
| EU 16b Cash inflows - Total weighted value   | 35,010           | 33,913            | 32,521       | 31,935        | 31,510           |
| 16 Total net cash outflows (adjusted value)  | 66,026           | 65,112            | 64,247       | 64,274        | 64,015           |
| 17 Liquidity coverage ratio (%)  | 153%             | 149%              | 144%         | 140%          | 138%             |
| <b>Net Stable Funding Ratio</b>  |                  |                   |              |               |                  |
| 18 Total available stable funding  | 287,121          | 284,003           | 276,560      | 268,552       | 264,223          |
| 19 Total required stable funding   | 203,534          | 205,151           | 199,908      | 197,804       | 193,534          |
| 20 NSFR ratio (%)  | 141%             | 138%              | 138%         | 136%          | 137%             |

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

|  | A   | B                | C   | D            | E             | F                |
|--|---|------------------|---|--------------|---------------|------------------|
|  | Minimum requirement for own funds and eligible liabilities (MREL) |                  | G-SII Requirement for own funds and eligible liabilities (TLAC) |              |               |                  |
| (in millions)  | 31 December 2025  | 31 December 2025 | 30 September 2025   | 30 June 2025 | 31 March 2025 | 31 December 2024 |
| <b>Own funds and eligible liabilities, ratios and components</b>   |   |                  |   |              |               |                  |
| 1 Own funds and eligible liabilities   | 47,082  |                  |   |              |               |                  |
| EU-1a Of which own funds and subordinated liabilities  | 46,079  |                  |   |              |               |                  |
| 2 Total risk exposure amount of the resolution group (TREA)  | 135,398   |                  |   |              |               |                  |
| 3 Own funds and eligible liabilities as a percentage of TREA (row1/row2)   | 34.8%   |                  |   |              |               |                  |
| EU-3a Of which own funds and subordinated liabilities  | 34.0%   |                  |   |              |               |                  |
| 4 Total exposure measure of the resolution group   | 453,650   |                  |   |              |               |                  |
| 5 Own funds and eligible liabilities as percentage of the total exposure measure   | 10.4%   |                  |   |              |               |                  |
| EU-5a Of which own funds or subordinated liabilities   | 10.2%   |                  |   |              |               |                  |
| 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 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 (%) |   |                  |   |              |               |                  |
| <b>Minimum requirement for own funds and eligible liabilities (MREL)</b>   |   |                  |   |              |               |                  |
| EU-7 MREL requirement expressed as percentage of the total risk exposure amount  | 22.7%   |                  |   |              |               |                  |
| EU-8 Of which to be met with own funds or subordinated liabilities   | 16.4%   |                  |   |              |               |                  |
| EU-9 MREL requirement expressed as percentage of the total exposure measure  | 7.3%  |                  |   |              |               |                  |
| EU-10 Of which to be met with own funds or subordinated liabilities  | 7.3%  |                  |   |              |               |                  |

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

|  | 31 December 2025  |   |   |
|--|---|---|---|
|  | A   | B   | C   |
|  | 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 |
| (in millions)  |   |   |   |
| <b>Own funds and eligible liabilities and adjustments</b>  |   |   |   |
| 1 Common Equity Tier 1 capital (CET1)  | 20,899  |   |   |
| 2 Additional Tier 1 capital (AT1)  | 3,228   |   |   |
| 6 Tier 2 capital (T2)  | 4,114   |   |   |
| 11 Own funds for the purpose of Articles 92a of Regulation (EU) No 575/2013 and 45 of Directive 2014/59/EU   | 28,241  |   |   |
| <b>Own funds and eligible liabilities: Non-regulatory capital elements</b>   |   |   |   |
| 12 Eligible liabilities instruments issued directly by the resolution entity that are subordinated to excluded liabilities (not grandfathered)                 | 17,886  |   |   |
| 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                                      |   |   |   |
| 13 Eligible liabilities that are not subordinated to excluded liabilities (not grandfathered pre-cap)  | 1,003   |   |   |
| 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                                      | 1,003   |   |   |
| 17 Eligible liabilities items before adjustments   | 18,841  |   |   |
| EU-17a Of which subordinated liabilities items   | 17,838  |   |   |
| <b>Own funds and eligible liabilities: Adjustments to non-regulatory capital elements</b>  |   |   |   |
| 18 Own funds and eligible liabilities items before adjustments   | 47,082  |   |   |
| 19 (Deduction of exposures between multiple point of entry (MPE) resolution groups)  |   |   |   |
| 20 (Deduction of investments in other eligible liabilities instruments)  |   |   |   |
| 22 Own funds and eligible liabilities after adjustments  | 47,082  |   |   |
| EU-22a Of which: own funds and subordinated liabilities  | 46,079  |   |   |
| <b>Risk-weighted exposure amount and leverage exposure measure of the resolution group</b>   |   |   |   |
| 23 Total risk exposure amount (TREA)   | 135,398   |   |   |
| 24 Total exposure measure (TEM)  | 453,650   |   |   |
| <b>Ratio of own funds and eligible liabilities</b>   |   |   |   |
| 25 Own funds and eligible liabilities as a percentage of TREA  | 34.8%   |   |   |
| EU-25a Of which own funds and subordinated liabilities   | 34.0%   |   |   |
| 26 Own funds and eligible liabilities as a percentage of TEM   | 10.4%   |   |   |
| EU-26a Of which own funds and subordinated liabilities   | 10.2%   |   |   |
| 27 CET1 (as a percentage of the TREA) available after meeting the resolution group's requirements  | 9.7%  |   |   |
| 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                                   |   |   |   |
| <b>Memorandum items</b>  |   |   |   |
| 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 2025  |                                     |                                   |                                |   |                             |  |
|---|-------------------------------------|-----------------------------------|--------------------------------|---|-----------------------------|--|
| Insolvency ranking  |                                     |                                   |                                |   |                             |  |
|   | 1                                   | 2                                 | 3                              | 4   | 5                           | 6  |
| (in millions)   | (most junior)                       |                                   |                                |   |                             |  |
| 1 Description of insolvency rank (free text)                                | 1- Common equity Tier 1 instruments | 2 - Additional Tier 1 instruments | 3 - Tier 2 capital instruments | 4 - No longer qualifying AT1 or T2 unless other contractual ranking | 5 - Other subordinated debt | 6 - Senior non-preferred "Tier 3" debt instruments |
| 5 Own funds and liabilities potentially eligible for meeting MREL           | 20,952                              | 3,228                             | 4,156                          |   |                             | 17,886   |
| 6 of which residual maturity ≥ 1 year < 2 years                             |                                     |                                   |                                |   |                             | 5,186  |
| 7 of which residual maturity ≥ 2 year < 5 years                             |                                     |                                   |                                |   |                             | 7,213  |
| 8 of which residual maturity ≥ 5 years < 10 years                           |                                     |                                   | 3,000                          |   |                             | 5,486  |
| 9 of which residual maturity ≥ 10 years, but excluding perpetual securities |                                     |                                   | 1,156                          |   |                             |  |
| 10 of which perpetual securities  | 20,952                              | 3,228                             |                                |   |                             |  |

| 31 December 2025  |                       |                                     |  |   |  |  |                |
|---|-----------------------|-------------------------------------|--|---|--|--|----------------|
| Insolvency ranking  |                       |                                     |  |   |  |  |                |
|   | 7                     | 8                                   | 9  | 10  | 11   | 12   |                |
| (in millions)   | (most senior)         |                                     |  |   |  |  | Sum of 1 to 12 |
| 1 Description of insolvency rank (free text)                                | 7 - Other liabilities | 8 - Preferred deposits retail + SME | 9 - Covered deposits - Claims of a DGS following its subrogation in the rights and obligations of covered depositors | 10 - Employee liabilities that have a preferential status by law. | 11 - Dutch Tax and social security authority. Claims that have a preferential status by law. | 12 - Secured creditors (collateralised part) |                |
| 5 Own funds and liabilities potentially eligible for meeting MREL           | 1,003                 |                                     |  |   |  |  | 47,224         |
| 6 of which residual maturity ≥ 1 year < 2 years                             | 215                   |                                     |  |   |  |  | 5,401          |
| 7 of which residual maturity ≥ 2 year < 5 years                             | 397                   |                                     |  |   |  |  | 7,610          |
| 8 of which residual maturity ≥ 5 years < 10 years                           | 161                   |                                     |  |   |  |  | 8,647          |
| 9 of which residual maturity ≥ 10 years, but excluding perpetual securities | 230                   |                                     |  |   |  |  | 1,386          |
| 10 of which perpetual securities  |                       |                                     |  |   |  |  | 24,179         |

## **EU OV1 – Overview of total risk exposure amounts**

The total risk exposure amount (TREA) significantly decreased by EUR 7.7 billion to EUR 135.4 billion in the fourth quarter of 2025 (30 September 2025: EUR 143.1 billion), mostly due to a drop of EUR 7.9 billion in the credit risk RWA.

The decrease in the credit risk RWA was mainly driven by RWA optimisation initiatives, including methodological enhancements and data quality improvements. These included improvements in the collateral chain and the partial reintroduction of the SME support factor. The execution of a significant risk transfer on a corporate loans portfolio resulted in another significant reduction. Further reductions were achieved through the continued down-steering of the Asset Based Finance portfolio and a decrease in Clearing exposures.

The risk exposure amount for operational risk increased to EUR 17.6 billion in the fourth quarter of 2025 (30 September 2025: EUR 17.1 billion). Following the CRR III changes to the operational risk framework, the three-year period used for the calculations is based on full calendar years, with updates occurring in the fourth quarter. Accordingly, the Q4 2025 operational risk own funds requirements are based on the period 2023-2025.

The risk exposure amount for market risk decreased over the fourth quarter of 2025 to EUR 1.6 billion (30 September 2025: EUR 1.9 billion).

|  | A                | B                 | C                            |
|--|------------------|-------------------|------------------------------|
|  | 31 December 2025 | 30 September 2025 | 31 December 2025             |
| (in millions)  | TREA             | TREA              | Total own funds requirements |
| 1 <b>Credit risk (excluding CCR)</b>   | <b>108,376</b>   | <b>115,550</b>    | <b>8,670</b>                 |
| 2 - of which the standardised approach   | 81,267           | 88,145            | 6,501                        |
| 3 - of which the Foundation IRB (F-IRB) approach                                       | 928              | 1,357             | 74                           |
| 4 - of which slotting approach   |                  |                   |                              |
| EU 4a - of which equities under the simple risk-weighted approach                      | 2,700            | 2,631             | 216                          |
| 5 - of which the Advanced IRB (A-IRB) approach <sup>1</sup>                            | 15,166           | 15,023            | 1,213                        |
| 6 <b>Counterparty Credit Risk - CCR</b>  | <b>6,902</b>     | <b>7,899</b>      | <b>552</b>                   |
| 7 - of which the standardised approach   | 3,617            | 4,105             | 289                          |
| 8 - of which internal model method (IMM)   |                  |                   |                              |
| EU 8a - of which exposures to a CCP  | 880              | 823               | 70                           |
| 9 - of which other CCR   | 2,404            | 2,971             | 192                          |
| 10 <b>Credit valuation adjustments risk - CVA risk</b>                                 | <b>186</b>       | <b>199</b>        | <b>15</b>                    |
| EU 10a - of which the standardised approach (SA)                                       |                  |                   |                              |
| EU 10b - of which the basic approach (F-BA and R-BA)                                   | 186              | 199               | 15                           |
| EU 10c - of which the simplified approach  |                  |                   |                              |
| 15 <b>Settlement risk</b>  |                  |                   |                              |
| 16 <b>Securitisation exposures in the non-trading book (after the cap)<sup>2</sup></b> | <b>935</b>       | <b>690</b>        | <b>75</b>                    |
| 17 - of which SEC-IRBA approach  |                  |                   |                              |
| 18 - of which SEC-ERBA (including IAA)   | 59               | 61                | 5                            |
| 19 - of which SEC-SA approach  | 630              | 388               | 50                           |
| EU 19a - of which 1250% / deduction  |                  |                   |                              |
| 20 <b>Position, foreign exchange and commodities risks (Market risk)</b>               | <b>1,618</b>     | <b>1,915</b>      | <b>129</b>                   |
| 21 - of which the Alternative standardised approach (A-SA) <sup>3</sup>                |                  |                   |                              |
| EU 21a - of which the Simplified standardised approach (S-SA)                          | 2                | 4                 |                              |
| 22 - of which Alternative Internal Model Approach (A-IMA) <sup>3</sup>                 |                  |                   |                              |
| EU 22a <b>Large exposures</b>  |                  |                   |                              |
| 23 <b>Reclassifications between the trading and non-trading books</b>                  |                  |                   |                              |
| 24 <b>Operational risk</b>   | <b>17,628</b>    | <b>17,132</b>     | <b>1,410</b>                 |
| EU 24a <b>Exposures to crypto-assets</b>   |                  |                   |                              |
| 25 <b>Amounts below the thresholds for deduction (subject to 250% risk weight)</b>     | <b>708</b>       | <b>911</b>        | <b>57</b>                    |
| 26 <b>Output floor applied (%)</b>   | <b>50%</b>       | <b>50%</b>        |                              |
| 27 <b>Floor adjustment (before application of transitional cap)</b>                    |                  |                   |                              |
| 28 <b>Floor adjustment (after application of transitional cap)</b>                     |                  |                   |                              |
| <b>29 Total<sup>2</sup></b>  | <b>135,398</b>   | <b>143,143</b>    | <b>10,832</b>                |

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

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

3. Row 21 and row 22 are left blank for both the current and previous reporting periods, as the approaches referenced in those lines are not applicable under the methodology currently in use. This is due to the FRTB delay, as a result of which Market Risk own funds requirements are still calculated based on the approaches as existed prior to CRR III.

## 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 complies with all regulatory and supervisory requirements (e.g. CET1 ratio, leverage ratio, MREL). The internal 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 (CAS) that, together with supporting documentation, is submitted to the ECB and assessed as part of the Supervisory Review and Evaluation Process (SREP).

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

TREA diminished by EUR 7.7 billion, amounting to EUR 135.4 billion at the end of 2025 (30 September 2025: EUR 143.1 billion). This reduction was primarily caused by a drop of EUR 7.9 billion in credit risk RWA.

The core drivers of the decrease in the credit risk RWA were: a) RWA optimisation initiatives, such as methodological enhancements, data quality improvements in the collateral chain and the partial reintroduction of the SME support factor; b) the completion in December 2025 of a significant risk transfer transaction on a EUR 2 billion corporate loans portfolio; c) the continued down-steering of the Asset Based Finance portfolio; and d) lower exposures in Clearing.

The risk exposure amount for operational risk grew to EUR 17.6 billion in the fourth quarter of 2025 (30 September 2025: EUR 17.1 billion). This reflects the inclusion of our 2025 financial results in the calculation of the average for the three-year period that applies for calculating own funds requirements for operational risk.

The risk exposure amount for market risk decreased to EUR 1.6 billion over the last quarter of 2025 (30 September 2025: EUR 1.9 billion) driven by the SVaR component due to a reduction in EUR 3-month/6-month interest rate curve risk exposure.

As result of the completion in September 2025 of the transition of certain portfolios to the standardised approach, the difference between the RWEAs calculated using the full standardised approach and the RWEAs used as the basis for the output floor is now minimal. At the end of 2025, the RWEAs calculated using the full standardised approach came to around EUR 153.4 billion, a decrease of approximately EUR 15.2 billion compared to the previous quarter (30 September 2025: EUR 168.6 billion). This reduction was mainly driven by the impact of the improvements in the collateral chain and other dynamics previously explained for credit risk RWEA.

|   | A   | B   | C                          | D  | EU D                                       |
|---|---|---|----------------------------|--|--|
|   | 31 December 2025  |   |                            |  |  |
|   | Risk weighted exposure amounts (RWEAs)                                    |   |                            |  |  |
| (in millions)   | RWEAs for modelled approaches that banks have supervisory approval to use | RWEAs for portfolios where standardised approaches are used | Total actual RWEAs (A + B) | RWEAs calculated using full standardised approach <sup>2</sup> | RWEAs that is the base of the output floor |
| 1 Credit risk (excluding counterparty credit risk)          | 19,359  | 81,267  | 100,626                    | 124,018  | 123,788                                    |
| 2 Counterparty credit risk                                  | 839   | 6,063   | 6,902                      | 7,991  | 7,991                                      |
| 3 Credit valuation adjustment                               |   | 186   | 186                        | 186  | 186  |
| 4 Securitisation exposures in the banking book <sup>1</sup> |   | 689   | 689                        | 689  | 689  |
| 5 Market risk   | 1,615   | 2   | 1,618                      | 1,244  | 1,244                                      |
| 6 Operational risk  |   | 17,628  | 17,628                     | 17,628   | 17,628                                     |
| 7 Other risk weighted exposure amounts                      |   | 7,751   | 7,751                      | 1,662  | 1,662                                      |
| <b>8 Total</b>  | <b>21,813</b>   | <b>113,585</b>  | <b>135,398</b>             | <b>153,417</b>   | <b>153,188</b>                             |

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

2. The bank has chosen not to follow the EBA's mapping for row 7 of this column. Part of the bank's 'other risk weighted exposure amounts' refer to add-ons that would not be applicable if the bank applied Credit Risk SA to certain portfolios. Following EBA's mapping would therefore result in a double counting of RWEAs, the result of which would be that the total in row 8 would not be an accurate number for the TREA at end of the output floor transitional period.

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

The credit risk RWEA excluding CCR (which is presented in the CMS1 template) fell by EUR 7.1 billion to EUR 100.6 billion in the last quarter of 2025 (30 September 2025: EUR 107.7 billion). This drop was the result of the implementation of RWA optimisation measures, a new securitisation and reductions in our Asset Based Finance and Clearing operations.

By the end of 2025, only 19.2% of our credit risk RWEA (excluding CCR) was calculated using modelled approved approaches, narrowed down to our residential mortgages, banks and financial institutions portfolios only. In addition, the difference between the credit risk RWEAs calculated using the full standardised approach and the credit risk RWEAs used as the basis for the output floor is now negligible following the switch of certain portfolios to the standardised approach. These two metrics registered a decrease of approximately EUR 14.6 billion between the third and the fourth quarters of 2025, reflecting the dynamics described in CMS1.

|  | A  | B   | C                  | D   | EU D                                       |
|--|--|---|--------------------|---|--|
|  | 31 December 2025   |   |                    |   |  |
|  | Risk weighted exposure amounts (RWEAs)   |   |                    |   |  |
| (in millions)  | RWEAs for modelled approaches that institutions have supervisory approval to use | RWEAs for column (A) if re-computed using the standardised approach | Total actual RWEAs | RWEAs calculated using full standardised approach | RWEAs that is the base of the output floor |
| 1 Central governments and central banks  |  |   | 355                | 355   | 355  |
| EU 1a Regional governments or local authorities  |  |   |                    |   |  |
| EU 1b Public sector entities   |  |   | 29                 | 29  | 29   |
| EU 1c Categorised as Multilateral Development Banks in SA  |  |   | 2                  | 2   | 2  |
| EU 1d Categorised as International organisations in SA   |  |   |                    |   |  |
| 2 Institutions   | 758  | 324   | 1,293              | 858   | 858  |
| 3 Equity   | 3,265  | 1,151   | 3,265              | 1,151   | 1,151                                      |
| 5 Corporates   | 170  | 216   | 45,817             | 46,092  | 45,863                                     |
| 5.1 - of which F-IRB is applied  | 170  | 220   | 170                | 449   | 220  |
| 5.2 - of which A-IRB is applied  |  |   |                    |   |  |
| EU 5a - of which Corporates - General  | 170  | 216   | 35,965             | 445   | 216  |
| EU 5b - of which Corporates - Specialised lending  |  |   | 9,852              | 9,852   | 9,852                                      |
| EU 5c - of which Corporates - Purchased receivables  |  |   |                    |   |  |
| 6 Retail <sup>1</sup>  | 15,166   | 15  | 18,720             | 3,569   | 3,569                                      |
| 6.1 - of which Retail - Qualifying revolving   |  |   |                    |   |  |
| EU 6.1a - of which Retail - Purchased receivables  |  |   |                    |   |  |
| EU 6.1b - of which Retail - Other  | 8  | 15  | 18,720             | 3,569   | 3,569                                      |
| 6.2 - of which Retail - Secured by residential real estate   | 15,158   | 38,821  | 15,158             | 38,821  | 38,821                                     |
| EU 7a Categorised as secured by immovable properties and ADC exposures in SA <sup>2</sup>            | 13,573   | 38,830  | 25,436             | 64,266  | 64,266                                     |
| EU 7b Collective investment undertakings (CIU)   |  |   | 550                | 550   | 550  |
| EU 7c Categorised as exposures in default in SA  | 1,587  | 1,151   | 3,094              | 4,245   | 4,245                                      |
| EU 7d Categorised as subordinated debt exposures in SA   |  |   | 31                 | 31  | 31   |
| EU 7e Categorised as covered bonds in SA   | 321  | 540   | 95                 | 635   | 635  |
| EU 7f Categorised as claims on institutions and corporates with a short-term credit assessment in SA | 239  | 295   | 50                 | 345   | 345  |
| 8 Other non-credit obligation assets   |  |   | 1,887              | 1,887   | 1,887                                      |
| <b>9 Total</b>   | <b>19,359</b>  | <b>42,522</b>   | <b>100,626</b>     | <b>124,018</b>                                    | <b>123,788</b>                             |

1. Following EBA's mapping tool, for column a, row 6 is the sum rows of 6.1, EU 6.1a, EU 6.1b and 6.2. For the other columns row 6.2 is not included in the total for row 6.

2. The bank does not follow the EBA mapping tool for the datapoints in row EU 7a for columns d and EU d because the EBA mapping tool in our view incorrectly omits the applicable datapoints from the underlying Credit Risk SA (C07.00) template.

# 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 of its stakeholders. This is defined by our strategic risk appetite statement and ensured by our risk management framework.

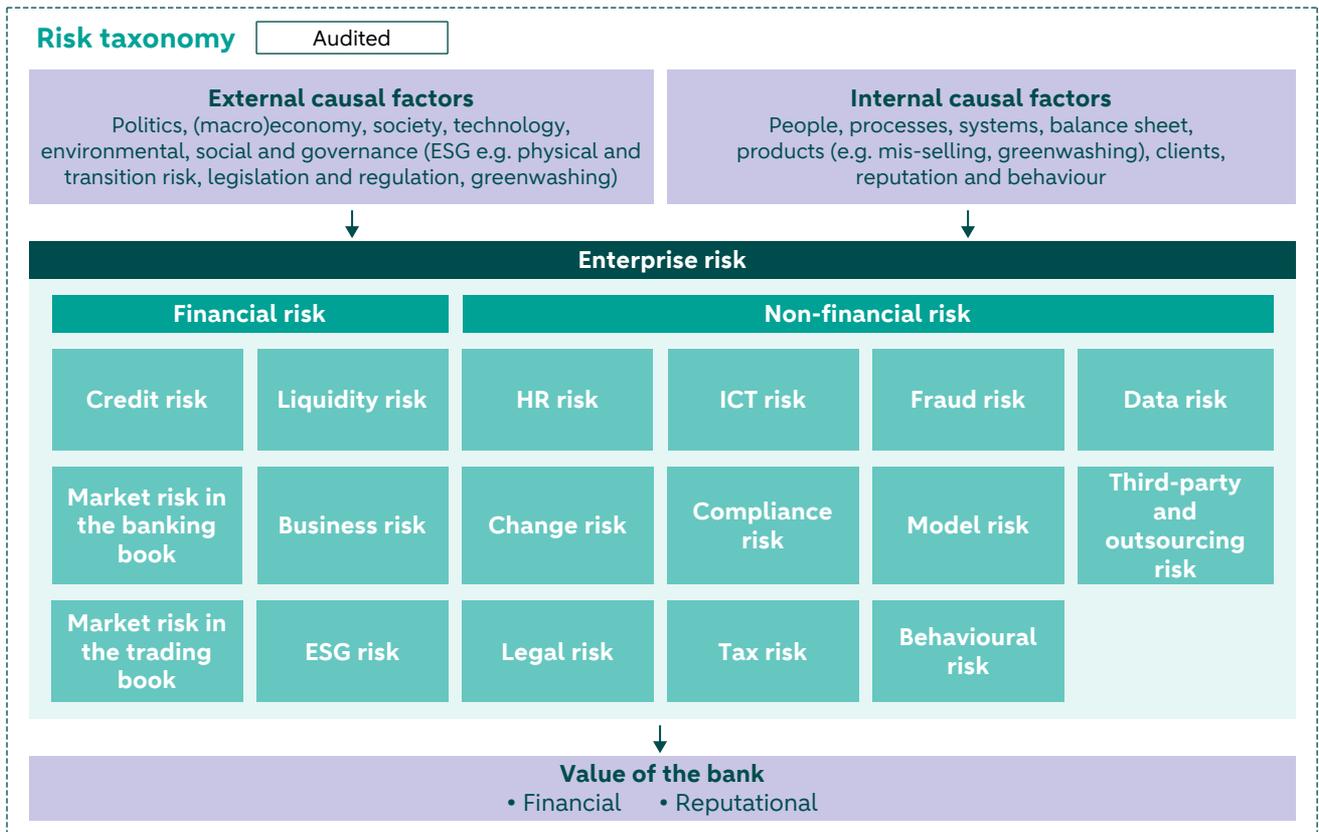
A core component of our risk management framework is the enterprise risk management (ERM) cycle, which safeguards that risks are identified, assessed, addressed, monitored and reported consistently across the bank.

### **Risk taxonomy**

A key outcome of the risk identification step in the ERM cycle is the risk taxonomy, which provides the foundation for the reiterative process of defining and managing material risks within the bank's risk management framework. The risk taxonomy is reviewed and updated on an annual basis, or sooner if an update is required due to the emergence of any new material risk type.

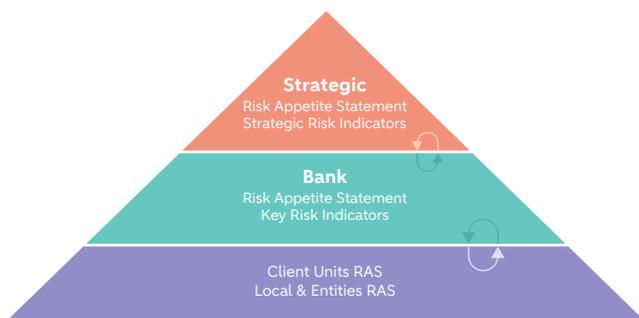
The taxonomy considers materiality of risks based on an assessment of financial and non-financial impact in combination with likelihood. The key financial risk types related to our business model are credit risk, liquidity risk and market risk in the banking book. The chart below depicts our risk taxonomy in place for 2025.

In 2025, the bank reviewed and updated its criteria for assessing materiality to ensure a focus on the most relevant risks. In 2026, we will monitor and report on our risks in accordance with the updated risk taxonomy. Consistent with the principles underpinning the new strategy, the risk taxonomy will be simplified in 2026, concentrating on those risks that are most relevant for the bank's steering and decision-making.



### Risk appetite framework

Our risk appetite determines the level of risk that the bank is willing to take in order to pursue its strategy. 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). In 2025, the Strategic Risk Appetite Statement SRIs were further articulated in the bank-wide Bank Risk Appetite Statement (bank RAS) and key risk indicators (KRIs), which were cascaded to risk appetite statements at a client unit level (client unit RAS), local level (LRAS) and entity level (ERAS). In alignment with the principles of ABN AMRO’s new strategy, the risk appetite framework will be adjusted in 2026, resulting in a simplified structure whereby the strategic and bank RAS layers are consolidated into a single bank-wide layer.

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 metrics
- concentration limits for counterparties, products, 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)
- several ESG risk appetite indicators

The status of adherence to the risk appetite and the outlook are discussed every month by the Executive Board, and every quarter by the Supervisory Board, based on the CRO memo.



### 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 client units. By taking an integrated view, we strive to carefully balance our actions to manage our risk profile within our risk appetite. 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. The main non-financial risks include compliance, operational risks (such as ICT, data and third party and outsourcing) and model risks. In 2026, regulatory risk will be distinguished more specifically in our simplified risk taxonomy.

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 a certain level of assurance and/or comfort regarding the achievement of objectives related to strategy, compliance with laws, regulations and internal policies, reliability of both financial and non-financial reporting and effectiveness and efficiency of operations. ABN AMRO's first and second lines of defence perform a variety of activities regarding our risk management and control systems. These activities include risk assessments, stress tests, and evaluations of the effectiveness of controls. 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.

During 2025, the Executive Board assessed the design and effectiveness of these systems. The results were discussed with the Audit Committee, the Supervisory Board, Group Audit and the external auditor. ABN AMRO continuously evaluates the adequacy of the effectiveness of its risk control framework. This includes executing interventions to foster strong risk awareness and practices. This is achieved, for example, through 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 economic crime, as well as adequately managing ICT risk and third party and outsourcing risk.

## 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 supervisory authorities 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. The Head of Model Validation & Model Risk Management reports directly to the Chief Risk Officer.

## Capital

### Regulatory capital (CRD V/CRR III)

In the European Union (EU), the Basel framework is implemented via the Capital Requirements Directive (CRD) and Capital Requirements Regulation (CRR). The 'Basel IV' package refers to the updates CRR III and CRD VI (this is an EU Directive that has to be transposed into local legislation). In the Netherlands, the transposition of the CRD VI changes has been delayed until the spring of 2026. The CRR III update is applicable with effect from 1 January 2025 and therefore applies to reporting dates after that date. These capital requirements specify how much capital and buffers the bank needs to have in place to cover its financial risks.

When determining their capital requirements, banks have to calculate their exposure to three major risk types (credit risk, operational risk and market risk). The changes compared with CRD V/CRR II concern the calculations to be made within these different risk areas:

- Within the area of credit risk, the regulations are moving towards more standardised calculations by removing the possibility of applying certain approaches to certain types of exposures and through the introduction of additional floors when internally modelled approaches are used.
- For operational risk, a new single non-modelled approach has been introduced to replace the existing approaches.

- For market risk, new standardised, alternative standardised and internally modelled approaches have been introduced. To create a more level playing field with jurisdictions outside the EU, the European Commission has decided that these new approaches will not be applicable for calculating regulatory capital requirements until 1 January 2027. The existing approaches therefore continue to apply.

Another key change in the applicable capital requirements for banks is the introduction of an ‘output floor’ that is calculated on the basis of all these risk areas combined. This output floor is calculated as a percentage of the capital requirements that would apply if a bank only used standardised approaches for all risk areas. This output floor is then compared with the capital requirements that the bank has calculated using the approaches it has approval for. ABN AMRO is currently not constrained by this output floor.

The total capital requirements for the bank are expressed in a total risk exposure amount (TREA). For ABN AMRO, most of that TREA consists of the risk-weighted exposure amount, which is also referred to as risk-weighted assets (RWA). The bank’s capital ratio is the amount of capital held by the bank divided by the TREA. The CRR sets required minimum percentages for such capital ratios and these minimum percentages are referred to as the Pillar 1 framework or requirements. Under the CRD, supervisory authorities have the authority to impose bank-specific additional capital requirements (on top of Pillar 1). These additional capital requirements are known as Pillar 2 requirements.

### 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 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. The outcome of stress testing is used for setting and monitoring risk appetite limits and targets.

### 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.

This figure 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. 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.

### 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.

ABN AMRO has a two-tier governance model consisting of an Executive Board and a Supervisory Board. The Executive Board and Supervisory Board of ABN AMRO define the governance arrangements aimed at ensuring 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 internal control framework that includes a clear organisational structure and well-functioning independent internal risk management, compliance and audit functions that have sufficient authority, expertise, stature and resources to perform their tasks
- an adequate and effective three lines of defence model at the bank
- a risk culture that addresses risk awareness at the bank, risk ownership and risk-taking behaviour
- a corporate culture and values that foster responsible and ethical behaviour, including a code of conduct
- the bank's key policies within the applicable legal and regulatory framework
- the overall risk strategy, including the bank's risk appetite and risk management framework and measures to ensure the management body devotes sufficient time to risk issues
- the amounts, types and distribution of both internal capital and regulatory capital to provide adequate cover for the bank's risks
- targets for the bank's capital and liquidity management

## Supervisory Board and supervisory risk committees

### Risk & Capital Committee

The Risk & Capital Committee is responsible for supervising and advising the Supervisory Board on risk management and control, compliance, capital allocation and liquidity requirements, the bank's risk appetite, regulatory compliance, (such as codes of conduct and internal procedures), risk awareness within the bank, the integration of sustainability, climate-related, and environmental risks into the risk management framework, and sound remuneration policies and practices in light of risk, capital, liquidity and expected earnings. The Risk & Capital Committee meets every quarter, and otherwise when required.

## 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 this context, the Executive Board approves the materiality assessment methodology and results as well as the risk taxonomy every year. The internal capital adequacy plan (ICAAP), business model analysis and climate resilience analysis are also approved by the Executive Board.

In the risk decision-making framework, the Executive Board has set up three executive risk management committees, which are described 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 is chaired by the Chief Risk Officer and meets at least once a month.

The GRC has delegated specific approval powers to sub-committees, including client unit and Innovation and Technology (I&T) risk committees, Strategic Product Approval Committees (SPACs), the Scenario and Stress Testing Committee (SSC), the Impairment and Provisioning Committee (IPC), the Financial Crime Risk Committee (FCRC), the Engagement Committee, and the Methodology Acceptance Group (MAG).

### 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 determined by the Executive Board. In addition, the

CCC is responsible for approving and monitoring large intercompany credit facilities. The CCC is chaired by the head of Credit Risk and convenes twice a week.

### **Group Regulatory Committee**

The Regulatory Committee (RC) is responsible for a bank-wide understanding, adequate oversight and decision taking on matters relating to the timely regulatory compliance of the Group to current, new and changing national and international laws and regulations, supervisory expectations and the remediation of supervisory findings. The RC is chaired by the Chief Risk Officer and convenes at least once every two months.

### **Diversity and inclusion policy**

The Executive Board consisted of the Chief Executive Officer (CEO), the Chief Financial Officer (CFO), the Chief Risk Officer (CRO), the Chief Innovation & Technology Officer (CI&TO), three Chief Commercial Officers (CCOs) (Personal & Business Banking, Corporate Banking and Wealth Management) and the Chief Operations Officer (COO). The COO role ceased to be part of the Executive Board with effect from 1 January 2026. The COO's responsibilities have been redistributed among members of the Executive Board.

The Executive Board's composition is based on ABN AMRO's guiding principle that diversity of thought, expertise, background, competences and interpersonal styles is a prerequisite for effective management and, by extension, for sustainable long-term value creation. The vision set by ABN AMRO is to become a company that mirrors, at all levels, the diversity of the communities in which it operates. A diverse Executive Board fosters a variety of views and experiences and facilitates independent opinions and sound decision-making within the Executive Board.

To that effect, the following diversity aspects are relevant for the composition of the Executive Board: gender, age, educational and professional background, and geographical provenance. The Supervisory Board considered these aspects for the appointment in 2025. In line with ABN AMRO's diversity policy, ABN AMRO strives to meet its gender target. According to ABN AMRO's gender diversity target, at least one-third (1/3) of ABN AMRO's Executive Board should consist of the underrepresented gender. As at 1 January 2026, the Executive Board consisted of three male members and four female members.

When vacancies arise and in succession planning, ABN AMRO gives due consideration to any applicable diversity requirements in its search for suitable new members who meet the fit and proper requirements stipulated in the Dutch Financial Markets Supervision Act.

The Rules of Procedure of the Executive Board are available on our website. These Rules of Procedure were last updated in 2025, based on changes to our organisational structure, relevant legislative and regulatory guidance.

### **Risk reporting**

The Chief Risk Officer (CRO) is responsible for reporting to the Executive Board and the Supervisory Board on the bank's risks. The CRO reports monthly to the GRC and quarterly to the Executive Board and Supervisory Board.

### **Three lines of defence**

The three lines of defence 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   |
| <p><b>Responsibility</b></p> <ul style="list-style-type: none"> <li>Delivers value-added services to our clients</li> <li>Owns and manages risks and implements internal controls for day-to-day operations</li> <li>Operates within the risk appetite</li> <li>Strikes the right balance between return and risk in its decisions</li> <li>Seeks outside-in views and advice, where necessary</li> <li>Ensure systems, processes and reporting capabilities are commensurate with its activities and risk appetite</li> </ul> | <p><b>Responsibility</b></p> <ul style="list-style-type: none"> <li>Sets the bank-wide risk management framework</li> <li>Sets risk policies and ensures regulations are translated into policies</li> <li>Sets the risk appetite</li> <li>Maintains risk control and oversight through monitoring, reporting and escalating, where necessary</li> <li>Provides independent challenge and expertise to the First Line</li> <li>Proactively challenges the risk management practices of the First Line</li> <li>Provides outside-in views and ensures consistency in risk management practices across the First Line</li> </ul> | <p><b>Responsibility</b></p> <ul style="list-style-type: none"> <li>Protects and enhances organisational value by providing risk-based and objective assurance, insight and added value to support the achievement of our objectives</li> <li>Evaluates the design and effectiveness of governance, risk management and control processes, agrees with management on remediation and monitors follow-up</li> </ul> |

- 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 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 as well as the risk appetite within which the first line must operate.
- The third line of defence is the internal audit function, which provides assurance on the adequacy of the risk management activities performed by the first and second lines of defence based on an independent assessment.

### Personal details of the members of the Executive Board

The information below refers to the members of the Executive Board as at 10 March 2026.



Chief Executive Officer and Chair of the Executive Board

#### Marguerite Bérard French, female, 1977

Marguerite Bérard was appointed as CEO and Chair of the Executive Board of ABN AMRO, effective 23 April 2025. As CEO, Marguerite Bérard is also responsible for Brand, Marketing & Communications, Group Audit, Group Economics, Human Resources, Legal & Corporate Office, Strategy & Transformation and the Sustainability Centre of Excellence. Her current term ends at the close of ABN AMRO's Annual General Meeting in 2029.

**Relevant positions pursuant to CRD V**  
 Chief Executive Officer and Chair of the Executive Board of ABN AMRO Bank N.V., member of the non-executive board, independent director and member of the Audit Committee of Carrefour Group S.A.



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 client unit Corporate Banking. 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. On 25 November 2025, the Supervisory Board of ABN AMRO announced its intention to nominate Dan Dorner for a second term of four years.

**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 of 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, Procurement, CC&OPS and BPM Process Management. 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 of ABN AMRO as Chief Risk Officer, 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, Security & Intelligence Management and First Line Risk & Privacy. 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, member of the Supervisory Board of Migros Bank AG.



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 client unit Wealth Management. Her current term ends at the close of ABN AMRO's Annual General Meeting in 2026. On 25 November 2025, the Supervisory Board of ABN AMRO announced its intention to nominate Choy van der Hooft-Cheong for a second term of four years.

**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, member of the Supervisory Council of Stichting de Oude Kerk Amsterdam, chair of the board of Stichting ABN AMRO Art & Heritage.



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, Tax and Workplace Management. 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 client unit Personal & Business Banking, including Detecting Financial Crime and Customer Data Solutions. Her term ends at the close of ABN AMRO's Annual General Meeting in 2026. On 25 November 2025, the Supervisory Board of ABN AMRO announced its intention to nominate Annerie Vreugdenhil for a second term of four years.

**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), Chair of the Board of Stichting ABN AMRO Foundation.

**Personal details of the members of the Supervisory Board**

The information below refers to the members of the Supervisory Board as at 10 March 2026.



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**  
Member of the International Advisory Board of Akbank, Chair of the Management Board of Stichting Fondsen Nederlands Kanker Instituut, member of the Supervisory Board of Foundation Holland Festival, the Netherlands, member of the Artis-Ambassadors group 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 Scope Group's Ambassadors Group.



Vice-Chair of the Supervisory Board

**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**

Vice-Chair 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

**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 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 Metropole Orkest, member of the Supervisory Council of the Kadaster, 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

**Daniel Hartert** German, male, 1958

Daniel Hartert was appointed to the Supervisory Board of ABN AMRO effective 11 September 2025. His current term expires at the close of the Annual General Meeting in 2030.

**Last executive position held**  
CIO of Bayer AG & CEO of Bayer Business Services GmbH.

**Relevant positions pursuant to CRD V**

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

**Other relevant ancillary positions**

CxO adviser to the management board of Capgemini SE, CxO adviser at Netskope Inc.



Member

**Mariken Tannemaat** Dutch, female, 1971

Mariken Tannemaat was appointed to the Supervisory Board of ABN AMRO effective 15 December 2020 and reappointed effective 23 April 2025. Her current term expires at the close of the Annual General Meeting in 2029.

**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 and non-executive director of Prudential International Assurance PLC.

**Other relevant ancillary positions**

Adviser 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. The Supervisory Board intends to nominate Sarah Russell for reappointment as a member of the Supervisory Board for a period of four years with effect from 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 Chair of the Supervisory Board of ABN AMRO Clearing Bank N.V., member and Vice-Chair of the Supervisory Board of APG Groep N.V., member and Vice-Chair of the Supervisory Board 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 private consultancy firm Ms De Vries, member of the Supervisory Board of BNG Bank N.V.

**Other relevant ancillary positions**

Chair of the Advisory Board of Authority for Nuclear Safety and Radiation Protection, member of the Advisory Board of Human Environment and Transport Inspectorate (ILT), regular author of expert contribution to the Dutch financial daily gazette (Financieele Dagblad), Chair of the Advisory Council of the Dutch Healthcare Authority (Nederlandse Zorgautoriteit), member of the Advisory Council of the Inspectorate of Education (Inspectie van het Onderwijs).

**Foreseeable changes to the composition of the management**

ABN AMRO intends to appoint Michiel Lap as Chair of the Supervisory Board of ABN AMRO Bank N.V. with effect from the closure of the Annual General Meeting on 22 April 2026. Michiel Lap will succeed Tom de Swaan, who will retire as Chair after almost eight years. On 29 January 2026, ABN AMRO announced the nomination of Jean-Pierre Mustier to its Supervisory Board for a four-year term. The nomination of Jean-Pierre Mustier is subject to the approval of the European Central Bank.

# 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             |                              |   |                                      |  |
| (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 |
| <b>Assets</b>                              |   |   |                                      |                              |   |                                      |  |
| 1 Cash and balances at central banks       | 49,486  | 49,486                                  | 49,486                               |                              |   |                                      |  |
| 2 Financial assets held for trading        | 2,044   | 2,044                                   |                                      |                              |   | 2,044                                |  |
| 3 Derivatives                              | 3,933   | 3,933                                   |                                      | 3,933                        |   | 3,474                                |  |
| 4 Financial investments                    | 50,231  | 50,190                                  | 48,772                               |                              |   |                                      | 1,418  |
| 5 Securities financing                     | 40,173  | 40,173                                  |                                      | 40,173                       |   |                                      |  |
| 6 Loans and receivables-banks              | 2,170   | 2,506                                   | 2,081                                | 426                          |   |                                      |  |
| 7 Residential mortgages                    | 157,588                                       | 157,588                                 | 157,588                              |                              |   |                                      |  |
| 8 Consumers loans                          | 6,677   | 6,677                                   | 6,677                                |                              |   |                                      |  |
| 9 Corporate loans                          | 85,560  | 85,560                                  | 83,246                               |                              | 2,314                                   |                                      |  |
| 10 Other loans and receivables - customers | 5,935   | 5,935                                   | 342                                  | 5,594                        |   |                                      |  |
| 11 Equity accounted investments            | 233   | 325                                     | 325                                  |                              |   |                                      |  |
| 12 Property and equipment                  | 1,221   | 1,220                                   | 1,220                                |                              |   |                                      |  |
| 13 Goodwill and other intangible assets    | 356   | 355                                     |                                      |                              |   |                                      | 355  |
| 14 Assets held for sale                    | 2,466   | 2,466                                   | 2,466                                |                              |   |                                      |  |
| 15 Tax assets                              | 143   | 142                                     | 142                                  |                              |   |                                      |  |
| 16 Other assets                            | 4,993   | 4,991                                   | 4,991                                |                              |   |                                      |  |
| <b>17 Total assets</b>                     | <b>413,210</b>                                | <b>413,593</b>                          | <b>357,335</b>                       | <b>50,126</b>                | <b>2,314</b>                            | <b>5,518</b>                         | <b>1,773</b>   |
| <b>Liabilities</b>                         |   |   |                                      |                              |   |                                      |  |
| 15 Financial liabilities held for trading  | 1,631   | 1,631                                   |                                      |                              |   | 1,631                                |  |
| 16 Derivatives                             | 1,967   | 1,967                                   |                                      | 1,967                        |   | 1,472                                |  |
| 17 Securities financing                    | 15,320  | 15,320                                  |                                      | 15,320                       |   |                                      |  |
| 18 Due to banks                            | 4,320   | 4,320                                   |                                      |                              |   |                                      | 4,320  |
| 19 Current accounts                        | 100,140                                       | 100,163                                 |                                      |                              |   |                                      | 100,163  |
| 20 Demand deposits                         | 132,299                                       | 132,299                                 |                                      |                              |   |                                      | 132,299  |
| 21 Time deposits                           | 45,601  | 45,972                                  |                                      |                              |   |                                      | 45,972   |
| 22 Other due to customers                  | 1,086   | 1,086                                   |                                      |                              |   |                                      | 1,086  |
| 23 Issued debt                             | 74,072  | 74,072                                  |                                      |                              |   |                                      | 74,072   |
| 24 Subordinated liabilities                | 4,946   | 4,946                                   |                                      |                              |   |                                      | 4,946  |
| 25 Provisions                              | 666   | 659                                     |                                      |                              |   |                                      | 659  |
| 26 Liabilities held for sale               | 20  | 20                                      |                                      |                              |   |                                      | 20   |
| 27 Tax liabilities                         | 183   | 181                                     |                                      |                              |   |                                      | 181  |
| 28 Other liabilities                       | 3,918   | 3,914                                   |                                      |                              |   |                                      | 3,914  |
| <b>29 Total liabilities</b>                | <b>386,167</b>                                | <b>386,551</b>                          |                                      | <b>17,287</b>                |   | <b>3,103</b>                         | <b>367,633</b>   |

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 2025 |                       |                          |               |                       |
|   | 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)       | 413,593          | 357,335               | 2,314                    | 50,126        | 5,518                 |
| 2 Liabilities carrying value amount under regulatory scope of consolidation (as per template LI1) | 386,551          |                       |                          | 17,287        | 3,103                 |
| <b>3 Total net amount under regulatory scope of consolidation</b>                                 | <b>27,043</b>    | <b>357,335</b>        | <b>2,314</b>             | <b>32,839</b> | <b>2,415</b>          |
| 4 Off-balance sheet amounts   | 101,636          | 96,271                | 5,365                    |               |                       |
| 5 Differences in valuations   | -135             | -135                  |                          |               |                       |
| 6 Differences due to different netting rules, other than those already included in row 2          | -8,745           |                       |                          | -8,745        |                       |
| 7 Differences due to consideration of provisions  | -1,062           | -1,062                |                          |               |                       |
| 8 Differences due to the use of credit risk mitigation techniques (CRMs)                          | -21,813          | -4,384                | -1,266                   | -16,163       |                       |
| 9 Differences due to credit conversion factors  | -70,089          | -70,089               |                          |               |                       |
| 10 Differences due to securitisation with risk transfer   | -1,169           |                       | -1,169                   |               |                       |
| 11 Other differences  | 370,852          | -5,644                | -43                      | 9,320         |                       |
| <b>12 Exposure amounts considered for regulatory purposes</b>                                     | <b>396,519</b>   | <b>372,293</b>        | <b>5,202</b>             | <b>17,251</b> |                       |

## 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 Retained Custo 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 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 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 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 Real Estate 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 |
| ABN AMRO Social Impact Investments B.V.                  | Full consolidated                  | X                                  |                            |               |                                   | Other financial corporation |
| ABN AMRO Support Services (Ireland) Limited              | Full consolidated                  | X                                  |                            |               |                                   | Other financial corporation |
| ABN AMRO Ventures B.V.                                   | Full consolidated                  | X                                  |                            |               |                                   | Other financial corporation |
| ABN AMRO Ventures Management 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 |   |                             |
| ALFAM Holding N.V.                         | Full consolidated                  | X                                  |                            |               |                                   |          |   | Other financial corporation |
| Amsterdamsche Holding Company B.V.         | Full consolidated                  | X                                  |                            |               |                                   |          |   | Non-financial corporation   |
| Aurasio GmbH                               | Full consolidated                  | X                                  |                            |               |                                   |          |   | Other financial corporation |
| B.V. Financieringsmaatschappij N.O.B.      | Full consolidated                  | X                                  |                            |               |                                   |          |   | Other financial corporation |
| Banco AAB Clearing S.A.                    | Full consolidated                  | X                                  |                            |               |                                   |          |   | Credit institution          |
| BUX B.V.                                   | Full consolidated                  | X                                  |                            |               |                                   |          |   | Other financial corporation |
| BUX Technology B.V.                        | Full consolidated                  | X                                  |                            |               |                                   |          |   | Other financial corporation |
| FFSB LIMITED                               | Full consolidated                  | X                                  |                            |               |                                   |          |   | Other financial corporation |
| Franx B.V.                                 | Full consolidated                  | X                                  |                            |               |                                   |          |   | Other financial corporation |
| HauckAufhäuserLampePrivatbnkAG             | Full consolidated                  | X                                  |                            |               |                                   |          |   | Credit institution          |
| International Card Services B.V.           | Full consolidated                  | X                                  |                            |               |                                   |          |   | Credit institution          |
| Moneyou B.V.                               | Full consolidated                  | X                                  |                            |               |                                   |          |   | Other financial corporation |
| Neufize OBC Cin Gest S.a.r.l.              | Full consolidated                  | X                                  |                            |               |                                   |          |   | Other financial corporation |
| New10 B.V.                                 | Full consolidated                  | X                                  |                            |               |                                   |          |   | Other financial corporation |
| Oosteroever Hypotheken B.V.                | Full consolidated                  | X                                  |                            |               |                                   |          |   | Other financial corporation |
| P.H.P. Investeringsmaatschappij II B.V.    | Full consolidated                  | X                                  |                            |               |                                   |          |   | Other financial corporation |
| PF Energy USA 1 B.V.                       | Full consolidated                  | X                                  |                            |               |                                   |          |   | Other financial corporation |
| PF Energy USA 2 B.V.                       | Full consolidated                  | X                                  |                            |               |                                   |          |   | Other financial corporation |
| PF Energy USA 3 Inc.                       | Full consolidated                  | X                                  |                            |               |                                   |          |   | Other financial corporation |
| Principal Finance Investments Holding B.V. | Full consolidated                  | X                                  |                            |               |                                   |          |   | Other financial corporation |
| Quion 9 B.V.                               | Full consolidated                  | X                                  |                            |               |                                   |          |   | Other financial corporation |
| Sumsare N.V.                               | Full consolidated                  |                                    |                            |               |                                   | X        |   | Other financial corporation |

## 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/CRR III).

### 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.

### 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 CRD V and CRR III) 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 reasons of capital efficiency, ABN AMRO has obtained capital waivers under CRR Article 7 for the following Dutch subsidiaries: ABN AMRO Hypotheken Groep B.V. and ABN AMRO Clearing Bank N.V. However, ABN AMRO Clearing Bank N.V. is required to comply with CRR requirements on a sub-consolidated basis. These subsidiaries are integrated in the group-wide central funding and risk management governance framework, supported by guarantees issued by ABN AMRO Bank N.V.

Regarding the prudential requirements of ABN AMRO Bank N.V. on an individual basis, the individual consolidation method specified in CRR Article 9(1) is applied. Dutch subsidiaries operating in the banking and finance sector are consolidated under this method if they satisfy the conditions outlined in points (c) and (d) of CRR Article 7(1), have material exposures or liabilities to ABN AMRO Bank N.V., and are included in the bank's risk management and risk governance framework.

There are no current or anticipated significant practical or legal obstacles to the timely transfer of own funds or repayment of liabilities between ABN AMRO Bank N.V. and its subsidiaries. This is particularly relevant in the context of the capital waivers obtained under CRR Article 7, the application of the individual consolidation method as outlined in CRR Article 9(1), and the exemptions for intragroup exposures under the Large Exposures framework.

Certain subsidiaries are excluded from ABN AMRO's prudential consolidation, resulting in a minor difference between the prudential and the accounting consolidation. This follows from the CRR, which has its own prudential consolidation instructions. It uses the "control" concept that also applies to IFRS, but the general instruction in the CRR to consolidate is given only for institutions and financial institutions that classify as subsidiaries. For a detailed overview of subsidiary entities and the respective consolidation methods applied, please refer to: EU LI3 - Outline of the differences in the scopes of consolidation (entity by entity). As of 31 December 2025, all entities within the group that are subject to regulatory capital adequacy requirements at their level met the applicable minimum regulatory capital adequacy requirements.

## EU PV1 - Prudent valuation adjustments (PVA)

The CRR sets out requirements relating to prudent valuation adjustments of 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). An important part 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 the 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 interest rates risk category.

The total AVA went up EUR 33 million to EUR 135 million as at 31 December 2025 (31 December 2024: EUR 102 million). This increase was mainly the result of a higher AVA banking book fall-back approach for unlisted equity investments and investments funds (not visible in the table), which is related to the acquisition of Hauck Aufhäuser Lampe Privatbank AG (HAL AG) as at 1 July 2025. This movement was partly offset by lower market price uncertainty for the interest risk category.

The fair value adjustments and prudent valuation AVA are discussed and approved in the Prudent Valuation Committee Trading and ALM & Other Entities on a monthly and quarterly basis.

|   | A                | B              | C                | D      | E           | EU e1                                      | EU e2                            | F   | G   | H   |
|---|------------------|----------------|------------------|--------|-------------|--|----------------------------------|---|---|---|
|   | 31 December 2025 |                |                  |        |             |  |                                  |   |   |   |
|   | 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)   |                  |                |                  |        |             |  |                                  |   |   |   |
| <b>Category level AVA</b>                               |                  |                |                  |        |             |  |                                  |   |   |   |
| 1 Market price uncertainty                              | 5                | 53             | 1                | 5      |             | 7  |                                  | 42  | 15  | 27  |
| 3 Close-out cost  |                  | 3              |                  |        |             |  |                                  | 3   |   | 3   |
| 4 Concentrated positions                                |                  | 1              |                  |        |             |  |                                  | 1   |   | 1   |
| 5 Early termination                                     |                  | 1              |                  |        |             |  |                                  | 1   | 1   |   |
| 6 Model risk  |                  |                |                  |        |             |  |                                  |   |   |   |
| 7 Operational risk                                      |                  | 3              |                  |        |             |  |                                  | 4   | 1   | 3   |
| 10 Future administrative costs                          |                  |                |                  |        |             |  |                                  |   |   |   |
| <b>12 Total Additional Valuation Adjustments (AVAs)</b> |                  |                |                  |        |             |  |                                  | <b>135</b>                                | <b>18</b>   | <b>117</b>  |

# 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. ABN AMRO has complied with all applicable capital adequacy requirements. 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 the 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. 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

As at 31 December 2025, the Common Equity Tier 1 (CET1), Tier 1 and total capital ratios were 15.4%, 17.8% and 20.9% respectively (30 June 2025: 14.5%, 17.6% and 20.6% respectively, excluding interim profits). In comparison with 30 June 2025, the CET1 capital ratio increased, mainly due to the decrease in TREA and an increase in CET1 capital. The EUR 4.4 billion decrease in TREA mainly reflects a decrease in credit risk RWEA, offset by the increase in the risk exposure amount for operational risk. The CET1 capital position increased mainly due to the addition of the eligible part of net profit after deduction of AT1 coupons and distributions. Unrealised gains on investments in debt securities due to market movements also contributed positively to the CET1 capital. All capital ratios were in line with the bank's risk appetite and comfortably above regulatory requirements.

The maximum distributable amount (MDA) trigger level decreased to 11.2% (30 June 2025: 11.3%). The CET1 ratio of 15.4% remained well above the MDA trigger level.

From 1 January 2026, the MDA trigger level increased to 11.4% due to an increase in the Pillar 2 requirement of 0.35% to 2.60% (up from 2.25%), of which 0.20% should be filled by CET1 capital.

|  | A                | B                   |
|--|------------------|---------------------|
| (in millions)  | 31 December 2025 | Source <sup>1</sup> |
| <b>Common Equity Tier 1 (CET1) capital: instruments and reserves</b>   |                  |                     |
| 1 <b>Capital instruments and the related share premium accounts</b>  | 12,568           |                     |
| - of which shares  | 12,568           | CC2-33 & CC2-34     |
| 2 Retained earnings  | 8,907            |                     |
| 3 Accumulated other comprehensive income (and other reserves)  | 80               | 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   | 1,372            |                     |
| <b>6 Common Equity Tier 1 (CET1) capital before regulatory adjustments</b>   | <b>22,928</b>    |                     |
| <b>Common Equity Tier 1 (CET1) capital: regulatory adjustments</b>   |                  |                     |
| 7 Additional value adjustments (-)   | -128             |                     |
| 8 Intangible assets (net of related tax liability) (-)   | -346             | 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) (-)   | -82              |                     |
| 11 Fair value reserves related to gains or losses on cash flow hedges of financial instruments that are not valued at fair value   | -209             |                     |
| 12 Negative amounts resulting from the calculation of expected loss amounts  | -209             |                     |
| 13 Any increase in equity that results from securitised assets (-)   |                  |                     |
| 14 Gains or losses on liabilities valued at fair value resulting from changes in own credit standing   | 1                |                     |
| 15 Defined-benefit pension fund assets (-)   | -5               |                     |
| 16 Direct, indirect and synthetic holdings by an institution of own CET1 instruments (-)   | -280             |                     |
| 17 Direct, indirect and synthetic holdings of the CET1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (-)                         |                  |                     |
| 18 Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (-) |                  |                     |
| 19 Direct, indirect and synthetic holdings by the institution of the CET1 instruments of financial sector entities where the institution has a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (-)           |                  |                     |
| EU-20a Exposure amount of the following items which qualify for a RW of 1250%, where the institution opts for the deduction alternative  | -20              |                     |
| EU-20b - of which qualifying holdings outside the financial sector (-)   |                  |                     |
| EU-20c - of which securitisation positions (-)   | -20              |                     |
| 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   | -751             |                     |
| <b>28 Total regulatory adjustments to Common Equity Tier 1 (CET1)</b>  | <b>-2,048</b>    |                     |
| <b>29 Common Equity Tier 1 (CET1) capital</b>  | <b>20,899</b>    |                     |

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

|  | A                | B                   |
|--|------------------|---------------------|
| (in millions)  | 31 December 2025 | Source <sup>1</sup> |
| <b>Additional Tier 1 (AT1) capital: instruments</b>  |                  |                     |
| 30 Capital instruments and the related share premium accounts  | 3,233            | CC2-37              |
| 31 - of which classified as equity under applicable accounting standards   | 3,233            |                     |
| 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  |                  |                     |
| <b>36 Additional Tier 1 (AT1) capital before regulatory adjustments</b>  | <b>3,233</b>     |                     |
| <b>Additional Tier 1 (AT1) capital: regulatory adjustments</b>   |                  |                     |
| 37 Direct, indirect and synthetic holdings by an institution of own AT1 instruments (-)  | -5               |                     |
| 38 Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (-)                            |                  |                     |
| 39 Direct, indirect and synthetic holdings of the AT1 instruments of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (-)                       |                  |                     |
| 40 Direct, indirect and synthetic holdings by the institution of the AT1 instruments of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions) (-)   |                  |                     |
| 42 Qualifying T2 deductions that exceed the T2 items of the institution (-)  |                  |                     |
| 42a Other regulatory adjustments to AT1 capital  |                  |                     |
| <b>43 Total regulatory adjustments to Additional Tier 1 (AT1) capital</b>  | <b>-5</b>        |                     |
| <b>44 Additional Tier 1 (AT1) capital</b>  | <b>3,228</b>     |                     |
| <b>45 Tier 1 capital (T1 = CET1 + AT1)</b>   | <b>24,127</b>    |                     |
| <b>Tier 2 (T2) capital: instruments</b>  |                  |                     |
| 46 Capital instruments and the related share premium accounts  | 4,144            | 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   |                  |                     |
| <b>51 Tier 2 (T2) capital before regulatory adjustments</b>  | <b>4,144</b>     |                     |
| <b>Tier 2 (T2) capital: regulatory adjustments</b>   |                  |                     |
| 52 Direct, indirect and synthetic holdings by an institution of own T2 instruments and subordinated loans (-)  | -30              |                     |
| 53 Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where those entities have reciprocal cross holdings with the institution designed to inflate artificially the own funds of the institution (-)      |                  |                     |
| 54 Direct, indirect and synthetic holdings of the T2 instruments and subordinated loans of financial sector entities where the institution does not have a significant investment in those entities (amount above 10% threshold and net of eligible short positions) (-) |                  |                     |
| 55 Direct, indirect and synthetic holdings by the institution of the T2 instruments and subordinated loans of financial sector entities where the institution has a significant investment in those entities (net of eligible short positions)(-)                        |                  |                     |
| EU-56a Qualifying eligible liabilities deductions that exceed the eligible liabilities items of the institution (-)  |                  |                     |
| EU-56b Other regulatory adjustments to T2 capital  |                  |                     |
| <b>57 Total regulatory adjustments to Tier 2 (T2) capital</b>  | <b>-30</b>       |                     |
| <b>58 Tier 2 (T2) capital</b>  | <b>4,114</b>     |                     |
| <b>59 Total capital (TC = T1 + T2)</b>   | <b>28,241</b>    |                     |
| 60 Total risk exposure amount  | 135,398          |                     |

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

|  | A                | B                   |
|--|------------------|---------------------|
| (in millions)  | 31 December 2025 | Source <sup>1</sup> |
| <b>Capital ratios and requirements including buffers</b>   |                  |                     |
| 61 Common Equity Tier 1 (as a % of total risk exposure amount)   | 15.4%            |                     |
| 62 Tier 1 (as a % of total risk exposure amount)   | 17.8%            |                     |
| 63 Total capital (as a % of total risk exposure amount)  | 20.9%            |                     |
| 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) | 11.20%           |                     |
| 65 - of which capital conservation buffer requirement  | 2.50%            |                     |
| 66 - of which countercyclical buffer requirement   | 1.65%            |                     |
| 67 - of which systemic risk buffer requirement   | 0.04%            |                     |
| EU-67a - of which G-SII or O-SII buffer  | 1.25%            |                     |
| EU-67b - of which additional own funds requirements to address the risks other than the risk of excessive leverage   | 1.27%            |                     |
| 68 Common Equity Tier 1 available to meet buffers (as a % of risk exposure amount)   | 9.67%            |                     |
| <b>Amounts below the thresholds for deduction (before risk weighting)</b>  |                  |                     |
| 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)   | 353              |                     |
| 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)   | 226              |                     |
| 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)  | 57               |                     |
| <b>Applicable caps on the inclusion of provisions in Tier 2</b>  |                  |                     |
| 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   | 1,082            |                     |
| 78 Credit risk adjustments included in T2 in respect of exposures subject to internal ratings-based approach (prior to the application of the cap)   |                  |                     |
| 79 Cap for inclusion of credit risk adjustments in T2 under internal ratings-based approach  | 121              |                     |
| <b>Capital instruments subject to phase-out arrangements (only applicable between 1 Jan 2014 - 1 Jan 2022)</b>   |                  |                     |
| 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

| (in millions)   | 31 December 2025                                   |   | Reference     |
|---|--|---|---------------|
|   | A  | B                                       |               |
|   | Balance sheet as in published financial statements | Under regulatory scope of consolidation |               |
|   | As at period end                                   | As at period end                        |               |
| <b>Assets<sup>1</sup></b>   |  |   |               |
| 1 Cash and balances at central banks                              | 49,486   | 49,486                                  |               |
| 2 Financial assets held for trading                               | 2,044  | 2,044                                   |               |
| 3 Derivatives   | 3,933  | 3,933                                   |               |
| 4 Financial investments   | 50,231   | 50,190                                  |               |
| 5 Securities financing  | 40,173   | 40,173                                  |               |
| 6 Loans and advances banks  | 2,170  | 2,506                                   |               |
| 7 Loans and advances customers                                    | 255,760  | 255,761                                 |               |
| 8 Equity-accounted investments                                    | 233  | 325                                     |               |
| 9 Property and equipment  | 1,221  | 1,220                                   |               |
| 10 Goodwill and other intangible assets                           | 356  | 355                                     |               |
| 11 Assets held for sale   | 2,466  | 2,466                                   |               |
| 12 Tax assets   | 143  | 142                                     | CC1-8         |
| 13 Other assets   | 4,993  | 4,991                                   |               |
| <b>14 Total assets</b>  | <b>413,210</b>                                     | <b>413,593</b>                          |               |
| <b>Liabilities<sup>1</sup></b>                                    |  |   |               |
| 15 Financial liabilities held for trading                         | 1,631  | 1,631                                   |               |
| 16 Derivatives  | 1,967  | 1,967                                   |               |
| 17 Securities financing   | 15,320   | 15,320                                  |               |
| 18 Due to banks   | 4,320  | 4,320                                   |               |
| 19 Due to customers   | 279,126  | 279,522                                 |               |
| 20 Issued debt  | 74,072   | 74,072                                  |               |
| 21 Subordinated liabilities                                       | 4,946  | 4,946                                   | CC1-46        |
| 22 Provisions   | 666  | 659                                     |               |
| 23 Liabilities held for sale                                      | 20   | 20                                      |               |
| 24 Tax liabilities  | 183  | 181                                     |               |
| 25 Other liabilities  | 3,918  | 3,914                                   |               |
| <b>26 Total liabilities</b>                                       | <b>386,167</b>                                     | <b>386,551</b>                          |               |
| <b>Shareholders' equity<sup>1</sup></b>                           |  |   |               |
| 27 Share capital  | 823  | 823                                     | CC1-1         |
| 28 Share premium  | 11,745   | 11,745                                  | CC1-1         |
| 29 Other reserves (incl. retained earnings/profit for the period) | 11,159   | 11,159                                  | CC1-2         |
| 30 Accumulated other comprehensive income                         | 80   | 80                                      | CC1-3 & CC1-8 |
| 31 AT1 capital securities   | 3,233  | 3,233                                   | CC1-36        |
| <b>32 Equity attributable to owners of the parent company</b>     | <b>27,040</b>                                      | <b>27,040</b>                           |               |
| 33 Equity attributable to non-controlling interests               | 3  | 3                                       |               |
| <b>34 Total equity</b>  | <b>27,043</b>                                      | <b>27,043</b>                           |               |

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                   |
| 2a Public or private placement  | Public                         |
| 3 Governing law(s) of the instrument  | Dutch Law                      |
| 3a Contractual recognition of write down and conversion powers of resolution authorities  | N/A                            |
| <b>Regulatory treatment</b>   |                                |
| 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 823                        |
| 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                            |
| <b>Coupons / dividends</b>  |                                |
| 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  | XS2893176862  |
| 2a Public or private placement  | Public  | Public  |
| 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   |
| <b>Regulatory treatment</b>   |   |   |
| 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  |   |
| 8 Amount recognised in regulatory capital (in millions, as of most recent reporting date) | EUR 994   | EUR 746   |
| 9 Nominal amount of instrument (as of most recent reporting date)                         | EUR 1,000   | EUR 750   |
| 9a Issue price  | 100%  | 100%  |
| 9b Redemption price   | 100%  | 100%  |
| 10 Accounting classification  | Equity  | Equity  |
| 11 Original date of issuance  | 04 October 2017   | 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 2027 (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                            |
| <b>Coupons / dividends</b>  |   |   |
| 17 Fixed or floating dividend/coupon  | Fixed   | Fixed   |
| 18 Coupon rate and any related index  | 4.75% 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

### 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  | XS3004202811  |
| 2a Public or private placement  | Public  | Public  |
| 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   |
| <b>Regulatory treatment</b>   |   |   |
| 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  |   |
| 11 Original date of issuance  | 04 October 2024   | 26 February 2025  |
| 12 Perpetual or dated   | Perpetual   | Perpetual   |
| 13 Original maturity date   | No maturity   | No maturity   |
| 14 Issuer call subject to prior supervisory approval                                      | 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 2033 (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                            |   |
| <b>Coupons / dividends</b>  |   |   |
| 17 Fixed or floating dividend/coupon  | Fixed   | Fixed   |
| 18 Coupon rate and any related index  | 6.875% per year   | 5.750% 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.                          |
| 2 Unique identifier (eg CUSIP, ISIN or Bloomberg identifier for private placement)        | XS1385037558                                | US00084DAL47 / XS1392917784                 |
| 2a Public or private placement  | Public                                      | Public                                      |
| 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   |
| <b>Regulatory treatment</b>   |   |   |
| 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 255                                     | EUR 50                                      |
| 9 Nominal amount of instrument (as of most recent reporting date)                         | USD 300 (EUR 288)                           | USD 1,000 (EUR 960)                         |
| 9a Issue price  | 100%  | 99.827%                                     |
| 9b Redemption price   | 100%  | 100%  |
| 10 Accounting classification  | Liability - amortised cost                  | Liability - amortised cost                  |
| 11 Original date of issuance  | 08 April 2016                               | 18 April 2016                               |
| 12 Perpetual or dated   | Dated                                       | Dated                                       |
| 13 Original maturity date   | 08 April 2031                               | 18 April 2026                               |
| 14 Issuer call subject to prior supervisory approval                                      | No  | No  |
| 15 Optional call date, contingent call dates, and redemption amount                       | Tax & regulatory call (100% nominal amount) | Tax & regulatory call (100% nominal amount) |
| 16 Subsequent call dates, if applicable   | N/A   | N/A   |
| <b>Coupons / dividends</b>  |   |   |
| 17 Fixed or floating dividend/coupon  | Fixed                                       | Fixed                                       |
| 18 Coupon rate and any related index  | 5.6% per year                               | 4.8% 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

## 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/<br>US00084DAV29   | XS2498035455   | XS2558022591  |
| 2a Public or private placement  | Public  | Public   | Public  |
| 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   |
| <b>Regulatory treatment</b>   |   |  |   |
| 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 850   | EUR 496  | EUR 999   |
| 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   |
| <b>Coupons / dividends</b>  |   |  |   |
| 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  |
| 2a Public or private placement  | Public  | Public  |
| 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   |
| <b>Regulatory treatment</b>   |   |   |
| 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 748   | 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   |
| <b>Coupons / dividends</b>  |   |   |
| 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.

|                  | A                           |                              | B   |   | C  |  | D                    |                | E |  | F |  |
|------------------|-----------------------------|------------------------------|---|---|--|--|----------------------|----------------|---|--|---|--|
|                  | 31 December 2025            |                              |   |   |  |  |                      |                |   |  |   |  |
|                  | General credit exposures    |                              | Relevant credit exposures - Market risk                         |   | Securitisation exposures - Exposure value for non-trading book |  | Total exposure value |                |   |  |   |  |
| (in millions)    | Exposure value under the SA | Exposure value under the IRB | Sum of long and short position of trading book exposures for SA | Value of trading book exposures for internal models |  |  |                      |                |   |  |   |  |
| Country          |                             |                              |   |   |  |  |                      |                |   |  |   |  |
| Australia        | 20                          |                              |   |   |  |  |                      | 21             |   |  |   |  |
| Belgium          | 3,104                       | 55                           |   |   | 1  |  |                      | 3,160          |   |  |   |  |
| Bulgaria         |                             |                              |   |   |  |  |                      |                |   |  |   |  |
| Bermuda          | 1,590                       |                              |   |   |  |  |                      | 1,590          |   |  |   |  |
| Chile            | 53                          |                              |   |   |  |  |                      | 53             |   |  |   |  |
| Croatia          | 3                           |                              |   |   |  |  |                      | 3              |   |  |   |  |
| Cyprus           | 78                          |                              |   |   |  |  |                      | 78             |   |  |   |  |
| Czech Republic   | 16                          |                              |   |   | 2  |  |                      | 18             |   |  |   |  |
| France           | 7,641                       | 17                           |   |   | 8  |  |                      | 7,667          |   |  |   |  |
| Germany          | 7,082                       | 180                          |   |   | 8  |  |                      | 7,271          |   |  |   |  |
| Greece           | 7                           |                              |   |   |  |  |                      | 7              |   |  |   |  |
| Denmark          | 116                         | 4                            |   |   | 10   |  |                      | 129            |   |  |   |  |
| Estonia          |                             |                              |   |   |  |  |                      |                |   |  |   |  |
| Hong Kong        | 111                         | 9                            |   |   |  |  |                      | 120            |   |  |   |  |
| Hungary          | 4                           | 1                            |   |   |  |  |                      | 4              |   |  |   |  |
| Iceland          |                             |                              |   |   |  |  |                      |                |   |  |   |  |
| Ireland          | 344                         | 3                            |   |   |  |  |                      | 347            |   |  |   |  |
| Korea            |                             | 5                            |   |   |  |  |                      | 6              |   |  |   |  |
| Latvia           |                             | 1                            |   |   |  |  |                      | 1              |   |  |   |  |
| Lithuania        | 10                          |                              |   |   |  |  |                      | 10             |   |  |   |  |
| Luxembourg       | 3,256                       | 2                            |   |   | 2  |  |                      | 3,259          |   |  |   |  |
| Marshall Islands | 1,475                       |                              |   |   |  |  |                      | 1,475          |   |  |   |  |
| Netherlands      | 63,000                      | 167,928                      |   |   | 90   |  |                      | 231,017        |   |  |   |  |
| Norway           | 1,343                       | 1                            |   |   | 1  |  |                      | 1,345          |   |  |   |  |
| Poland           | 109                         | 1                            |   |   |  |  |                      | 110            |   |  |   |  |
| Romania          | 12                          |                              |   |   |  |  |                      | 12             |   |  |   |  |
| Spain            | 917                         | 7                            |   |   | 3  |  |                      | 927            |   |  |   |  |
| Sweden           | 1,119                       | 4                            |   |   | 5  |  |                      | 1,128          |   |  |   |  |
| Slovakia         | 46                          |                              |   |   |  |  |                      | 46             |   |  |   |  |
| Slovenia         | 14                          | 1                            |   |   |  |  |                      | 15             |   |  |   |  |
| United Kingdom   | 8,028                       | 1,096                        |   |   | 13   |  |                      | 9,138          |   |  |   |  |
| United States    | 1,359                       | 291                          |   |   | 3  |  |                      | 1,653          |   |  |   |  |
| Other countries  | 5,600                       | 359                          |   |   | 20   |  |                      | 5,979          |   |  |   |  |
| <b>Total</b>     | <b>106,458</b>              | <b>169,964</b>               |   |   | <b>167</b>   |  |                      | <b>276,589</b> |   |  |   |  |

|                  | G  | H                                       | I  | J            | K              | L                                  | M                               |
|------------------|--|---|--|--------------|----------------|------------------------------------|---------------------------------|
|                  | 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        | 2  |   |  | 2            | 22             | 0.02%                              | 1.00%                           |
| Belgium          | 219  |   |  | 220          | 2,744          | 2.48%                              | 1.00%                           |
| Bulgaria         |  |   |  |              |                | 0.00%                              | 2.00%                           |
| Bermuda          | 111  |   |  | 111          | 1,391          | 1.26%                              | 0.00%                           |
| Chile            | 4  |   |  | 4            | 53             | 0.05%                              | 0.50%                           |
| Croatia          |  |   |  |              | 3              | 0.00%                              | 1.50%                           |
| Cyprus           | 6  |   |  | 6            | 73             | 0.07%                              | 1.00%                           |
| Czech Republic   | 1  |   |  | 1            | 13             | 0.01%                              | 1.25%                           |
| France           | 508  | 5                                       |  | 513          | 6,413          | 5.80%                              | 1.00%                           |
| Germany          | 488  | 3                                       |  | 491          | 6,139          | 5.55%                              | 0.75%                           |
| Greece           | 1  |   |  | 1            | 9              | 0.01%                              | 0.25%                           |
| Denmark          | 8  | 2                                       |  | 10           | 128            | 0.12%                              | 2.50%                           |
| Estonia          |  |   |  |              |                | 0.00%                              | 1.50%                           |
| Hong Kong        | 9  |   |  | 9            | 115            | 0.10%                              | 0.50%                           |
| Hungary          |  |   |  |              | 4              | 0.00%                              | 1.00%                           |
| Iceland          |  |   |  |              |                | 0.00%                              | 2.50%                           |
| Ireland          | 23   |   |  | 23           | 289            | 0.26%                              | 1.50%                           |
| Korea            |  |   |  |              | 2              | 0.00%                              | 1.00%                           |
| Latvia           |  |   |  |              | 2              | 0.00%                              | 1.00%                           |
| Lithuania        |  |   |  |              |                | 0.00%                              | 1.00%                           |
| Luxembourg       | 212  | 1                                       |  | 212          | 2,652          | 2.40%                              | 0.50%                           |
| Marshall Islands | 98   |   |  | 98           | 1,230          | 1.11%                              | 0.00%                           |
| Netherlands      | 5,905  | 17                                      |  | 5,923        | 74,033         | 66.90%                             | 2.00%                           |
| Norway           | 85   |   |  | 85           | 1,064          | 0.96%                              | 2.50%                           |
| Poland           | 6  |   |  | 6            | 77             | 0.07%                              | 1.00%                           |
| Romania          | 1  |   |  | 1            | 12             | 0.01%                              | 1.00%                           |
| Spain            | 61   |   |  | 61           | 763            | 0.69%                              | 0.50%                           |
| Sweden           | 77   |   |  | 77           | 960            | 0.87%                              | 2.00%                           |
| Slovakia         | 2  |   |  | 2            | 20             | 0.02%                              | 1.50%                           |
| Slovenia         | 1  |   |  | 1            | 18             | 0.02%                              | 1.00%                           |
| United Kingdom   | 509  | 3                                       |  | 513          | 6,412          | 5.79%                              | 2.00%                           |
| United States    | 138  | 1                                       |  | 139          | 1,735          | 1.57%                              | 0.00%                           |
| Other countries  | 337  | 6                                       |  | 343          | 4,285          | 3.87%                              | 0.00%                           |
| <b>Total</b>     | <b>8,812</b>                                 | <b>41</b>                               |  | <b>8,853</b> | <b>110,661</b> | <b>100.00%</b>                     |                                 |

### EU CCyB2 - Amount of institution-specific countercyclical capital buffer

The institution-specific countercyclical capital buffer requirement decreased from 30 June 2025 to 31 December 2025, mainly due to geographical changes in the composition of exposures.

| (in millions)   | 31 December 2025 |
|---|------------------|
| 1 Total risk exposure amount                                      | 135,398          |
| 2 Institution specific countercyclical capital buffer rate        | 1.645%           |
| 3 Institution specific countercyclical capital buffer requirement | 2,227            |

# Leverage ratio

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

| (in millions)  | A<br>31 December 2025 |
|--|-----------------------|
| <b>1 Total assets as per published financial statements</b>  | <b>413,210</b>        |
| 2 Adjustment for entities which are consolidated for accounting purposes but are outside the scope of prudential consolidation   | 384                   |
| 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  | -655                  |
| 7 Adjustment for eligible cash pooling transactions  |                       |
| 8 Adjustments for derivative financial instruments   | 6,623                 |
| 9 Adjustments for securities financing transactions (SFTs)   | 3,366                 |
| 10 Adjustment for off-balance sheet items (i.e. conversion to credit equivalent amounts of off-balance sheet exposures)  | 30,038                |
| 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   | 685                   |
| <b>13 Total exposure amount</b>  | <b>453,650</b>        |

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

| (in millions)   | A<br>31 December 2025 |
|---|-----------------------|
| <b>EU-1 Total on-balance sheet exposures (excluding derivatives, SFTs, and exempted exposures)</b>                    | <b>370,555</b>        |
| EU-2 Of which: Trading book exposures   | 2,044                 |
| EU-3 Of which: Banking book exposures   | 368,510               |
| EU-4 - of which covered bonds   | 6,324                 |
| EU-5 - of which exposures treated as sovereigns   | 92,430                |
| EU-6 - of which exposures to regional governments, MDB, international organisations and PSE not treated as sovereigns | 699                   |
| EU-7 - of which institutions  | 7,205                 |
| EU-8 - of which secured by mortgages of immovable properties  | 195,953               |
| EU-9 - of which retail exposures  | 4,280                 |
| EU-10 - of which corporates   | 45,572                |
| EU-11 - of which exposures in default   | 5,111                 |
| EU-12 - of which other exposures (e.g. equity, securitisations, and other non-credit obligation assets)               | 10,935                |

## EU LR2 - LRCom: Leverage ratio common disclosure

The Capital Requirements Regulation (CRR) includes a non-risk-based and binding leverage ratio. The leverage ratio decreased to 5.3% as at 31 December 2025 (30 June 2025: 5.5%, excluding interim profits). This was primarily due to the decrease in Tier 1 capital and, to a lesser extent, the increase in total exposure measure. Tier 1 capital decreased mainly due to the call of a EUR 1 billion AT1 instrument, partly offset by the addition of the eligible part of net profit in CET1 capital. The reported leverage ratio remained well above the 3.0% requirement.

| (in millions)   | A                | B              |
|---|------------------|----------------|
|   | 31 December 2025 | 30 June 2025   |
| <b>On-balance sheet exposures (excluding derivatives and SFTs)</b>  |                  |                |
| 1 On-balance sheet items (excluding derivatives, SFTs, but including collateral)  | 369,937          | 371,071        |
| 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)   | -656             | -1,227         |
| 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)  | -1,330           | -1,338         |
| <b>7 Total on-balance sheet exposures (excluding derivatives and SFTs)</b>  | <b>367,951</b>   | <b>368,505</b> |
| <b>Derivative exposures</b>   |                  |                |
| 8 Replacement cost associated with SA-CCR derivatives transactions (i.e. net of eligible cash variation margin)                             | 6,425            | 5,657          |
| 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  | 9,556            | 7,346          |
| 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)  | -5,188           | -3,400         |
| 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)   |                  |                |
| <b>13 Total derivatives exposures</b>   | <b>10,793</b>    | <b>9,603</b>   |
| <b>Securities financing transaction (SFT) exposures</b>   |                  |                |
| 14 Gross SFT assets (with no recognition of netting), after adjusting for sales accounting transactions                                     | 44,269           | 41,275         |
| 15 (Netted amounts of cash payables and cash receivables of gross SFT assets)   | -4,096           | -5,028         |
| 16 Counterparty credit risk exposure for SFT assets   | 3,421            | 2,124          |
| 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)  |                  |                |
| <b>18 Total securities financing transaction exposures</b>  | <b>43,594</b>    | <b>38,372</b>  |
| <b>Other off-balance sheet exposures</b>  |                  |                |
| 19 Off-balance sheet exposures at gross notional amount   | 99,331           | 91,485         |
| 20 (Adjustments for conversion to credit equivalent amounts)  | -69,292          | -62,423        |
| 21 (General provisions deducted in determining Tier 1 capital and specific provisions associated with off-balance sheet exposures)          |                  |                |
| <b>22 Off-balance sheet exposures</b>   | <b>30,038</b>    | <b>29,063</b>  |

| (in millions)   | A                | B              |
|---|------------------|----------------|
|   | 31 December 2025 | 30 June 2025   |
| <b>Excluded exposures</b>   |                  |                |
| 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)   | -1,145           | -839           |
| EU-22g (Excluded excess collateral deposited at triparty agents)  |                  |                |
| EU-22h (Excluded CSD related services of CSD/institutions in accordance with point (o) of Art. 429a(1) CRR)   |                  |                |
| EU-22i (Excluded CSD related services of designated institutions in accordance with point (p) of Art. 429a(1) CRR)  |                  |                |
| EU-22j (Reduction of the exposure value of pre-financing or intermediate loans)   |                  |                |
| EU-22k (Excluded exposures to shareholders according to Article 429a (1), point (da) CRR)   |                  |                |
| EU-22l (Exposures deducted in accordance with point (q) of Article 429a(1) CRR)   |                  |                |
| <b>EU-22m (Total exempted exposures)</b>  | <b>-1,145</b>    | <b>-839</b>    |
| <b>Capital and total exposure measure</b>   |                  |                |
| 23 Tier 1 capital   | 24,127           | 24,542         |
| <b>24 Total exposure measure<sup>1</sup></b>  | <b>453,650</b>   | <b>448,941</b> |
| <b>Leverage ratio</b>   |                  |                |
| 25 Leverage ratio   | 5.3%             | 5.5%           |
| EU-25 Leverage ratio (excluding the impact of the exemption of public sector investments and promotional loans) (%)   | 5.3%             | 5.5%           |
| 25a Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves)  | 5.3%             | 5.5%           |
| 26 Regulatory minimum leverage ratio requirement (%)  | 3.0%             | 3.0%           |
| EU-26a Additional own funds requirements to address the risk of excessive leverage (%)  |                  |                |
| EU-26b - of which to be made up of CET1 capital (percentage points)   |                  |                |
| 27 Leverage ratio buffer requirement (%)  |                  |                |
| EU-27a Overall leverage ratio requirement (%)   | 3.0%             | 3.0%           |
| <b>Choice on transitional arrangements and relevant exposures</b>   |                  |                |
| EU-27b Choice on transitional arrangements for the definition of the capital measure  |                  |                |
| <b>Disclosure of mean values</b>  |                  |                |
| 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   | 47,346           | 36,958         |
| 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  | 40,173           | 36,247         |
| 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)  | 460,823          | 449,652        |
| 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) | 460,823          | 449,652        |
| 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)          | 5.2%             | 5.5%           |
| 31a Leverage ratio (excluding the impact of any applicable temporary exemption of central bank reserves) incorporating mean values from row 28 of gross SFT assets (after adjustment for sale accounting transactions and netted of amounts of associated cash payables and cash receivables)         | 5.2%             | 5.5%           |

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

## **EU LRA - Disclosure of leverage ratio qualitative information**

ABN AMRO monitors and reports its leverage ratio based on CRR 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

| (in millions)  | A   | B                 | C             | D             | E   | F                 | G             | H             |
|--|---|-------------------|---------------|---------------|---|-------------------|---------------|---------------|
|  | Total unweighted value (average)                |                   |               |               | Total weighted value (average)                  |                   |               |               |
|  | 31 December 2025                                | 30 September 2025 | 30 June 2025  | 31 March 2025 | 31 December 2025                                | 30 September 2025 | 30 June 2025  | 31 March 2025 |
|  | Data points used in the calculation of averages |                   |               |               | Data points used in the calculation of averages |                   |               |               |
|  | 12  | 12                | 12            | 12            | 12  | 12                | 12            | 12            |
| <b>High-quality liquid assets (HQLA)</b>   |   |                   |               |               |   |                   |               |               |
| <b>1 Total high-quality liquid assets</b>  |   |                   |               |               | <b>100,643</b>                                  | <b>96,963</b>     | <b>92,660</b> | <b>89,809</b> |
| <b>Cash - outflows</b>   |   |                   |               |               |   |                   |               |               |
| 2 Retail deposits and deposits from small business customers, of which:  | 154,623   | 152,156           | 150,016       | 148,932       | 11,543  | 11,273            | 10,991        | 10,833        |
| 3 <i>Stable deposits</i>   | 90,539  | 89,747            | 89,188        | 88,662        | 4,527   | 4,487             | 4,459         | 4,433         |
| 4 <i>Less stable deposits</i>  | 51,603  | 49,747            | 47,723        | 46,611        | 6,722   | 6,503             | 6,259         | 6,138         |
| 5 Unsecured wholesale funding  | 117,924   | 114,310           | 110,901       | 109,155       | 61,897  | 60,114            | 58,393        | 57,763        |
| 6 <i>Operational deposits (all counterparties) and deposits in networks of cooperative banks</i>   | 26,168  | 25,216            | 24,305        | 23,628        | 6,531   | 6,293             | 6,065         | 5,896         |
| 7 <i>Non-operational deposits (all counterparties)</i>   | 87,194  | 84,616            | 82,090        | 81,389        | 50,804  | 49,342            | 47,822        | 47,730        |
| 8 <i>Unsecured debt</i>  | 4,562   | 4,479             | 4,506         | 4,137         | 4,562   | 4,479             | 4,506         | 4,137         |
| 9 Secured wholesale funding  |   |                   |               |               | 3,678   | 3,723             | 3,899         | 4,021         |
| 10 Additional requirements   | 58,313  | 58,044            | 57,598        | 57,994        | 14,267  | 14,204            | 14,179        | 14,354        |
| 11 <i>Outflows related to derivative exposures and other collateral requirements</i>   | 10,700  | 11,048            | 11,218        | 11,573        | 7,392   | 7,494             | 7,577         | 7,745         |
| 12 <i>Outflows related to loss of funding on debt products</i>   |   |                   |               | 1             |   |                   |               | 1             |
| 13 <i>Credit and liquidity facilities</i>  | 47,613  | 46,996            | 46,380        | 46,419        | 6,875   | 6,710             | 6,602         | 6,608         |
| 14 Other contractual funding obligations   | 11,133  | 10,992            | 10,538        | 10,578        | 7,945   | 7,949             | 7,507         | 7,511         |
| 15 Other contingent funding obligations  | 40,510  | 40,857            | 41,418        | 41,507        | 1,706   | 1,763             | 1,800         | 1,727         |
| <b>16 Total cash outflows</b>  |   |                   |               |               | <b>101,036</b>                                  | <b>99,026</b>     | <b>96,767</b> | <b>96,209</b> |
| <b>Cash - inflows</b>  |   |                   |               |               |   |                   |               |               |
| 17 Secured lending (e.g. reverse repos)  | 41,099  | 38,582            | 36,313        | 35,191        | 16,388  | 15,276            | 14,130        | 13,845        |
| 18 Inflows from fully performing exposures   | 17,371  | 17,238            | 17,024        | 16,944        | 14,581  | 14,575            | 14,370        | 14,188        |
| 19 Other cash inflows  | 13,339  | 13,302            | 12,986        | 12,579        | 4,041   | 4,063             | 4,021         | 3,901         |
| 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)  |   |                   |               |               |   |                   |               |               |
| <b>20 Total cash inflows</b>   | <b>71,809</b>                                   | <b>69,122</b>     | <b>66,322</b> | <b>64,713</b> | <b>35,010</b>                                   | <b>33,913</b>     | <b>32,521</b> | <b>31,935</b> |
| 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>   | 63,235  | 61,325            | 59,376        | 57,953        | 35,010  | 33,913            | 32,521        | 31,935        |
| <b>Total adjusted value</b>  |   |                   |               |               |   |                   |               |               |
| EU-21 <b>Liquidity buffer</b>  |   |                   |               |               | <b>100,643</b>                                  | <b>96,963</b>     | <b>92,660</b> | <b>89,809</b> |
| <b>22 Total net cash outflows</b>  |   |                   |               |               | <b>66,026</b>                                   | <b>65,112</b>     | <b>64,247</b> | <b>64,274</b> |
| <b>23 Liquidity coverage ratio</b>   |   |                   |               |               | <b>153%</b>                                     | <b>149%</b>       | <b>144%</b>   | <b>140%</b>   |

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

The consolidated LCR amounted to 153% at the end of December 2025, based on a 12-month rolling average (30 September 2025: 149%).

### Concentration of funding and liquidity sources

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

### Composition of the liquidity buffer

Cash at central banks and government bonds are the main components of the liquidity buffer. Retained notes are also an important source of ECB-eligible collateral, but are not LCR-eligible. The liquidity buffer (excluding retained notes) as at 31 December 2025 amounted to EUR 100.6 billion, based on a 12-month rolling average (30 September 2025: EUR 97.0 billion). The increase was mainly observed in cash at central banks.

### Derivative exposures and potential collateral calls

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

### Currency mismatch in the LCR

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

### Other items

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

## EU LIQ2 - Net Stable Funding Ratio

The NSFR amounted to 141% at the end of December 2025 (30 September 2025: 138%). The increase was mainly observed in available stable funding from retail deposits.

| (in millions)  | A                                     | B          | C                    | D        | E                |
|--|---------------------------------------|------------|----------------------|----------|------------------|
|  | Unweighted value by residual maturity |            |                      |          | 31 December 2025 |
|  | No maturity                           | < 6 months | 6 months to < 1 year | ≥ 1 year | Weighted value   |
| <b>Available stable funding (ASF) Items</b>  |                                       |            |                      |          |                  |
| 1 Capital items and instruments  | 25,659                                | 854        |                      | 4,092    | 29,751           |
| 2 <i>Own funds</i>   | 25,659                                | 50         |                      | 4,092    | 29,751           |
| 3 <i>Other capital instruments</i>   |                                       | 803        |                      |          |                  |
| 4 Retail deposits  |                                       | 151,566    | 2,600                | 6,134    | 149,564          |
| 5 <i>Stable deposits</i>   |                                       | 92,549     | 1,082                | 1,828    | 90,778           |
| 6 <i>Less stable deposits</i>  |                                       | 59,017     | 1,518                | 4,305    | 58,786           |
| 7 Wholesale funding:   |                                       | 151,946    | 5,274                | 57,076   | 106,470          |
| 8 <i>Operational deposits</i>  |                                       | 23,918     |                      |          | 11,959           |
| 9 <i>Other wholesale funding</i>   |                                       | 128,028    | 5,274                | 57,076   | 94,510           |
| 10 Interdependent liabilities  |                                       | 1,771      |                      |          |                  |
| 11 Other liabilities:  |                                       | 10,567     | 98                   | 1,287    | 1,336            |
| 12 <i>NSFR derivative liabilities</i>  |                                       |            |                      |          |                  |
| 13 <i>All other liabilities and capital instruments not included in the above categories</i>   |                                       | 10,567     | 98                   | 1,287    | 1,336            |
| <b>14 Total available stable funding (ASF)</b>   |                                       |            |                      |          | <b>287,121</b>   |
| <b>Required stable funding (RSF) Items</b>   |                                       |            |                      |          |                  |
| 15 Total high-quality liquid assets (HQLA)   |                                       |            |                      |          | 744              |
| EU-15a Assets encumbered for a residual maturity of ≥1 year in a cover pool  |                                       | 33         | 38                   | 33,932   | 28,902           |
| 16 Deposits held at other financial institutions for operational purposes  |                                       | 873        |                      |          | 437              |
| 17 Performing loans and securities:  |                                       | 65,212     | 10,368               | 185,803  | 151,482          |
| 18 <i>Performing securities financing transactions with financial customers collateralised by Level 1 HQLA subject to 0% haircut</i>   |                                       | 14,810     | 1,113                |          | 556              |
| 19 <i>Performing securities financing transactions with financial customers collateralised by other assets and loans and advances to financial institutions</i>                    |                                       | 31,100     | 3,610                | 4,106    | 8,129            |
| 20 <i>Performing loans to non-financial corporate clients, loans to retail and small business customers, and loans to sovereigns, and PSEs<sup>1</sup></i>                         |                                       | 15,604     | 5,335                | 51,334   | 53,934           |
| 21 <i>- of which with a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk<sup>1</sup></i>  |                                       | 1,074      | 128                  | 848      | 1,152            |
| 22 <i>Performing residential mortgages<sup>1</sup></i>   |                                       | 174        | 238                  | 128,000  | 86,217           |
| 23 <i>- of which with a risk weight of less than or equal to 35% under the Basel II Standardised Approach for credit risk<sup>1</sup></i>  |                                       | 144        | 205                  | 113,945  | 74,239           |
| 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> |                                       | 3,524      | 72                   | 2,363    | 2,645            |
| 25 Interdependent assets   |                                       | 1,771      |                      |          |                  |
| 26 Other assets:   |                                       | 24,541     | 201                  | 7,144    | 17,153           |
| 27 <i>Physical traded commodities</i>  |                                       |            |                      |          |                  |
| 28 <i>Assets posted as initial margin for derivative contracts and contributions to default funds of CCPs</i>  |                                       | 9,166      |                      |          | 7,791            |
| 29 <i>NSFR derivative assets</i>   |                                       | 1,084      |                      |          | 1,084            |
| 30 <i>NSFR derivative liabilities before deduction of variation margin posted</i>  |                                       | 1,297      |                      |          | 65               |
| 31 <i>All other assets not included in the above categories</i>  |                                       | 12,994     | 201                  | 7,144    | 8,213            |
| 32 Off-balance sheet items   |                                       | 65,149     | 5,914                | 27,997   | 4,816            |
| <b>33 Total RSF</b>  |                                       |            |                      |          | <b>203,534</b>   |
| <b>34 Net Stable Funding Ratio (%)</b>   |                                       |            |                      |          | <b>141%</b>      |

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

# Credit risk

The background is a solid teal color with several overlapping, semi-transparent geometric shapes in a slightly darker shade of teal. These shapes are elongated and have rounded ends, creating a modern, abstract design.

# 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.

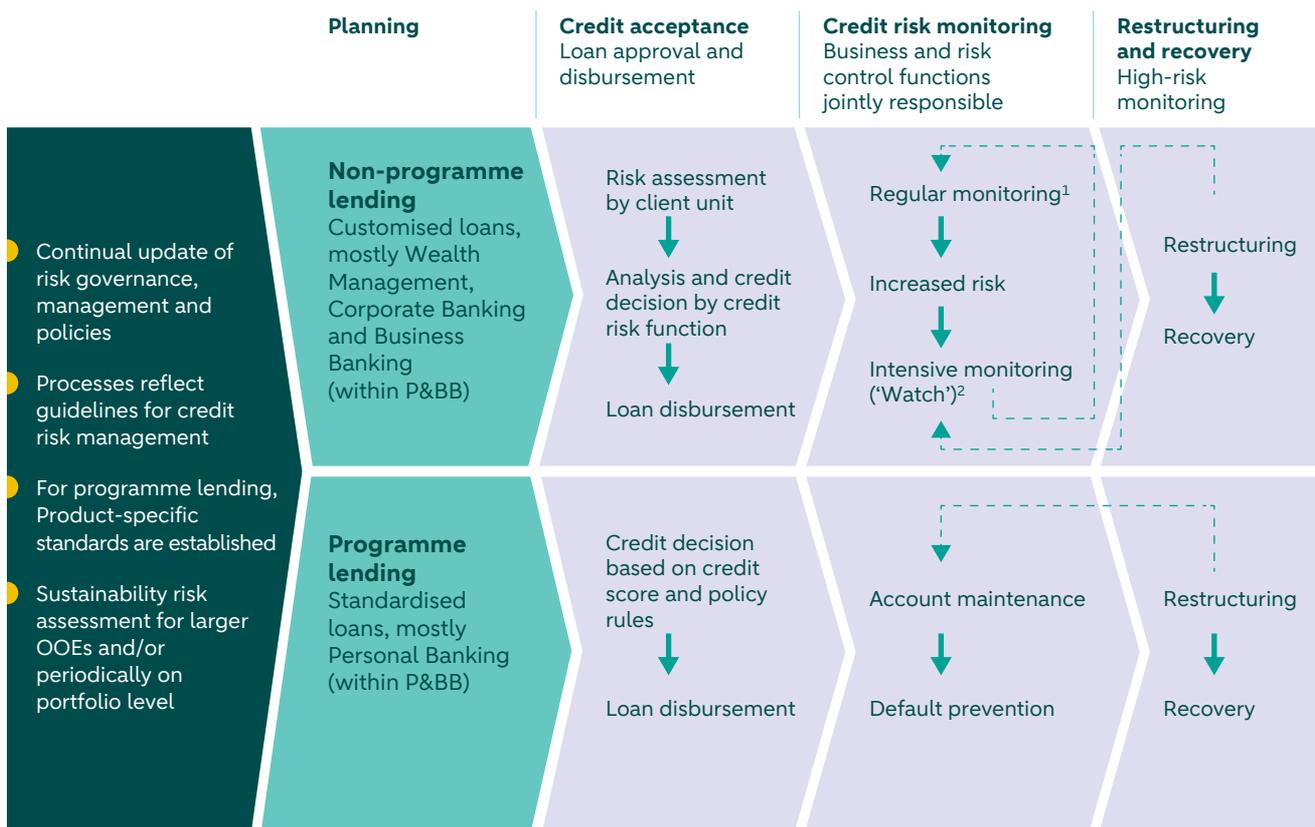
Credit risk management within the bank is governed by the bank-wide central credit risk policy and further detailed in underlying specific credit risk policies and standards, which are aligned with the bank’s strategy. Credit risk management is the responsibility of the first and second lines of defence. 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 to 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 different approaches to manage 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 applied. For customised lending to counterparties (non-programme lending), risks are assessed on an individual basis.

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

## Credit risk management process



<sup>1</sup> Daily monitoring or annual or semi-annual credit review.  
<sup>2</sup> 'Watch': status assigned to counterparties with an increased risk.

## Planning

Within programme lending, the credit cycle starts with the 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 risk drivers and external data are taken into consideration to calculate a credit score (scorecard). The credit decision is based on the outcome of the scorecard in combination with the application of policy rules.

Within non-programme lending, the credit acceptance phase starts with the creation of a credit proposal by the relevant client unit. The qualitative and quantitative details of the credit risk associated with the loan are assessed and documented. Information must be provided on matters such as the purpose of the loan, details and structure of the credit facility, the borrower and other involved parties, the sector and geography, management and owners, and potential ESG risks, along with a detailed financial analysis. In addition, compliance with internal policies is checked. The credit proposal first requires approval from the client unit, after which an analysis is performed by Risk Management. The final credit decision is based on the independent assessment by the credit risk function.

## 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 counterparties and portfolios. Monitoring starts when the credit facility is granted and 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 comes under programme or non-programme lending, a time-based or event-based review applies. For programme lending portfolios, the entire risk management framework is defined in a product programme, which 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 potential changes in the risk profile of the counterparty that can impact creditworthiness, compared with the assessment at the point of loan origination.

If a situation arises in which an individual counterparty shows signs of credit risk deterioration and action is required to avoid the credit risk turning into a default classification, a 'watch' status is assigned. This status indicates that a counterparty is subject to increased monitoring and appropriate follow-up measures, in order to prevent further deterioration or a default. Triggers for this status can be changes in the financial position of the client, potential or actual breaches of covenants, management issues, or the market or sector outlook.

In addition to monitoring at counterparty level, the bank monitors credit risk developments at aggregated level, including at portfolio, client unit and bank-wide level.

## Restructuring & Recovery

Non-programme lending counterparties 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 counterparty 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 counterparty 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 facilities are transferred to the Late Collections department 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 facility is transferred to other internal departments or external parties (such as Flanderijn) for debt collection.

### Credit concentration risk

Credit concentration risk is the risk of losses arising from large exposures to a single counterparty or group of counterparties that are highly positively correlated. Limiting excessive concentrations is fundamental to our credit risk strategy, and therefore we aim to keep the credit risk portfolio sufficiently diversified. To avoid credit risk concentrations, the bank sets maximum levels for subgroups in the following categories:

- single counterparty and groups of related counterparties (counterparty concentration)
- countries (geographic concentration)
- economic sectors (sector concentration)
- products (product concentration)
- ESG risk (physical and/or transition risk concentration)

### Counterparty concentration

Counterparty concentration risk is the risk of losses arising from large exposures to one counterparty or group of counterparties in a risk group. 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 three metrics: one obligor exposure (OOE), economic capital (EC) and loss at default (LAD). The OOE is the total exposure to a risk group and includes all drawn and undrawn credit facilities granted, plus all indirect exposures, including guarantees and any other recourse claims. EC is the internal measure of required capital we reserve to protect against large unexpected losses, while the loss at default is the expected loss in the event that the counterparty defaults. The bank limits counterparty credit risk by setting OOE, EC and LAD limits. All credit applications with an OOE/EC/LAD above the applicable limit are reviewed and require approval from 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 region. 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 limit. Given that our strategic focus is on Northwest Europe, our country risk exposure has declined significantly in recent years.

### Sector concentration

Sector concentration risk is the risk of losses arising from large credit exposures to counterparties active in a single economic sector. Sector concentration risk arises when deterioration in a specific sector has an effect on all credit exposures related to that sector. ABN AMRO manages sector concentration risk by setting limits on economic capital (EC) for credit risk in each sector as a percentage of total EC for credit risk. Adhering to these limits ensures a sufficiently diversified portfolio.

### Product concentration

Product concentration risk is the risk of losses arising from large credit exposures in a specific asset or product class. This asset or product class concentration can occur, for example, in residential mortgages, commercial real estate and leveraged transaction loans. Limits are defined for each product type in our risk appetite.

### ESG risk concentration

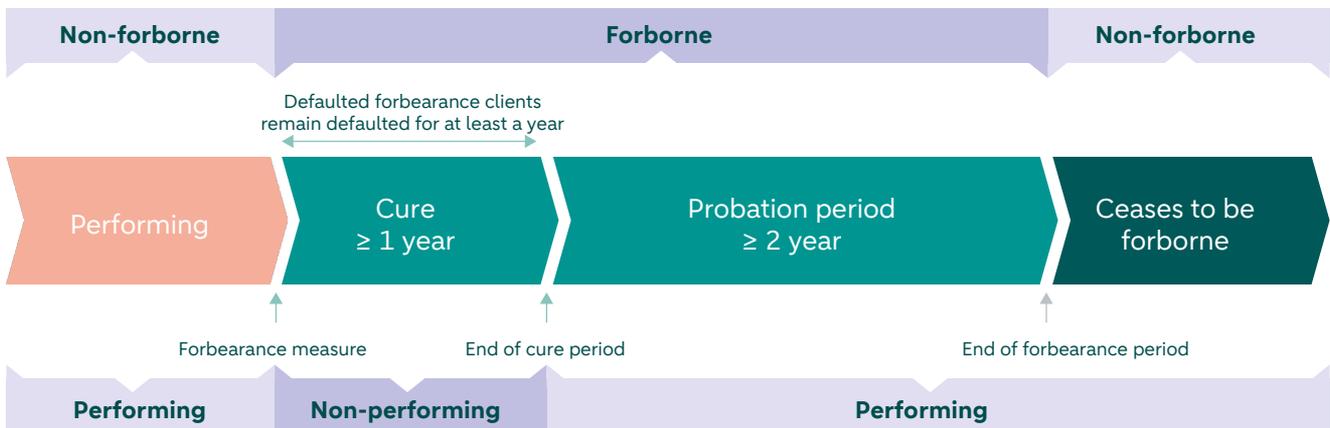
A concentration of clients that are exposed to high climate transition or physical climate risks can also pose a risk for the bank. The bank therefore monitors the concentration of corporate exposures in sectors with higher climate transition risk. In particular, we limit the concentration of corporate 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 properties that have relatively high climate transition risks and are located in an area sensitive to physical climate risk.

### 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 date of the last forbearance measure or, if later, 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.

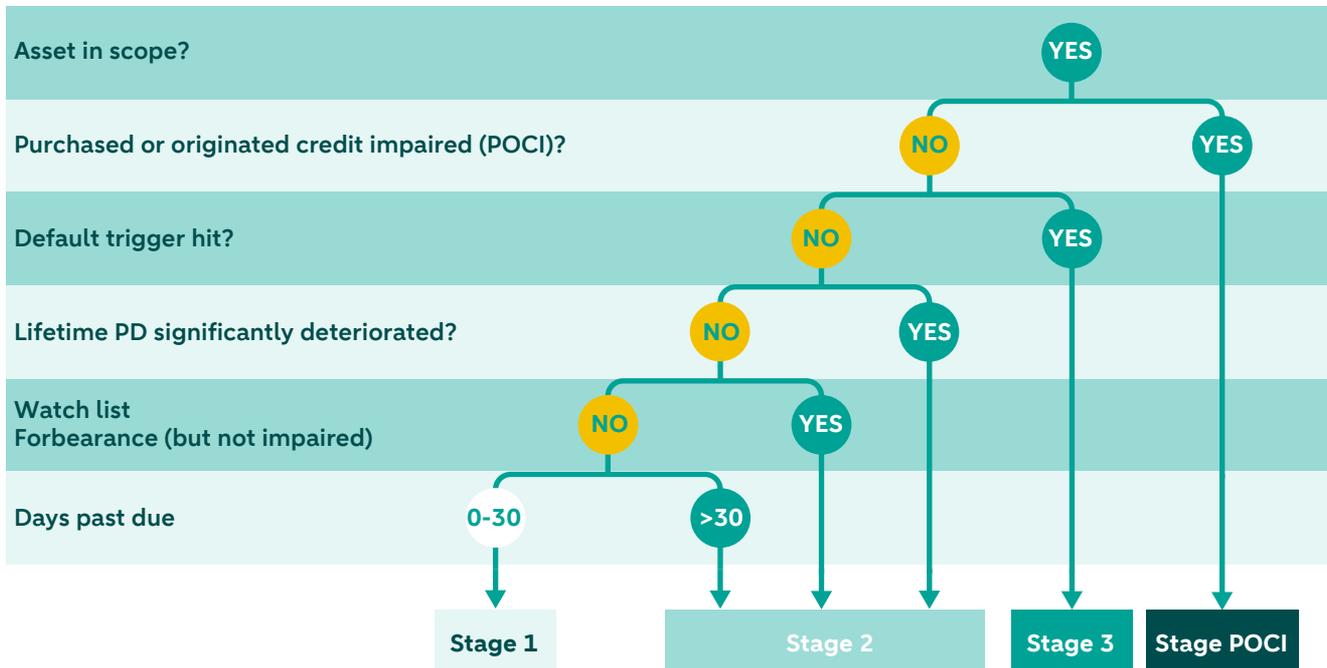
## Past due credit exposures

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.

## Measuring allowances for expected credit losses

### Asset stages

The following flow chart shows the risk stage allocation of financial instruments.



### 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 5 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 5 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.

### 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.

The following figure shows the change in credit quality of financial instruments since initial recognition. We use quantitative and qualitative stage triggers to determine whether a financial instrument should be classified as stage 1 or stage 2. A transfer to stage 3 will always be the result of the default of a financial instrument.

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

### Risk staging

We use quantitative and qualitative stage triggers to determine whether a financial instrument should be classified as stage 1 or stage 2. A transfer to stage 3 will always be the result of the default of a financial instrument.

### 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 balance 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.

### Range of lifetime PD deterioration thresholds

The following table shows LPD deterioration thresholds that triggered transfers to stage 2 as at 31 December 2025. The table provides ranges because each product class uses multiple ECL models, and thresholds are determined for each ECL model.

| Product class         | Range     |
|-----------------------|-----------|
| Consumer lending      | 1.8x-4.0x |
| Residential mortgages | 1.5x-2.1x |
| Corporate loans       | 1.3x-4.8x |

### 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:

- Forborne 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).

### 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. 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.

### Credit enhancements

Financial guarantees held are included in the ECL calculations of a financial asset when they are an integral element of the contractual terms of the financial asset. Financial guarantees that do not form an integral element of the contractual terms of a financial asset are accounted for as a separate asset.

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

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

In the second half of 2025, total performing loans and advances decreased marginally, mostly in relation to credit institutions and other financial corporations. Other financial corporations mainly relate to exposures to Clearing, securities financing and to a lesser extent financial institutions. The direct exposure to private credit funds is limited to approximately EUR 0.2 billion as at 31 December 2025. The decrease in total performing loans and advances was mainly the result of seasonal balance sheet steering measures combined with lower trading positions of Clearing clients, and was partly offset by increases in households and central banks. Total off-balance sheet exposures went up, mainly in other financial corporations. The non-performing exposures compared to the performing exposures remained stable.

|   | A                                    | B                                 | C                                 | D                        | E                                 | F                                 |
|---|--------------------------------------|-----------------------------------|-----------------------------------|--------------------------|-----------------------------------|-----------------------------------|
|   | 31 December 2025                     |                                   |                                   |                          |                                   |                                   |
|   | Gross carrying amount/nominal amount |                                   |                                   |                          |                                   |                                   |
|   | Performing exposures                 |                                   |                                   | Non-performing exposures |                                   |                                   |
| (in millions)   |                                      | Of which:<br>stage 1 <sup>1</sup> | Of which:<br>stage 2 <sup>1</sup> |                          | Of which:<br>stage 2 <sup>1</sup> | Of which:<br>stage 3 <sup>1</sup> |
| 005 <b>Cash balances at central banks and other demand deposits</b> | <b>50,127</b>                        | <b>50,127</b>                     |                                   |                          |                                   |                                   |
| 010 <b>Loans and advances</b>                                       | <b>302,320</b>                       | <b>279,007</b>                    | <b>22,801</b>                     | <b>5,534</b>             | <b>110</b>                        | <b>5,337</b>                      |
| 020 Central banks   | 7,970                                | 7,970                             |                                   |                          |                                   |                                   |
| 030 General governments   | 1,416                                | 1,410                             | 7                                 | 3                        |                                   | 3                                 |
| 040 Credit institutions   | 13,494                               | 13,456                            | 37                                |                          |                                   |                                   |
| 050 Other financial corporations                                    | 44,660                               | 43,937                            | 722                               | 60                       |                                   | 42                                |
| 060 Non-financial corporations                                      | 63,810                               | 57,592                            | 6,190                             | 3,161                    |                                   | 3,095                             |
| 070 - of which SMEs   | 15,882                               | 14,145                            | 1,737                             | 853                      |                                   | 848                               |
| 080 Households  | 170,970                              | 154,641                           | 15,845                            | 2,311                    | 110                               | 2,197                             |
| 090 <b>Debt securities</b>  | <b>49,171</b>                        | <b>48,871</b>                     | <b>10</b>                         |                          |                                   |                                   |
| 100 Central banks   | 1,649                                | 1,649                             |                                   |                          |                                   |                                   |
| 110 General governments   | 36,075                               | 35,785                            | 10                                |                          |                                   |                                   |
| 120 Credit institutions   | 11,315                               | 11,305                            |                                   |                          |                                   |                                   |
| 130 Other financial corporations                                    | 70                                   | 70                                |                                   |                          |                                   |                                   |
| 140 Non-financial corporations                                      | 63                                   | 63                                |                                   |                          |                                   |                                   |
| 150 <b>Off-balance sheet exposures</b>                              | <b>98,342</b>                        | <b>54,222</b>                     | <b>3,331</b>                      | <b>778</b>               | <b>1</b>                          | <b>611</b>                        |
| 160 Central banks   | 4                                    |                                   |                                   |                          |                                   |                                   |
| 170 General governments   | 1,000                                | 971                               | 2                                 |                          |                                   |                                   |
| 180 Credit institutions   | 552                                  | 254                               | 3                                 |                          |                                   |                                   |
| 190 Other financial corporations                                    | 37,827                               | 10,336                            | 252                               | 5                        |                                   | 5                                 |
| 200 Non-financial corporations                                      | 43,771                               | 34,576                            | 2,856                             | 765                      |                                   | 598                               |
| 210 Households  | 15,188                               | 8,086                             | 218                               | 9                        | 1                                 | 8                                 |
| <b>220 Total</b>  | <b>499,960</b>                       | <b>432,228</b>                    | <b>26,142</b>                     | <b>6,312</b>             | <b>111</b>                        | <b>5,948</b>                      |

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 2025                             |                             |
|   | Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions |                                |             |   |                                |             | Accumulated partial write-off | Collateral and financial guarantees received |                             |
|   | Performing exposures – accumulated impairment and provisions   |                                |             | Non-performing exposures – accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions |                                |             |                               | On performing exposures                      | On non-performing exposures |
|   | Of which: stage 1 <sup>1</sup>   | Of which: stage 2 <sup>1</sup> |             | Of which: stage 2 <sup>1</sup>  | Of which: stage 3 <sup>1</sup> |             |                               |  |                             |
| (in millions)   |  |                                |             |   |                                |             |                               |  |                             |
| 005 <b>Cash balances at central banks and other demand deposits</b> | -4   | -4                             |             |   |                                |             |                               |  |                             |
| 010 <b>Loans and advances</b>                                       | -286   | -147                           | -140        | -938  | -1                             | -936        | -10                           | 255,730                                      | 3,516                       |
| 020 Central banks   |  |                                |             |   |                                |             |                               | 7,526  |                             |
| 030 General governments   |  |                                |             |   |                                |             |                               | 904  | 2                           |
| 040 Credit institutions   |  |                                |             |   |                                |             |                               | 12,265                                       |                             |
| 050 Other financial corporations                                    | -7   | -5                             | -3          | -2  |                                | -2          |                               | 30,536                                       | 4                           |
| 060 Non-financial corporations                                      | -190   | -100                           | -90         | -797  |                                | -796        | -10                           | 39,879                                       | 1,392                       |
| 070 - of which SMEs   | -59  | -31                            | -29         | -226  |                                | -226        | -9                            | 10,085                                       | 496                         |
| 080 Households  | -89  | -42                            | -47         | -138  | -1                             | -138        |                               | 164,621                                      | 2,117                       |
| 090 <b>Debt securities</b>  | -1   |                                | -1          |   |                                |             | -1                            |  |                             |
| 100 Central banks   |  |                                |             |   |                                |             |                               |  |                             |
| 110 General governments   | -1   |                                | -1          |   |                                |             | -1                            |  |                             |
| 120 Credit institutions   |  |                                |             |   |                                |             |                               |  |                             |
| 130 Other financial corporations                                    |  |                                |             |   |                                |             |                               |  |                             |
| 140 Non-financial corporations                                      |  |                                |             |   |                                |             |                               |  |                             |
| 150 <b>Off-balance sheet exposures</b>                              | 13   | 9                              | 3           | 50  |                                | 3           |                               | 8,810  | 117                         |
| 160 Central banks   |  |                                |             |   |                                |             |                               |  |                             |
| 170 General governments   |  |                                |             |   |                                |             |                               | 1  |                             |
| 180 Credit institutions   |  |                                |             |   |                                |             |                               | 1  |                             |
| 190 Other financial corporations                                    |  |                                |             |   |                                |             |                               | 802  |                             |
| 200 Non-financial corporations                                      | 10   | 8                              | 3           | 50  |                                | 3           |                               | 7,504  | 115                         |
| 210 Households  | 2  | 1                              |             |   |                                |             |                               | 501  | 2                           |
| <b>220 Total</b>  | <b>-304</b>  | <b>-160</b>                    | <b>-144</b> | <b>-988</b>   | <b>-1</b>                      | <b>-939</b> | <b>-11</b>                    | <b>264,540</b>                               | <b>3,633</b>                |

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 2025, the total loans and advances had declined slightly, primarily in the 'on demand' and 'No stated maturity' buckets. This decrease was mainly due to lower trading positions at Clearing clients and securities financing. The total debt securities were also marginally lower, the decline mostly coming from the '≤ 1 year' maturity bucket.

|                      | A                  | B             | C                | D              | E                  | F              |
|----------------------|--------------------|---------------|------------------|----------------|--------------------|----------------|
|                      | 31 December 2025   |               |                  |                |                    |                |
|                      | Net exposure value |               |                  |                |                    |                |
| (in millions)        | On demand          | ≤ 1 year      | >1 year ≤5 years | > 5 years      | No stated maturity | Total          |
| 1 Loans and advances | 14,291             | 60,553        | 48,694           | 170,042        | 13,050             | 306,630        |
| 2 Debt securities    | 95                 | 9,745         | 19,598           | 21,618         | 158                | 51,214         |
| <b>3 Total</b>       | <b>14,386</b>      | <b>70,299</b> | <b>68,292</b>    | <b>191,659</b> | <b>13,207</b>      | <b>357,844</b> |

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

In the second half of 2025, there was a slight decrease of EUR 33 million in the final stock of non-performing loans and advances versus the final stock reported as at 30 June 2025. This was attributable to higher client outflows from non-performing portfolios. During this period, most of the inflows were caused by reclassification from performing not forborne.

This EUR 33 million decrease partly offset the increase of EUR 143 million reported in the first half of 2025. As result, the final stock of non-performing loans and advances in 2025 rose by EUR 110 million, reaching EUR 5.5 billion at the end of the year (31 December 2024: EUR 5.4 billion).

|   | A                     |
|---|-----------------------|
|   | 31 December 2025      |
| (in millions)   | Gross carrying amount |
| 1 <b>Initial stock of non-performing loans and advances</b> | 5,425                 |
| 2 Inflows to non-performing portfolios                      | 3,513                 |
| 3 Outflows from non-performing portfolios                   | -3,403                |
| 4 <i>Outflows due to write-offs</i>                         | -221                  |
| 5 <i>Outflow due to other situations</i>                    | -3,182                |
| <b>6 Final stock of non-performing loans and advances</b>   | <b>5,534</b>          |

## EU CQ1 - Credit quality of forborne exposures

As at 31 December 2025, the total forborne exposure (including loan commitments given) had remained stable at EUR 5.6 billion compared to 30 June 2025.

|  | A   | B                       | C                  | D            | E  | F                                    | G  | H            |
|--|---|-------------------------|--------------------|--------------|--|--------------------------------------|--|--------------|
|  | 31 December 2025  |                         |                    |              |  |                                      |  |              |
|  | Gross carrying amount/nominal amount of exposures with forbearance measures |                         |                    |              | Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions |                                      | Collateral received and financial guarantees received on forborne exposures                                  |              |
|  | Performing forborne   | Non-performing forborne |                    |              | On performing forborne exposures   | On non-performing forborne exposures | Of which: collateral and financial guarantees received on non-performing exposures with forbearance measures |              |
| (in millions)  |   | Of which: defaulted     | Of which: impaired |              |  |                                      |  |              |
| 005 Cash balances at central banks and other demand deposits |   |                         |                    |              |  |                                      |  |              |
| 010 <b>Loans and advances</b>                                | 2,612   | 2,151                   | 2,040              | 2,040        | -34  | -385                                 | 3,305  | 1,374        |
| 020 Central banks  |   |                         |                    |              |  |                                      |  |              |
| 030 General governments                                      | 2   |                         |                    |              |  |                                      |  |              |
| 040 Credit institutions                                      |   |                         |                    |              |  |                                      |  |              |
| 050 Other financial corporations                             | 31  | 38                      | 38                 | 38           |  |                                      | 32   | 4            |
| 060 Non-financial corporations                               | 1,993   | 1,509                   | 1,509              | 1,509        | -30  | -354                                 | 2,150  | 810          |
| 070 Households   | 587   | 604                     | 493                | 493          | -4   | -32                                  | 1,122  | 561          |
| 080 <b>Debt securities</b>                                   |   |                         |                    |              |  |                                      |  |              |
| 090 <b>Loan commitments given</b>                            | 590   | 230                     | 230                | 230          | 1  |                                      | 163  | 46           |
| <b>100 Total</b>   | <b>3,202</b>  | <b>2,381</b>            | <b>2,270</b>       | <b>2,270</b> | <b>-35</b>   | <b>-385</b>                          | <b>3,468</b>   | <b>1,420</b> |

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

At the end of 2025, the performing exposures that are past due longer than 30 days had declined sharply from EUR 351 million as at 31 December 2024 to EUR 188 million. This was partly driven by further alignment of past due reporting across the different segments. Non-performing exposures (NPEs) remained stable at EUR 6.3 billion. The EUR 0.2 billion decrease in NPEs of SMEs and households was offset by a comparable increase in NPEs of non-financial corporations.

|   | A                                    | B                                 | C                            |
|---|--------------------------------------|-----------------------------------|------------------------------|
|   | 31 December 2025                     |                                   |                              |
|   | Gross carrying amount/nominal amount |                                   |                              |
|   | Performing exposures                 |                                   |                              |
| (in millions)   |                                      | Not past due + past due ≤ 30 days | Past due > 30 days ≤ 90 days |
| 005 <b>Cash balances at central banks and other demand deposits</b> | <b>50,127</b>                        | <b>50,127</b>                     |                              |
| 10 <b>Loans and advances</b>  | <b>302,320</b>                       | <b>302,132</b>                    | <b>188</b>                   |
| 20 Central banks  | 7,970                                | 7,970                             |                              |
| 30 General governments  | 1,416                                | 1,416                             |                              |
| 40 Credit institutions  | 13,494                               | 13,494                            |                              |
| 50 Other financial corporations                                     | 44,660                               | 44,651                            | 8                            |
| 60 Non-financial corporations                                       | 63,810                               | 63,743                            | 67                           |
| 70 - of which SMEs  | 15,882                               | 15,846                            | 36                           |
| 80 Households   | 170,970                              | 170,858                           | 112                          |
| 90 <b>Debt securities</b>   | <b>49,171</b>                        | <b>49,171</b>                     |                              |
| 100 Central banks   | 1,649                                | 1,649                             |                              |
| 110 General governments   | 36,075                               | 36,075                            |                              |
| 120 Credit institutions   | 11,315                               | 11,315                            |                              |
| 130 Other financial corporations                                    | 70                                   | 70                                |                              |
| 140 Non-financial corporations                                      | 63                                   | 63                                |                              |
| 150 <b>Off-balance sheet exposures</b>                              | <b>98,342</b>                        |                                   |                              |
| 160 Central banks   | 4                                    |                                   |                              |
| 170 General governments   | 1,000                                |                                   |                              |
| 180 Credit institutions   | 552                                  |                                   |                              |
| 190 Other financial corporations                                    | 37,827                               |                                   |                              |
| 200 Non-financial corporations                                      | 43,771                               |                                   |                              |
| 210 Households  | 15,188                               |                                   |                              |
| <b>220 Total</b>  | <b>499,960</b>                       | <b>401,429</b>                    | <b>188</b>                   |

|   | D                                    | E                             | F                            | G                          | H                            | I                            | J                  | K                   | L            |
|---|--------------------------------------|-------------------------------|------------------------------|----------------------------|------------------------------|------------------------------|--------------------|---------------------|--------------|
|   | 31 December 2025                     |                               |                              |                            |                              |                              |                    |                     |              |
|   | 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 <b>Cash balances at central banks and other demand deposits</b> |                                      |                               |                              |                            |                              |                              |                    |                     |              |
| 10 <b>Loans and advances</b>  | <b>5,534</b>                         | <b>4,673</b>                  | <b>235</b>                   | <b>292</b>                 | <b>142</b>                   | <b>115</b>                   | <b>31</b>          | <b>48</b>           | <b>5,424</b> |
| 20 Central banks  |                                      |                               |                              |                            |                              |                              |                    |                     |              |
| 30 General governments  | 3                                    |                               |                              |                            |                              | 3                            |                    |                     | 3            |
| 40 Credit institutions  |                                      |                               |                              |                            |                              |                              |                    |                     |              |
| 50 Other financial corporations                                     | 60                                   | 41                            | 17                           |                            |                              | 1                            |                    |                     | 60           |
| 60 Non-financial corporations                                       | 3,161                                | 2,770                         | 144                          | 111                        | 36                           | 63                           | 19                 | 17                  | 3,161        |
| 70 - of which SMEs  | 853                                  | 666                           | 29                           | 65                         | 29                           | 41                           | 5                  | 17                  | 853          |
| 80 Households   | 2,311                                | 1,862                         | 73                           | 180                        | 106                          | 47                           | 11                 | 30                  | 2,200        |
| 90 <b>Debt securities</b>   |                                      |                               |                              |                            |                              |                              |                    |                     |              |
| 100 Central banks   |                                      |                               |                              |                            |                              |                              |                    |                     |              |
| 110 General governments   |                                      |                               |                              |                            |                              |                              |                    |                     |              |
| 120 Credit institutions   |                                      |                               |                              |                            |                              |                              |                    |                     |              |
| 130 Other financial corporations                                    |                                      |                               |                              |                            |                              |                              |                    |                     |              |
| 140 Non-financial corporations                                      |                                      |                               |                              |                            |                              |                              |                    |                     |              |
| 150 <b>Off-balance sheet exposures</b>                              | <b>778</b>                           |                               |                              |                            |                              |                              |                    |                     | <b>613</b>   |
| 160 Central banks   |                                      |                               |                              |                            |                              |                              |                    |                     |              |
| 170 General governments   |                                      |                               |                              |                            |                              |                              |                    |                     |              |
| 180 Credit institutions   |                                      |                               |                              |                            |                              |                              |                    |                     |              |
| 190 Other financial corporations                                    | 5                                    |                               |                              |                            |                              |                              |                    |                     | 5            |
| 200 Non-financial corporations                                      | 765                                  |                               |                              |                            |                              |                              |                    |                     | 600          |
| 210 Households  | 9                                    |                               |                              |                            |                              |                              |                    |                     | 8            |
| <b>220 Total</b>  | <b>6,312</b>                         | <b>4,673</b>                  | <b>235</b>                   | <b>292</b>                 | <b>142</b>                   | <b>115</b>                   | <b>31</b>          | <b>48</b>           | <b>6,037</b> |

## EU CQ4 - Quality of non-performing exposures by geography

The table below includes the top five countries with on-balance sheet exposures in excess of EUR 10 billion. The countries with exposures below EUR 10 billion are considered to be less material and have been grouped under 'Other countries'. As at 31 December 2025, the top five countries (NL, US, FR, DE, UK) contributed to 83% of the total on- and off-balance amount, while 140 countries ('Other countries') contributed to the remaining 17%.

The total exposure slightly increased to EUR 456.1 billion in Q4 2025 from EUR 451.0 billion in Q2 2025. The increase mainly came from off-balance sheet exposures, most notably from the Netherlands, Germany and the United States, partly offset by a decline in the on-balance sheet exposures. The defaulted exposures and impairments remained stable.

|  | A                                    | B                        | C                   | D                               | E                      | F  | G   |
|--|--------------------------------------|--------------------------|---------------------|---------------------------------|------------------------|--|---|
|  | 31 December 2025                     |                          |                     |                                 |                        |  |   |
|  | Gross carrying amount/nominal amount | Of which: non-performing | Of which: defaulted | Of which: subject to impairment | 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 |
| (in millions)                          |                                      |                          |                     |                                 |                        |  |   |
| <b>010 On-balance sheet exposures</b>  | <b>357,025</b>                       | <b>5,534</b>             | <b>5,424</b>        | <b>356,221</b>                  | <b>-1,225</b>          |  |   |
| 020 Netherlands                        | 223,837                              | 4,043                    | 3,934               | 223,323                         | -785                   |  |   |
| 030 United States                      | 21,178                               | 28                       | 28                  | 21,178                          | -2                     |  |   |
| 040 France                             | 20,053                               | 165                      | 165                 | 20,053                          | -84                    |  |   |
| 050 Germany                            | 17,727                               | 541                      | 541                 | 17,438                          | -129                   |  |   |
| 060 United Kingdom                     | 13,893                               | 491                      | 491                 | 13,893                          | -90                    |  |   |
| 070 Other countries <sup>1</sup>       | 60,336                               | 266                      | 265                 | 60,336                          | -134                   |  |   |
| <b>080 Off-balance sheet exposures</b> | <b>99,120</b>                        | <b>778</b>               | <b>613</b>          |                                 |                        | <b>63</b>  |   |
| 090 Netherlands                        | 50,501                               | 520                      | 425                 |                                 |                        | 8  |   |
| 100 United States                      | 13,679                               |                          |                     |                                 |                        |  |   |
| 110 United Kingdom                     | 6,928                                | 89                       | 65                  |                                 |                        | 3  |   |
| 120 Germany                            | 5,937                                | 7                        | 6                   |                                 |                        | 2  |   |
| 130 France                             | 4,445                                | 15                       | 15                  |                                 |                        | 4  |   |
| 140 Other countries <sup>1</sup>       | 17,630                               | 147                      | 102                 |                                 |                        | 46   |   |
| <b>150 Total</b>                       | <b>456,145</b>                       | <b>6,312</b>             | <b>6,037</b>        | <b>356,221</b>                  | <b>-1,225</b>          | <b>63</b>  |   |

1. Other countries: Albania, Algeria, Andorra, Angola, Argentina, Aruba, Australia, Austria, Azerbaijan, Bahamas, Bahrain, Bangladesh, Belgium, Bermuda, Bolivia, Bonaire, Bosnia and Herzegovina, Brazil, British Virgin Islands, Brunei Darussalam, Bulgaria, Burkina Faso, Cambodia, Cameroon, Canada, Cape Verde, Cayman Islands, Chile, China, Colombia, Costa Rica, Cote d'Ivoire, Croatia, Cuba, Curaçao, Cyprus, Czech Republic, Denmark, Djibouti, Ecuador, Egypt, Estonia, Ethiopia, Finland, French Guiana, Gabon, Gambia, Georgia, Ghana, Gibraltar, Greece, Guadeloupe, Guernsey, Guyana, 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, Nicaragua, Nigeria, Norway, Oman, Pakistan, Panama, Paraguay, Peru, Philippines, Poland, Portugal, Qatar, Republic of Korea, Republic of Moldova, Reunion, Romania, Russian Federation, Rwanda, Saudi Arabia, Serbia, Singapore, Sint-Bartélemy, Slovakia, Slovenia, South Africa, Spain, Sri Lanka, St. Maarten (MF), St. Maarten (SX), Suriname, Sweden, Switzerland, Taiwan, Tajikistan, Thailand, Trinidad and Tobago, Tunisia, Turkey, Turks and Caicos Islands, Uganda, Ukraine, United Arab Emirates, United Republic of Tanzania, Uruguay, Vietnam, Zambia, Zimbabwe.

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

As at 31 December 2025, the GCA of non-financial corporations was up at EUR 67.0 billion (30 June 2025: EUR 66.0 billion). The most sizeable increases were in real estate activities and the electricity, gas, steam, and air conditioning supply sectors, and were offset by a reduction in financial and insurance activities. Non-performing exposure remained flat at EUR 3.2 billion, with the largest decline observed in the manufacturing sector.

|   | A                        | B            | C                   | D             | E  | F                      |   |
|---|--------------------------|--------------|---------------------|---------------|--|------------------------|---|
|   |                          |              |                     |               |  | 31 December 2025       |   |
|   | Gross carrying amount    |              |                     |               | Of which: loans and advances subject to impairment | Accumulated impairment | Accumulated negative changes in fair value due to credit risk on non-performing exposures |
|   | Of which: non-performing |              | Of which: defaulted |               |  |                        |   |
| (in millions)   |                          |              |                     |               |  |                        |   |
| 010 Agriculture, forestry and fishing                             | 4,487                    | 115          | 115                 | 4,487         |  | -33                    |   |
| 020 Mining and quarrying  | 1,071                    | 15           | 15                  | 1,071         |  | -2                     |   |
| 030 Manufacturing   | 4,008                    | 316          | 316                 | 4,008         |  | -121                   |   |
| 040 Electricity, gas, steam and air conditioning supply           | 2,361                    | 92           | 92                  | 2,361         |  | -62                    |   |
| 050 Water supply  | 518                      | 6            | 6                   | 518           |  | -7                     |   |
| 060 Construction  | 2,449                    | 87           | 87                  | 2,449         |  | -44                    |   |
| 070 Wholesale and retail trade                                    | 5,269                    | 324          | 324                 | 5,269         |  | -211                   |   |
| 080 Transport and storage   | 7,008                    | 141          | 141                 | 7,008         |  | -29                    |   |
| 090 Accommodation and food service activities                     | 729                      | 50           | 50                  | 729           |  | -14                    |   |
| 100 Information and communication                                 | 4,310                    | 490          | 490                 | 4,310         |  | -137                   |   |
| 110 Financial and insurance activities <sup>1</sup>               | 14,509                   | 662          | 662                 | 14,509        |  | -70                    |   |
| 120 Real estate activities  | 10,476                   | 232          | 232                 | 10,453        |  | -48                    |   |
| 130 Professional, scientific and technical activities             | 3,858                    | 352          | 352                 | 3,858         |  | -88                    |   |
| 140 Administrative and support service activities                 | 3,527                    | 170          | 170                 | 3,527         |  | -72                    |   |
| 150 Public administration and defense, compulsory social security | 1                        |              |                     | 1             |  |                        |   |
| 160 Education   | 48                       |              |                     | 48            |  | -1                     |   |
| 170 Human health services and social work activities              | 1,820                    | 92           | 92                  | 1,815         |  | -31                    |   |
| 180 Arts, entertainment and recreation                            | 209                      | 9            | 9                   | 209           |  | -8                     |   |
| 190 Other services  | 310                      | 8            | 8                   | 310           |  | -9                     |   |
| <b>200 Total</b>  | <b>66,971</b>            | <b>3,161</b> | <b>3,161</b>        | <b>66,943</b> |  | <b>-987</b>            |   |

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

## EU CQ7 - Collateral obtained by taking possession and execution processes

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

|   | A  | B                            |
|---|--|------------------------------|
|   | 31 December 2025                         |                              |
|   | Collateral obtained by taking possession |                              |
| (in millions)                               | Value at initial recognition             | Accumulated negative changes |
| 010 Property, plant and equipment (PP&E)    |  |                              |
| 020 Other than PP&E                         | 3  |                              |
| 030 Residential immovable property          | 3  |                              |
| 040 Commercial Immovable property           |  |                              |
| 050 Movable property (auto, shipping, etc.) |  |                              |
| 060 Equity and debt instruments             |  |                              |
| 070 Other collateral                        |  |                              |
| <b>080 Total</b>                            | <b>3</b>                                 |                              |

# 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.

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 or amounts 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 and pursue the guarantors on time and without impediment so that losses on the exposure at the time a counterparty defaults are minimised.

In addition to minimising exposure to credit 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 and guarantees 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 and guarantees, are aimed at the effective and timely realisation of collateral and guarantee amounts.

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 must 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 collateral 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 expected amount for 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 purposes of collateral and guarantees are 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 and guarantees, we prefer to accept collateral and guarantees that are also eligible for capital relief. But even though collateral and guarantees are there to reduce credit risk, they carry risks of their own such as a change in effectiveness, change in value, the possibility of damage and so on. Collateral and guarantees

therefore need to be actively managed so that they continue to qualify as effective and eligible risk mitigation techniques recognised by the regulator that can also reduce regulatory capital for the bank. For this purpose, collateral and guarantees need 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 applies A-IRB for nearly all mortgage loans, F-IRB for its exposures to institutions (banks) and SA for the other credit risk exposures.

After meeting their eligibility criteria, the various types of collateral and guarantees 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 <sup>1</sup>        | 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<br>Other physical collateral<br>V<br>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     |

1. For the Standardised Approach (SA), the benefit of immovable property collateral is not via a credit risk mitigation technique but directly via a lower risk weight that applies for certain exposure and sub-exposure classes that can apply based on the presence of the immovable property.

### 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 (NHG), as provided by the WEW, are considered to be guaranteed by the Dutch State. Given that the bank applies the SA for direct exposures to central governments, under the current CRR this results in a substitution effect for mortgage loans subject to NHG and parts of these loans secured by the NHG amount, where this amount then receives an SA treatment as exposure to central governments.

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 evaluated 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 CRR 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 and guarantees, are aimed at the effective and timely realisation of collateral and guarantees.

### Accounting policy for offsetting financial assets and liabilities

Financial assets and liabilities are offset, and the net amount is reported on the statement of financial position, 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 are agreements in which the bank has a legally enforceable right to offset in the event of default, but no ability and/or intention to realise the asset and settle the liability simultaneously in the normal course of business. As a result, the criteria to offset are not met. 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. The ratio of the secured carrying amount versus the total carrying amount increased slightly to 67.9% as at 31 December 2025 from 66.2% as at 30 June 2025 due to a combination of higher secured volumes and a decrease in unsecured amounts.

|                                      | A                         | B                       | C                               | D   | E                                       |
|--------------------------------------|---------------------------|-------------------------|---------------------------------|---|---|
|                                      |                           |                         |                                 |   | 31 December 2025                        |
|                                      | Unsecured carrying amount | Secured carrying amount | Of which: secured by collateral | Of which: secured by financial guarantees | Of which: secured by credit derivatives |
| (in millions)                        |                           |                         |                                 |   |   |
| 1 Loans and advances                 | 80,931                    | 275,822                 | 272,427                         | 3,395                                     |   |
| 2 Debt securities                    | 49,170                    |                         |                                 |   |   |
| <b>3 Total</b>                       | <b>130,100</b>            | <b>275,822</b>          | <b>272,427</b>                  | <b>3,395</b>                              |   |
| 4 Of which: non-performing exposures | 1,080                     | 3,516                   | 3,201                           | 315                                       |   |
| EU-5 - of which defaulted            | 970                       | 3,516                   |                                 |   |   |

# Use of the Standardised Approach

## EU CRD – Qualitative disclosure requirements related to Standardised Approach

Under the Standardised Approach, regulatory capital is calculated by using the risk weights prescribed in regulations. For retail exposures, the applicable risk weights are determined based on exposure characteristics. For most non-retail exposures, credit risk ratings from External Credit Assessment Institutions (ECAI) are used to derive the applicable risk weights. For this purpose, the bank has nominated three external credit rating agencies: Standard & Poor's, Moody's and Fitch<sup>1</sup>. For the mapping of ECAI ratings to risk weights, ABN AMRO complies with the standard mapping tables provided by the European Commission. In the case of non-retail counterparties for which no credit ratings from ECAI are available, exposures are classified as unrated when determining regulatory capital requirements.

## 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 (SA). It also provides an insight into the effects of credit risk mitigation (CRM) and credit conversion factors (CCF) on the exposures within the SA scope.

Compared to June 2025, on-balance exposures in the standardised approach scope rose by EUR 81.1 billion, primarily due to the transition of certain portfolios to the standardised approach, as well as business movements and the acquisition of HAL. The exposure classes with the highest impact were corporates and secured by mortgages on immovable property.

<sup>1</sup> Kroll Bond Rating Agency (KBRA) is used as an additional nominated ECAI to rate subscription finance exposures to Collective Investment Undertakings (CIUs).

|                         | A   | B                           | C                                       | D                           | E                     | F             |            |
|-------------------------|---|-----------------------------|---|-----------------------------|-----------------------|---------------|------------|
|                         | 31 December 2025  |                             |   |                             |                       |               |            |
|                         | Exposures before CCF and CRM <sup>1</sup>                                 |                             | Exposures post CCF and CRM <sup>1</sup> |                             | RWEA and RWEA density |               |            |
|                         | On-balance sheet exposures  | Off-balance sheet exposures | On-balance sheet exposures              | Off-balance sheet exposures | RWEA                  | RWEA density  |            |
| <i>(in millions)</i>    |   |                             |   |                             |                       |               |            |
| <b>Exposure classes</b> |   |                             |   |                             |                       |               |            |
| 1                       | Central governments or central banks                                      | 75,594                      | 891                                     | 109,824                     | 1,170                 | 355           | 0%         |
| 2                       | Non-central government public sector entities                             | 6,061                       | 271                                     | 5,089                       | 109                   | 29            | 1%         |
| EU 2a                   | <i>Regional governments or local authorities</i>                          | 2,549                       | 150                                     | 3,155                       | 59                    |               | 0%         |
| EU 2b                   | <i>Public sector entities</i>   | 3,512                       | 121                                     | 1,934                       | 51                    | 29            | 1%         |
| 3                       | Multilateral development banks  | 2,996                       |   | 3,983                       |                       | 2             | 0%         |
| EU 3a                   | International organisations   | 6,706                       |   | 5,376                       |                       |               | 0%         |
| 4                       | Institutions  | 746                         | 14,555                                  | 652                         | 43                    | 535           | 77%        |
| 5                       | Covered bonds   | 924                         |   | 924                         |                       | 95            | 10%        |
| 6                       | Corporates  | 41,752                      | 53,859                                  | 37,510                      | 14,613                | 45,647        | 88%        |
| 6.1                     | <i>- of which Specialised Lending</i>                                     | 11,619                      | 2,982                                   | 10,025                      | 1,000                 | 9,852         | 89%        |
| 7                       | Subordinated debt exposures and equity                                    | 13                          | 21                                      | 13                          | 8                     | 31            | 147%       |
| EU 7a                   | <i>Subordinated debt exposures</i>  | 13                          | 21                                      | 13                          | 8                     | 31            | 147%       |
| EU 7b                   | <i>Equity</i>   |                             |   |                             |                       |               |            |
| 8                       | Retail  | 4,226                       | 8,663                                   | 4,051                       | 772                   | 3,554         | 74%        |
| 9                       | Secured by mortgages on immovable property and ADC exposures              | 34,423                      | 9,597                                   | 33,542                      | 3,726                 | 25,436        | 68%        |
| 9.1                     | <i>Secured by mortgages on residential immovable property - non IPRE</i>  | 3,111                       | 1,868                                   | 3,061                       | 724                   | 1,443         | 38%        |
| 9.2                     | <i>Secured by mortgages on residential immovable property - IPRE</i>      | 2,437                       | 137                                     | 2,426                       | 49                    | 970           | 39%        |
| 9.3                     | <i>Secured by mortgages on commercial immovable property - non IPRE</i>   | 17,086                      | 6,367                                   | 16,314                      | 2,490                 | 12,732        | 68%        |
| 9.4                     | <i>Secured by mortgages on commercial immovable property - IPRE</i>       | 10,906                      | 789                                     | 10,868                      | 306                   | 8,831         | 79%        |
| 9.5                     | <i>Acquisition, Development and Construction (ADC)</i>                    | 883                         | 436                                     | 873                         | 158                   | 1,460         | 142%       |
| 10                      | Exposures in default  | 2,782                       | 757                                     | 2,276                       | 227                   | 3,094         | 124%       |
| EU 10a                  | Claims on institutions and corporates with a short-term credit assessment |                             | 370                                     |                             | 148                   | 50            | 34%        |
| EU 10b                  | Collective investment undertakings (CIU)                                  | 181                         | 166                                     | 181                         | 66                    | 550           | 222%       |
| EU 10c                  | Other items   | 2,580                       |   | 2,580                       |                       | 1,887         | 73%        |
| <b>12</b>               | <b>Total</b>  | <b>178,984</b>              | <b>89,150</b>                           | <b>206,001</b>              | <b>20,883</b>         | <b>81,267</b> | <b>36%</b> |

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

## EU CR5 – Standardised Approach

### EAD under the Standardised Approach

Compared to 30 June 2025, the EAD under the standardised approach (which includes both on-balance and off-balance exposures) increased by EUR 96.6 billion to EUR 226.9 billion in the fourth quarter of 2025. This increase mirrors the underlying drivers described in CR4.

| (in millions)  | A              | B         | C          | D            | E            | F          | G          | H        | I          | J            | 2025     |                |
|--|----------------|-----------|------------|--------------|--------------|------------|------------|----------|------------|--------------|----------|----------------|
|  | Risk weight    |           |            |              |              |            |            |          |            |              | Subtotal |                |
|  | 0%             | 2%        | 4%         | 10%          | 20%          | 30%        | 35%        | 40%      | 45%        | 50%          |          |                |
| <b>Exposure classes</b>  |                |           |            |              |              |            |            |          |            |              |          |                |
| 1 Central governments or central banks   | 109,804        |           | 399        | 114          | 537          |            |            |          |            |              | 63       | 110,917        |
| 2 Non-central government public sector entities                                  | 5,051          |           |            |              | 147          |            |            |          |            |              |          | 5,198          |
| EU 2a Regional governments or local authorities                                  | 3,213          |           |            |              |              |            |            |          |            |              |          | 3,213          |
| EU 2b Public sector entities   | 1,838          |           |            |              | 147          |            |            |          |            |              |          | 1,985          |
| 3 Multilateral development banks   | 3,974          |           |            |              | 9            |            |            |          |            |              |          | 3,983          |
| EU 3a International organisations  | 5,376          |           |            |              |              |            |            |          |            |              |          | 5,376          |
| 4 Institutions   |                | 41        |            |              | 124          | 64         |            | 4        |            |              | 12       | 244            |
| 5 Covered bonds  |                |           |            | 906          |              |            | 10         |          |            |              |          | 916            |
| 6 Corporates   |                |           | 184        |              | 3,601        |            |            |          |            |              | 2,982    | 6,767          |
| 6.1 - of which Specialised Lending   |                |           |            |              |              |            |            |          |            |              |          |                |
| 7 Subordinated debt exposures and equity   |                |           |            |              |              |            |            |          |            |              |          |                |
| EU 7a Subordinated debt exposures  |                |           |            |              |              |            |            |          |            |              |          |                |
| EU 7b Equity   |                |           |            |              |              |            |            |          |            |              |          |                |
| 8 Retail exposures   |                |           |            |              |              |            |            |          | 480        |              |          | 480            |
| 9 Secured by mortgages on immovable property and ADC exposures                   |                |           |            |              | 3,424        | 524        | 587        |          | 469        | 309          |          | 5,313          |
| 9.1 Secured by mortgages on residential immovable property - non IPRE            |                |           |            |              | 2,796        |            |            |          |            | 101          |          | 2,897          |
| 9.1.1 no loan splitting applied  |                |           |            |              |              |            |            |          |            | 11           |          | 11             |
| 9.1.2 loan splitting applied (secured)   |                |           |            |              | 2,796        |            |            |          |            |              |          | 2,796          |
| 9.1.3 loan splitting applied (unsecured)   |                |           |            |              |              |            |            |          |            | 89           |          | 89             |
| 9.2 Secured by mortgages on residential immovable property - IPRE                |                |           |            |              | 614          | 524        | 587        |          | 469        |              |          | 2,195          |
| 9.3 Secured by mortgages on commercial immovable property - non IPRE             |                |           |            |              | 1            |            |            |          |            | 208          |          | 208            |
| 9.3.1 no loan splitting applied  |                |           |            |              |              |            |            |          |            |              |          |                |
| 9.3.2 loan splitting applied (secured)   |                |           |            |              | 1            |            |            |          |            |              |          | 1              |
| 9.3.3 loan splitting applied (unsecured)   |                |           |            |              |              |            |            |          |            | 208          |          | 208            |
| 9.4 Secured by mortgages on commercial immovable property - IPRE                 |                |           |            |              | 13           |            |            |          |            |              |          | 13             |
| 9.5 Acquisition, Development and Construction (ADC)                              |                |           |            |              |              |            |            |          |            |              |          |                |
| 10 Exposures in default  |                |           |            |              |              |            |            |          |            |              |          |                |
| EU 10a Claims on institutions and corporates with a short-term credit assessment |                |           |            |              | 120          |            |            |          |            | 4            |          | 124            |
| EU 10b Collective investment undertakings (CIU)                                  | 20             |           |            |              |              | 2          |            |          |            | 1            |          | 23             |
| EU 10c Other items   | 670            |           |            |              | 6            |            |            |          |            | 23           |          | 698            |
| <b>EU 11c Total</b>  | <b>124,896</b> | <b>41</b> | <b>583</b> | <b>1,020</b> | <b>7,967</b> | <b>590</b> | <b>598</b> | <b>4</b> | <b>949</b> | <b>3,393</b> |          | <b>140,040</b> |

|                         |   | K              | L             | M        | N            | O            | P            | Q             | R         |                  |                |
|-------------------------|---|----------------|---------------|----------|--------------|--------------|--------------|---------------|-----------|------------------|----------------|
|                         |   |                |               |          |              |              |              |               |           | 31 December 2025 |                |
|                         | Subtotal  |                |               |          |              |              |              |               |           | Risk weight      | Subtotal       |
| (in millions)           |   | 60%            | 70%           | 75%      | 80%          | 90%          | 100%         | 105%          | 110%      |                  |                |
| <b>Exposure classes</b> |   |                |               |          |              |              |              |               |           |                  |                |
| 1                       | Central governments or central banks                                      | 110,917        |               |          |              |              |              |               |           | 110,917          |                |
| 2                       | Non-central government public sector entities                             | 5,198          |               |          |              |              |              |               |           | 5,198            |                |
| EU 2a                   | <i>Regional governments or local authorities</i>                          | 3,213          |               |          |              |              |              |               |           | 3,213            |                |
| EU 2b                   | <i>Public sector entities</i>   | 1,985          |               |          |              |              |              |               |           | 1,985            |                |
| 3                       | Multilateral development banks  | 3,983          |               |          |              |              |              |               |           | 3,983            |                |
| EU 3a                   | International organisations   | 5,376          |               |          |              |              |              |               |           | 5,376            |                |
| 4                       | Institutions  | 244            |               | 258      |              |              |              |               |           | 503              |                |
| 5                       | Covered bonds   | 916            |               |          |              |              |              |               |           | 916              |                |
| 6                       | Corporates  | 6,767          | 9             | 2,136    | 2,895        |              | 36,653       |               |           | 48,460           |                |
| 6.1                     | <i>- of which Specialised Lending</i>                                     |                |               |          | 2,895        |              | 4,709        |               |           | 7,603            |                |
| 7                       | Subordinated debt exposures and equity                                    |                | 1             |          |              |              |              |               |           | 1                |                |
| EU 7a                   | <i>Subordinated debt exposures</i>  |                | 1             |          |              |              |              |               |           | 1                |                |
| EU 7b                   | <i>Equity</i>   |                |               |          |              |              |              |               |           |                  |                |
| 8                       | Retail exposures  | 480            |               | 4,049    |              |              | 294          |               |           | 4,823            |                |
| 9                       | Secured by mortgages on immovable property and ADC exposures              | 5,313          | 14,147        | 516      |              | 2,734        | 5,662        | 16            | 1,695     | 30,082           |                |
| 9.1                     | <i>Secured by mortgages on residential immovable property - non IPRE</i>  | 2,897          |               | 195      |              |              | 693          |               |           | 3,785            |                |
| 9.1.1                   | <i>no loan splitting applied</i>  | 11             |               | 7        |              |              | 173          |               |           | 192              |                |
| 9.1.2                   | <i>loan splitting applied (secured)</i>                                   | 2,796          |               |          |              |              |              |               |           | 2,796            |                |
| 9.1.3                   | <i>loan splitting applied (unsecured)</i>                                 | 89             |               | 188      |              |              | 520          |               |           | 798              |                |
| 9.2                     | <i>Secured by mortgages on residential immovable property - IPRE</i>      | 2,195          | 40            | 14       |              |              | 121          | 16            |           | 2,386            |                |
| 9.3                     | <i>Secured by mortgages on commercial immovable property - non IPRE</i>   | 208            | 13,688        | 307      |              |              | 4,585        |               |           | 18,788           |                |
| 9.3.1                   | <i>no loan splitting applied</i>  |                |               | 7        |              |              | 677          |               |           | 683              |                |
| 9.3.2                   | <i>loan splitting applied (secured)</i>                                   | 1              | 13,688        |          |              |              |              |               |           | 13,689           |                |
| 9.3.3                   | <i>loan splitting applied (unsecured)</i>                                 | 208            |               | 300      |              |              | 3,909        |               |           | 4,417            |                |
| 9.4                     | <i>Secured by mortgages on commercial immovable property - IPRE</i>       | 13             | 419           |          |              | 2,734        | 90           |               | 1,695     | 4,951            |                |
| 9.5                     | <i>Acquisition, Development and Construction (ADC)</i>                    |                |               |          |              |              | 172          |               |           | 172              |                |
| 10                      | Exposures in default  |                |               |          |              |              | 1,322        |               |           | 1,322            |                |
| EU 10a                  | Claims on institutions and corporates with a short-term credit assessment | 124            |               |          |              |              | 24           |               |           | 148              |                |
| EU 10b                  | Collective investment undertakings (CIU)                                  | 23             |               |          |              |              | 1            |               |           | 24               |                |
| EU 10c                  | Other items   | 698            |               |          |              |              | 1,872        |               |           | 2,570            |                |
| <b>EU 11c</b>           | <b>Total</b>  | <b>140,040</b> | <b>14,148</b> | <b>9</b> | <b>6,960</b> | <b>2,895</b> | <b>2,734</b> | <b>45,827</b> | <b>16</b> | <b>1,695</b>     | <b>214,323</b> |

|                         |   | S              | T            | U            | V         | W    | X      | Y            | Z              | AA                                |
|-------------------------|---|----------------|--------------|--------------|-----------|------|--------|--------------|----------------|-----------------------------------|
| 31 December 2025        |   |                |              |              |           |      |        |              |                |                                   |
|                         | Subtotal  | Risk weight    |              |              |           |      |        |              | Total          | Of which:<br>unrated <sup>1</sup> |
| (in millions)           |   | 130%           | 150%         | 250%         | 370%      | 400% | 1,250% | Others       |                |                                   |
| <b>Exposure classes</b> |   |                |              |              |           |      |        |              |                |                                   |
| 1                       | Central governments or central banks                                      | 110,917        |              | 2            | 74        |      |        |              | 110,994        | 41,597                            |
| 2                       | Non-central government public sector entities                             | 5,198          |              |              |           |      |        |              | 5,198          |                                   |
| EU 2a                   | <i>Regional governments or local authorities</i>                          | 3,213          |              |              |           |      |        |              | 3,213          | 743                               |
| EU 2b                   | <i>Public sector entities</i>   | 1,985          |              |              |           |      |        |              | 1,985          | 359                               |
| 3                       | Multilateral development banks  | 3,983          |              |              |           |      |        |              | 3,983          | 1,131                             |
| EU 3a                   | International organisations   | 5,376          |              |              |           |      |        |              | 5,376          |                                   |
| 4                       | Institutions  | 503            |              | 192          |           |      |        |              | 695            | 691                               |
| 5                       | Covered bonds   | 916            |              |              |           |      |        | 8            | 924            |                                   |
| 6                       | Corporates  | 48,460         | 3,422        | 198          |           |      |        | 42           | 52,123         | 42,858                            |
| 6.1                     | <i>- of which Specialised Lending</i>                                     | 7,603          | 3,422        |              |           |      |        |              | 11,025         | 11,004                            |
| 7                       | Subordinated debt exposures and equity                                    | 1              |              | 21           |           |      |        |              | 21             | 21                                |
| EU 7a                   | <i>Subordinated debt exposures</i>  | 1              |              | 21           |           |      |        |              | 21             | 21                                |
| EU 7b                   | <i>Equity</i>   |                |              |              |           |      |        |              |                |                                   |
| 8                       | Retail exposures  | 4,823          |              |              |           |      |        |              | 4,823          |                                   |
| 9                       | Secured by mortgages on immovable property and ADC exposures              | 30,082         |              | 1,314        |           |      |        | 5,872        | 37,268         |                                   |
| 9.1                     | <i>Secured by mortgages on residential immovable property - non IPRE</i>  | 3,785          |              |              |           |      |        |              | 3,785          |                                   |
| 9.1.1                   | <i>no loan splitting applied</i>  | 192            |              |              |           |      |        |              | 192            |                                   |
| 9.1.2                   | <i>loan splitting applied (secured)</i>                                   | 2,796          |              |              |           |      |        |              | 2,796          |                                   |
| 9.1.3                   | <i>loan splitting applied (unsecured)</i>                                 | 798            |              |              |           |      |        |              | 798            |                                   |
| 9.2                     | <i>Secured by mortgages on residential immovable property - IPRE</i>      | 2,386          |              | 89           |           |      |        |              | 2,475          |                                   |
| 9.3                     | <i>Secured by mortgages on commercial immovable property - non IPRE</i>   | 18,788         |              | 16           |           |      |        |              | 18,804         |                                   |
| 9.3.1                   | <i>no loan splitting applied</i>  | 683            |              |              |           |      |        |              | 683            |                                   |
| 9.3.2                   | <i>loan splitting applied (secured)</i>                                   | 13,689         |              |              |           |      |        |              | 13,689         |                                   |
| 9.3.3                   | <i>loan splitting applied (unsecured)</i>                                 | 4,417          |              | 16           |           |      |        |              | 4,432          |                                   |
| 9.4                     | <i>Secured by mortgages on commercial immovable property - IPRE</i>       | 4,951          |              | 351          |           |      |        | 5,872        | 11,174         |                                   |
| 9.5                     | <i>Acquisition, Development and Construction (ADC)</i>                    | 172            |              | 859          |           |      |        |              | 1,031          |                                   |
| 10                      | Exposures in default  | 1,322          |              | 1,182        |           |      |        |              | 2,503          |                                   |
| EU 10a                  | Claims on institutions and corporates with a short-term credit assessment | 148            |              |              |           |      |        |              | 148            |                                   |
| EU 10b                  | Collective investment undertakings (CIU)                                  | 24             |              | 21           |           |      |        | 202          | 248            | 248                               |
| EU 10c                  | Other items   | 2,570          |              |              |           |      |        | 10           | 2,580          | 2,580                             |
| <b>EU 11c</b>           | <b>Total</b>  | <b>214,323</b> | <b>3,422</b> | <b>2,930</b> | <b>74</b> |      |        | <b>6,135</b> | <b>226,884</b> | <b>89,126</b>                     |

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

# Use of the IRB approach to credit risk

## EU CRE – Qualitative disclosure requirements related to IRB approach

### Credit risk approach

For the purpose of determining capital requirements for credit risk, ABN AMRO applies the Advanced Internal Ratings Based (A-IRB) approach to the mortgage portfolio of ABN AMRO Hypotheken Groep B.V. Under this approach, the internal estimates for Probability of Default (PD), Loss Given Default (LGD) and Exposure at Default (EAD) risk parameters are used to calculate Credit Risk RWA. Additionally, ABN AMRO applies the Foundation Internal Ratings Based (F-IRB) approach to its exposures to banks and financial companies. Under this approach, internal estimates are used for the PD parameter only, while for LGD and EAD the regulatory prescribed values are used to calculate Credit Risk RWA. According to the Basel IV/CRR III requirements, estimated risk parameters are floored to the regulatory prescribed levels under the A-IRB as well as the F-IRB approach. For the other portfolios, the Standardised Approach (SA) is applied, meaning that regulatory prescribed risk weights are used to determine Credit Risk RWA. The PD, LGD and EAD models are still used for the SA portfolios for internal purposes, such as origination, pricing, monitoring and reporting, internal capital calculation and credit risk adjustment calculations.

### 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              |
| Sub-investment grade | UCR 3-                | 0.300   | 0.36    | 0.465    | BBB-                         | Baa3               | BBB-             |
|                      | 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            |
| Default              | UCR 6+                | 16.971  | 24.00   | 100.000  | CCC/C                        | Ca/C               | CCC/C            |
|                      | 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. Under the Basel IV standards/CRR III requirements, own estimates of CCF are only allowed for undrawn revolving commitments; for all other types of credit facilities, regulatory prescribed CCF values are used.

## 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;
- 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

Due to the transition of portfolios to the Standardised Approach in the third quarter of 2025, only the 'Retail - secured by residential real estate' exposure remains under the A-IRB approach, and only certain banks and financial institutions remain under the F-IRB approach under 'Institutions'. Exposure to CGCB is calculated using the Standardised Approach and is therefore absent in the IRB overviews.

|   |                                  | A  | B  | C   | D   | E                                   | F                             | G                                    | H   | I   | J                      | K                                  | L  |
|---|----------------------------------|--|--|---|---|-------------------------------------|-------------------------------|--------------------------------------|---|---|------------------------|------------------------------------|--|
|   |                                  | 31 December 2025                         |  |   |   |                                     |                               |                                      |   |   |                        |                                    |  |
|   | PD range                         | On-balance sheet exposures (in millions) | Off-balance sheet exposures pre-CCF <sup>1</sup> (in millions) | Exposure weighted average CCF <sup>1</sup> (in %) | Exposure post CCF <sup>1</sup> and post CRM (in millions) | Exposure weighted average PD (in %) | Number of obligors (in units) | Exposure weighted average LGD (in %) | Exposure weighted average maturity (in years) | RWEA after supporting factors (in millions) | Density of RWEA (in %) | Expected loss amount (in millions) | Value adjustments and provisions (in millions) |
| Central governments and central banks     | 0.00 to <0.15                    |  |  |   |   |                                     |                               |                                      |   |   |                        |                                    |  |
|   | 0.00 to <0.10                    |  |  |   |   |                                     |                               |                                      |   |   |                        |                                    |  |
|   | 0.10 to <0.15                    |  |  |   |   |                                     |                               |                                      |   |   |                        |                                    |  |
|   | 0.15 to <0.25                    |  |  |   |   |                                     |                               |                                      |   |   |                        |                                    |  |
|   | 0.25 to <0.50                    |  |  |   |   |                                     |                               |                                      |   |   |                        |                                    |  |
|   | 0.50 to <0.75                    |  |  |   |   |                                     |                               |                                      |   |   |                        |                                    |  |
|   | 0.75 to <2.50                    |  |  |   |   |                                     |                               |                                      |   |   |                        |                                    |  |
|   | 0.75 to <1.75                    |  |  |   |   |                                     |                               |                                      |   |   |                        |                                    |  |
|   | 1.75 to <2.5                     |  |  |   |   |                                     |                               |                                      |   |   |                        |                                    |  |
|   | 2.50 to <10.00                   |  |  |   |   |                                     |                               |                                      |   |   |                        |                                    |  |
|   | 2.5 to <5                        |  |  |   |   |                                     |                               |                                      |   |   |                        |                                    |  |
|   | 5 to <10                         |  |  |   |   |                                     |                               |                                      |   |   |                        |                                    |  |
|   | 10.00 to <100.00                 |  |  |   |   |                                     |                               |                                      |   |   |                        |                                    |  |
|   | 10 to <20                        |  |  |   |   |                                     |                               |                                      |   |   |                        |                                    |  |
|   | 20 to <30                        |  |  |   |   |                                     |                               |                                      |   |   |                        |                                    |  |
|   | 30.00 to <100.00                 |  |  |   |   |                                     |                               |                                      |   |   |                        |                                    |  |
| 100.00 (Default)                          |                                  |  |  |   |   |                                     |                               |                                      |   |   |                        |                                    |  |
|   | <b>Subtotal (exposure class)</b> |  |  |   |   |                                     |                               |                                      |   |   |                        |                                    |  |
| Regional governments or local authorities | 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)                          |                                  |  |  |   |   |                                     |                               |                                      |   |   |                        |                                    |  |
|   | <b>Subtotal (exposure class)</b> |  |  |   |   |                                     |                               |                                      |   |   |                        |                                    |  |

|                                    |                                  | A   | B   | C  | D  | E                                      | F                                | G                                       | H  | I  | J                         | K                                     | L   |
|------------------------------------|----------------------------------|---|---|--|--|--|----------------------------------|---|--|--|---------------------------|---------------------------------------|---|
|                                    |                                  | 31 December 2025                            |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | PD range                         | On-balance sheet exposures<br>(in millions) | Off-balance sheet exposures pre-CCF <sup>1</sup><br>(in millions) | Exposure weighted average CCF <sup>1</sup><br>(in %) | Exposure post CCF <sup>1</sup> and post CRM<br>(in millions) | Exposure weighted average PD<br>(in %) | Number of obligors<br>(in units) | Exposure weighted average LGD<br>(in %) | Exposure weighted average maturity<br>(in years) | RWEA after supporting factors<br>(in millions) | Density of RWEA<br>(in %) | Expected loss amount<br>(in millions) | Value adjustments and provisions<br>(in millions) |
| Public sector entities             | 0.00 to <0.15                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <i>0.00 to &lt;0.10</i>          |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <i>0.10 to &lt;0.15</i>          |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | 0.15 to <0.25                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | 0.25 to <0.50                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | 0.50 to <0.75                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <i>0.75 to &lt;2.50</i>          |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <i>0.75 to &lt;1.75</i>          |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <i>1.75 to &lt;2.5</i>           |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | 2.50 to <10.00                   |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <i>2.5 to &lt;5</i>              |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <i>5 to &lt;10</i>               |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | 10.00 to <100.00                 |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <i>10 to &lt;20</i>              |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
| <i>20 to &lt;30</i>                |                                  |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
| 30.00 to <100.00                   |                                  |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
| 100.00 (Default)                   |                                  |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <b>Subtotal (exposure class)</b> |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
| Corporates - Specialised Lending   | 0.00 to <0.15                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <i>0.00 to &lt;0.10</i>          |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <i>0.10 to &lt;0.15</i>          |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | 0.15 to <0.25                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | 0.25 to <0.50                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | 0.50 to <0.75                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <i>0.75 to &lt;2.50</i>          |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <i>0.75 to &lt;1.75</i>          |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <i>1.75 to &lt;2.5</i>           |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | 2.50 to <10.00                   |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <i>2.5 to &lt;5</i>              |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <i>5 to &lt;10</i>               |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | 10.00 to <100.00                 |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <i>10 to &lt;20</i>              |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
| <i>20 to &lt;30</i>                |                                  |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
| 30.00 to <100.00                   |                                  |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
| 100.00 (Default)                   |                                  |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <b>Subtotal (exposure class)</b> |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
| Corporates - Purchased receivables | 0.00 to <0.15                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <i>0.00 to &lt;0.10</i>          |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <i>0.10 to &lt;0.15</i>          |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | 0.15 to <0.25                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | 0.25 to <0.50                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | 0.50 to <0.75                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <i>0.75 to &lt;2.50</i>          |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <i>0.75 to &lt;1.75</i>          |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <i>1.75 to &lt;2.5</i>           |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | 2.50 to <10.00                   |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <i>2.5 to &lt;5</i>              |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <i>5 to &lt;10</i>               |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | 10.00 to <100.00                 |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <i>10 to &lt;20</i>              |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
| <i>20 to &lt;30</i>                |                                  |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
| 30.00 to <100.00                   |                                  |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
| 100.00 (Default)                   |                                  |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                    | <b>Subtotal (exposure class)</b> |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |

|   |                                  | A  | B  | C   | D                            | E                  | F                             | G                                  | H                             | I               | J                    | K                                | L |
|---|----------------------------------|--|--|---|------------------------------|--------------------|-------------------------------|------------------------------------|-------------------------------|-----------------|----------------------|----------------------------------|---|
|   |                                  | 31 December 2025                                 |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |   |
| PD range                                    | On-balance sheet exposures       | Off-balance sheet exposures pre-CCF <sup>1</sup> | Exposure weighted average CCF <sup>1</sup> | Exposure post CCF <sup>1</sup> 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                    |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |   |
|   | 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)                            |                                  |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |   |
|   | <b>Subtotal (exposure class)</b> |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |   |
| Retail - Secured by residential real estate | 0.00 to <0.15                    | 50,897   | 239  | 100.0%                                      | 51,136                       | 0.1%               | 268,514                       | 12.0%                              | 1,947                         | 3.8%            | 8                    | -2                               |   |
|   | 0.00 to <0.10                    |  |  | 0.0%  |                              | 0.0%               |                               | 0.0%                               |                               | 0.0%            |                      |                                  |   |
|   | 0.10 to <0.15                    | 50,897   | 239  | 100.0%                                      | 51,136                       | 0.1%               | 268,514                       | 12.0%                              | 1,947                         | 3.8%            | 8                    | -2                               |   |
|   | 0.15 to <0.25                    | 16,605   | 305  | 100.0%                                      | 16,910                       | 0.2%               | 74,898                        | 15.8%                              | 1,079                         | 6.4%            | 5                    | -2                               |   |
|   | 0.25 to <0.50                    | 39,997   | 985  | 99.6%                                       | 40,978                       | 0.4%               | 207,758                       | 13.1%                              | 3,605                         | 8.8%            | 20                   | -13                              |   |
|   | 0.50 to <0.75                    | 18,652   | 3,407                                      | 58.3%                                       | 20,638                       | 0.6%               | 101,736                       | 14.9%                              | 2,916                         | 14.1%           | 19                   | -12                              |   |
|   | 0.75 to <2.50                    | 8,232  | 120  | 100.0%                                      | 8,352                        | 1.3%               | 41,313                        | 14.6%                              | 1,949                         | 23.3%           | 16                   | -13                              |   |
|   | 0.75 to <1.75                    | 6,503  | 98   | 100.0%                                      | 6,601                        | 1.1%               | 35,550                        | 14.1%                              | 1,335                         | 20.2%           | 11                   | -9                               |   |
|   | 1.75 to <2.5                     | 1,729  | 22   | 100.0%                                      | 1,751                        | 2.0%               | 5,763                         | 16.6%                              | 614                           | 35.1%           | 6                    | -4                               |   |
|   | 2.50 to <10.00                   | 2,179  | 21   | 100.0%                                      | 2,200                        | 4.6%               | 8,055                         | 15.2%                              | 1,091                         | 49.6%           | 15                   | -11                              |   |
|   | 2.5 to <5                        | 1,397  | 13   | 100.0%                                      | 1,411                        | 3.3%               | 4,938                         | 15.3%                              | 609                           | 43.2%           | 7                    | -6                               |   |
|   | 5 to <10                         | 781  | 7  | 100.0%                                      | 789                          | 6.9%               | 3,117                         | 14.8%                              | 481                           | 61.0%           | 8                    | -5                               |   |
|   | 10.00 to <100.00                 | 1,188  | 12   | 100.0%                                      | 1,200                        | 25.0%              | 4,947                         | 14.7%                              | 984                           | 82.0%           | 45                   | -15                              |   |
|   | 10 to <20                        | 582  | 4  | 100.0%                                      | 586                          | 13.8%              | 2,480                         | 14.0%                              | 448                           | 76.5%           | 11                   | -5                               |   |
|   | 20 to <30                        | 350  | 5  | 100.0%                                      | 356                          | 24.0%              | 1,469                         | 14.8%                              | 326                           | 91.7%           | 13                   | -6                               |   |
| 30.00 to <100.00                            | 255                              | 3  | 100.0%                                     | 259   | 51.8%                        | 998                | 15.9%                         | 210                                | 81.2%                         | 21              | -4                   |                                  |   |
| 100.00 (Default)                            | 1,237                            | 3  | 100.0%                                     | 1,240                                       | 100.0%                       | 5,278              | 23.9%                         | 1,586                              | 127.9%                        | 179             | -50                  |                                  |   |
|   | <b>Subtotal (exposure class)</b> | <b>138,987</b>                                   | <b>5,093</b>                               | <b>72.0%</b>                                | <b>142,655</b>               | <b>1.5%</b>        | <b>712,499</b>                | <b>13.5%</b>                       | <b>15,158</b>                 | <b>10.6%</b>    | <b>308</b>           | <b>-116</b>                      |   |
| 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)                            |                                  |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |   |
|   | <b>Subtotal (exposure class)</b> |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |   |

|                                      |                                  | A  | B  | C   | D                            | E                  | F                             | G                                  | H                             | I               | J                    | K                                | L           |
|--------------------------------------|----------------------------------|--|--|---|------------------------------|--------------------|-------------------------------|------------------------------------|-------------------------------|-----------------|----------------------|----------------------------------|-------------|
|                                      |                                  | 31 December 2025                                 |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |             |
| PD range                             | On-balance sheet exposures       | Off-balance sheet exposures pre-CCF <sup>1</sup> | Exposure weighted average CCF <sup>1</sup> | Exposure post CCF <sup>1</sup> 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 - Purchased receivables       | 0.00 to <0.15                    |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |             |
|                                      | 0.00 to <0.10                    |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |             |
|                                      | 0.10 to <0.15                    |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |             |
|                                      | 0.15 to <0.25                    |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |             |
|                                      | 0.25 to <0.50                    |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |             |
|                                      | 0.50 to <0.75                    |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |             |
|                                      | 0.75 to <2.50                    |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |             |
|                                      | 0.75 to <1.75                    |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |             |
|                                      | 1.75 to <2.5                     |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |             |
|                                      | 2.50 to <10.00                   |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |             |
|                                      | 2.5 to <5                        |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |             |
|                                      | 5 to <10                         |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |             |
|                                      | 10.00 to <100.00                 |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |             |
|                                      | 10 to <20                        |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |             |
|                                      | 20 to <30                        |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |             |
|                                      | 30.00 to <100.00                 |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |             |
|                                      | 100.00 (Default)                 |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |             |
|                                      | <b>Subtotal (exposure class)</b> |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |             |
| Retail - Other                       | 0.00 to <0.15                    | 5  | 7  | 50.0%                                       | 9                            | 0.1%               | 105                           | 55.1%                              |                               | 1               | 14.6%                |                                  |             |
|                                      | 0.00 to <0.10                    |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |             |
|                                      | 0.10 to <0.15                    | 5  | 7  | 50.0%                                       | 9                            | 0.1%               | 105                           | 55.1%                              |                               | 1               | 14.6%                |                                  |             |
|                                      | 0.15 to <0.25                    | 3  |  | 0.0%  | 3                            | 0.2%               | 2                             | 42.0%                              |                               |                 | 15.9%                |                                  |             |
|                                      | 0.25 to <0.50                    | 4  | 1  | 100.0%                                      | 4                            | 0.4%               | 9                             | 27.4%                              |                               | 1               | 18.0%                |                                  |             |
|                                      | 0.50 to <0.75                    | 8  | 1  | 100.0%                                      | 8                            | 0.5%               | 29                            | 29.9%                              |                               | 2               | 22.5%                |                                  |             |
|                                      | 0.75 to <2.50                    | 4  |  | 100.0%                                      | 4                            | 1.3%               | 12                            | 30.6%                              |                               | 1               | 34.7%                |                                  |             |
|                                      | 0.75 to <1.75                    | 3  |  | 100.0%                                      | 3                            | 1.2%               | 11                            | 30.7%                              |                               | 1               | 33.4%                |                                  |             |
|                                      | 1.75 to <2.5                     | 1  |  | 0.0%  | 1                            | 2.1%               | 1                             | 30.0%                              |                               |                 | 42.9%                |                                  |             |
|                                      | 2.50 to <10.00                   |  |  | 0.0%  |                              | 2.7%               | 1                             | 30.0%                              |                               |                 | 45.3%                |                                  |             |
|                                      | 2.5 to <5                        |  |  | 0.0%  |                              | 2.7%               | 1                             | 30.0%                              |                               |                 | 45.3%                |                                  |             |
|                                      | 5 to <10                         |  |  | 0.0%  |                              | 0.0%               |                               | 0.0%                               |                               |                 | 0.0%                 |                                  |             |
|                                      | 10.00 to <100.00                 |  |  | 100.0%                                      |                              | 26.6%              | 1                             | 75.0%                              |                               |                 | 185.4%               |                                  |             |
|                                      | 10 to <20                        |  |  | 0.0%  |                              | 0.0%               |                               | 0.0%                               |                               |                 | 0.0%                 |                                  |             |
|                                      | 20 to <30                        |  |  | 100.0%                                      |                              | 26.6%              | 1                             | 75.0%                              |                               |                 | 185.4%               |                                  |             |
|                                      | 30.00 to <100.00                 |  |  | 0.0%  |                              | 0.0%               |                               | 0.0%                               |                               |                 | 0.0%                 |                                  |             |
|                                      | 100.00 (Default)                 |  |  | 0.0%  |                              | 100.0%             | 5                             | 34.2%                              |                               | 2               | 402.4%               |                                  |             |
|                                      | <b>Subtotal (exposure class)</b> | <b>24</b>  | <b>8</b>                                   | <b>56.9%</b>                                | <b>29</b>                    | <b>2.2%</b>        | <b>164</b>                    | <b>38.4%</b>                       |                               | <b>8</b>        | <b>27.3%</b>         |                                  |             |
| <b>Total (all exposures classes)</b> | <b>139,011</b>                   | <b>5,102</b>                                     |  | <b>142,684</b>                              |                              |                    | <b>712,663</b>                |                                    |                               | <b>15,166</b>   |                      | <b>308</b>                       | <b>-116</b> |

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                                |
|---|----------------------------------|----------------------------|--|--|---|------------------------------|--------------------|-------------------------------|------------------------------------|-------------------------------|-----------------|----------------------|----------------------------------|
|   |                                  | 31 December 2025           |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | PD range                         | On-balance sheet exposures | Off-balance sheet exposures pre-CCF <sup>1</sup> | Exposure weighted average CCF <sup>1</sup> | Exposure post CCF <sup>1</sup> and post CRM | Exposure weighted average PD | Number of obligors | Exposure weighted average LGD | Exposure weighted average maturity | RWEA after supporting factors | Density of RWEA | Expected loss amount | Value adjustments and provisions |
|   |                                  | (in millions)              | (in millions)                                    | (in %)                                     | (in millions)                               | (in %)                       | (in units)         | (in %)                        | (in years)                         | (in millions)                 | (in %)          | (in millions)        | (in millions)                    |
| Central governments and central banks     | 0.00 to <0.15                    |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | <i>0.00 to &lt;0.10</i>          |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | <i>0.10 to &lt;0.15</i>          |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | 0.15 to <0.25                    |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | 0.25 to <0.50                    |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | 0.50 to <0.75                    |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | 0.75 to <2.50                    |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | <i>0.75 to &lt;1.75</i>          |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | <i>1.75 to &lt;2.5</i>           |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | 2.50 to <10.00                   |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | <i>2.5 to &lt;5</i>              |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | <i>5 to &lt;10</i>               |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | 10.00 to <100.00                 |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | <i>10 to &lt;20</i>              |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
| <i>20 to &lt;30</i>                       |                                  |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
| <i>30.00 to &lt;100.00</i>                |                                  |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
| 100.00 (Default)                          |                                  |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | <b>Subtotal (exposure class)</b> |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
| Regional governments or local authorities | 0.00 to <0.15                    |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | <i>0.00 to &lt;0.10</i>          |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | <i>0.10 to &lt;0.15</i>          |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | 0.15 to <0.25                    |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | 0.25 to <0.50                    |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | 0.50 to <0.75                    |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | 0.75 to <2.50                    |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | <i>0.75 to &lt;1.75</i>          |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | <i>1.75 to &lt;2.5</i>           |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | 2.50 to <10.00                   |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | <i>2.5 to &lt;5</i>              |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | <i>5 to &lt;10</i>               |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | 10.00 to <100.00                 |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | <i>10 to &lt;20</i>              |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
| <i>20 to &lt;30</i>                       |                                  |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
| <i>30.00 to &lt;100.00</i>                |                                  |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
| 100.00 (Default)                          |                                  |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |
|   | <b>Subtotal (exposure class)</b> |                            |  |  |   |                              |                    |                               |                                    |                               |                 |                      |                                  |

|                                  |                                  | A   | B   | C  | D  | E                                      | F                                | G                                       | H  | I  | J                         | K                                     | L   |
|----------------------------------|----------------------------------|---|---|--|--|--|----------------------------------|---|--|--|---------------------------|---------------------------------------|---|
|                                  |                                  | 31 December 2025                            |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | PD range                         | On-balance sheet exposures<br>(in millions) | Off-balance sheet exposures pre-CCF <sup>1</sup><br>(in millions) | Exposure weighted average CCF <sup>1</sup><br>(in %) | Exposure post CCF <sup>1</sup> and post CRM<br>(in millions) | Exposure weighted average PD<br>(in %) | Number of obligors<br>(in units) | Exposure weighted average LGD<br>(in %) | Exposure weighted average maturity<br>(in years) | RWEA after supporting factors<br>(in millions) | Density of RWEA<br>(in %) | Expected loss amount<br>(in millions) | Value adjustments and provisions<br>(in millions) |
| Public sector entities           | 0.00 to <0.15                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | <i>0.00 to &lt;0.10</i>          |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | <i>0.10 to &lt;0.15</i>          |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | 0.15 to <0.25                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | 0.25 to <0.50                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | 0.50 to <0.75                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | 0.75 to <2.50                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | <i>0.75 to &lt;1.75</i>          |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | <i>1.75 to &lt;2.5</i>           |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | 2.50 to <10.00                   |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | <i>2.5 to &lt;5</i>              |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | <i>5 to &lt;10</i>               |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | 10.00 to <100.00                 |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | <i>10 to &lt;20</i>              |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | <i>20 to &lt;30</i>              |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | 30.00 to <100.00                 |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
| 100.00 (Default)                 |                                  |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | <b>Subtotal (exposure class)</b> |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
| Institutions                     | 0.00 to <0.15                    | 6,421                                       | 81  | 39.0%  | 6,453  | 0.1%                                   | 193                              | 14.5%                                   | 2.50   | 524  | 8%                        | 1                                     |   |
|                                  | <i>0.00 to &lt;0.10</i>          | 6,224                                       | 78  | 39.0%  | 6,254  | 0.1%                                   | 179                              | 14.3%                                   | 2.50   | 493  | 8%                        |                                       |   |
|                                  | <i>0.10 to &lt;0.15</i>          | 197   | 3   | 55.0%  | 199  | 0.1%                                   | 14                               | 18.8%                                   | 2.50   | 32   | 16%                       |                                       |   |
|                                  | 0.15 to <0.25                    | 11  | 4   | 67.0%  | 14   | 0.2%                                   | 13                               | 22.3%                                   | 2.50   | 4  | 26%                       |                                       |   |
|                                  | 0.25 to <0.50                    | 1   | 8   | 21.0%  | 3  | 0.4%                                   | 11                               | 45.0%                                   | 2.50   | 2  | 73%                       |                                       |   |
|                                  | 0.50 to <0.75                    |   | 42  | 0.0%   |  | 0.7%                                   | 1                                | 45.0%                                   | 2.50   |  | 102%                      |                                       |   |
|                                  | 0.75 to <2.50                    | 180   | 13  | 27.0%  | 183  | 1.9%                                   | 15                               | 45.0%                                   | 2.50   | 211  | 115%                      | 2                                     |   |
|                                  | <i>0.75 to &lt;1.75</i>          | 3   |   | 42.0%  | 3  | 1.1%                                   | 1                                | 45.0%                                   | 2.50   | 2  | 96%                       |                                       |   |
|                                  | <i>1.75 to &lt;2.5</i>           | 177   | 13  | 27.0%  | 181  | 1.9%                                   | 14                               | 45.0%                                   | 2.50   | 208  | 115%                      | 2                                     |   |
|                                  | 2.50 to <10.00                   |   |   | 57.0%  |  | 3.4%                                   | 1                                | 45.0%                                   | 2.50   |  | 133%                      |                                       |   |
|                                  | <i>2.5 to &lt;5</i>              |   |   | 57.0%  |  | 3.4%                                   | 1                                | 45.0%                                   | 2.50   |  | 133%                      |                                       |   |
|                                  | <i>5 to &lt;10</i>               |   |   | 0.0%   |  | 0.0%                                   |                                  | 0.0%                                    |  |  | 0%                        |                                       |   |
|                                  | 10.00 to <100.00                 | 5   | 7   | 21.0%  | 6  | 28.2%                                  | 5                                | 45.0%                                   | 2.50   | 18   | 273%                      | 1                                     |   |
|                                  | <i>10 to &lt;20</i>              |   |   | 0.0%   |  | 0.0%                                   |                                  | 0.0%                                    |  |  | 0%                        |                                       |   |
|                                  | <i>20 to &lt;30</i>              | 5   | 7   | 21.0%  | 6  | 28.2%                                  | 5                                | 45.0%                                   | 2.50   | 18   | 273%                      | 1                                     |   |
|                                  | 30.00 to <100.00                 |   |   | 0.0%   |  | 0.0%                                   |                                  | 0.0%                                    |  |  | 0%                        |                                       |   |
| 100.00 (Default)                 |                                  |   | 0.0%  |  | 0.0%   |  | 0.0%                             |   |  | 0%   |                           |                                       |   |
|                                  | <b>Subtotal (exposure class)</b> | <b>6,618</b>                                | <b>155</b>  | <b>27.0%</b>   | <b>6,660</b>   | <b>0.1%</b>                            | <b>239</b>                       | <b>15.4%</b>                            | <b>2.50</b>                                      | <b>758</b>                                     | <b>11%</b>                | <b>3</b>                              |   |
| Corporates - Specialised Lending | 0.00 to <0.15                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | <i>0.00 to &lt;0.10</i>          |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | <i>0.10 to &lt;0.15</i>          |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | 0.15 to <0.25                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | 0.25 to <0.50                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | 0.50 to <0.75                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | 0.75 to <2.50                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | <i>0.75 to &lt;1.75</i>          |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | <i>1.75 to &lt;2.5</i>           |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | 2.50 to <10.00                   |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | <i>2.5 to &lt;5</i>              |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | <i>5 to &lt;10</i>               |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | 10.00 to <100.00                 |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | <i>10 to &lt;20</i>              |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | <i>20 to &lt;30</i>              |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | 30.00 to <100.00                 |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
| 100.00 (Default)                 |                                  |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                  | <b>Subtotal (exposure class)</b> |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |

|                                      |                                  | A   | B   | C  | D  | E                                      | F                                | G                                       | H  | I  | J                         | K                                     | L   |
|--------------------------------------|----------------------------------|---|---|--|--|--|----------------------------------|---|--|--|---------------------------|---------------------------------------|---|
|                                      |                                  | 31 December 2025                            |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                      | PD range                         | On-balance sheet exposures<br>(in millions) | Off-balance sheet exposures pre-CCF <sup>1</sup><br>(in millions) | Exposure weighted average CCF <sup>1</sup><br>(in %) | Exposure post CCF <sup>1</sup> and post CRM<br>(in millions) | Exposure weighted average PD<br>(in %) | Number of obligors<br>(in units) | Exposure weighted average LGD<br>(in %) | Exposure weighted average maturity<br>(in years) | RWEA after supporting factors<br>(in millions) | Density of RWEA<br>(in %) | Expected loss amount<br>(in millions) | Value adjustments and provisions<br>(in millions) |
| Corporates - Purchased receivables   | 0.00 to <0.15                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                      | 0.00 to <0.10                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                      | 0.10 to <0.15                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                      | 0.15 to <0.25                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                      | 0.25 to <0.50                    |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                      | 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)                     |                                  |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
|                                      | <b>Subtotal (exposure class)</b> |   |   |  |  |  |                                  |   |  |  |                           |                                       |   |
| Corporates - Other                   | 0.00 to <0.15                    | 47  | 441   | 73.0%  | 370  | 0.1%                                   | 38                               | 45.0%                                   | 2.50   | 156  | 42.1%                     |                                       |   |
|                                      | 0.00 to <0.10                    | 26  | 59  | 37.0%  | 48   | 0.1%                                   | 29                               | 45.0%                                   | 2.50   | 14   | 28.4%                     |                                       |   |
|                                      | 0.10 to <0.15                    | 21  | 382   | 79.0%  | 322  | 0.1%                                   | 9                                | 45.0%                                   | 2.50   | 142  | 44.2%                     |                                       |   |
|                                      | 0.15 to <0.25                    | 17  |   | 20.0%  | 17   | 0.2%                                   | 3                                | 45.0%                                   | 2.50   | 10   | 55.7%                     |                                       |   |
|                                      | 0.25 to <0.50                    |   |   | 50.0%  |  | 0.4%                                   | 1                                | 45.0%                                   | 2.50   |  | 85.8%                     |                                       |   |
|                                      | 0.50 to <0.75                    | 1   | 2   | 20.0%  | 2  | 0.7%                                   | 8                                | 45.0%                                   | 2.50   | 2  | 98.0%                     |                                       |   |
|                                      | 0.75 to <2.50                    |   | 3   | 43.0%  | 1  | 1.4%                                   | 6                                | 45.0%                                   | 2.50   | 2  | 128.3%                    |                                       |   |
|                                      | 0.75 to <1.75                    |   | 1   | 100.0%   | 1  | 1.1%                                   | 2                                | 45.0%                                   | 2.50   | 1  | 122.5%                    |                                       |   |
|                                      | 1.75 to <2.5                     |   | 2   | 20.0%  |  | 1.9%                                   | 4                                | 45.0%                                   | 2.50   | 1  | 140.3%                    |                                       |   |
|                                      | 2.50 to <10.00                   |   |   | 20.0%  |  | 6.5%                                   | 4                                | 45.0%                                   | 2.50   | 1  | 195.1%                    |                                       |   |
|                                      | 2.5 to <5                        |   |   | 20.0%  |  | 3.4%                                   | 2                                | 45.0%                                   | 2.50   |  | 161.7%                    |                                       |   |
|                                      | 5 to <10                         |   |   | 20.0%  |  | 6.8%                                   | 2                                | 45.0%                                   | 2.50   | 1  | 197.7%                    |                                       |   |
|                                      | 10.00 to <100.00                 |   |   | 20.0%  |  | 25.4%                                  | 7                                | 45.0%                                   | 2.50   |  | 273.5%                    |                                       |   |
|                                      | 10 to <20                        |   |   | 20.0%  |  | 13.5%                                  | 4                                | 45.0%                                   | 2.50   |  | 247.8%                    |                                       |   |
|                                      | 20 to <30                        |   |   | 51.0%  |  | 27.1%                                  | 3                                | 45.0%                                   | 2.50   |  | 277.3%                    |                                       |   |
| 30.00 to <100.00                     |                                  |   | 0.0%  |  | 0.0%   |  | 0.0%                             |   |  | 0.0%   |                           |                                       |   |
| 100.00 (Default)                     |                                  |   | 0.0%  |  | 0.0%   |  | 0.0%                             |   |  | 0.0%   |                           |                                       |   |
|                                      | <b>Subtotal (exposure class)</b> | <b>66</b>                                   | <b>446</b>  | <b>0.0%</b>  | <b>391</b>   | <b>0.1%</b>                            | <b>67</b>                        | <b>45.0%</b>                            | <b>2.50</b>                                      | <b>170</b>                                     | <b>43.5%</b>              |                                       |   |
| <b>Total (all exposures classes)</b> |                                  | <b>6,684</b>                                | <b>601</b>  | <b>61.0%</b>   | <b>7,051</b>   |  | <b>306</b>                       |   | <b>2.50</b>                                      | <b>928</b>                                     | <b>13.2%</b>              | <b>3</b>                              |   |

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) approach to the Standardised Approach (SA) in 2025, mainly in Corporates.

|  | A  | B   | C   | D  | E   |
|--|--|---|---|--|---|
|  | 31 December 2025   |   |   |  |   |
|  | Total 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 (%) |
| (in millions)  |  |   |   |  |   |
| 1 Central governments or central banks   |  | 87,110  | 100%  | 0%   | 0%  |
| 2 Regional governments or local authorities                                    |  | 2,919   | 100%  | 0%   | 0%  |
| 3 Public sector entities   |  | 3,560   | 100%  | 0%   | 0%  |
| 4 Institutions   |  | 11,665  | 20%   | 80%  | 0%  |
| 5 Corporates   | 391  | 82,756  | 100%  | 0%   | 0%  |
| 5.1 - of which Corporates - General  |  | 69,923  | 99%   | 1%   | 0%  |
| 5.2 - of which Corporates - Specialised lending                                |  | 12,833  | 100%  | 0%   | 0%  |
| 5.2.1 - of which Corporates - Specialised lending, excluding slotting approach |  | 12,833  | 100%  | 0%   | 0%  |
| 5.2.2 - of which Corporates - Specialised lending under slotting approach      |  |   |   |  | 0%  |
| 5.3 - of which Corporates - Purchased Receivables                              |  |   |   |  | 0%  |
| 6 Retail   | 172,645  | 201,132   | 17%   | 83%  | 0%  |
| 6.1 - of which Retail – Qualifying revolving                                   |  |   |   |  | 0%  |
| 6.2 - of which Retail – Secured by residential immovable property              |  | 173,470   | 4%  | 96%  | 0%  |
| 6.3 - of which Retail – Purchased Receivables                                  |  |   |   |  | 0%  |
| 6.4 - of which Retail – Other retail exposures                                 | 29   | 27,661  | 100%  | 0%   | 0%  |
| 7 Equity   |  | 1,377   | 0%  | 100%   | 0%  |
| EU 7a Collective investment undertakings (CIU)                                 |  | 248   | 100%  | 0%   | 0%  |
| 8 Other non-credit obligation assets   |  | 2,580   | 100%  | 0%   | 0%  |
| <b>9 Total</b>   | <b>180,665</b>   | <b>393,346</b>  | <b>55%</b>  | <b>45%</b>   | <b>0%</b>   |

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

The table below illustrates that, as at 31 December 2025, most of the exposures still included in the IRB approach were secured by eligible collateral, primarily consisting of immovable property and other physical assets. Compared to 30 June 2025, the IRB-based RWEA experienced a significant reduction of EUR 51.8 billion in Q4 2025, predominantly driven by the shift from the Internal Ratings-Based (IRB) approach to the Standardised Approach (SA) across multiple portfolios. Currently, only the calculation of the RWEA for the residential mortgages, banks and financial institutions portfolios is performed using the IRB methodology.

## Exposure class A-IRB

|  | A                                 | B  | C                        | D                                   | E                              | F                                 | G   | H | I | J |
|--|-----------------------------------|--|--------------------------|-------------------------------------|--------------------------------|-----------------------------------|---|---|---|---|
|  | 31 December 2025                  |  |                          |                                     |                                |                                   |   |   |   |   |
| Total exposures  | Credit risk mitigation techniques |  |                          |                                     |                                |                                   |   |   |   |   |
|  | Funded credit protection (FCP)    |  |                          |                                     |                                |                                   |   |   |   |   |
|  | Part of exposures covered by      |  |                          |                                     |                                |                                   |   |   |   |   |
|  | Financial collaterals             | Other eligible collaterals               |                          |                                     | Other funded credit protection |                                   |   |   |   |   |
|  |                                   | 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 Regional governments and local authorities           |                                   |  |                          |                                     |                                |                                   |   |   |   |   |
| 3 Public sector entities                               |                                   |  |                          |                                     |                                |                                   |   |   |   |   |
| 5 Corporates   |                                   |  |                          |                                     |                                |                                   |   |   |   |   |
| 5.1 Corporates – General                               |                                   |  |                          |                                     |                                |                                   |   |   |   |   |
| 5.2 Corporates – Specialised lending                   |                                   |  |                          |                                     |                                |                                   |   |   |   |   |
| 5.3 Corporates - Purchased Receivables                 |                                   |  |                          |                                     |                                |                                   |   |   |   |   |
| 6 Retail   | 137,207                           | 5%                                       | 99%                      | 99%                                 |                                |                                   |   |   |   |   |
| 6.1 Retail – Qualifying revolving                      |                                   |  |                          |                                     |                                |                                   |   |   |   |   |
| 6.2 Retail – secured by residential immovable property | 137,178                           | 5%                                       | 99%                      | 99%                                 |                                |                                   |   |   |   |   |
| 6.3 Retail - Purchased Receivables                     |                                   |  |                          |                                     |                                |                                   |   |   |   |   |
| 6.4 Retail - Other retail exposures                    | 29                                |  | 29%                      | 29%                                 |                                |                                   |   |   |   |   |
| <b>7 Total</b>   | <b>137,207</b>                    | <b>5%</b>                                | <b>99%</b>               | <b>99%</b>                          |                                |                                   |   |   |   |   |

|  | K                                 | L                  | M  | N  |
|--|-----------------------------------|--------------------|--|--|
|  | 31 December 2025                  |                    |  |  |
|  | Credit risk mitigation techniques |                    | Credit risk mitigation methods in the calculation of RWEA  |  |
|  | Unfunded credit protection (UFCP) |                    |  |  |
|  | Part of exposures covered by      |                    |  |  |
|  | Guarantees <sup>1</sup>           | 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 Regional governments and local authorities           |                                   |                    |  |  |
| 3 Public sector entities                               |                                   |                    |  |  |
| 5 Corporates   |                                   |                    |  |  |
| 5.1 Corporates – General                               |                                   |                    |  |  |
| 5.2 Corporates – Specialised lending                   |                                   |                    |  |  |
| 5.3 Corporates - Purchased Receivables                 |                                   |                    |  |  |
| 6 Retail   |                                   |                    | 15,166   | 15,166   |
| 6.1 Retail – Qualifying revolving                      |                                   |                    |  |  |
| 6.2 Retail – secured by residential immovable property |                                   |                    | 15,158   | 15,158   |
| 6.3 Retail - Purchased Receivables                     |                                   |                    |  |  |
| 6.4 Retail - Other retail exposures                    |                                   |                    | 8  | 8  |
| <b>7 Total</b>   |                                   |                    | <b>15,166</b>  | <b>15,166</b>  |

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 2025                  |  |                          |                                     |                                |                                   |   |   |   |   |
| Total exposures                              | Credit risk mitigation techniques |  |                          |                                     |                                |                                   |   |   |   |   |
|  | Funded credit protection (FCP)    |  |                          |                                     |                                |                                   |   |   |   |   |
|  | Part of exposures covered by      |  |                          |                                     |                                |                                   |   |   |   |   |
|  | Financial Collaterals             | Other eligible collaterals               |                          |                                     | Other funded credit protection |                                   |   |   |   |   |
|  |                                   | 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 Regional governments and local authorities |                                   |  |                          |                                     |                                |                                   |   |   |   |   |
| 3 Public sector entities                     |                                   |  |                          |                                     |                                |                                   |   |   |   |   |
| 4 Institutions                               | 6,660                             | 5%                                       |                          |                                     |                                |                                   |   |   |   |   |
| 5 Corporates                                 | 391                               |  |                          |                                     |                                |                                   |   |   |   |   |
| 5.1 Corporates – General                     | 391                               |  |                          |                                     |                                |                                   |   |   |   |   |
| 5.2 Corporates – Specialised                 |                                   |  |                          |                                     |                                |                                   |   |   |   |   |
| 5.3 Corporates - Purchased Receivables       |                                   |  |                          |                                     |                                |                                   |   |   |   |   |
| <b>6 Total</b>                               | <b>7,051</b>                      | <b>5%</b>                                |                          |                                     |                                |                                   |   |   |   |   |

|  | K                                 | L                  | M  | N  |
|--|-----------------------------------|--------------------|--|--|
|  | 31 December 2025                  |                    |  |  |
|  | 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 Regional governments and local authorities |                                   |                    |  |  |
| 3 Public sector entities                     |                                   |                    |  |  |
| 4 Institutions                               | 14.50%                            |                    | 759  | 759  |
| 5 Corporates                                 |                                   |                    | 170  | 170  |
| 5.1 Corporates – General                     |                                   |                    | 170  | 170  |
| 5.2 Corporates – Specialised lending         |                                   |                    |  |  |
| 5.3 Corporates - Purchased Receivables       |                                   |                    |  |  |
| <b>6 Total</b>                               | <b>13.70%</b>                     |                    | <b>928</b>   | <b>928</b>   |

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

After the sharp decrease observed in Q3 2025 caused by the transfer of multiple portfolios to the Standardised Approach (SA), the credit risk RWEA under the IRB approach stabilised at EUR 19.4 billion as at 31 December 2025 compared to EUR 19.6 billion as at 30 September 2025.

|  | A                |
|--|------------------|
|  | 31 December 2025 |
| (in millions)  | RWEA             |
| 1 <b>RWEA as at the end of the previous reporting period<sup>1</sup></b> | <b>19,571</b>    |
| 2 Asset size (+/-)   | -282             |
| 3 Asset quality (+/-)  | 91               |
| 4 Model updates (+/-)  |                  |
| 5 Methodology and policy (+/-)   | -21              |
| 6 Acquisitions and disposals (+/-)                                       |                  |
| 7 Foreign exchange movements (+/-)                                       |                  |
| 8 Other (+/-)  |                  |
| <b>9 RWEA as at the end of the reporting period</b>                      | <b>19,359</b>    |

1. Following EBA's mapping for this template, the RWEA includes 'Equity IRB'. 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 was in line with overviews from the previous year: Central governments and central banks were mostly in the lowest PD buckets; Retail - Secured by residential real estate were in the low to medium PD buckets; and Corporate exposures and Retail - Other were concentrated in the middle to high PD buckets.

Note that in Q3 2025, several portfolios, such as Corporates, were reverted to the SA. The table below still shows IRB exposures, as the exposure class applied at the beginning of the year is relevant.

|                                       | A                | B  | C  | D | E                                 | F                                 | G              | H  |
|---------------------------------------|------------------|--|--|---|-----------------------------------|-----------------------------------|----------------|--|
|                                       | 31 December 2025 |  |  |   |                                   |                                   |                |  |
|                                       | 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 (%) |
| <b>Exposure class</b>                 |                  |  |  |   |                                   |                                   |                |  |
| Central governments and central banks | 0.00 to <0.15    | 2  |  |   |                                   |                                   |                |  |
|                                       | 0.00 to <0.10    | 2  |  |   |                                   |                                   |                |  |
|                                       | 0.10 to <0.15    |  |  |   |                                   |                                   |                |  |
|                                       | 0.15 to <0.25    |  |  |   |                                   |                                   |                |  |
|                                       | 0.25 to <0.50    |  |  |   |                                   |                                   |                |  |
|                                       | 0.50 to <0.75    |  |  |   |                                   |                                   |                |  |
|                                       | 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 2025                          |                         |  |  |                                   |                                   |                |  |
|   | 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 |                                   |                                   |                |  |
| Regional governments or local authorities | 0.00 to <0.15           |  |  |                                   |                                   |                |  |
|   | <i>0.00 to &lt;0.10</i> |  |  |                                   |                                   |                |  |
|   | <i>0.10 to &lt;0.15</i> |  |  |                                   |                                   |                |  |
|   | 0.15 to <0.25           |  |  |                                   |                                   |                |  |
|   | 0.25 to <0.50           |  |  |                                   |                                   |                |  |
|   | 0.50 to <0.75           |  |  |                                   |                                   |                |  |
|   | 0.75 to <2.50           |  |  |                                   |                                   |                |  |
|   | <i>0.75 to &lt;1.75</i> |  |  |                                   |                                   |                |  |
|   | <i>1.75 to &lt;2.5</i>  |  |  |                                   |                                   |                |  |
|   | 2.50 to <10.00          |  |  |                                   |                                   |                |  |
|   | <i>2.5 to &lt;5</i>     |  |  |                                   |                                   |                |  |
|   | <i>5 to &lt;10</i>      |  |  |                                   |                                   |                |  |
|   | 10.00 to <100.00        |  |  |                                   |                                   |                |  |
|   | <i>10 to &lt;20</i>     |  |  |                                   |                                   |                |  |
|   | <i>20 to &lt;30</i>     |  |  |                                   |                                   |                |  |
| <i>30.00 to &lt;100.00</i>                |                         |  |  |                                   |                                   |                |  |
| 100.00 (Default)                          |                         |  |  |                                   |                                   |                |  |
| Public sector entities                    | 0.00 to <0.15           |  |  |                                   |                                   |                |  |
|   | <i>0.00 to &lt;0.10</i> |  |  |                                   |                                   |                |  |
|   | <i>0.10 to &lt;0.15</i> |  |  |                                   |                                   |                |  |
|   | 0.15 to <0.25           |  |  |                                   |                                   |                |  |
|   | 0.25 to <0.50           |  |  |                                   |                                   |                |  |
|   | 0.50 to <0.75           |  |  |                                   |                                   |                |  |
|   | 0.75 to <2.50           |  |  |                                   |                                   |                |  |
|   | <i>0.75 to &lt;1.75</i> |  |  |                                   |                                   |                |  |
|   | <i>1.75 to &lt;2.5</i>  |  |  |                                   |                                   |                |  |
|   | 2.50 to <10.00          |  |  |                                   |                                   |                |  |
|   | <i>2.5 to &lt;5</i>     |  |  |                                   |                                   |                |  |
|   | <i>5 to &lt;10</i>      |  |  |                                   |                                   |                |  |
|   | 10.00 to <100.00        |  |  |                                   |                                   |                |  |
|   | <i>10 to &lt;20</i>     |  |  |                                   |                                   |                |  |
|   | <i>20 to &lt;30</i>     |  |  |                                   |                                   |                |  |
| <i>30.00 to &lt;100.00</i>                |                         |  |  |                                   |                                   |                |  |
| 100.00 (Default)                          |                         |  |  |                                   |                                   |                |  |
| Corporates - Specialised Lending          | 0.00 to <0.15           | 13   |  | 0.0%                              |                                   | 0.1%           | 0.0%                                       |
|   | <i>0.00 to &lt;0.10</i> |  |  | <i>0.0%</i>                       |                                   | <i>0.0%</i>    | <i>0.0%</i>                                |
|   | <i>0.10 to &lt;0.15</i> | 13   |  | <i>0.0%</i>                       |                                   | <i>0.1%</i>    | <i>0.0%</i>                                |
|   | 0.15 to <0.25           | 19   |  | 0.0%                              |                                   | 0.2%           | 0.0%                                       |
|   | 0.25 to <0.50           | 97   |  | 0.0%                              |                                   | 0.4%           | 8.0%                                       |
|   | 0.50 to <0.75           | 89   |  | 0.0%                              |                                   | 0.7%           | 6.7%                                       |
|   | 0.75 to <2.50           | 96   |  | 0.0%                              |                                   | 1.3%           | 2.9%                                       |
|   | <i>0.75 to &lt;1.75</i> | 68   |  | <i>0.0%</i>                       |                                   | <i>1.1%</i>    | <i>3.3%</i>                                |
|   | <i>1.75 to &lt;2.5</i>  | 28   |  | <i>0.0%</i>                       |                                   | <i>1.8%</i>    | <i>0.2%</i>                                |
|   | 2.50 to <10.00          | 196  |  | 0.0%                              |                                   | 3.9%           | 1.7%                                       |
|   | <i>2.5 to &lt;5</i>     | 185  |  | <i>0.0%</i>                       |                                   | <i>3.7%</i>    | <i>1.8%</i>                                |
|   | <i>5 to &lt;10</i>      | 11   |  | <i>0.0%</i>                       |                                   | <i>7.0%</i>    | <i>1.6%</i>                                |
|   | 10.00 to <100.00        | 31   |  | 0.0%                              |                                   | 28.1%          | 5.2%                                       |
|   | <i>10 to &lt;20</i>     |  |  | <i>0.0%</i>                       |                                   | <i>0.0%</i>    | <i>5.0%</i>                                |
|   | <i>20 to &lt;30</i>     | 30   |  | <i>0.0%</i>                       |                                   | <i>27.6%</i>   | <i>5.6%</i>                                |
| <i>30.00 to &lt;100.00</i>                | 1                       |  | <i>0.0%</i>  |                                   | <i>43.8%</i>                      | <i>0.0%</i>    |  |
| 100.00 (Default)                          | 5                       |  | 0.0%   |                                   | 100.0%                            |                |  |

| A   | B                       | C  | D  | E                                 | F                                 | G              | H  |
|---|-------------------------|--|--|-----------------------------------|-----------------------------------|----------------|--|
| 31 December 2025                            |                         |  |  |                                   |                                   |                |  |
|   | 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 - Purchased receivables          | 0.00 to <0.15           |  |  |                                   |                                   |                |  |
|   | <i>0.00 to &lt;0.10</i> |  |  |                                   |                                   |                |  |
|   | <i>0.10 to &lt;0.15</i> |  |  |                                   |                                   |                |  |
|   | 0.15 to <0.25           |  |  |                                   |                                   |                |  |
|   | 0.25 to <0.50           |  |  |                                   |                                   |                |  |
|   | 0.50 to <0.75           |  |  |                                   |                                   |                |  |
|   | 0.75 to <2.50           |  |  |                                   |                                   |                |  |
|   | <i>0.75 to &lt;1.75</i> |  |  |                                   |                                   |                |  |
|   | <i>1.75 to &lt;2.5</i>  |  |  |                                   |                                   |                |  |
|   | 2.50 to <10.00          |  |  |                                   |                                   |                |  |
|   | <i>2.5 to &lt;5</i>     |  |  |                                   |                                   |                |  |
|   | <i>5 to &lt;10</i>      |  |  |                                   |                                   |                |  |
|   | 10.00 to <100.00        |  |  |                                   |                                   |                |  |
|   | <i>10 to &lt;20</i>     |  |  |                                   |                                   |                |  |
|   | <i>20 to &lt;30</i>     |  |  |                                   |                                   |                |  |
| 30.00 to <100.00                            |                         |  |  |                                   |                                   |                |  |
| 100.00 (Default)                            |                         |  |  |                                   |                                   |                |  |
| Corporates - Other                          | 0.00 to <0.15           | 842  | 1  | 0.1%                              |                                   | 0.1%           | 0.5%                                       |
|   | <i>0.00 to &lt;0.10</i> | 99   | 1  | 1.0%                              |                                   | 0.0%           | 1.3%                                       |
|   | <i>0.10 to &lt;0.15</i> | 743  |  | 0.0%                              |                                   | 0.1%           | 0.2%                                       |
|   | 0.15 to <0.25           | 319  |  | 0.0%                              |                                   | 0.2%           | 0.4%                                       |
|   | 0.25 to <0.50           | 1,303  |  | 0.0%                              |                                   | 0.4%           | 0.4%                                       |
|   | 0.50 to <0.75           | 2,399  |  | 0.0%                              |                                   | 0.7%           | 0.8%                                       |
|   | 0.75 to <2.50           | 4,730  | 10   | 0.2%                              |                                   | 1.4%           | 1.8%                                       |
|   | <i>0.75 to &lt;1.75</i> | 3,001  | 4  | 0.1%                              |                                   | 1.1%           | 1.3%                                       |
|   | <i>1.75 to &lt;2.5</i>  | 1,729  | 6  | 0.3%                              |                                   | 1.8%           | 2.8%                                       |
|   | 2.50 to <10.00          | 1,149  | 2  | 0.2%                              |                                   | 4.2%           | 5.9%                                       |
|   | <i>2.5 to &lt;5</i>     | 911  | 1  | 0.1%                              |                                   | 3.5%           | 5.4%                                       |
|   | <i>5 to &lt;10</i>      | 238  | 1  | 0.5%                              |                                   | 6.8%           | 7.2%                                       |
|   | 10.00 to <100.00        | 19,703   | 156  | 0.8%                              |                                   | 26.6%          | 1.0%                                       |
|   | <i>10 to &lt;20</i>     | 57   |  | 0.0%                              |                                   | 13.6%          | 10.3%                                      |
|   | <i>20 to &lt;30</i>     | 19,605   | 156  | 0.8%                              |                                   | 26.6%          | 0.6%                                       |
| 30.00 to <100.00                            | 41                      |  | 0.0%   |                                   | 41.5%                             | 7.5%           |  |
| 100.00 (Default)                            | 842                     |  | 0.0%   |                                   | 100.0%                            |                |  |
| Retail - Secured by residential real estate | 0.00 to <0.15           | 277,589  | 274  | 0.1%                              | 0.1%                              | 0.1%           | 0.1%                                       |
|   | <i>0.00 to &lt;0.10</i> | 63   |  | 0.0%                              |                                   | 0.0%           | 0.1%                                       |
|   | <i>0.10 to &lt;0.15</i> | 277,526  | 274  | 0.1%                              | 0.1%                              | 0.1%           | 0.1%                                       |
|   | 0.15 to <0.25           | 84,827   | 129  | 0.2%                              | 0.2%                              | 0.2%           | 0.3%                                       |
|   | 0.25 to <0.50           | 216,952  | 603  | 0.3%                              | 0.4%                              | 0.3%           | 0.4%                                       |
|   | 0.50 to <0.75           | 97,319   | 411  | 0.4%                              | 0.6%                              | 0.6%           | 0.5%                                       |
|   | 0.75 to <2.50           | 49,086   | 437  | 0.9%                              | 1.3%                              | 1.2%           | 1.1%                                       |
|   | <i>0.75 to &lt;1.75</i> | 44,941   | 368  | 0.8%                              | 1.1%                              | 1.2%           | 1.0%                                       |
|   | <i>1.75 to &lt;2.5</i>  | 4,145  | 69   | 1.7%                              | 2.0%                              | 2.0%           | 2.4%                                       |
|   | 2.50 to <10.00          | 10,466   | 515  | 4.9%                              | 4.6%                              | 4.7%           | 4.7%                                       |
|   | <i>2.5 to &lt;5</i>     | 7,528  | 288  | 3.8%                              | 3.3%                              | 3.5%           | 3.4%                                       |
|   | <i>5 to &lt;10</i>      | 2,938  | 227  | 7.7%                              | 6.9%                              | 7.9%           | 7.0%                                       |
|   | 10.00 to <100.00        | 4,948  | 1,030  | 20.8%                             | 25.0%                             | 23.8%          | 19.3%                                      |
|   | <i>10 to &lt;20</i>     | 3,107  | 413  | 13.3%                             | 13.8%                             | 14.8%          | 13.0%                                      |
|   | <i>20 to &lt;30</i>     | 927  | 164  | 17.7%                             | 24.0%                             | 24.6%          | 18.3%                                      |
| 30.00 to <100.00                            | 914                     | 453  | 49.6%  | 51.8%                             | 53.5%                             | 47.5%          |  |
| 100.00 (Default)                            | 5,865                   |  | 0.0%   | 100.0%                            | 100.0%                            |                |  |

| A                              | B                | C  | D  | E                                 | F                                 | G              | H  |
|--------------------------------|------------------|--|--|-----------------------------------|-----------------------------------|----------------|--|
| 31 December 2025               |                  |  |  |                                   |                                   |                |  |
|                                | 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    | 1,444,801                                      | 2,302  | 0.2%                              |                                   | 0.1%           | 0.0%                                       |
|                                | 0.00 to <0.10    | 926,673  | 1,323  | 0.1%                              |                                   | 0.0%           | 0.0%                                       |
|                                | 0.10 to <0.15    | 518,128  | 979  | 0.2%                              |                                   | 0.1%           | 0.1%                                       |
|                                | 0.15 to <0.25    | 153,795  | 823  | 0.5%                              |                                   | 0.2%           | 0.2%                                       |
|                                | 0.25 to <0.50    | 102,134  | 1,334  | 1.3%                              |                                   | 0.3%           | 0.4%                                       |
|                                | 0.50 to <0.75    | 21,752   | 469  | 2.2%                              |                                   | 0.6%           | 0.7%                                       |
|                                | 0.75 to <2.50    | 67,732   | 2,764  | 4.1%                              |                                   | 1.5%           | 1.0%                                       |
|                                | 0.75 to <1.75    | 53,052   | 1,970  | 3.7%                              |                                   | 1.2%           | 0.9%                                       |
|                                | 1.75 to <2.5     | 14,680   | 794  | 5.4%                              |                                   | 2.3%           | 1.6%                                       |
|                                | 2.50 to <10.00   | 21,820   | 2,467  | 11.3%                             |                                   | 4.2%           | 3.0%                                       |
|                                | 2.5 to <5        | 15,977   | 1,319  | 8.3%                              |                                   | 3.4%           | 2.2%                                       |
|                                | 5 to <10         | 5,843  | 1,148  | 19.6%                             |                                   | 6.5%           | 5.4%                                       |
|                                | 10.00 to <100.00 | 6,293  | 3,113  | 49.5%                             |                                   | 23.4%          | 12.0%                                      |
|                                | 10 to <20        | 3,538  | 1,338  | 37.8%                             |                                   | 12.3%          | 8.7%                                       |
|                                | 20 to <30        | 81   | 18   | 22.2%                             |                                   | 24.2%          | 8.2%                                       |
|                                | 30.00 to <100.00 | 2,674  | 1,757  | 65.7%                             |                                   | 38.0%          | 27.3%                                      |
|                                | 100.00 (Default) | 14,835   |  |                                   | 0.0%                              |                | 100.0%                                     |
| Retail - Purchased receivables | 0.00 to <0.15    |  |  |                                   |                                   |                |  |
|                                | 0.00 to <0.10    |  |  |                                   |                                   |                |  |
|                                | 0.10 to <0.15    |  |  |                                   |                                   |                |  |
|                                | 0.15 to <0.25    |  |  |                                   |                                   |                |  |
|                                | 0.25 to <0.50    |  |  |                                   |                                   |                |  |
|                                | 0.50 to <0.75    |  |  |                                   |                                   |                |  |
|                                | 0.75 to <2.50    |  |  |                                   |                                   |                |  |
|                                | 0.75 to <1.75    |  |  |                                   |                                   |                |  |
|                                | 1.75 to <2.5     |  |  |                                   |                                   |                |  |
|                                | 2.50 to <10.00   |  |  |                                   |                                   |                |  |
|                                | 2.5 to <5        |  |  |                                   |                                   |                |  |
|                                | 5 to <10         |  |  |                                   |                                   |                |  |
|                                | 10.00 to <100.00 |  |  |                                   |                                   |                |  |
|                                | 10 to <20        |  |  |                                   |                                   |                |  |
|                                | 20 to <30        |  |  |                                   |                                   |                |  |
|                                | 30.00 to <100.00 |  |  |                                   |                                   |                |  |
|                                | 100.00 (Default) |  |  |                                   |                                   |                |  |
| Retail - Other                 | 0.00 to <0.15    | 342  |  | 0.0%                              | 0.1%                              | 0.1%           | 0.1%                                       |
|                                | 0.00 to <0.10    | 220  |  | 0.0%                              |                                   | 0.0%           | 0.0%                                       |
|                                | 0.10 to <0.15    | 122  |  | 0.0%                              | 0.1%                              | 0.1%           | 0.3%                                       |
|                                | 0.15 to <0.25    | 5,943  | 29   | 0.5%                              | 0.2%                              | 0.2%           | 0.5%                                       |
|                                | 0.25 to <0.50    | 3,611  | 13   | 0.4%                              | 0.4%                              | 0.4%           | 0.6%                                       |
|                                | 0.50 to <0.75    | 905  | 1  | 0.1%                              | 0.5%                              | 0.7%           | 0.6%                                       |
|                                | 0.75 to <2.50    | 33,467   | 43   | 0.1%                              | 1.3%                              | 1.7%           | 12.8%                                      |
|                                | 0.75 to <1.75    | 23,500   | 26   | 0.1%                              | 1.2%                              | 1.5%           | 11.4%                                      |
|                                | 1.75 to <2.5     | 9,967  | 17   | 0.2%                              | 2.1%                              | 2.2%           | 16.6%                                      |
|                                | 2.50 to <10.00   | 20,089   | 41   | 0.2%                              | 2.7%                              | 4.3%           | 13.1%                                      |
|                                | 2.5 to <5        | 16,635   | 21   | 0.1%                              | 2.7%                              | 3.6%           | 14.4%                                      |
|                                | 5 to <10         | 3,454  | 20   | 0.6%                              |                                   | 7.4%           | 9.2%                                       |
|                                | 10.00 to <100.00 | 3,580  | 40   | 1.1%                              | 26.6%                             | 20.5%          | 18.5%                                      |
|                                | 10 to <20        | 1,920  | 40   | 2.1%                              |                                   | 13.9%          | 12.6%                                      |
|                                | 20 to <30        | 1,660  |  | 0.0%                              | 26.6%                             | 28.2%          | 33.7%                                      |
|                                | 30.00 to <100.00 |  |  | 0.0%                              |                                   | 0.0%           | 25.0%                                      |
|                                | 100.00 (Default) | 2,540  |  |                                   | 0.0%                              | 100.0%         | 100.0%                                     |

## Exposure class F-IRB

| A   | B                          | C  | D  | E                                 | F                                 | G              | H  |
|---|----------------------------|--|--|-----------------------------------|-----------------------------------|----------------|--|
|   |                            |  |  |                                   |                                   |                | 31 December 2025                           |
|   | 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 |                                   |                                   |                |  |
| <b>Exposure class</b>                     |                            |  |  |                                   |                                   |                |  |
| Central governments and central banks     | 0.00 to <0.15              |  |  |                                   |                                   |                |  |
|   | <i>0.00 to &lt;0.10</i>    |  |  |                                   |                                   |                |  |
|   | <i>0.10 to &lt;0.15</i>    |  |  |                                   |                                   |                |  |
|   | 0.15 to <0.25              |  |  |                                   |                                   |                |  |
|   | 0.25 to <0.50              |  |  |                                   |                                   |                |  |
|   | 0.50 to <0.75              |  |  |                                   |                                   |                |  |
|   | <i>0.75 to &lt;2.50</i>    |  |  |                                   |                                   |                |  |
|   | <i>0.75 to &lt;1.75</i>    |  |  |                                   |                                   |                |  |
|   | <i>1.75 to &lt;2.5</i>     |  |  |                                   |                                   |                |  |
|   | 2.50 to <10.00             |  |  |                                   |                                   |                |  |
|   | <i>2.5 to &lt;5</i>        |  |  |                                   |                                   |                |  |
|   | <i>5 to &lt;10</i>         |  |  |                                   |                                   |                |  |
|   | 10.00 to <100.00           |  |  |                                   |                                   |                |  |
|   | <i>10 to &lt;20</i>        |  |  |                                   |                                   |                |  |
|   | <i>20 to &lt;30</i>        |  |  |                                   |                                   |                |  |
|   | <i>30.00 to &lt;100.00</i> |  |  |                                   |                                   |                |  |
|   | 100.00 (Default)           |  |  |                                   |                                   |                |  |
| Regional governments or local authorities | 0.00 to <0.15              |  |  |                                   |                                   |                |  |
|   | <i>0.00 to &lt;0.10</i>    |  |  |                                   |                                   |                |  |
|   | <i>0.10 to &lt;0.15</i>    |  |  |                                   |                                   |                |  |
|   | 0.15 to <0.25              |  |  |                                   |                                   |                |  |
|   | 0.25 to <0.50              |  |  |                                   |                                   |                |  |
|   | 0.50 to <0.75              |  |  |                                   |                                   |                |  |
|   | <i>0.75 to &lt;2.50</i>    |  |  |                                   |                                   |                |  |
|   | <i>0.75 to &lt;1.75</i>    |  |  |                                   |                                   |                |  |
|   | <i>1.75 to &lt;2.5</i>     |  |  |                                   |                                   |                |  |
|   | 2.50 to <10.00             |  |  |                                   |                                   |                |  |
|   | <i>2.5 to &lt;5</i>        |  |  |                                   |                                   |                |  |
|   | <i>5 to &lt;10</i>         |  |  |                                   |                                   |                |  |
|   | 10.00 to <100.00           |  |  |                                   |                                   |                |  |
|   | <i>10 to &lt;20</i>        |  |  |                                   |                                   |                |  |
|   | <i>20 to &lt;30</i>        |  |  |                                   |                                   |                |  |
|   | <i>30.00 to &lt;100.00</i> |  |  |                                   |                                   |                |  |
|   | 100.00 (Default)           |  |  |                                   |                                   |                |  |
| Public sector entities                    | 0.00 to <0.15              |  |  |                                   |                                   |                |  |
|   | <i>0.00 to &lt;0.10</i>    |  |  |                                   |                                   |                |  |
|   | <i>0.10 to &lt;0.15</i>    |  |  |                                   |                                   |                |  |
|   | 0.15 to <0.25              |  |  |                                   |                                   |                |  |
|   | 0.25 to <0.50              |  |  |                                   |                                   |                |  |
|   | 0.50 to <0.75              |  |  |                                   |                                   |                |  |
|   | <i>0.75 to &lt;2.50</i>    |  |  |                                   |                                   |                |  |
|   | <i>0.75 to &lt;1.75</i>    |  |  |                                   |                                   |                |  |
|   | <i>1.75 to &lt;2.5</i>     |  |  |                                   |                                   |                |  |
|   | 2.50 to <10.00             |  |  |                                   |                                   |                |  |
|   | <i>2.5 to &lt;5</i>        |  |  |                                   |                                   |                |  |
|   | <i>5 to &lt;10</i>         |  |  |                                   |                                   |                |  |
|   | 10.00 to <100.00           |  |  |                                   |                                   |                |  |
|   | <i>10 to &lt;20</i>        |  |  |                                   |                                   |                |  |
|   | <i>20 to &lt;30</i>        |  |  |                                   |                                   |                |  |
|   | <i>30.00 to &lt;100.00</i> |  |  |                                   |                                   |                |  |
|   | 100.00 (Default)           |  |  |                                   |                                   |                |  |

| A                                  | B                | C  | D  | E                                 | F                                 | G              | H  |
|------------------------------------|------------------|--|--|-----------------------------------|-----------------------------------|----------------|--|
| 31 December 2025                   |                  |  |  |                                   |                                   |                |  |
|                                    | 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 |                                   |                                   |                |  |
| Institutions                       | 0.00 to <0.15    | 199  |  | 0.0%                              | 0.1%                              | 0%             | 1%   |
|                                    | 0.00 to <0.10    | 170  |  | 0.0%                              | 0.1%                              | 0%             | 1%   |
|                                    | 0.10 to <0.15    | 29   |  | 0.0%                              | 0.1%                              | 0%             | 0%   |
|                                    | 0.15 to <0.25    | 13   |  | 0.0%                              | 0.2%                              | 0%             | 0%   |
|                                    | 0.25 to <0.50    | 15   |  | 0.0%                              | 0.4%                              | 0%             | 0%   |
|                                    | 0.50 to <0.75    | 2  |  | 0.0%                              | 0.7%                              | 1%             | 0%   |
|                                    | 0.75 to <2.50    | 5  |  | 0.0%                              | 1.9%                              | 1%             | 0%   |
|                                    | 0.75 to <1.75    | 4  |  | 0.0%                              | 1.1%                              | 1%             | 0%   |
|                                    | 1.75 to <2.5     | 1  |  | 0.0%                              | 1.9%                              | 2%             | 0%   |
|                                    | 2.50 to <10.00   | 5  |  | 0.0%                              | 3.4%                              | 4%             | 0%   |
|                                    | 2.5 to <5        | 5  |  | 0.0%                              | 3.4%                              | 4%             | 0%   |
|                                    | 5 to <10         |  |  | 0.0%                              |                                   | 0%             | 0%   |
|                                    | 10.00 to <100.00 | 78   |  | 0.0%                              | 28.2%                             | 26%            | 0%   |
|                                    | 10 to <20        | 3  |  | 0.0%                              |                                   | 16%            | 0%   |
|                                    | 20 to <30        | 75   |  | 0.0%                              | 28.2%                             | 27%            | 0%   |
|                                    | 30.00 to <100.00 |  |  |                                   |                                   |                |  |
| 100.00 (Default)                   |                  |  |  | 0.0%                              |                                   | 0%             |  |
| Corporates - Specialised Lending   | 0.00 to <0.15    |  |  |                                   |                                   |                |  |
|                                    | 0.00 to <0.10    |  |  |                                   |                                   |                |  |
|                                    | 0.10 to <0.15    |  |  |                                   |                                   |                |  |
|                                    | 0.15 to <0.25    |  |  | 0.0%                              |                                   | 0%             | 0%   |
|                                    | 0.25 to <0.50    | 78   |  | 0.0%                              |                                   | 0%             | 0%   |
|                                    | 0.50 to <0.75    | 79   |  | 0.0%                              |                                   | 1%             | 1%   |
|                                    | 0.75 to <2.50    | 12   |  | 0.0%                              |                                   | 1%             | 7%   |
|                                    | 0.75 to <1.75    | 12   |  | 0.0%                              |                                   | 1%             | 7%   |
|                                    | 1.75 to <2.5     |  |  |                                   |                                   |                |  |
|                                    | 2.50 to <10.00   | 1  |  | 0.0%                              |                                   | 3%             | 0%   |
|                                    | 2.5 to <5        | 1  |  | 0.0%                              |                                   | 3%             | 0%   |
|                                    | 5 to <10         |  |  |                                   |                                   |                |  |
|                                    | 10.00 to <100.00 | 1  |  | 0.0%                              |                                   | 27%            | 0%   |
|                                    | 10 to <20        |  |  |                                   |                                   |                |  |
|                                    | 20 to <30        | 1  |  | 0.0%                              |                                   | 27%            | 0%   |
|                                    | 30.00 to <100.00 |  |  |                                   |                                   |                |  |
| 100.00 (Default)                   | 6                |  |  | 0.0%                              |                                   | 100%           |  |
| Corporates - Purchased receivables | 0.00 to <0.15    |  |  |                                   |                                   |                |  |
|                                    | 0.00 to <0.10    |  |  |                                   |                                   |                |  |
|                                    | 0.10 to <0.15    |  |  |                                   |                                   |                |  |
|                                    | 0.15 to <0.25    |  |  |                                   |                                   |                |  |
|                                    | 0.25 to <0.50    |  |  |                                   |                                   |                |  |
|                                    | 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 2025   |                  |  |  |                                   |                                   |                |  |
|                    | 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    | 247  |  | 0.0%                              | 0.1%                              | 0%             | 0%   |
|                    | 0.00 to <0.10    | 137  |  | 0.0%                              | 0.1%                              | 0%             | 0%   |
|                    | 0.10 to <0.15    | 110  |  | 0.0%                              | 0.1%                              | 0%             | 0%   |
|                    | 0.15 to <0.25    | 152  |  | 0.0%                              | 0.2%                              | 0%             | 0%   |
|                    | 0.25 to <0.50    | 266  |  | 0.0%                              | 0.4%                              | 0%             | 0%   |
|                    | 0.50 to <0.75    | 381  |  | 0.0%                              | 0.7%                              | 1%             | 0%   |
|                    | 0.75 to <2.50    | 963  | 1  | 0.1%                              | 1.4%                              | 1%             | 0%   |
|                    | 0.75 to <1.75    | 582  |  | 0.0%                              | 1.1%                              | 1%             | 0%   |
|                    | 1.75 to <2.5     | 381  | 1  | 0.3%                              | 1.9%                              | 2%             | 0%   |
|                    | 2.50 to <10.00   | 261  |  | 0.0%                              | 6.5%                              | 4%             | 0%   |
|                    | 2.5 to <5        | 210  |  | 0.0%                              | 3.4%                              | 3%             | 0%   |
|                    | 5 to <10         | 51   |  | 0.0%                              | 6.8%                              | 6%             | 0%   |
|                    | 10.00 to <100.00 | 167  |  | 0.0%                              | 25.4%                             | 28%            | 0%   |
|                    | 10 to <20        | 12   |  | 0.0%                              | 13.5%                             | 13%            | 0%   |
|                    | 20 to <30        | 133  |  | 0.0%                              | 27.1%                             | 27%            | 0%   |
|                    | 30.00 to <100.00 | 22   |  | 0.0%                              |                                   | 43%            | 0%   |
| 100.00 (Default)   | 117              |  | 0.0%   |                                   | 100.0%                            |                |  |

# 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 income. 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, and (reverse) repurchase agreements, 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 CCPs, 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, equities & commodities are an additional risk factor. Any additional collateral payments to counterparties in the event of 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 derivatives or securities financing 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.

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 in the CRR to apply internal models to estimate market risk effects related to SFT or master netting agreements. For economic capital 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. The RWEA presented here increased by EUR 0.6 billion in the second half of 2025 as result of higher post-CRM exposures.

|               |  | A                     | B                               | C    | D  | E                                   | F                       | G              | H                 |
|---------------|--|-----------------------|---------------------------------|------|--|-------------------------------------|-------------------------|----------------|-------------------|
|               |  | 31 December 2025      |                                 |      |  |                                     |                         |                |                   |
| (in millions) |  | Replacement cost (RC) | Potential future exposure (PFE) | EEPE | Alpha used for computing regulatory exposure value | Exposure value pre-CRM <sup>1</sup> | Exposure value post-CRM | Exposure value | RWEA <sup>1</sup> |
| EU1           | EU - Original Exposure Method (for derivatives)                      |                       |                                 |      | 1.4  |                                     |                         |                |                   |
| EU2           | EU - Simplified SA-CCR (for derivatives)                             |                       |                                 |      | 1.4  |                                     |                         |                |                   |
| 1             | SA-CCR (for derivatives)   | 599                   | 3,534                           |      | 1.4  | 6,273                               | 5,156                   | 5,156          | 3,617             |
| 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)                 |                       |                                 |      |  | 48,057                              | 6,374                   | 6,374          | 2,404             |
| 5             | VaR for SFTs   |                       |                                 |      |  |                                     |                         |                |                   |
| <b>6</b>      | <b>Total</b>   |                       |                                 |      |  | <b>54,330</b>                       | <b>11,530</b>           | <b>11,530</b>  | <b>6,022</b>      |

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

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

Compared to the first half of 2025, the exposures went up in all risk-weight buckets in the second half of the year, with the highest percentual increases observed in the 20% and 75% buckets. As result, the total exposures rose by EUR 3.5 billion in Q4 2025 vs Q2 2025.

|                         |   | A                | B            | C          | D        | E          | F          | G   | H          | I            | J          | K            | L             |
|-------------------------|---|------------------|--------------|------------|----------|------------|------------|-----|------------|--------------|------------|--------------|---------------|
|                         |   | 31 December 2025 |              |            |          |            |            |     |            |              |            |              |               |
|                         |   | Risk weight      |              |            |          |            |            |     |            |              |            |              | Total         |
| (in millions)           |   | 0%               | 2%           | 4%         | 10%      | 20%        | 50%        | 70% | 75%        | 100%         | 150%       | Others       |               |
| <b>Exposure classes</b> |   |                  |              |            |          |            |            |     |            |              |            |              |               |
| 1                       | Central governments or central banks                            | 210              |              |            | 5        |            |            |     |            |              |            |              | 215           |
| 2                       | Regional governments or local authorities                       | 54               |              |            |          |            |            |     |            |              |            |              | 54            |
| 3                       | Public sector entities  | 11               |              |            |          | 2          |            |     |            |              |            |              | 13            |
| 4                       | Multilateral development banks                                  | 7                |              |            |          |            |            |     |            |              |            |              | 7             |
| 5                       | International organisations                                     | 12               |              |            |          |            |            |     |            |              |            |              | 12            |
| 6                       | Institutions  |                  | 3,269        |            |          | 587        | 23         |     | 1          | 5            | 55         | 2,822        | 6,762         |
| 7                       | Corporates  |                  |              | 381        |          |            | 194        |     | 108        | 3,633        | 29         |              | 4,346         |
| 8                       | Retail  |                  |              |            |          |            |            |     |            |              |            |              |               |
| 9                       | Institutions and corporates with a short-term credit assessment |                  |              |            |          |            |            |     |            |              |            |              |               |
| 10                      | Other items   |                  |              |            |          |            |            |     |            |              | 34         |              | 34            |
| <b>11</b>               | <b>Total exposure value</b>                                     | <b>293</b>       | <b>3,269</b> | <b>381</b> | <b>5</b> | <b>589</b> | <b>217</b> |     | <b>109</b> | <b>3,638</b> | <b>118</b> | <b>2,822</b> | <b>11,444</b> |

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

### Exposure class F-IRB

As at 31 December 2025, the total exposure values and total RWEA in the CCR F-IRB decreased compared to 30 June 2025, mainly driven by reductions in Corporates – Other. Most of the exposures for both Corporates – Other and Institutions portfolios (which are the only two exposure classes under F-IRB) are concentrated within the low to mid-range PD scales.

|                       |   | A                               | B                                      | C                                 | D                                       | E  | F                     | G                      |               |
|-----------------------|---|---------------------------------|--|-----------------------------------|---|--|-----------------------|------------------------|---------------|
|                       |   | 31 December 2025                |  |                                   |   |  |                       |                        |               |
|                       | PD scale                                  | Exposure value<br>(in millions) | Exposure-weighted average PD<br>(in %) | Numbers of obligors<br>(in units) | Exposure-weighted average LGD<br>(in %) | Exposure-weighted average maturity<br>(in years) | RWEA<br>(in millions) | RWEA density<br>(in %) |               |
| <b>Exposure class</b> |   |                                 |  |                                   |   |  |                       |                        |               |
| 1                     | Central governments and central banks     | 0.00 to <0.15                   |  |                                   |   |  |                       |                        |               |
| 2                     |   | 0.15 to <0.25                   |  |                                   |   |  |                       |                        |               |
| 3                     |   | 0.25 to <0.50                   |  |                                   |   |  |                       |                        |               |
| 4                     |   | 0.50 to <0.75                   |  |                                   |   |  |                       |                        |               |
| 5                     |   | 0.75 to <2.50                   |  |                                   |   |  |                       |                        |               |
| 6                     |   | 2.50 to <10.00                  |  |                                   |   |  |                       |                        |               |
| 7                     |   | 10.00 to <100.00                |  |                                   |   |  |                       |                        |               |
| 8                     |   | 100.00 (Default)                |  |                                   |   |  |                       |                        |               |
| 9                     |   | <b>Subtotal</b>                 |  |                                   |   |  |                       |                        |               |
| 10                    | Regional governments or local authorities | 0.00 to <0.15                   |  |                                   |   |  |                       |                        |               |
| 11                    |   | 0.15 to <0.25                   |  |                                   |   |  |                       |                        |               |
| 12                    |   | 0.25 to <0.50                   |  |                                   |   |  |                       |                        |               |
| 13                    |   | 0.50 to <0.75                   |  |                                   |   |  |                       |                        |               |
| 14                    |   | 0.75 to <2.50                   |  |                                   |   |  |                       |                        |               |
| 15                    |   | 2.50 to <10.00                  |  |                                   |   |  |                       |                        |               |
| 16                    |   | 10.00 to <100.00                |  |                                   |   |  |                       |                        |               |
| 17                    |   | 100.00 (Default)                |  |                                   |   |  |                       |                        |               |
| 18                    |   | <b>Subtotal</b>                 |  |                                   |   |  |                       |                        |               |
| 19                    | Public sector entities                    | 0.00 to <0.15                   |  |                                   |   |  |                       |                        |               |
| 20                    |   | 0.15 to <0.25                   |  |                                   |   |  |                       |                        |               |
| 21                    |   | 0.25 to <0.50                   |  |                                   |   |  |                       |                        |               |
| 22                    |   | 0.50 to <0.75                   |  |                                   |   |  |                       |                        |               |
| 23                    |   | 0.75 to <2.50                   |  |                                   |   |  |                       |                        |               |
| 24                    |   | 2.50 to <10.00                  |  |                                   |   |  |                       |                        |               |
| 25                    |   | 10.00 to <100.00                |  |                                   |   |  |                       |                        |               |
| 26                    |   | 100.00 (Default)                |  |                                   |   |  |                       |                        |               |
| 27                    |   | <b>Subtotal</b>                 |  |                                   |   |  |                       |                        |               |
| 28                    | Institutions                              | 0.00 to <0.15                   | 2,221                                  | 0.05%                             | 175                                     | 45.00%   | 1.08                  | 361                    | 16.26%        |
| 29                    |   | 0.15 to <0.25                   | 94                                     | 0.19%                             | 14                                      | 45.00%   | 0.66                  | 32                     | 34.02%        |
| 30                    |   | 0.25 to <0.50                   | 116                                    | 0.28%                             | 14                                      | 45.00%   | 2.14                  | 78                     | 67.09%        |
| 31                    |   | 0.50 to <0.75                   | 1                                      | 0.70%                             | 1                                       | 45.00%   | 2.50                  |                        | 80.30%        |
| 32                    |   | 0.75 to <2.50                   | 19                                     | 1.13%                             | 3                                       | 45.00%   | 0.54                  | 17                     | 90.19%        |
| 33                    |   | 2.50 to <10.00                  |  | 0.00%                             |   | 0.00%  |                       |                        | 0.00%         |
| 34                    |   | 10.00 to <100.00                |  | 0.00%                             |   | 0.00%  |                       |                        | 0.00%         |
| 35                    |   | 100.00 (Default)                |  | 0.00%                             |   | 0.00%  |                       |                        | 0.00%         |
| 36                    |   | <b>Subtotal</b>                 | <b>2,450</b>                           | <b>0.08%</b>                      | <b>207</b>                              | <b>45.00%</b>                                    | <b>1.11</b>           | <b>488</b>             | <b>19.93%</b> |
| 37                    | Corporates - Specialised Lending          | 0.00 to <0.15                   |  |                                   |   |  |                       |                        |               |
| 38                    |   | 0.15 to <0.25                   |  |                                   |   |  |                       |                        |               |
| 39                    |   | 0.25 to <0.50                   |  |                                   |   |  |                       |                        |               |
| 40                    |   | 0.50 to <0.75                   |  |                                   |   |  |                       |                        |               |
| 41                    |   | 0.75 to <2.50                   |  |                                   |   |  |                       |                        |               |
| 42                    |   | 2.50 to <10.00                  |  |                                   |   |  |                       |                        |               |
| 43                    |   | 10.00 to <100.00                |  |                                   |   |  |                       |                        |               |
| 44                    |   | 100.00 (Default)                |  |                                   |   |  |                       |                        |               |
| 45                    |   | <b>Subtotal</b>                 |  |                                   |   |  |                       |                        |               |

|                                       | A                | B                               | C                                      | D                                 | E                                       | F  | G                     |                        |
|---------------------------------------|------------------|---------------------------------|--|-----------------------------------|---|--|-----------------------|------------------------|
|                                       | 31 December 2025 |                                 |  |                                   |   |  |                       |                        |
|                                       | PD scale         | Exposure value<br>(in millions) | Exposure-weighted average PD<br>(in %) | Numbers of obligors<br>(in units) | Exposure-weighted average LGD<br>(in %) | Exposure-weighted average maturity<br>(in years) | RWEA<br>(in millions) | RWEA density<br>(in %) |
| 46 Corporates - Purchased receivables | 0.00 to <0.15    |                                 |  |                                   |   |  |                       |                        |
| 47                                    | 0.15 to <0.25    |                                 |  |                                   |   |  |                       |                        |
| 48                                    | 0.25 to <0.50    |                                 |  |                                   |   |  |                       |                        |
| 49                                    | 0.50 to <0.75    |                                 |  |                                   |   |  |                       |                        |
| 50                                    | 0.75 to <2.50    |                                 |  |                                   |   |  |                       |                        |
| 51                                    | 2.50 to <10.00   |                                 |  |                                   |   |  |                       |                        |
| 52                                    | 10.00 to <100.00 |                                 |  |                                   |   |  |                       |                        |
| 53                                    | 100.00 (Default) |                                 |  |                                   |   |  |                       |                        |
| 54                                    | <b>Subtotal</b>  |                                 |  |                                   |   |  |                       |                        |
| 55 Corporates - Other                 | 0.00 to <0.15    | 930                             | 0.07%                                  | 53                                | 45.00%                                  | 1.22   | 202                   | 21.75%                 |
| 56                                    | 0.15 to <0.25    | 245                             | 0.18%                                  | 19                                | 45.00%                                  | 0.53   | 80                    | 32.76%                 |
| 57                                    | 0.25 to <0.50    | 78                              | 0.32%                                  | 25                                | 45.00%                                  | 0.77   | 41                    | 52.15%                 |
| 58                                    | 0.50 to <0.75    | 30                              | 0.66%                                  | 5                                 | 45.00%                                  | 0.50   | 22                    | 73.40%                 |
| 59                                    | 0.75 to <2.50    | 6                               | 1.11%                                  | 1                                 | 45.00%                                  | 0.50   | 5                     | 92.89%                 |
| 60                                    | 2.50 to <10.00   |                                 | 0.00%                                  |                                   | 0.00%                                   |  |                       | 0.00%                  |
| 61                                    | 10.00 to <100.00 |                                 | 0.00%                                  |                                   | 0.00%                                   |  |                       | 0.00%                  |
| 62                                    | 100.00 (Default) |                                 | 0.00%                                  |                                   | 0.00%                                   |  |                       | 0.00%                  |
| 63                                    | <b>Subtotal</b>  | <b>1,289</b>                    | <b>0.13%</b>                           | <b>103</b>                        | <b>45.00%</b>                           | <b>1.04</b>                                      | <b>351</b>            | <b>27.19%</b>          |
| <b>64 Total</b>                       |                  | <b>3,739</b>                    | <b>0.10%</b>                           | <b>310</b>                        | <b>45.00%</b>                           | <b>1.09</b>                                      | <b>839</b>            | <b>22.43%</b>          |

## EU CCR5 – Composition of collateral for exposures to CCR

### Collateral composition

The table below provides an overview of the collateral composition for the counterparty credit risk exposures.

In Q4 2025, the total collateral used in derivative transactions diminished compared to Q2 2025, while the total collateral used in securities financing transactions (SFTs) increased. Both dynamics were mainly due to seasonal movements in Clearing and derivative transactions in Securities Finance.

|                            | A  | B            | C                               | D            | E                                 | F              | G                               | H             |
|----------------------------|--|--------------|---------------------------------|--------------|-----------------------------------|----------------|---------------------------------|---------------|
|                            | 31 December 2025                           |              |                                 |              |                                   |                |                                 |               |
|                            | Collateral used in derivative transactions |              |                                 |              | Collateral used in SFTs           |                |                                 |               |
|                            | Fair value of collateral received          |              | Fair value of posted collateral |              | Fair value of collateral received |                | Fair value of posted collateral |               |
| (in millions)              | Segregated                                 | Unsegregated | Segregated                      | Unsegregated | Segregated                        | Unsegregated   | Segregated                      | Unsegregated  |
| <b>Collateral type</b>     |  |              |                                 |              |                                   |                |                                 |               |
| 1 Cash – domestic currency | 4,605                                      | 5,867        |                                 | 2,101        | 6,106                             | 18,100         |                                 | 24,476        |
| 2 Cash – other currencies  | 3,384                                      | 538          |                                 | 135          | 648                               | 21,942         |                                 | 25,018        |
| 3 Domestic sovereign debt  |  | 861          | 9                               | 490          |                                   | 2,046          |                                 | 1,855         |
| 4 Other sovereign debt     |  | 351          |                                 | 1,105        |                                   | 36,145         |                                 | 31,672        |
| 5 Government agency debt   |  |              |                                 | 26           |                                   | 571            |                                 | 611           |
| 6 Corporate bonds          |  | 12           |                                 |              |                                   | 11,044         |                                 | 9,597         |
| 7 Equity securities        | 11,575                                     |              |                                 |              | 22,920                            | 8,454          |                                 | 2,648         |
| 8 Other collateral         |  |              |                                 |              |                                   | 2,977          |                                 | 3,071         |
| <b>9 Total</b>             | <b>19,563</b>                              | <b>7,629</b> | <b>9</b>                        | <b>3,858</b> | <b>29,675</b>                     | <b>101,279</b> |                                 | <b>98,948</b> |

## EU CCR6 – Credit derivatives exposures

The table below shows ABN AMRO's credit derivative hedges, split by protection sold and bought. ABN AMRO uses these credit derivatives to mitigate CVA risk own funds requirements. During the second half of 2025, these derivatives decreased due to seasonal business movements.

| (in millions)                      | A                 | B               |
|------------------------------------|-------------------|-----------------|
|                                    | 31 December 2025  |                 |
|                                    | Protection bought | Protection sold |
| <b>Notionals</b>                   |                   |                 |
| 1 Single-name credit default swaps |                   |                 |
| 2 Index credit default swaps       | 535               | 75              |
| 3 Total return swaps               |                   |                 |
| 4 Credit options                   |                   |                 |
| 5 Other credit derivatives         |                   |                 |
| 6 Total notionals                  | 535               | 75              |
| <b>Fair values</b>                 |                   |                 |
| 7 Positive fair value (asset)      |                   |                 |
| 8 Negative fair value (liability)  | -15               |                 |

## EU CCR8 – Exposures to CCPs

The table shows exposures to several CCPs, primarily due to ABN AMRO's Clearing business. In the second half of 2025, the RWEA of exposures to QCCPs increased by EUR 300 million, mainly driven by higher prefunded default fund contributions.

| (in millions)  | A                | B          |
|--|------------------|------------|
|  | 31 December 2025 |            |
|  | Exposure value   | RWEA       |
| 1 <b>Exposures to QCCPs (total)<sup>1</sup></b>  |                  | <b>878</b> |
| 2 Exposures for trades at QCCPs (excluding initial margin and default fund contributions)      | 2,139            | 50         |
| 3 - of which (i) OTC derivatives   | 1,137            | 23         |
| 4 - of which (ii) Exchange-traded derivatives  | 397              | 16         |
| 5 - of which (iii) SFTs  | 606              | 12         |
| 6 - of which (iv) Netting sets where cross-product netting has been approved                   |                  |            |
| 7 Segregated initial margin  |                  |            |
| 8 Non-segregated initial margin  | 1,511            | 30         |
| 9 Prefunded default fund contributions   | 2,068            | 797        |
| 10 Unfunded default fund contributions   |                  |            |
| 11 <b>Exposures to non-QCCPs (total)<sup>1</sup></b>   |                  | <b>2</b>   |
| 12 Exposures for trades at non-QCCPs (excluding initial margin and default fund contributions) | 2                | 2          |
| 13 - of which (i) OTC derivatives  |                  |            |
| 14 - of which (ii) Exchange-traded derivatives   |                  |            |
| 15 - of which (iii) SFTs   | 2                | 2          |
| 16 - of which (iv) Netting sets where cross-product netting has been approved                  |                  |            |
| 17 Segregated initial margin   |                  |            |
| 18 Non-segregated initial margin   |                  |            |
| 19 Prefunded default fund contributions  |                  |            |
| 20 Unfunded default fund contributions   |                  |            |

1. QCCP = Qualifying central counterparty

# 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 as an investor and as an originator.

### Investor securitisations

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

### Originator securitisations

In April 2025, ABN AMRO and the European Investment Bank Group entered into a synthetic securitisation agreement regarding a portfolio of approximately EUR 1.0 billion, with the aim of transferring risk for regulatory capital purposes. The transaction has been set up as a three-tranche synthetic securitisation: mezzanine tranche, senior tranche and junior tranche. ABN AMRO has the originator role and fully retains the junior tranche. Because the bank has used the option the CRR provides to fully deduct the retained position from CET1 (instead of applying a 1250% risk weight), the SEC3 template and the section 'Bank acting as originator or as sponsor' in SEC 1 remain empty for this securitisation, based on the EBA's current mapping for this template.

In December 2025, ABN AMRO completed a significant risk transfer (SRT) transaction with funds managed by Blackstone. The transaction was set up as a two-tranche synthetic securitisation where the investors provide first loss protection against potential losses on a EUR 2 billion portfolio of corporate loans.

### 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 provides details of the securitisation positions in which ABN AMRO acts as an investor or originator. 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 where the bank acts as an investor increased to EUR 3.5 billion (30 June 2025: EUR 3.1 billion), mainly as a result of new investments in other wholesale. The total exposure value where the bank acts as an originator increased to EUR 1.7 billion due to the new SRT with Blackstone. The difference between the exposure value and the total loan portfolio of EUR 2.0 billion is the result of a guarantee from the investor.

|                                     | A                       | B | C             | D             | E     | F     | G                |
|-------------------------------------|-------------------------|---|---------------|---------------|-------|-------|------------------|
|                                     |                         |   |               |               |       |       | 31 December 2025 |
|                                     | Bank acts as originator |   |               |               |       |       |                  |
|                                     | Traditional             |   |               | Synthetic     |       |       | Subtotal         |
|                                     | STS                     |   | Non-STS       |               |       |       |                  |
| (in millions)                       | Of which: SRT           |   | Of which: SRT | Of which: SRT |       |       |                  |
| 1 <b>Total exposures</b>            |                         |   |               |               | 1,718 | 1,718 | 1,718            |
| 2 <b>Retail (total)</b>             |                         |   |               |               |       |       |                  |
| 3 - of which residential mortgage   |                         |   |               |               |       |       |                  |
| 4 - of which credit card            |                         |   |               |               |       |       |                  |
| 5 - of which other retail exposures |                         |   |               |               |       |       |                  |
| 6 - of which re-securitisation      |                         |   |               |               |       |       |                  |
| 7 <b>Wholesale (total)</b>          |                         |   |               |               | 1,718 | 1,718 | 1,718            |
| 8 - of which loans to corporates    |                         |   |               |               | 1,718 | 1,718 | 1,718            |
| 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 2025 |       |
|                                     | Bank acts as sponsor |         |           |   | Bank acts as investor |         |                  |       |
|                                     | Traditional          |         | Synthetic |   | Traditional           |         | Synthetic        |       |
| (in millions)                       | STS                  | Non-STS |           |   | STS                   | Non-STS |                  |       |
| 1 <b>Total exposures</b>            |                      |         |           |   | 1,752                 | 1,732   |                  | 3,484 |
| 2 <b>Retail (total)</b>             |                      |         |           |   | 1,552                 | 1,067   |                  | 2,618 |
| 3 - of which residential mortgage   |                      |         |           |   | 100                   | 814     |                  | 914   |
| 4 - of which credit card            |                      |         |           |   | 200                   |         |                  | 200   |
| 5 - of which other retail exposures |                      |         |           |   | 1,252                 | 253     |                  | 1,505 |
| 6 - of which re-securitisation      |                      |         |           |   |                       |         |                  |       |
| 7 <b>Wholesale (total)</b>          |                      |         |           |   | 200                   | 665     |                  | 865   |
| 8 - of which loans to corporates    |                      |         |           |   |                       |         |                  |       |
| 9 - of which commercial mortgages   |                      |         |           |   |                       |         |                  |       |
| 10 - of which lease and receivables |                      |         |           |   |                       | 290     |                  | 290   |
| 11 - of which other wholesale       |                      |         |           |   | 200                   | 375     |                  | 575   |
| 12 - of which re-securitisation     |                      |         |           |   |                       |         |                  |       |

### EU SEC3 - Securitisation exposures in the non-trading book and associated regulatory capital requirements - institution acting as originator or as sponsor

In December 2025, ABN AMRO completed a significant risk transfer (SRT) transaction which was set up as a two-tranche synthetic securitisation, where the investors provide first loss protection against potential losses on a EUR 2 billion portfolio of corporate loans.

|                                       | A  | B              | C               | D                 | E                   | F  | G                        | H            | I                   |
|---------------------------------------|--|----------------|-----------------|-------------------|---------------------|--|--------------------------|--------------|---------------------|
|                                       | Exposure values (by RW bands/deductions) |                |                 |                   |                     | Exposure values (by regulatory approach) |                          |              |                     |
| (in millions)                         | ≤ 20% RW                                 | > 20% ≤ 50% RW | > 50% ≤ 100% RW | > 100% ≤ 1250% RW | 1250% RW/deductions | SEC-IRBA                                 | SEC-ERBA (including IAA) | SEC-SA       | 1250% RW/deductions |
|                                       |  |                |                 |                   |                     | 31 December 2025                         |                          |              |                     |
| 1 <b>Total exposures</b>              | <b>1,718</b>                             |                |                 |                   |                     |  |                          | <b>1,718</b> |                     |
| 2 <b>Traditional transactions</b>     |  |                |                 |                   |                     |  |                          |              |                     |
| 3 Securitisation                      |  |                |                 |                   |                     |  |                          |              |                     |
| 4 <i>Of which: retail underlying</i>  |  |                |                 |                   |                     |  |                          |              |                     |
| 5 <i>- of which STS</i>               |  |                |                 |                   |                     |  |                          |              |                     |
| 6 <i>Of which: wholesale</i>          |  |                |                 |                   |                     |  |                          |              |                     |
| 7 <i>- of which STS</i>               |  |                |                 |                   |                     |  |                          |              |                     |
| 8 Re-securitisation                   |  |                |                 |                   |                     |  |                          |              |                     |
| 9 <b>Synthetic transactions</b>       | <b>1,718</b>                             |                |                 |                   |                     |  |                          | <b>1,718</b> |                     |
| 10 Securitisation                     | 1,718                                    |                |                 |                   |                     |  |                          | 1,718        |                     |
| 11 <i>Of which: retail underlying</i> |  |                |                 |                   |                     |  |                          |              |                     |
| 12 <i>Of which: wholesale</i>         | 1,718                                    |                |                 |                   |                     |  |                          | 1,718        |                     |
| 13 Re-securitisation                  |  |                |                 |                   |                     |  |                          |              |                     |

|                                       | J                             | K                        | L          | M        | N                        | O                        | EU-P      | EU-Q     |
|---------------------------------------|-------------------------------|--------------------------|------------|----------|--------------------------|--------------------------|-----------|----------|
|                                       | 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 |
|                                       |                               |                          |            |          | 31 December 2025         |                          |           |          |
| 1 <b>Total exposures</b>              |                               |                          | <b>172</b> |          |                          |                          | <b>14</b> |          |
| 2 <b>Traditional transactions</b>     |                               |                          |            |          |                          |                          |           |          |
| 3 Securitisation                      |                               |                          |            |          |                          |                          |           |          |
| 4 <i>Of which: retail underlying</i>  |                               |                          |            |          |                          |                          |           |          |
| 5 <i>- of which STS</i>               |                               |                          |            |          |                          |                          |           |          |
| 6 <i>Of which: wholesale</i>          |                               |                          |            |          |                          |                          |           |          |
| 7 <i>- of which STS</i>               |                               |                          |            |          |                          |                          |           |          |
| 8 Re-securitisation                   |                               |                          |            |          |                          |                          |           |          |
| 9 <b>Synthetic transactions</b>       |                               |                          | <b>172</b> |          |                          |                          | <b>14</b> |          |
| 10 Securitisation                     |                               |                          | 172        |          |                          |                          | 14        |          |
| 11 <i>Of which: retail underlying</i> |                               |                          |            |          |                          |                          |           |          |
| 12 <i>Of which: wholesale</i>         |                               |                          | 172        |          |                          |                          | 14        |          |
| 13 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 3.5 billion as at 31 December 2025. (30 June 2025: EUR 3.1 billion). Most of the exposures continue to be Simple, Transparent and Standardised (STS).

| (in millions)                         | A  | B               | C                | D                  | E                    | F  | G                        | H      | I                    |
|---------------------------------------|--|-----------------|------------------|--------------------|----------------------|--|--------------------------|--------|----------------------|
|                                       | Exposure values (by RW bands/deductions) |                 |                  |                    |                      | Exposure values (by regulatory approach) |                          |        |                      |
|                                       | ≤ 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 |
|                                       | 31 December 2025                         |                 |                  |                    |                      |  |                          |        |                      |
| 1 <b>Total exposures</b>              | 2,987                                    | 497             |                  |                    |                      |  | 318                      | 3,166  |                      |
| 2 <b>Traditional securitisation</b>   | 2,987                                    | 497             |                  |                    |                      |  | 318                      | 3,166  |                      |
| 3 Securitisation                      | 2,987                                    | 497             |                  |                    |                      |  | 318                      | 3,166  |                      |
| 4 <i>Of which: retail underlying</i>  | 2,471                                    | 147             |                  |                    |                      |  | 318                      | 2,301  |                      |
| 5 <i>- of which STS</i>               | 1,552                                    |                 |                  |                    |                      |  | 170                      | 1,381  |                      |
| 6 <i>Of which: wholesale</i>          | 515                                      | 350             |                  |                    |                      |  |                          | 865    |                      |
| 7 <i>- of which STS</i>               | 200                                      |                 |                  |                    |                      |  |                          | 200    |                      |
| 8 Re-securitisation                   |  |                 |                  |                    |                      |  |                          |        |                      |
| 9 <b>Synthetic securitisation</b>     |  |                 |                  |                    |                      |  |                          |        |                      |
| 10 Securitisation                     |  |                 |                  |                    |                      |  |                          |        |                      |
| 11 <i>Of which: retail underlying</i> |  |                 |                  |                    |                      |  |                          |        |                      |
| 12 <i>Of which: wholesale</i>         |  |                 |                  |                    |                      |  |                          |        |                      |
| 13 Re-securitisation                  |  |                 |                  |                    |                      |  |                          |        |                      |

| (in millions)                         | J  | K                        | L      | M        | N                        | O                        | EU-P   | EU-Q     |
|---------------------------------------|--|--------------------------|--------|----------|--------------------------|--------------------------|--------|----------|
|                                       | RWEA (by regulatory approach) <sup>1</sup> |                          |        |          | Capital charge after cap |                          |        |          |
|                                       | SEC-IRBA                                   | SEC-ERBA (including IAA) | SEC-SA | 1250% RW | SEC-IRBA                 | SEC-ERBA (including IAA) | SEC-SA | 1250% RW |
|                                       | 31 December 2025                           |                          |        |          |                          |                          |        |          |
| 1 <b>Total exposures</b>              |  | 59                       | 458    |          |                          | 5                        | 37     |          |
| 2 <b>Traditional securitisation</b>   |  | 59                       | 458    |          |                          | 5                        | 37     |          |
| 3 Securitisation                      |  | 59                       | 458    |          |                          | 5                        | 37     |          |
| 4 <i>Of which: retail underlying</i>  |  | 59                       | 279    |          |                          | 5                        | 22     |          |
| 5 <i>- of which STS</i>               |  | 23                       | 142    |          |                          | 2                        | 11     |          |
| 6 <i>Of which: wholesale</i>          |  |                          | 179    |          |                          |                          | 14     |          |
| 7 <i>- of which STS</i>               |  |                          | 20     |          |                          |                          | 2      |          |
| 8 Re-securitisation                   |  |                          |        |          |                          |                          |        |          |
| 9 <b>Synthetic securitisation</b>     |  |                          |        |          |                          |                          |        |          |
| 10 Securitisation                     |  |                          |        |          |                          |                          |        |          |
| 11 <i>Of which: retail underlying</i> |  |                          |        |          |                          |                          |        |          |
| 12 <i>Of which: wholesale</i>         |  |                          |        |          |                          |                          |        |          |
| 13 Re-securitisation                  |  |                          |        |          |                          |                          |        |          |

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

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

Compared to 30 June 2025, there was an increase of EUR 2.0 billion due to the completion of a new SRT transaction in December 2025. This transaction was set up as a two-tranche synthetic securitisation where the investors provide first loss protection against potential losses on a EUR 2 billion portfolio of corporate loans.

The remaining amount corresponds to the synthetic securitisation agreement that ABN AMRO and the EIB Group (whose counterparty is the European Investment Fund - EIF) entered into in April 2025 on an approximately EUR 1.0 billion portfolio of existing loans to Dutch SMEs originated by ABN AMRO. The transaction was set up as a three-tranche synthetic securitisation under which the EIF is the investor/guarantor, providing protection on the mezzanine tranche of approximately EUR 150 million and on the senior tranche of approximately EUR 835 million. The junior tranche is fully retained by ABN AMRO.

|                                     | A   | B   | C |
|-------------------------------------|---|---|---|
|                                     | 31 December 2025  |   |   |
|                                     | Exposures securitised by the Bank - Bank acts as originator or as sponsor |   |   |
|                                     | Total outstanding nominal amount  | Total amount of specific credit risk adjustments made during the period |   |
| (in millions)                       | Of which: Exposures in default  |   |   |
| 1 Total exposures                   | 3,005   |   |   |
| 2 Retail (total)                    |   |   |   |
| 3 - of which residential mortgage   |   |   |   |
| 4 - of which credit card            |   |   |   |
| 5 - of which other retail exposures |   |   |   |
| 6 - of which re-securitisation      |   |   |   |
| 7 Wholesale (total)                 | 3,005   |   |   |
| 8 - of which loans to corporates    | 3,005   |   |   |
| 9 - of which commercial mortgages   |   |   |   |
| 10 - of which lease and receivables |   |   |   |
| 11 - of which other wholesale       |   |   |   |
| 12 - of which re-securitisation     |   |   |   |

# Market risk

## EU 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 arises when market movements, for instance in interest rates, credit spreads and foreign exchange rates, negatively affect the bank's value and earnings. The banking book positions are intended to be held for the long term (or until maturity) and capture all positions that are not held for trading purposes.

### 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 are aligned with the defined risk appetite. The Asset & Liability Committee (ALCO) has delegated the day-to-day management to the Asset and Liability Management and Treasury department (ALM/Treasury). This department's activities include the execution of hedge transactions. ALM/Treasury forms the first line of defence. Financial Risk Management acts as the second line of defence.

The risk appetite is articulated in terms of supervisory outlier test (SOT) on net interest Income (NII), SOT on economic value of equity (EVE) and economic capital (EC) 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 rate funding transactions and fixed interest rate 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 market risk in the banking book metrics are derived from behavioural models which rely on assumptions based on extensive research and historical client behaviour data. The models undergo independent validation and are 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 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 (EVE) or the bank's net interest income (NII) due to unfavourable 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 profile of assets and liabilities on the balance sheet can change if client behaviour changes. Therefore, interest rate risk is actively managed in line with the risk appetite.

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 refers to the risk of financial losses resulting from unfavourable movements in credit spreads within the balance sheet. From a value perspective, credit spread risk is primarily associated with products valued at fair

value. It is quantified as the impact on economic value of a one basis point change in credit spreads (CS01). The primary sources of this risk are bonds held for liquidity purposes and wholesale funding.

From an earnings perspective, credit spread risk in the banking book (CSRBB) impacts the spreads at which new positions are originated, such as during reinvestments. This risk is assessed using a net interest income (NII) at risk approach, where origination spreads are stressed and compared to a base scenario. The main sources of this earnings-based risk are loans and savings.

### Foreign exchange risk

Foreign exchange (FX) risk is the risk arising from unfavourable 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 foreign currency.

### 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 unfavourable 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 three lines of defence 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 trading mandates and limits, which define the nature and amount of the permitted transactions and risks, are reviewed and approved annually, together with the associated constraints. The limit utilisation is monitored and discussed by the first and second line of defence on a daily basis.

### 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 the 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 client-unit 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 the 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

| (in millions)                               | A                |          |
|---|------------------|----------|
|   | 31 December 2025 |          |
|   | RWEA             |          |
| <b>Outright products</b>                    |                  |          |
| 1 Interest rate risk (general and specific) |                  |          |
| 2 Equity risk (general and specific)        |                  | 2        |
| 3 Foreign exchange risk                     |                  |          |
| 4 Commodity risk                            |                  |          |
| <b>Options</b>                              |                  |          |
| 5 Simplified approach                       |                  |          |
| 6 Delta-plus method                         |                  |          |
| 7 Scenario approach                         |                  |          |
| 8 Securitisation (specific risk)            |                  |          |
| <b>9 Total</b>                              |                  | <b>2</b> |

### 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 the one 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)

|  | 31 December 2025 |                        |
|--|------------------|------------------------|
|  | A                | B                      |
| (in millions)  | RWEA             | Own funds requirements |
| <b>1 VaR</b>   | <b>309</b>       | <b>25</b>              |
| a Previous day's VaR   |                  | 10                     |
| b Multiplication factor (mc) x average of previous 60 working days (VaRavg)  |                  | 25                     |
| <b>2 SVaR</b>  | <b>827</b>       | <b>66</b>              |
| a Latest available SVaR  |                  | 23                     |
| b Multiplication factor (mc) x average of previous 60 working days (sVaRavg) |                  | 66                     |
| <b>3 IRC</b>   | <b>479</b>       | <b>38</b>              |
| a Most recent IRC measure  |                  | 34                     |
| b 12 weeks average IRC measure   |                  | 38                     |
| <b>4 Comprehensive risk measure</b>  |                  |                        |
| a Most recent risk measure of comprehensive risk measure                     |                  |                        |
| b 12 weeks average of comprehensive risk measure                             |                  |                        |
| c Comprehensive risk measure floor   |                  |                        |
| <b>5 Other</b>   |                  |                        |
| <b>6 Total</b>   | <b>1,615</b>     | <b>129</b>             |

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

Market Risk RWEA under the Internal Model Approach (IMA) decreased to EUR 1.6 billion as at 31 December 2025, compared to EUR 1.9 billion as at 30 September 2025. This decrease was driven by the SVaR component, due to a reduction in EUR 3-month/6-month interest rate curve risk exposure.

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.

|  | 31 December 2025 |            |            |                            |       |              |                              |
|--|------------------|------------|------------|----------------------------|-------|--------------|------------------------------|
|  | A                | B          | C          | D                          | E     | F            | G                            |
| (in millions)  | VaR              | SVaR       | IRC        | Comprehensive risk measure | Other | Total RWEA   | Total own funds requirements |
| <b>1 RWEA at the previous quarter-end</b>                    | <b>341</b>       | <b>922</b> | <b>598</b> |                            |       | <b>1,861</b> | <b>149</b>                   |
| 1a Regulatory adjustment                                     | -227             | -607       | -210       |                            |       | -1,044       | -84                          |
| 1b RWEA at the previous quarter-end (end of the day)         | 114              | 314        | 388        |                            |       | 817          | 65                           |
| 2 Movement in risk levels                                    | 7                | -24        | 37         |                            |       | 21           | 2                            |
| 3 Model updates/changes                                      |                  |            |            |                            |       |              |                              |
| 4 Methodology and policy                                     |                  |            |            |                            |       |              |                              |
| 5 Acquisitions and disposals                                 |                  |            |            |                            |       |              |                              |
| 6 Foreign exchange movements                                 |                  |            |            |                            |       |              |                              |
| 7 Other  |                  |            |            |                            |       |              |                              |
| 8a RWEA at the end of the disclosure period (end of the day) | 121              | 291        | 425        |                            |       | 837          | 67                           |
| 8b Regulatory adjustment                                     | 188              | 536        | 54         |                            |       | 778          | 62                           |
| <b>8 RWEA at the end of the disclosure period</b>            | <b>309</b>       | <b>827</b> | <b>479</b> |                            |       | <b>1,615</b> | <b>129</b>                   |

## EU MR3 – IMA values for trading portfolios

| (in millions) |               | A  |
|---------------|---------------|--|
|               |               | 31 December 2025                                 |
|               |               | <b>VaR (10 day 99%)</b>                          |
| 1             | Maximum value | 12   |
| 2             | Average value | 9  |
| 3             | Minimum value | 4  |
| 4             | Period end    | 10   |
|               |               | <b>SVaR (10 day 99%)</b>                         |
| 5             | Maximum value | 36   |
| 6             | Average value | 25   |
| 7             | Minimum value | 17   |
| 8             | Period end    | 23   |
|               |               | <b>IRC (99.9%)</b>                               |
| 9             | Maximum value | 59   |
| 10            | Average value | 34   |
| 11            | Minimum value | 16   |
| 12            | Period end    | 34   |
|               |               | <b>Comprehensive risk capital charge (99.9%)</b> |
| 13            | Maximum value |  |
| 14            | Average value |  |
| 15            | Minimum value |  |
| 16            | Period end    |  |

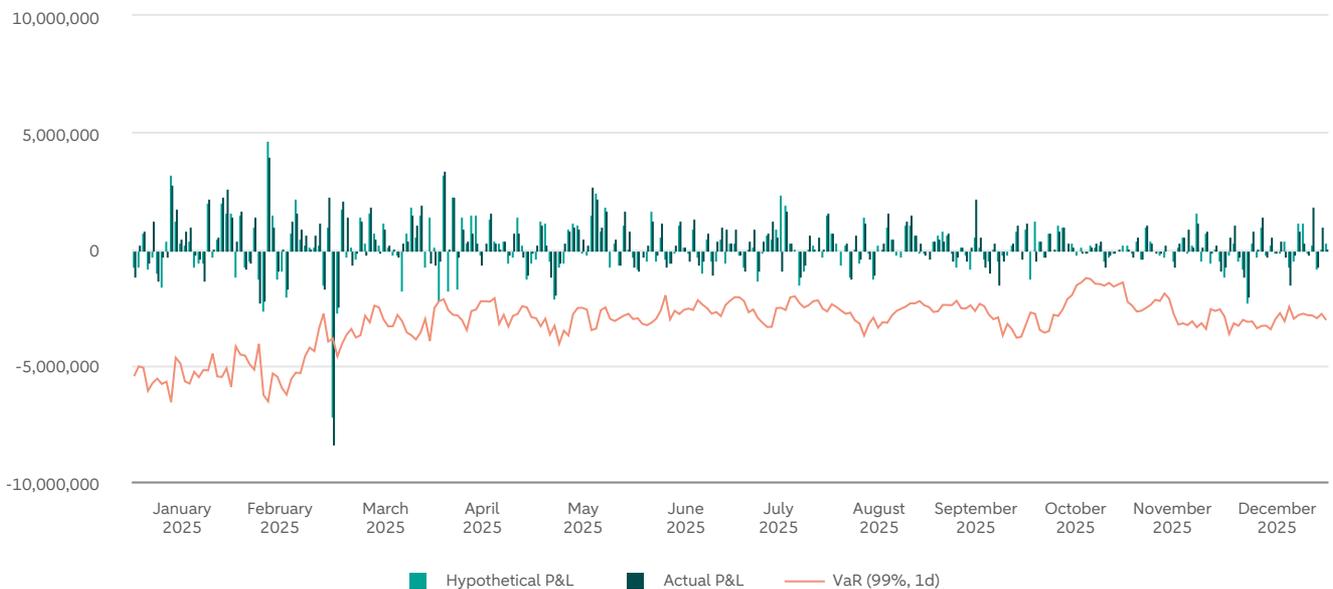
## EU MR4 – Comparison of VaR estimates with gains/losses

### Analysis of outliers

ABN AMRO reported one VaR outlier during the 250 days ending on 31 December 2025. The number of outliers remained the same compared to the 250 days ending on 30 June 2025.

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

### Comparison of VaR estimates with gains/losses 2025



# 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 (EVE) or the bank's net interest income (NII) due to unfavourable 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 loans with fixed rates. These assets are funded mainly by non-maturing deposits and wholesale funding which typically have a shorter average interest maturity than the assets;
- Client behaviour, which determines the maturity profile of certain 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 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. The volume migrating to term deposits is subject to rate changes. Future client rates for savings 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 NII-at-Risk and various economic value measures such as the present value change of one basis point shock (PV01) and the 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. 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 (parallel move up) in interest rates and for a 200bps instantaneous decrease (parallel move down) 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 are aligned with the EBA guidelines. The scope is limited to material currencies (EUR and USD).

The ‘Parallel up’ scenario, where interest rates increase by 200bps instantaneously, remained the EVE-at-Risk scenario with the highest impact at the year-end 2025. The EVE impact became higher as the duration of equity increased slightly from June 2025.

As at 31 December 2025, the NII-at-Risk was EUR 683 million for the ‘Parallel up’ scenario (instantaneous increase in interest rates of 200bps) and EUR 599 million negative for the ‘Parallel down’ scenario (instantaneous decrease in interest rates of 200bps). The change in NII-at-Risk was mainly attributable to increased loan volumes and a decrease in fixed time deposit volumes.

| (in millions)                      | A                                       |        | B            |      | C                                  |  | D            |  |
|------------------------------------|---|--------|--------------|------|------------------------------------|--|--------------|--|
|                                    | Changes of the economic value of equity |        |              |      | Changes of the net interest income |  |              |  |
|                                    | 31 December 2025                        |        | 30 June 2025 |      | 31 December 2025                   |  | 30 June 2025 |  |
| <b>Supervisory shock scenarios</b> |   |        |              |      |                                    |  |              |  |
| 1 Parallel up                      | -2,132                                  | -2,112 | 683          | 439  |                                    |  |              |  |
| 2 Parallel down                    | 215                                     | 298    | -599         | -319 |                                    |  |              |  |
| 3 Steepener                        | -268                                    | -113   |              |      |                                    |  |              |  |
| 4 Flattener                        | -325                                    | -457   |              |      |                                    |  |              |  |
| 5 Short rates up                   | -715                                    | -803   |              |      |                                    |  |              |  |
| 6 Short rates down                 | 496                                     | 694    |              |      |                                    |  |              |  |

# Credit valuation adjustment risk

## EU CVAA - Qualitative disclosure requirements related to credit valuation adjustment risk

Credit valuation adjustments (CVA) are taken into account for not fully collateralised OTC derivative transactions, to reflect the cost associated with the risk of ABN AMRO’s transaction counterparty 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 risk economic capital, these calculations are based on the regulatory Full Basic Approach used for the calculation of regulatory capital for CVA risk as described in the CRR (article 384).

## EU CVA 2 – Credit valuation adjustment risk under the Full Basic Approach (F-BA)

The CVA2 template was introduced in Q4 2025 in accordance with the CRR III applicable since 1 January 2025 (annual disclosure). This template shows the CVA RWA for own funds requirements (also presented in OV1) and the notional CVA changes. The figures reported below are aligned with EBA mapping.

| (in millions)                   | A                      | EU B                   |
|---------------------------------|------------------------|------------------------|
|                                 | 31 December 2025       |                        |
|                                 | Own funds requirements | Notional of CVA hedges |
| 1 BACVA <sup>csr-unhedged</sup> | 39                     |                        |
| 2 BACVA <sup>csr-hedged</sup>   | 13                     |                        |
| 3 <b>Total</b>                  | 15                     |                        |
| EU 4 Single-name CDS            |                        | 13                     |
| EU 5 Index CDS                  |                        | 13                     |
| EU 6 <b>Total</b>               |                        | 25                     |

# 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).

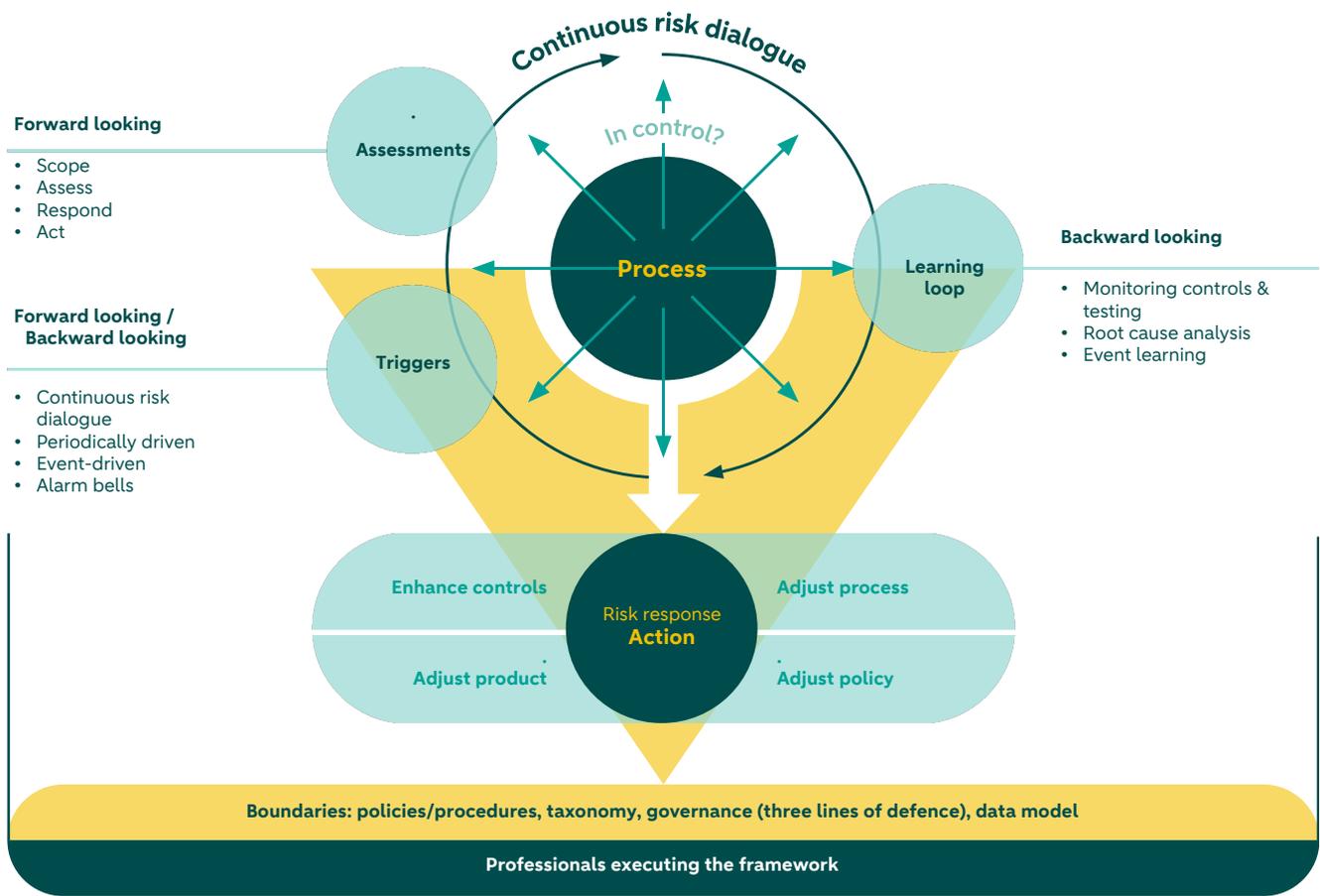
In 2025, ABN AMRO defined 11 non-financial sub-risk types (see below), as well as an overall NFR generic category, to provide a holistic profile of non-financial risks. The bank has in place dedicated functional areas with specific knowledge and expertise to deal with each material type of NFR. The NFR 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.

Starting in 2026, the focus of NFR management will be recalibrated as per our revised risk taxonomy.

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 focus on the key risks.

| Non-financial risk types |            |                  |                                  |
|--------------------------|------------|------------------|----------------------------------|
| Compliance risk          | Data risk  | ICT risk         | Third-party and outsourcing risk |
| Change risk              | Model risk | Fraud risk       | Legal risk                       |
| HR risk                  | Tax 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. But while 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 the ‘three lines of defence 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 of, for example, 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 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 have been 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 Basel IV Standardised Approach, the own funds requirement for operational risk is calculated on the basis of the three-year average income of the bank.

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 Q4 2025, operational risk RWA increased by EUR 1.7 billion, from EUR 16.0 billion (Q4 2024) to EUR 17.6 billion. This RWA increase can be attributed to the bank's income growth in the past few years, which forms the basis for the RWA calculation, and to the inclusion of HAL in Q3 2025. Furthermore, in keeping with the CRR III regulations regarding the operational risk framework, the three-year period used for the calculations is based on full calendar years, with updates occurring in the fourth quarter. Accordingly, the Q4 2025 operational risk own funds requirements are based on financial figures from the period 2023-2025.

## EU OR1 - Operational risk losses

The table below presents an overview of the operational risk losses over the last ten years using two thresholds (EUR 20,000 and EUR 100,000). These losses include total net losses of legal & tax claims, timing losses (losses from previous periods that are recognised in this period) and simple operational losses.

In the 10-year overview of operational risk losses, the total net loss for the year 2025 (using a threshold of EUR 20,000) was EUR 129 million, which is 9% higher than for 2024 (EUR 118 million). This overview also contains the recent added historical loss events from the newly purchased Hauck Aufhäuser Lampe Privatbank (HAL). The total net loss amount for all HAL-related events amounted to EUR 20 million, divided over multiple years during this period.

|   | A    | B    | C    | D    | E    | F    | G    | H    | I    | J    | K                |
|---|------|------|------|------|------|------|------|------|------|------|------------------|
| (in millions)   | 2025 | 2024 | 2023 | 2022 | 2021 | 2020 | 2019 | 2018 | 2017 | 2016 | Ten-year average |
| <b>Using EUR 20,000 threshold</b>   |      |      |      |      |      |      |      |      |      |      |                  |
| 1 Total amount of operational risk losses net of recoveries (no exclusions)             | 129  | 118  | 85   | 150  | 882  | 10   | 59   | 52   | 40   | 161  | 169              |
| 2 Total number of operational risk losses   | 186  | 161  | 151  | 218  | 255  | 177  | 184  | 145  | 128  | 164  | 177              |
| 3 Total amount of excluded operational risk losses                                      |      |      |      |      |      |      |      |      |      |      |                  |
| 4 Total number of excluded operational risk events                                      |      |      |      |      |      |      |      |      |      |      |                  |
| 5 Total amount of operational risk losses net of recoveries and net of excluded losses  | 129  | 118  | 85   | 150  | 882  | 10   | 59   | 52   | 40   | 161  | 169              |
| <b>Using EUR 100,000 threshold</b>  |      |      |      |      |      |      |      |      |      |      |                  |
| 6 Total amount of operational risk losses net of recoveries (no exclusions)             | 123  | 114  | 81   | 144  | 875  | 5    | 59   | 43   | 35   | 157  | 164              |
| 7 Total number of operational risk losses   | 57   | 52   | 46   | 58   | 71   | 63   | 65   | 52   | 43   | 58   | 57               |
| 8 Total amount of excluded operational risk losses                                      |      |      |      |      |      |      |      |      |      |      |                  |
| 9 Total number of excluded operational risk events                                      |      |      |      |      |      |      |      |      |      |      |                  |
| 10 Total amount of operational risk losses net of recoveries and net of excluded losses | 123  | 114  | 81   | 144  | 875  | 5    | 59   | 43   | 35   | 157  | 164              |

## EU OR2 - Business Indicator, components and subcomponents

Under the CRR III regulations regarding the operational risk framework, the own funds requirement for operational risk is calculated based on the three-year average operating income of the bank. This period is based on full calendar years, with updates occurring in the fourth quarter.

The risk exposure amount for operational risk went up by EUR 1.7 billion to EUR 17.6 billion in 2025, from EUR 16.0 billion as at 31 December 2024. This increase is the result of a) the bank's income growth over the last years, which via the Business Indicator is the basis for the calculation, and by b) the inclusion of HAL in Q3 2025. The Q4 2025 risk exposure amount for operational risk (and, therefore, the own funds requirement) was based on financial figures from the period 2023-2025.

| (in millions)  | A       | B       | C       | D                          |
|--|---------|---------|---------|----------------------------|
|  | 2025    | 2024    | 2023    | Average value              |
| <b>BI and its subcomponents</b>  |         |         |         |                            |
| 1 Interest, lease and dividend component (ILDC)  |         |         |         | 6,227                      |
| EU 1 ILDC related to the individual institution/consolidated Group (excluding entities considered by Article 314(3)) |         |         |         | 6,227                      |
| 1a Interest and lease income   | 16,936  | 17,628  | 14,525  | 16,363                     |
| 1b Interest and lease expense  | 10,559  | 11,310  | 8,586   | 10,151                     |
| 1c Total assets/Asset component  | 392,450 | 397,093 | 412,316 | 400,620                    |
| 1d Dividend income/ dividend component   | 21      | 17      | 9       | 16                         |
| 2 Services component (SC)  |         |         |         | 2,770                      |
| 2a Fee and commission income   | 2,490   | 2,634   | 2,749   | 2,624                      |
| 2b Fee and commission expense  | 513     | 519     | 510     | 514                        |
| 2c Other operating income  | 163     | 147     | 128     | 146                        |
| 2d Other operating expense   | 100     | 136     | 145     | 127                        |
| 3 Financial component (FC)   |         |         |         | 604                        |
| 3a Net profit or loss applicable to trading book (TB)  | 239     | 666     | 631     | 512                        |
| 3b Net profit or loss applicable to banking book (BB)  | 162     | 93      | 20      | 92                         |
| EU 3c Approach followed to determine the TB/BB boundary (PBA or accounting approach)                                 |         |         |         | <b>accounting approach</b> |
| 4 Business Indicator (BI)  |         |         |         | 9,601                      |
| 5 Business indicator component (BIC)   |         |         |         | 1,410                      |
| <b>Disclosure on the BI:</b>   |         |         |         |                            |
| 6a BI gross of excluded divested activities  | 9,601   |         |         |                            |
| 6b Reduction in BI due to excluded divested activities   |         |         |         |                            |
| EU 6c Impact in BI of mergers/acquisitions   | 386     |         |         |                            |

## EU OR3 - Operational risk own funds requirements and risk exposure amounts

| (in millions)   | A            |
|---|--------------|
|   | 2025         |
| 1 <b>Business Indicator Component (BIC)</b>   | <b>1,410</b> |
| EU 1 Alternative Standardised Approach (ASA) Own Funds Requirements (OROF) under Article 314(4) |              |
| 3 Minimum Required Operational Risk Own Funds Requirements (OROF)                               | 1,410        |
| 4 Operational Risk Exposure Amounts (REA)   | 17,628       |

# Remuneration

# Remuneration policy

## EU REMA - Remuneration policy

### Remuneration principles and policies applicable to the whole workforce

#### Our purpose

Through our purpose – Banking for better, for generations to come – we aim to create value for society as a provider of financial services to our clients and 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 focus on an excellent employee experience and inspiring leadership, along with efficient organisational structures, processes and IT systems that help our employees work more effectively. Please refer to the Performance on our strategy section in the Annual Report 2025 for further context.

This report describes the remuneration principles, policies and remuneration elements for ABN AMRO as a whole, both within and outside the Netherlands.

#### Policies and principles based on legislation

Our policies and principles are based on applicable European and local remuneration legislation and regulations, including Articles 92-94 of CRDV as transposed into Dutch legislation, the Regulatory Technical Standards (RTS) on Identified Staff as included in a Commission Delegated Regulation, the Dutch Financial Undertakings Remuneration Policy Act (Wbfo), the Regulation on Sound Remuneration Policies (Regeling beheerst belongingsbeleid), and the EBA Guidelines on Sound Remuneration Policies.

#### Remuneration principles

| Reward philosophy   |   |
|---|---|
| <p><b>Our reward framework enables ABN AMRO to attract, motivate, develop and retain the right talent in a sustainable manner so that we can achieve our business strategy.</b></p> <p>Compliant &amp; responsible</p> <ul style="list-style-type: none"> <li>Compliant with the boundaries of all applicable remuneration legislation and guidelines</li> <li>Respectful of our societal role and impact, our client's interests and other stakeholders</li> </ul> | <p>Fair &amp; transparent</p> <ul style="list-style-type: none"> <li>Clear remuneration policies and processes</li> <li>Principle of equal pay for equal work or work of equal value</li> <li>Balanced total remuneration package in line with the relevant market</li> </ul> <p>Align employee's and ABN AMRO's interests</p> <ul style="list-style-type: none"> <li>Clarity in how individual performance and remuneration are connected</li> <li>Balanced risk-taking in line with our moderate risk appetite</li> <li>Encouragement of personal development and values-led behaviour as integral part of performance</li> </ul> |

A future-proof workforce requires a remuneration framework that enables ABN AMRO to meet its responsibilities towards clients, society, employees, investors and other stakeholders, both now and in the years ahead.

To support this, 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 annually, and this review takes 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 that is aligned with the relevant local market and complies with the applicable remuneration restrictions. Outside the Netherlands, the package consists of an annual base salary (with ranges that differ for each country), annual variable remuneration and fringe benefits. Within the Netherlands, the remuneration packages, as stipulated in ABN AMRO's CLA for CLA employees and the Compensation & Benefits Regulations for CLA+ employees, generally consist of an annual base salary, fringe benefits and pension contribution. In addition, a recognition premium governed by ABN AMRO's CLA applies specifically to CLA employees. Variable remuneration is awarded for specific roles or in specific situations. Remuneration levels are generally positioned around the median of the relevant labour market, based on benchmarking, while keeping labour costs balanced.

## Employment conditions

ABN AMRO's employment conditions form an essential part of the total remuneration package and contribute to social sustainability, supporting the wellbeing and vitality of employees both inside and outside the workplace. Examples include the following (this list is non-exhaustive and may differ from one country to the next):

- the possibility of hybrid working and working from offices closer to home, thus contributing to reducing CO<sub>2</sub> emissions and helping to improve work-life balance
- free public transport to encourage sustainable daily commuting
- bicycle scheme, a tax-friendly contribution for buying an electric or other bicycle to encourage sustainable commuting, with a higher reimbursement per kilometre applying for travel by bicycle than for travel by car
- Banking for Better (B4B) days, giving employees the opportunity to take up to one week of B4B days to make a contribution to society. In 2025, we updated our employment conditions further by supporting employees serving as reservist. They are explicitly allowed to use Banking for Better days, regardless of any compensation they may receive for making that contribution
- cross-sector mobility guidance to help employees move into sectors with labour shortages, such as education and healthcare
- personal development budget to support employees' employability both now and in the future.

## Performance management

A performance management process is in place that is aimed at pursuing ABN AMRO's purpose and strategy by managing employee performance. Our performance management process helps us to align our objectives with the bank's strategy, purpose and core values. Where applicable, it also serves as the basis for awarding variable remuneration. ABN AMRO's performance management process is called Together & Better and it applies to all employees globally. In addition to being a tool for steering performance, Together & Better encourages employees to take control of their performance, development and careers in a mature employment relationship. Our performance management also aims, where possible and relevant, to make a clear link between performance and reward.

## KPI-setting

At the beginning of the year, employees take the initiative to set objectives that are aligned with ABN AMRO's bank-wide strategic KPIs. It is the joint responsibility of the manager and the employee to agree on the objectives. Within Together & Better, objectives are set that relate to 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 have at least one objective that is aligned with risk and compliance ('Banking licence'). Individual objectives must be directly linked to our purpose, strategy, business objectives and core values ('values@work'). The KPIs set are both financial and non-financial, as well as qualitative and quantitative.

## Performance indicators for Identified Staff

The performance management process is slightly different for Identified Staff (at CLA and CLA+ level) because specific legal requirements for this group must be met. 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 the Dutch Financial Supervision Act, at least 50% of the targets are non-financial. For Identified Staff, including the Executive Board, the KPIs are set at organisation level, client unit/function level and an individual level. For 2025, the organisation level non-financial KPIs consisted of Sustainability Acceleration Assets, the Climate Plan, Growth and the relational Net Promoter Score (rNPS). The organisation level financial KPIs were the Cost/Income ratio, Growth and Absolute Cost Base. The non-financial KPIs for the client units and functions included the results of the Employee Engagement Survey, Growth (i.e. growth of primary clients, for Personal & Business Banking), Climate Plan and rNPS, and the financial KPIs included the Absolute Cost Base, Growth (operating income for Corporate Banking, and new assets for Wealth Management) and Client Unit ROE. At an individual level, objectives were set for results, behaviour and development. After each performance year, Identified Staff members receive a final performance score, which conveys the desired compliance and risk culture and is taken into account at client unit/function level and an individual level.

### Performance Management and Sustainability

Sustainability is part of ABN AMRO's performance management processes. As described above, sustainability is directly included in the KPI frameworks of Identified Staff, including the Executive Board. For CLA employees, sustainability is included in the calculation of the pool for discretionary variable remuneration.

### Gender pay gap and equal pay

The gender pay gap is the difference in average gross salaries between men and women. ABN AMRO currently 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 base salary, for its employees in the Netherlands. For ABN AMRO CLA employees working in the Netherlands, the unadjusted gender pay gap in 2025 amounted to 14.1% in favour of men (compared with 14.9% in 2024). The unadjusted gender pay gap is mainly attributable to more men being in higher job level positions than women, and more women in lower job level positions. ABN AMRO's unadjusted gender pay gap was slightly higher than the unadjusted gender pay gap in the Netherlands in 2025, which was 10.5% (source: FNV). When the unadjusted gender pay gap is corrected for job level, the result is the adjusted gender pay gap. The adjusted gender pay gap in 2025 was 0.44% in favour of men (compared with 0.66% in 2024).

We will continue to focus on increasing gender diversity in higher job levels, enabling a reduction in the unadjusted gender pay gap. Our ambition is demonstrated by our DE&I targets, which are set in our DE&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, which provides the international, bank-wide gender pay gap disclosure in line with the ESRS requirements.

### Equal pay

ABN AMRO strives to ensure equal pay regardless of factors such as gender, race, religion, cultural background, sexual orientation, belief system or political affiliation. Our generic job profile methodology, which maps out all Dutch CLA jobs, leads to a job grade that is determined in line with the Hay methodology. The Hay methodology is also used for the CLA+ levels and is recognised as a gender-neutral, objective and verifiable job-grading methodology. Each job level at CLA and CLA+ level is then linked to a salary scale. In addition, our remuneration policy contains guidelines for various moments of remuneration, i.e. salary-setting for new hires or annual salary increases. We periodically review the development of equal pay in our remuneration policies and practices, comparing salaries of men and women. This internal study shows a consistent practice of equal pay, as also confirmed by a gender pay gap (adjusted for job level) of less than 1%. In the coming years, ABN AMRO will report on the gender pay gap and equal pay in greater detail, in line with the requirements of the EU Pay Transparency Directive.

### EU Pay Transparency Directive

The EU Pay Transparency Directive, which entered into force in 2023, aims to promote equal pay between men and women by introducing concrete measures to increase pay transparency. EU Member States are required to transpose this Directive into their national legislation no later than 7 June 2026. ABN AMRO is preparing to comply with the requirements stemming from this Directive, both in the Netherlands and in other EU countries where the bank operates.

Although the Dutch government published a draft bill to implement the Directive on 26 March 2025, it decided to postpone actual implementation until 1 January 2027. At this stage, the Netherlands is the only EU Member State that

is formally not expected to meet the EU-wide transposition deadline. ABN AMRO is nevertheless already preparing for compliance with the Directive in the Dutch context.

## Developments and business events in 2025

### Collective Labour Agreements

In the Netherlands, ABN AMRO has two CLAs in place which are applicable to almost all internal employees. The Employment Conditions CLA is applicable until 1 July 2026, and the Social Plan until 1 July 2026. On 14 October 2025, it was announced that the Social Plan would be extended from 1 July 2026 to 1 July 2029, without any changes to its content. With this extension of the robust Social Plan, the bank and the unions reaffirmed the importance of providing employees with clarity and certainty regarding any individual consequences that may arise from reorganisations.

France, Germany and Belgium have their own CLAs. In France, the applicable CLA was signed in December 2024, resulting in salary increases that were applicable from 1 January 2025 for employees with at least one year of service. The salary increases ranged from 1% to 2.5%, depending on the employee's annual base salary (the lower the salary, the higher the salary increase). In addition, there were increases to the monthly homeworking allowance and the employer's contribution to the employee savings plan, and there was a one-off agreement to freeze the cost increase of mandatory health insurance for 2025. Discussions for a new CLA were entered into towards the end of 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, followed by a 3% increase in August 2025. A further increase of 2% will take effect in July 2026. The CLA for the German banking industry also applies to around 45% of HAL employees. Employees working within Corporate Banking and Clearing are not covered by the German banking industry CLA and have discretionary salary increase arrangements.

In Belgium, the annually agreed 'CLA 90' outlines the conditions and framework for annual collective variable remuneration, which is linked to predefined collective objectives. These are in line with the objectives of the Energy & Collaboration Plan and consist of targets for financials and collaboration. The mandatory salary increases throughout 2025 amounted to a total of 2.08%.

### Hiring freeze

On 7 April 2025, ABN AMRO implemented a hiring freeze, applicable to the entire bank and effective until further notice, to manage costs responsibly. While we recognise the significance of this decision, we also view the hiring freeze as an opportunity to strengthen our internal capabilities, optimise existing talent and foster a more collaborative working environment, all in alignment with our strategy. The hiring freeze did not affect ABN AMRO's remuneration policies or principles.

### Violation of bonus prohibition

In 2025, DNB imposed an administrative fine on ABN AMRO for violating the bonus prohibition in the period 2016 to 2024. Although ABN AMRO interpreted and applied the applicable legislation in good faith, we acknowledge that our viewpoint was incorrect. We regret this, are aware of the possible societal impact and have accepted and paid the fine of EUR 15 million imposed by DNB.

### New strategy

In November 2025, the bank announced a new strategy in which People & Performance is defined as a key enabler. This includes building a high-performance culture, investing in a digitally fluent workforce and rightsizing the workforce. ABN AMRO announced it would rightsize the organisation, resulting in a net total reduction of the global workforce by 5,200 FTEs by 2028 compared with year-end 2024. Around half of the reductions are expected to take place through attrition. In 2025, a reduction of approximately 1,500 FTEs was realised. Employees will be treated transparently and responsibly, in line with our standards. In the Netherlands, for example, the bank and trade unions agreed to extend the Social Plan for employees by three years.

### Legislation

Various European sustainability-related regulations, guidelines and other publications, including requirements relating to awarding variable remuneration and reporting on remuneration topics, have come into force in recent years or are

scheduled to come into force in 2026 and beyond. Examples include the EU 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 other 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 related 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. The above list of legislation and regulations is non-exhaustive.

Although CRD VI introduces several prudential and governance-related changes for banks, it does not introduce fundamental changes to the existing remuneration framework and basic remuneration rules. It expands its scope and expectations in line with broader prudential and sustainability objectives.

## Variable remuneration

### Variable remuneration restrictions

Various reward components that can be awarded qualify as variable remuneration. The award of variable remuneration is strictly regulated. Globally, our variable remuneration is capped at 100% of fixed remuneration. In the Netherlands, however, the Dutch legislator has chosen to impose a stricter cap of 20%, unless an exception applies under the remuneration regulations.

In January 2026, a legislative proposal was submitted to the Dutch House of Representatives to amend the existing Dutch framework for variable remuneration. The proposal aims to narrow the scope of the current 20% variable remuneration cap. Under the current regime, the Dutch scope covers all financial institutions, the rules apply to all employees and the cap is set at 20%, whereas the EU framework generally permits a cap of up to 100% for Identified Staff. The proposed amendment is aimed at aligning Dutch practice more closely with European standards by limiting the application of the variable remuneration cap to employees designated as Identified Staff. ABN AMRO will continue to monitor developments in this legislative process closely.

### Variable remuneration for Identified Staff

Based on remuneration legislation, ABN AMRO has to qualify employees as Identified Staff based on their role and/or income. ABN AMRO has three levels of Identified Staff: Executive Board, CLA+ Identified Staff and CLA Identified Staff (Other Identified Staff). When variable remuneration is awarded to Identified Staff, it must comply with the terms and conditions of ABN AMRO's Variable Compensation Plan (current version applicable since 29 December 2020), which implements all applicable remuneration restrictions on variable remuneration for Identified Staff. Under this plan, 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 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 2025

ABN AMRO has several risk-mitigating measures in place that apply to variable remuneration. As part of the end-of-year process, ex-ante and ex-post risk assessments 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 in part, insofar as the following criteria are met:

- 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 and 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 about the fulfilment of the criteria and/or conditions for payment
- a significant failure of risk management in the institution or client unit/function where 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 Legal, HR and Finance).

The malus assessment for 2025 relates to the vesting of:

- the first tranche of deferred variable compensation for the 2024 performance period
- the second tranche of deferred variable compensation for the 2023 performance period
- the third tranche of deferred variable compensation for the 2022 performance period
- the fourth tranche of deferred variable remuneration for the 2021 performance period

The Supervisory Board established, after an assessment against the malus criteria set out above, that no malus was applied for the 2025 performance year.

## Executive Board

### Executive Board Remuneration Policy

The Executive Board Remuneration Policy is published on our website. It 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 that facilitates ABN AMRO's Executive Board composition and further enhances the link with the current strategy and sustainability objectives. 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 aim of the Executive Board Remuneration Policy is therefore to contribute to sustainable long-term value creation.

The maximum percentage of 20% for variable remuneration has, in principle, been maintained in the 2024 Executive Board Remuneration Policy. Currently, the bonus prohibition does not allow the awarding of any 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).

Following the establishment of this policy in 2024, feedback received from internal and external stakeholders has been duly noted. These stakeholders included our Employee Council, various clients, the general public (via an IPSOS questionnaire), a representative number of shareholders and depositary receipt holders, NLF, Eumedion, VEB and proxy adviser 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 therefore able to obtain valuable feedback to address areas of concern. This is in line with our continued commitment to good governance.

### Executive Board Remuneration Policy - scenario analysis

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 within 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, with the exception of collective indexation under the CLA for the Dutch banking sector (CLA Banken) and lack of variable remuneration due to the bonus prohibition may hamper the retention and future attraction of expert leaders. When the 2024 Executive Board Remuneration Policy was

established, benchmarking was performed against the relevant peer groups within and outside the financial sector. The peer group is published on the ABN AMRO website. The benchmarking exercise confirmed that there is a growing discrepancy between the current remuneration levels of the Executive Board and the relevant benchmarking populations. This remains a matter of concern for the Supervisory Board, as this may compromise our ability to retain current Executive Board members and attract new expert leaders, which could in the longer term affect the board stability and the execution of ABN AMRO's strategy.

### 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. Appointment terms are set in line with the rotation principles and are a maximum of four years. 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 (state retirement age), 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 2025 and another 1% from 1 July 2025, in line with the CLA for the Dutch banking sector.

In 2025, the fixed annual remuneration was:

- from 1 January 2025 to 30 June 2025: Member of the Executive Board: EUR 732,342 (EUR 862,672 for the CEO);
- from 1 July 2025 to 31 December 2025: Member of the Executive Board: EUR 739,665 (EUR 871,299 for the CEO).

Further 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 Annual Report 2025.

### Variable remuneration

Due to the aforementioned 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 2025 performance year, the Executive Board did not receive any variable remuneration. The Executive Board members therefore only received their fixed remuneration.

### Benefits

The Executive Board can participate in ABN AMRO's pension schemes applicable to all employees in the Netherlands. For pensionable salary up to the applicable threshold, which for 2025 amounted to EUR 137,800, a collective defined contribution (CDC) pension scheme applies. The total pension contribution is 30%, of which 24.5% is an employer contribution and 5.5% is an employee contribution. The intended pension accrual is 1.875%, based on a state retirement age of 68 years. In 2025, 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 23.75% in 2025. In addition to pension benefits, Executive Board members are eligible for benefits such as a company car or a chauffeur.

### Severance

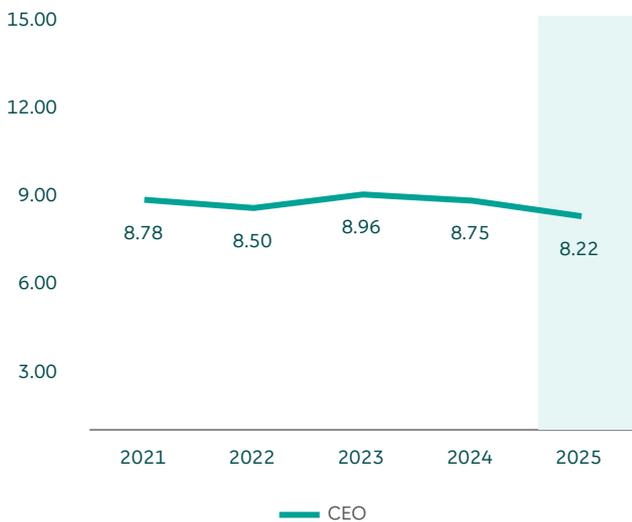
The remuneration policy for Executive Board members provides for a severance payment of up to a maximum of one year's gross salary if their contract is terminated at ABN AMRO's initiative. The current Executive Board members all have the same contractual right to a severance payment equal to three months' gross fixed salary. Robert Swaak stepped down as Chief Executive Officer with effect from the Annual General Meeting in 2025. In addition, it was announced in 2025 that Ton van Nimwegen would step down as Chief Operations Officer with effect from 1 January 2026. For both Robert Swaak and Ton van Nimwegen, the applicable notice period and severance payment were taken into account, as stipulated in the Executive Board Remuneration Policy and with due observance of applicable legislation.

### CEO pay ratio

The CEO 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 between the average employee remuneration for the financial year and the CEO's total annual remuneration has been calculated in accordance with the Corporate Governance Code 2025. The calculation does not include temporary agency workers and external contractors. The ratio in 2025 was 8.22. The ratio reflects the CEO's total remuneration, including pension costs and social security charges, divided by the average employee remuneration including pension costs and social security charges during 2025. 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.

The pay ratio at ABN AMRO is significantly lower than that of other companies included in the AEX and AMX indices. This difference primarily reflects the bank's structurally different remuneration environment. ABN AMRO operates under strict remuneration restrictions. These rules create a fundamentally different remuneration structure compared with non-financial companies, which often have broader latitude to award higher executive compensation. Given this context, ABN AMRO's lower pay ratio is regarded as an accurate and appropriate representation of ABN AMRO's current position, also considering the applicable remuneration restrictions. The ABN AMRO ratios published in 2021, 2022, 2023 and 2024 were 8.78, 8.5, 8.96 and 8.75, respectively. Information on the pay gap in line with the ESRS requirements is included in the 'Our employees at a glance' section in the Sustainability Statements chapter in the Annual Report 2025.

### CEO pay ratio



### 2025 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 organisation level, client unit/function level 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, including 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.

The Supervisory Board, acting in coordination with the relevant ABN AMRO departments, continuously monitors and evaluates the Executive Board members' performance against the established KPIs and targets.

## KPI-setting and performance

In 2025, all financial KPIs were focused on 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.

### Organisational level

Financial KPIs (return-based and cost-based) were, on average, achieved at organisation level. In addition to reporting on financial indicators, the organisation reported on three non-financial KPI categories related to Sustainability, People, and Risk, Compliance & Regulatory. Progress on sustainability was measured using KPIs linked to ABN AMRO’s Climate Plan and Sustainability Acceleration Assets. These assets reflect the share of sustainability-focused and EU Taxonomy-aligned financing and investments relative to the bank’s total assets. The Climate Plan KPI tracks the annual progress of targeted economic sectors against their planned climate-transition pathways. Both KPIs performed in line with expectations.

The organisation-wide employee engagement score was 79%. Although this represents a decline compared with the previous year, due in part to organisational changes, it still reflects strong commitment and resilience among employees.

The KPI for Risk, Compliance & Regulatory was exceeded, indicating further improvement in internal control and compliance awareness.

### Client units and functions

Financial KPIs were cost-based and growth-based. Cost objectives were met on average. Growth in certain strategic segments fell short of targets, owing to the influence of market conditions and competitive dynamics. Employee engagement at client unit and function level followed the organisation-wide pattern and showed a moderate decline compared with the previous year. The Primary Clients Growth KPI showed a notable increase in the share of primary clients; however, the result of the KPI was just below target. The rNPS KPI, linked to customer experience, exceeded expectations.

### Individual Level

Executive Board members were assessed on objectives related to financial performance, ESG (sustainability, people), customer experience, and risk & regulatory performance. The average individual score across the Executive Board was equivalent to “meets expectations”. The overall assessment of the Supervisory Board is that, on average, all members of the Executive Board had good overall performance ratings 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. In that regard, the Supervisory Board Remuneration Policy aims to contribute to the long-term performance of ABN AMRO and to sustainable long-term value creation. The Supervisory Board Remuneration Policy takes into account the special position that Supervisory Board members have in a two-tier board system.

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 2025 as well as a 1% indexation with effect from July 2025, in accordance with the CLA for the banking sector.

## Fixed remuneration

The annual fees from 1 January 2025 until 30 June 2025 were as follows:

- Member of the Supervisory Board: EUR 63,899 (EUR 83,068 for the Chair)
- Member of a Committee: EUR 15,975 (EUR 19,170 for the Chair)

The annual fees from 1 July 2025 until 31 December 2025 were as follows:

- Member of the Supervisory Board: EUR 64,538 (EUR 83,899 for the Chair)
- Member of a Committee: EUR 16,134 (EUR 19,361 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. Further details of the remuneration of the individual members of the Supervisory Board are provided in Note 36 and Note 38 to the Consolidated Annual Financial Statements chapter in the Annual Report 2025.

## Stakeholder views

### Annual General Meeting

During the Annual General Meeting of 23 April 2025, the 2024 remuneration report was put to an advisory vote, with 99.73% of the votes cast being in favour of a positive advice. ABN AMRO was pleased to note the positive advisory vote on the 2024 remuneration report and aims to continue meeting shareholders' expectations in this regard.

### Employee participation in 2025

In addition to the 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 works councils and subcommittees for subsidiaries and other countries.

At ABN AMRO, members of work councils are appointed for a term of three years. The current members have been appointed until 1 July 2026. Owing to retirements and job changes, mid-term elections have been held for the Commercial Council and the ICS subcommittee.

In 2025, the Dutch works councils received a total of 57 requests for advice, 12 requests for consent, 45 information memoranda and 1 notification. One of the requests for advice concerned the acquisition of NIBC.

Employees from Corporate Banking and Wealth Management in the Netherlands, Belgium, France, Germany, Greece, Luxembourg, Norway and the United Kingdom are also represented in the European Staff Council (ESC). The ESC is a forum for information sharing, consultation and dialogue on matters of an economic, financial or social nature that, due to their strategic importance or European character, are of interest to all European establishments of ABN AMRO or its subsidiaries.

## Additional Pillar 3 disclosures

In 2025, as part of the normal day-to-day business with regard to application of the remuneration framework, legal advice has been obtained from a law firm with a thorough specialisation in remuneration restrictions for financial institutions. This law firm is commissioned for advice whenever needed by the HR department and Legal. In addition, job grading – also as part of the normal day-to-day business – took place in case of new or changed positions.

## EU REM1 - Remuneration awarded for the financial year 2025

With regard to deferral arrangements and pay-out in instruments, 109 Identified Staff within ABN AMRO benefitted from the derogation as laid down in Article 94(3)(b) of Directive 2013/36/EU. This concerned Identified Staff whose variable remuneration (i) did not exceed a total amount of EUR 50,000 and (ii) did not represent more than 10% of the staff member's total annual remuneration. The total remuneration awarded to these Identified Staff was EUR 23,869 thousand, of which EUR 919 thousand was variable remuneration. In addition, 68 Identified Staff benefitted from the derogation on entity level as laid down in Article 94(3)(a) of Directive 2013/36/EU. The total remuneration awarded to these Identified Staff was EUR 14,918 thousand, of which EUR 4,825 thousand was variable remuneration.

The total variable remuneration awarded to Identified staff also consisted of sign-on, severance payments and profit sharing (France). Due to their specific nature, these remuneration components were 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. In 2025, the total amount of EUR 18,269 thousand (2024: EUR 13,425 thousand) included sign-on (EUR 195 thousand), severance payments (EUR 2,513 thousand) and profit sharing (EUR 40 thousand).

|   | 31 December 2025        |                        |                         |                        |
|---|-------------------------|------------------------|-------------------------|------------------------|
|   | A                       | B                      | C                       | D                      |
|   | MB Supervisory function | MB Management function | Other senior management | Other identified staff |
| (In thousands)  |                         |                        |                         |                        |
| <b>Fixed remuneration</b>   |                         |                        |                         |                        |
| 1 Number of identified staff <sup>1</sup>   | 8                       | 9                      |                         | 358                    |
| 2 <b>Total fixed remuneration</b>   | <b>819</b>              | <b>8,546</b>           |                         | <b>90,286</b>          |
| 3 <i>Of which: cash-based</i>   | 819                     | 7,038                  |                         | 76,963                 |
| EU-4a <i>Of which: shares or equivalent ownership interests</i>                     |                         |                        |                         |                        |
| 5 <i>Of which: share-linked instruments or equivalent non-cash instruments</i>      |                         |                        |                         |                        |
| EU-5x <i>Of which: other instruments</i>  |                         |                        |                         |                        |
| 7 <i>Of which: other forms</i>  |                         | 1,508                  |                         | 13,323                 |
| <b>Variable remuneration</b>  |                         |                        |                         |                        |
| 9 Number of identified staff  |                         |                        |                         | 307                    |
| 10 <b>Total variable remuneration</b>   |                         |                        |                         | <b>18,269</b>          |
| 11 <i>Of which: cash-based</i>  |                         |                        |                         | 13,311                 |
| 12 <i>- of which deferred</i>   |                         |                        |                         | 2,109                  |
| EU-13a <i>Of which: shares or equivalent ownership interests</i>                    |                         |                        |                         |                        |
| EU-14a <i>- of which deferred</i>   |                         |                        |                         |                        |
| EU-13b <i>Of which: share-linked instruments or equivalent non-cash instruments</i> |                         |                        |                         | 4,958                  |
| EU-14b <i>- of which deferred</i>   |                         |                        |                         | 2,109                  |
| EU-14x <i>Of which: other instruments</i>   |                         |                        |                         |                        |
| EU-14y <i>- of which deferred</i>   |                         |                        |                         |                        |
| 15 <i>Of which: other forms</i>   |                         |                        |                         |                        |
| 16 <i>- of which deferred</i>   |                         |                        |                         |                        |
| <b>17 Total remuneration (2 + 10)</b>   | <b>819</b>              | <b>8,546</b>           |                         | <b>108,555</b>         |

1. The number of identified staff is defined as the number of FTE throughout the year. In 2025, ABN AMRO reviewed the selection of Identified Staff in line with the applicable criteria and this process, in combination with the acquisition of HAL, led to a number of changes in the Identified Staff population.

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

|  | 31 December 2025              |                              |                            |                              |
|--|-------------------------------|------------------------------|----------------------------|------------------------------|
|  | A                             | B                            | C                          | D                            |
|  | MB<br>Supervisory<br>function | MB<br>Management<br>function | Other senior<br>management | Other<br>identified<br>staff |
| <i>(In thousands)</i>  |                               |                              |                            |                              |
| <b>Guaranteed variable remuneration awards</b>   |                               |                              |                            |                              |
| 1  |                               |                              |                            | 3                            |
| 2  |                               |                              |                            | 195                          |
| 3  |                               |                              |                            | 195                          |
| <i>- of which guaranteed variable remuneration awards paid during the financial year, that are not taken into account in the bonus cap</i> |                               |                              |                            |                              |
| <b>Severance payments awarded in previous periods, that have been paid out during the financial year</b>                                   |                               |                              |                            |                              |
| 4  |                               |                              |                            |                              |
| <i>Severance payments awarded in previous periods, that have been paid out during the financial year - Number of identified staff</i>      |                               |                              |                            |                              |
| 5  |                               |                              |                            |                              |
| <i>Severance payments awarded in previous periods, that have been paid out during the financial year - Total amount</i>                    |                               |                              |                            |                              |
| <b>Severance payments awarded during the financial year</b>  |                               |                              |                            |                              |
| 6  |                               | 1                            |                            | 9                            |
| <i>Severance payments awarded during the financial year - Number of identified staff</i>   |                               |                              |                            |                              |
| 7  |                               | 218                          |                            | 3,276                        |
| <i>Severance payments awarded during the financial year - Total amount</i>   |                               |                              |                            |                              |
| 8  |                               | 218                          |                            | 2,295                        |
| <i>- of which paid during the financial year</i>   |                               |                              |                            |                              |
| 9  |                               |                              |                            | 980                          |
| <i>- of which deferred</i>   |                               |                              |                            |                              |
| 10   |                               |                              |                            |                              |
| <i>- of which severance payments paid during the financial year, that are not taken into account in the bonus cap</i>                      |                               |                              |                            |                              |
| 11   |                               | 218                          |                            | 780                          |
| <i>- of which highest payment that has been awarded to a single person</i>   |                               |                              |                            |                              |

## EU REM3 - Deferred remuneration

|  | A  | B   | C   | D   | E   | F   | G   | H  |
|--|--|---|---|---|---|---|---|--|
|  | 31 December 2025   |   |   |   |   |   |   |  |
|  | 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)   |  |   |   |   |   |   |   |  |
| <b>1 MB Supervisory function</b>                               |  |   |   |   |   |   |   |  |
| 2 Cash-based   |  |   |   |   |   |   |   |  |
| 3 Shares or equivalent ownership interests                     |  |   |   |   |   |   |   |  |
| 4 Share-linked instruments or equivalent non-cash instruments  |  |   |   |   |   |   |   |  |
| 5 Other instruments  |  |   |   |   |   |   |   |  |
| 6 Other forms  |  |   |   |   |   |   |   |  |
| <b>7 MB Management function</b>                                | <b>7</b>   | <b>7</b>                                    |   |   |   | <b>8</b>  | <b>10</b>   |  |
| 8 Cash-based   |  |   |   |   |   |   |   |  |
| 9 Shares or equivalent ownership interests                     | 7  | 7   |   |   |   | 8   | 10  |  |
| 10 Share-linked instruments or equivalent non-cash instruments |  |   |   |   |   |   |   |  |
| 11 Other instruments   |  |   |   |   |   |   |   |  |
| 12 Other forms   |  |   |   |   |   |   |   |  |
| <b>13 Other senior management</b>                              |  |   |   |   |   |   |   |  |
| 14 Cash-based  |  |   |   |   |   |   |   |  |
| 15 Shares or equivalent ownership interests                    |  |   |   |   |   |   |   |  |
| 16 Share-linked instruments or equivalent non-cash instruments |  |   |   |   |   |   |   |  |
| 17 Other instruments   |  |   |   |   |   |   |   |  |
| 18 Other forms   |  |   |   |   |   |   |   |  |
| <b>19 Other identified staff</b>                               | <b>22,289</b>  | <b>8,773</b>                                | <b>13,517</b>                                   |   |   | <b>12,901</b>   | <b>9,945</b>  | <b>6,576</b>   |
| 20 Cash-based  | 8,938  | 4,378                                       | 4,561   |   |   |   | 4,378   |  |
| 21 Shares or equivalent ownership interests                    | 548  | 548   |   |   |   | 652   | 805   |  |
| 22 Share-linked instruments or equivalent non-cash instruments | 12,803   | 3,847                                       | 8,956   |   |   | 12,249  | 4,762   | 6,576  |
| 23 Other instruments   |  |   |   |   |   |   |   |  |
| 24 Other forms   |  |   |   |   |   |   |   |  |
| <b>25 Total amount</b>   | <b>22,296</b>  | <b>8,780</b>                                | <b>13,517</b>                                   |   |   | <b>12,909</b>   | <b>9,955</b>  | <b>6,576</b>   |

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

|            |   | A   |
|------------|---|---|
|            |   | 31 December 2025  |
|            |   | Identified staff that are high earners as set out in Article 450(i) CRR |
| (In units) |   |   |
| 1          | EUR 1,000,000 to below EUR 1,500,000 <sup>1</sup> | 4   |
| 2          | EUR 1,500,000 to below EUR 2,000,000              |   |
| 3          | EUR 2,000,000 to below EUR 2,500,000              |   |
| 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              |   |

1. The remuneration of one CLA+ member within Wealth Management exceeded the threshold of EUR 1 million, owing to salary and severance payments. This concerns an employee with a foreign contract. Furthermore, the remuneration of one HAL ExBo member exceeded the EUR 1 million threshold (1 July – 31 December 2025).

## 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          |
|----------------|---|------------------------------|------------------------|--------------|--------------------|----------------|------------------|---------------------|--|-----------|------------|
|                |   | Management body remuneration |                        |              | Business areas     |                |                  |                     |  |           |            |
|                |   | MB Supervisory function      | MB Management function | Total MB     | Investment banking | Retail banking | Asset management | Corporate functions | Independent internal control functions | All other | Total      |
| (In thousands) |   |                              |                        |              |                    |                |                  |                     |  |           |            |
| 1              | <b>Total number of identified staff</b>       |                              |                        |              |                    |                |                  |                     |  |           | <b>375</b> |
| 2              | - of which members of the MB                  | 8                            | 9                      | 17           |                    |                |                  |                     |  |           |            |
| 3              | - of which other senior management            |                              |                        |              |                    |                |                  |                     |  |           |            |
| 4              | - of which other identified staff             |                              |                        |              | 81                 | 139            |                  | 50                  | 88                                     |           |            |
| 5              | <b>Total remuneration of identified staff</b> | <b>819</b>                   | <b>8,764</b>           | <b>9,583</b> | <b>35,873</b>      | <b>34,858</b>  |                  | <b>17,979</b>       | <b>19,625</b>                          |           |            |
| 6              | - of which variable remuneration              |                              | 218                    | 218          | 7,018              | 8,487          |                  | 1,612               | 934                                    |           |            |
| 7              | - of which fixed remuneration <sup>1</sup>    | 819                          | 8,546                  | 9,365        | 28,855             | 26,371         |                  | 16,367              | 18,691                                 |           |            |

1. The severance payment is included in fixed remuneration.

# Encumbered and unencumbered assets

# Encumbered and unencumbered assets

## EU AE1 - Encumbered and unencumbered assets

|               |   | A                                    | B  | C                               | D  | E                                      | F                        | G                                 | H                        |
|---------------|---|--------------------------------------|--|---------------------------------|--|--|--------------------------|-----------------------------------|--------------------------|
|               |   | 31 December 2025                     |  |                                 |  |  |                          |                                   |                          |
| (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             | 57,954                               | 4,796  |                                 |  | 356,667                                | 73,680                   |                                   |                          |
| 030           | Equity instruments                              | 1                                    | 1  | 1                               | 1  | 1,006                                  |                          | 1,040                             |                          |
| 040           | Debt securities                                 | 5,053                                | 4,791  | 5,053                           | 4,791  | 47,739                                 | 44,392                   | 47,753                            | 44,392                   |
| 050           | - of which covered bonds                        | 144                                  | 113  | 144                             | 113  | 6,379                                  | 5,791                    | 6,467                             | 5,834                    |
| 060           | - of which securitisations                      |                                      |  |                                 |  |  |                          |                                   |                          |
| 070           | - of which issued by general governments        | 4,505                                | 4,306  | 4,505                           | 4,306  | 32,843                                 | 31,255                   | 32,768                            | 31,233                   |
| 080           | - of which issued by financial corporations     | 706                                  | 656  | 549                             | 485  | 11,322                                 | 9,504                    | 11,433                            | 9,527                    |
| 090           | - of which issued by non-financial corporations | 11                                   | 11   |                                 |  | 182                                    | 34                       | 183                               | 34                       |
| 120           | Other assets                                    | 52,883                               | 4  |                                 |  | 305,601                                | 27,025                   |                                   |                          |

## EU AE2 - Collateral received and own debt securities issued

|               |  | A  | B  | C   | D                        |
|---------------|--|--|--|---|--------------------------|
|               |  | 31 December 2025   |  |   |                          |
| (in millions) |  | 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 |
| 130           | Collateral received by the disclosing institution                          | 44,460   | 38,837                                       | 43,665  | 37,337                   |
| 140           | Loans on demand  |  |  |   |                          |
| 150           | Equity instruments   | 24,144   | 20,019                                       | 19,299  | 14,944                   |
| 160           | Debt securities  | 21,064   | 20,077                                       | 21,384  | 19,710                   |
| 170           | - of which covered bonds   | 1,815  | 1,803  | 1,382   | 1,382                    |
| 180           | - of which securitisations   | 3,440  | 3,440  |   |                          |
| 190           | - of which issued by general governments                                   | 15,580   | 15,289                                       | 17,686  | 16,363                   |
| 200           | - of which issued by financial corporations                                | 5,605  | 5,009  | 3,233   | 2,948                    |
| 210           | - of which issued by non-financial corporations                            | 220  | 161  | 464   | 313                      |
| 220           | Loans and advances other than loans on demand                              |  |  |   |                          |
| 230           | Other collateral received  | 358  | 9  | 60  |                          |
| 240           | Own debt securities issued other than own covered bonds or securitisations |  |  |   |                          |
| 241           | Own covered bonds and securitisation issued and not yet pledged            |  |  |   |                          |
| 250           | <b>Total, collateral received and own debt securities issued</b>           | <b>101,737</b>   | <b>42,699</b>                                |   |                          |

## EU AE3 - Sources of encumbrance

|   | A   | B  |
|---|---|--|
|   | 31 December 2025  |  |
|   | Matching liabilities,<br>contingent liabilities<br>or securities lent | Assets, collateral<br>received and own<br>debt securities issued<br>other than covered<br>bonds and<br>securitisations<br>encumbered |
| (in millions)                                       |   |  |
| 1 Carrying amount of selected financial liabilities | 42,636  | 62,192   |

## 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 and retained covered bond programmes. Retained covered bonds can be pledged as collateral, e.g. for participation under central bank programmes, and can be used in securities financing transactions to generate liquidity.

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 considered a part of the bank's economic 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 may also be 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 median on-balance sheet asset encumbrance ratio for 2025 was 14.5% (2024: 14.8%).

# ESG disclosures

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

## Basis of preparation

This disclosure is based on the Sustainability Statements chapter in the Annual Report 2025 (hereafter ‘the Sustainability Statements’ or ‘our Sustainability Statements’). The outcome of our double materiality assessment (DMA) constitutes the backbone of the disclosures.

## 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. We have included this information for each metric with regard to assumptions, approximations and judgments either in the respective sections or in the Definitions section of the Annual Report 2025. As indicated in these sections, 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.

Comparability of sustainability information between entities and over time may be affected by the lack of historical sustainability information in accordance with ESRS 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.

## Determining financial materiality of ESG risks (part of DMA methodology)

We assessed financial materiality by combining two factors: (1) likelihood of occurrence and (2) potential magnitude of financial effects over the short, medium, and long term. Our approach followed EBA guidelines on managing ESG risks, and covered all ESRS topics.

## Scope

The starting point was ABN AMRO’s balance sheet. Risks across the entire value chain — suppliers, own operations and clients — were considered if a clear link to financial impact (i.e. transmission channel) could be identified. Based on our environmental and social heatmaps, asset classes with low risk sensitivity were excluded from the scope.

## Methodologies, assumptions and scoring

We assessed the ESG risk drivers for each type of risk — credit, business, liquidity, market and non-financial (including all its sub-risks).

The transition risks in our lending book (downstream) were considered based on cost of risk mitigation for our clients. Our analysis estimated the risk of both physical damage and productivity loss on our clients’ financial strength. For simplicity, we assumed identical ESG risks within and outside the Netherlands.

The physical risks (downstream and own operations) were assessed based on scientific data for the Netherlands and the change to the collateral value (real estate; see the Climate scenario analysis section). The time horizon of the physical risk assessment was until 2050, considering the contractual duration of the residential real estate financing (30 years). For assessing non-financial ESG risks (own operations and downstream), we applied a scenario and stress testing methodology that combined the climate scenarios described below with expert judgement.

## Changes in methodology

In 2025, we aligned the scoring methodologies of the financial materiality assessment and risk taxonomy. Accordingly, the potential magnitude of risks is assessed against a four-point scale: Critical, High, Medium and Low. See the EU OVA disclosure for more information on the risk taxonomy.

## Scenarios

Our financial materiality assessment was performed against the following ESG scenarios:

- Climate-related transition risks in the lending portfolio were assessed against our internal base case, which differs from the Paris Agreement in considering a limited overshoot scenario that assumes the Netherlands and the EU will adopt GHG reduction plans to incentivise investment spending and disincentivise fossil fuel consumption. Still, EU GHG emissions are falling by less than the current EU targets. This is due to various reasons, including the lack of political commitment, higher financing cost, capacity and credit constraints, scarcity of materials, shortage of personnel and insufficient speed of technological progress. Macroeconomic forecasts related to this scenario ran until 2030, and were also used for calculating loan impairment allowances in our financial statements (see the Macroeconomic scenarios in the Credit risk review section).
- Climate-related physical risks were assessed against a high emission scenario (Representative Concentration Pathway (RCP) 8.5 scenario), where no additional efforts are made to constrain greenhouse gas emissions. This results in a temperature increase of 4.3°C by 2100. This scenario is relevant for our residential and commercial real estate portfolios.
- Finally, several operational risk scenarios were performed, assessing financial risks from data centre failure, greenwashing perception and shortcomings relating to privacy of client data and duty of care concerning residential mortgages.

## Background and definitions of ESG risk

Managing ESG risk is a part of safeguarding our risk profile. ESG risk is defined as the risk of any negative financial and/or reputational effect on ABN AMRO resulting from the negative materialisation of current or future ESG factors on the bank's portfolio and activities, its clients, assets or third parties that are actors in the value chain (referred to as 'third parties'). ESG risk takes effect in the form of ESG risk drivers and their subsequent transmission channels, affecting the traditional financial and non-financial risk types. The reputational and financial value of these risks is determined in line with our risk taxonomy (see Risk management framework). In the context of risk management, the term 'ESG' is used instead of 'sustainability' to ensure alignment with terminology used by the banking supervisory authorities.

## Strategy and business model

### Sustainability in relation to our strategy and business model

The main ESG-related 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 the 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 include real estate loans, building renovation loans and motor vehicle loans. While our non-lending activities may have a significant ESG impact, best practices for reporting on them are still evolving. What 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. In line with past years, we have disclosed information about our client assets portfolio with regard to climate change mitigation. Impacts also occur through the products and services that we offer and through the strategic choices that are made regarding privacy, access to our products and services and other matters. This is described in more detail in the Social section of the Sustainability Statements chapter of the Annual Report 2025.

## Sustainability as part of our strategy

In 2025, sustainability was one of the three pillars of our strategy. We aim to be our clients' first-choice partner and provide distinctive expertise in supporting their sustainability transition. Our efforts were focused on three main areas: climate, nature and social impact. We measured our progress through various metrics, for example our Sustainability Acceleration Standard asset volume (SAS).

The strategy update that we announced in November 2025 delivers a more focused approach to sustainability. The 2025 DMA outcome served as input for the strategy update. For a detailed description of how sustainability is integrated into our overall strategy, refer to the Strategy & performance chapter in the Annual Report 2025.

Under the new strategic plan, we have made sustainability a key enabler of our business, with a focus on decarbonisation. The section Key enablers of our strategy in the Annual Report 2025 details our focus on decarbonisation as a central sustainability priority. We aim to help clients achieve their emission targets via new commercial initiatives, such as benefits for home energy efficiency upgrades. We plan to develop a Transition Finance Framework to classify and enable financing for activities that credibly cut emissions in line with climate pathways, alongside already sustainable initiatives aligned with regulatory definitions. As described in the Strategy & performance chapter of the Annual Report 2025, any emissions pathway must be both credible and achievable to support an orderly and sustainable transition towards net-zero emissions.

Although we focus on decarbonisation, we aim to address other sustainability issues that matter to our clients or society. For example, improving energy efficiency in homes in lower-income neighbourhoods not only helps reduce emissions but can also create a positive social impact. Nature-related issues, such as cutting nitrogen emissions and boosting biodiversity, are important for our agricultural and other clients. We recognise the complex transitions clients are facing and seek to help them navigate these when they need financing.

We track our sustainable finance volumes via our SAS KPI. The SAS is based on a comprehensive framework developed to measure our Sustainability (acceleration) assets in order to assess our performance on a bank-wide and on a client-unit level. Although SAS includes topics defined as material in our DMA assessment, it was not developed to measure the progress of our material topics and should not be considered a metric under ESRS. Rather, we utilise SAS to help drive financing to clients, supporting their sustainability ambitions.

Our SAS volume is made up of Taxonomy-aligned loan volumes and Acceleration-aligned loan volumes, the latter containing a measurable sustainability component. We also measure and report on our Green Asset Ratio as per the EU Taxonomy. Increases in SAS can contribute to emission reductions in our portfolio, which in turn show up as progress towards our climate targets. However, there is not always a link between SAS and our climate strategy, as SAS includes inputs that are not just climate-related, or the achievement of emission reductions may occur later in the lifetime of the financed asset.

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

### Risk management of ESG matters

This section sets out our framework for managing environmental, social and governance (ESG) risks in line with our overall risk management framework. It also includes an overview of the policies we have in place for ESG matters.

#### ESG risk management framework

##### The seven steps in the ESG risk management framework<sup>1</sup>



#### Examples of tools and processes:

- 1 ESG risk management and strategy, target-setting and climate strategy
- 2 Environmental and social risk heatmap, financial materiality assessment
- 3 Portfolio scenario analysis, CASY (Client Assessment on Sustainability), stress testing
- 4 Lending criteria, risk policies, engagement
- 5 Risk appetite on ESG risks
- 6 ESG risk reporting at client unit risk and executive committees
- 7 Insights on ESG risks to decision-making

ESG risk is managed in line with the bank’s enterprise risk management cycle (ERM cycle). The risk governance in place, together with the ESG Risk Policy, which sets requirements for managing ESG risk, is referred to as the ESG Risk Management Framework. It ensures oversight of risks relating to ESG matters and operationalises how we manage them. The ESG Risk Management Framework applies to new and existing clients and suppliers throughout their lifecycle (i.e. from acceptance, through ongoing due diligence to a potential exit).

### ESG Risk Policy

Depending on what part of the value chain is under consideration and what role ABN AMRO plays in it, ESG risk and its underlying factors will be managed via different policies and standards. The figure below provides an overview of ESG-related risk policies and standards that apply.

The ESG Risk Policy, together with the underlying ESG risk standards, generic principles and related exclusions, defines requirements that apply across the bank and provides the framework for managing ESG risks within our defined risk appetite. The policy is reviewed annually to incorporate new insights and best practices, stakeholder perspectives and internal and external developments, and to ensure alignment with the latest regulatory guidance.

In principle, we neither directly provide financial products or services to activities on our Exclusion List, nor engage in business with companies listed on our Controversial Weapons List.

The ESG Risk Policy articulates how the bank puts the Enterprise Risk Management cycle into practice in relation to our new and existing clients and suppliers for the duration of the lifecycle (i.e. from onboarding, through to ongoing due diligence and engagement to potential exit). More specifically, the ESG risk policy acts as an umbrella document and includes:

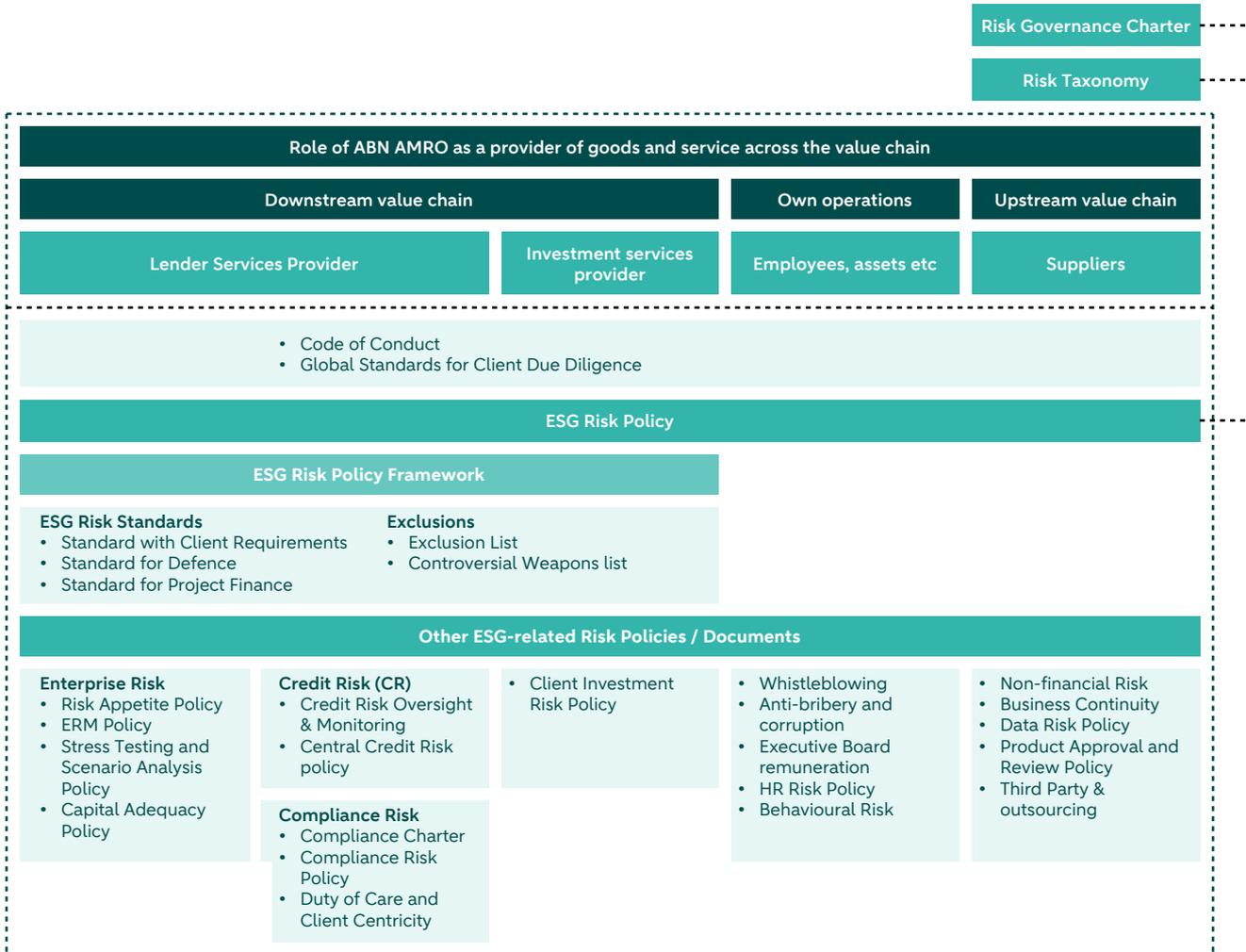
- The definition of ESG risks and related ESG terms.
- Requirements that apply to the first line of defence and the second line of defence across the ERM cycle.
- The framework for managing ESG risks as a risk driver across traditional risk types.
- How oversight of ESG risks is undertaken.

<sup>1</sup> Each step is outlined at the following pages.

- Delegated responsibilities and minimum ESG elements to be considered as part of the bank’s existing governance.

As part of the delegated authority granted to it by the Executive Board, the Group Risk Committee is responsible for approving the ESG Risk Policy. Once approved, the ESG Risk Policy is communicated internally across the first and second lines of defence, which are responsible for its implementation.

### Risk policies in place to manage ABN AMRO’s ESG matters



## Generic principles

### ESG requirements that apply to 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.

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

The ESG Risk Policy starts with the setting of the business strategy by the first line of defence. However, the business strategy on ESG matters cannot be set in isolation. It needs to align with the bank's risk appetite and risk policies in the second line of defence.

As a result, the business strategy and strategic decision-making are closely linked to risk control and oversight through the Enterprise Risk Management (ERM) cycle (described in the next sections):

- ESG risks shape strategic decision-making. For example, the bank's climate strategy was developed partly in response to climate-related transition risks. Likewise, decisions to engage with specific clients or group of clients to support their transition to a more ESG-mature business model are based on client- or sector-level risk assessments. Similarly, decisions to reduce, maintain or expand certain portfolios are informed by our insights into ESG risks. For example, our ambition to support the transition of the European defence industry and our related ESG risk management framework were reviewed in 2025.
- Strategic objectives guide ESG risk management. For example, our risk appetite limits take into account several elements, such as our long- and medium-term targets on carbon reduction. In addition, the ESG Risk Policy, together with its related exclusions and ESG risk standards, is reviewed regularly to ensure alignment with our broader strategic objectives, including assessing our clients' compliance with these goals.

## Risk identification and materiality assessment (step 2)

We assess the non-financial ESG risks (own operations and downstream) based on the scenario & stress testing methodology.

For identifying risks in our downstream value chain we rely to a large extent on our Environmental and Social Risk heatmaps. These heatmaps inform, for example, the materiality assessment, the internal stress testing and the risk appetite.

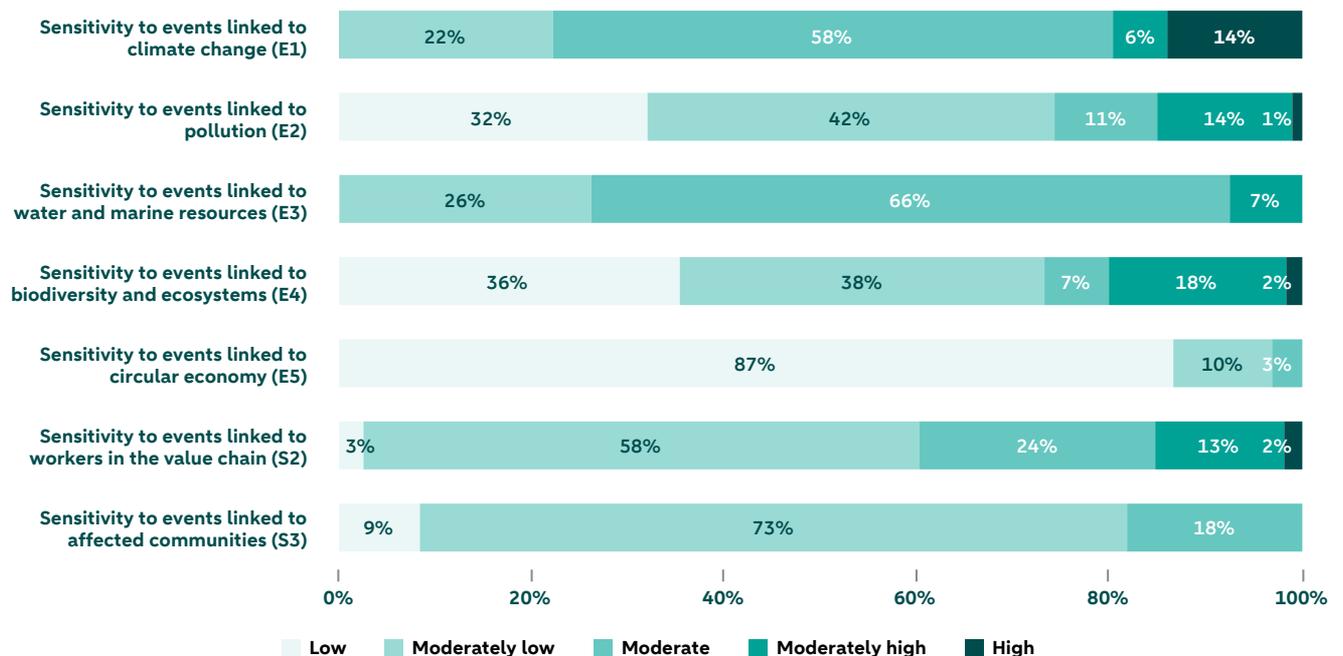
Alongside our risk heatmaps, we scan our emerging risks on a quarterly basis. Risks identified as the most significant following the emerging risk scan and assessment with our internal expert stakeholder group are fed into our Risk Event Register (RER), which subsequently informs our risk taxonomy and scenario booklet.

The Environmental and Social Risk heatmaps identify separate 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 (72 distinct sub-sectors) and a geographical lens (regions and countries to which we have exposure, either directly or through the sub-sectors’ value chains). In 2025, we refined the granularity of our sub-sectors, further enhancing the segmentation of our heatmaps. As a consequence, the sub-sectors used to analyse our business environment increased from 64 to 72 (such as isolating cleaning activities and outsourcing agencies), to better reflect higher social risk sensitivity in our client assessment tool.

The sensitivities 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 impacts. The overview of Environmental and Social Risk heatmaps for corporate loans shows an aggregated score of the negative impact, transition risk and physical risk scores in order to provide an overview of sensitivities across sectors, broken down by topic.

The results in the figure below indicate that 20% of our portfolio comprises clients active in sub-sectors with potentially high or moderately high sensitivity to environmental topics, driven by either physical or transition risks. This applies particularly in respect of climate change and pollution, where 20% (14% and 6%) and 15% (1% and 14%) respectively, of our corporate loans are in sub-sectors with a potentially high or moderately high sensitivity to these risks. With regard to social topics, we consider human rights impact to be the main driver of social risks, representing an inside-out negative impact. This applies mainly in respect of workers in the value chain, with 15% (2% and 13%) of our corporate loans being in sub-sectors with a potentially high or moderately high sensitivity to these risks.

### Overview of environmental and social risk heatmaps for corporate loans<sup>1,2</sup>



### Risk assessment and measurement (step 3)

ABN AMRO uses various tools to assess and measure ESG risk at different levels:

- At a bank level: ESG risks are considered under our materiality assessment and internal stress testing scenarios.

<sup>1</sup> 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 considers sensitivity to transition and physical risks. For E5, S2 and S3, this takes into account sensitivity of negative impact related to transition risks.

<sup>2</sup> 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.

- At a portfolio level: We use scenario analysis (including climate resilience analysis) to assess the impact of specific ESG risks in our client portfolios across the short, medium and long term. In 2025, climate scenario analyses were performed for, among others, the residential and commercial real estate portfolios. In addition, the product approval and review process considers ESG risks, alongside other risks, that may arise in our product offering, such as residential mortgages.
- At a client level: ESG risks of clients are taken into account and assessed as part of the new client take-on and review (primarily for corporate clients, and where applicable for natural persons) and corporate credit approval request and review. ESG risks of corporate clients are assessed based on the size, sector and maturity of the corporate client's transition to a more ESG-friendly business model. This is carried out via various tools:
  - (i) the Client Assessment on Sustainability (CASYS) questionnaire applies to clients with a lending relationship above EUR 1 million and addresses clients' compliance with the bank's ESG risk management 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 CASYS and RCT output are included in the credit risk assessment, second-line validation and credit risk decision.
- At a supplier level: ESG risks of our key suppliers are taken into account and assessed when we enter into new contracts and during the renewal of existing contracts. Our 2025 salience assessment identified relevant human rights risk drivers. ESG risks are measured using our ESG risk assessment tooling based on data provided by suppliers.

#### Risk response (step 4)

To ensure that ESG risks are managed in line with the bank's risk appetite and strategic objectives, mitigating actions are implemented at three levels: the bank, portfolio and client levels.

ESG risk mitigation measures include:

- Sector and activity exclusions: certain sectors and activities are excluded from our lending products and all our banking services, as outlined in the bank's Exclusion List (for example animal fur, cultivating tobacco and manufacturing tobacco products).
- Enhanced requirements for corporate lending: strict ESG-related requirements apply under the ESG Risk Standard with Client Requirements.
- Integration into risk policies: ESG risk considerations are embedded in the bank's credit risk and business risk policies.
- Climate strategy: targeted strategies for high-emission sectors, portfolio management and wider sector approaches support the bank's climate objectives.

#### Client engagement

An important risk mitigating measure is to engage with our corporate clients (downstream) and suppliers (upstream) that do not comply with our standards and have not made sufficient progress with their ESG risk performance. Different levels of engagement apply, depending on the outcome of the ESG risk assessment at either the individual or the portfolio level. Oversight is carried out via the Engagement Committee which meets on a quarterly basis.

The overall approach to client engagement remained unchanged during the reporting period. Engagement with corporate clients can be divided into four general categories, as follows:

- Normal intensity: an ongoing process tailored on the outcome of the client's ESG risk assessment and improvement areas. It is used as a mitigating action at the client level and focuses primarily on supporting the client's transition to a more ESG-mature business model on issues that are relevant to its sector and size.
- Focus list: if a client's transition to a more ESG-mature business model is insufficient or if key ESG developments occur in its profile, the client will be considered for the focus list. In practice, this means the client is monitored more frequently and progress is presented at the Engagement Committee on a quarterly basis.
- High intensity: if the client continues to demonstrate insufficient progress on its transition to a more ESG-mature business model, a formal, time-bound process is established involving setting detailed objectives. It could potentially lead to exiting the client relationship.
- Thematic engagement: this category applies if we identify that on average a sector or industry is at risk of breaching the bank's ESG-related requirements. Various teams within ABN AMRO can propose a thematic engagement, and the decision to engage is made by the Engagement Committee. Thematic engagements are used for risk mitigation

purposes, as well as to achieve our strategic objectives for accelerating the transition to a more ESG business model. There was no thematic engagement in 2025.

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

Monitoring activities help in evaluating whether risk responses are functioning as intended to keep risk exposures within the bank's risk appetite.

- As described in the Risk management framework section of the Annual Report 2025, the Strategic Risk Appetite Statement (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 Paris-aligned decarbonisation targets contained in our policies and climate strategy.
- (see Strategy and business model - Changes in material topics section in the Annual Report 2025). The ESG risk appetite is defined through key risk indicators (KRIs), which address ESG factors and risks. To ensure ESG risks remain within the approved risk appetite, we set limits and checkpoints and monitor them quarterly at the bank-wide, entity and local levels. This approach enables timely mitigating actions.

The KRIs related to our material risks are disclosed in the sections indicated in the table below. These encompass both physical and transition climate risks.

- We monitor the sector performance and the exposure coverage of the climate strategy, which supports effective management of climate transition risks across risk types.
- In addition, we track our exposure to carbon-related assets and the ratio of vulnerable collaterals in high physical risk areas.
- These indicators are reviewed on an ongoing basis as more granular insights and data become available over time.

For more information on the bank's risk appetite framework and the ESG risk reporting frequency, refer to the EU-OVA.

### **Governance of sustainability matters**

This section sets out the governance of sustainability matters. The focus of this section is on changes to the governance in 2025 and the roles of the Executive Board and the Supervisory Board.

#### **Roles and responsibilities**

The Executive Board's procedural rules guide its functioning and internal organisation. Each Executive Board committee also has its own procedural rules. The same applies to the Supervisory Board and its committees.

#### **Executive Board and its committees**

The Executive Board is responsible for the continuity of ABN AMRO and its affiliated business undertaking as well as for sustainable long-term value creation. The Executive Board sets and implements ABN AMRO's strategy, to which long-term sustainability is central. The Executive Board considers, among others, impacts, risks and opportunities when setting out the sustainability-related elements in its strategy and targets. Sustainability is taken into account via KPIs as described in our Remuneration Report in the Annual Report 2025, which helps drive accountability. The Executive Board is also responsible for compliance with sustainability regulations applicable to ABN AMRO.

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. For instance, the Group Risk Committee (GRC) is responsible for ESG risk management and for reviewing and steering ABN AMRO's risk profile within the scope of ABN AMRO's risk appetite. This committee also evaluates the short-, medium- and long-term effects of ESG risks on ABN AMRO to support the Executive Board in making informed strategic and business decisions. As a subcommittee of the GRC, the Engagement Committee is responsible for overseeing ABN AMRO's engagement activities regarding clients, sectors and (material) suppliers in relation to ABN AMRO's Environmental, Social and Governance expectations. 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. The committees of the Executive Board are chaired by an Executive Board member and involve senior leadership as members. Having dedicated Executive Board committees underscores the importance of sustainability at the highest level.

### **Supervisory Board and its committees**

The Supervisory Board supervises and advises the Executive Board in the exercise of its powers and duties, including in relation to sustainability. Each of the Supervisory Board's committees addresses sustainability aspects within its area of expertise. For instance, the Supervisory Sustainability Committee supervises sustainability aspects of the strategy and policies. These cover a broad range of topics, including those covered in the European Sustainability Reporting Standards (ESRS).

### **Sustainability governance in relation to risks, impacts and opportunities**

The Executive Board maintains oversight on impacts, risks and opportunities in relation to sustainability matters, with assistance from (among others) Group Strategy and the GRC. In 2025, SCE was responsible for conducting the DMA. Group Strategy conducted the integration of the DMA results in ABN AMRO's strategy. The Executive Board has mandated the GRC to manage ESG risks and negative impact. Generally, negative impact and risk are managed through our ESG risk management framework and in line with our enterprise risk management cycle. This includes controls and oversight by the GRC. Generally, positive impact and opportunities are included in our strategy (particularly business strategy) cycles, as overseen by the Executive Board. In 2025, positive impact and opportunities were managed by Group Strategy, SCE and the CSO.

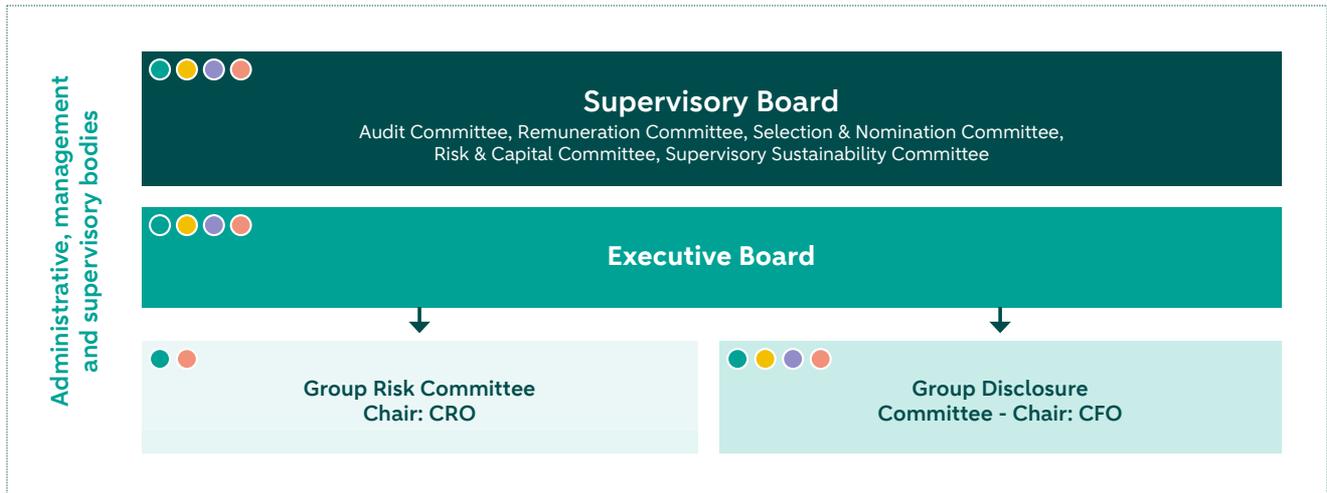
### **Information provided to and sustainability matters addressed by the Executive Board and Supervisory Board**

Sustainability matters are discussed on a regular basis during meetings of the Executive Board and the Supervisory Board. The Executive Board generally meets on a weekly basis, and the Supervisory Board meets at least six times a year. The Executive Board and the Supervisory Board also receive information from relevant governance bodies on sustainability matters, including impacts, risks and opportunities. For instance, the Executive Board and the Supervisory Board receive regular updates on progress towards sustainability-related targets that have been set within ABN AMRO and on ESG risks and related developments. Material sustainability topics on the agenda include, among others, the DMA, ESG risks and sustainability reporting.

Members of the Executive Board and the Supervisory Board must have sufficient knowledge and understanding of sustainability. Particular emphasis is placed on (among others) the knowledge, skills and expertise required for effectively managing risks, including AML/CTF, sustainability matters and diversity.

Each year, these Boards formally assess their own performances, including their composition, diversity and effectiveness. Similar assessments take place when members are appointed or reappointed to the Executive Board or the Supervisory Board. This ensures that both Boards collectively possess the necessary skills and expertise, including in relation to sustainability. Given the nature of ABN AMRO's activities, regulators also evaluate topics such as business conduct and climate and environmental risks as part of their suitability assessments. This helps ensure that both Boards are diverse and have the required knowledge and experience. Following their appointment, all new Executive Board and Supervisory Board members participate in a comprehensive induction programme. This includes sessions on sustainability-related matters, covering material impacts, risks and opportunities. As part of the Lifelong Learning Programme, members of both Boards attend additional training sessions to keep their sustainability knowledge up-to-date. Furthermore, knowledge and expertise with regard to sustainability matters is gained via (among others) several deep-dive sessions.

## Sustainability governance structure



- Supervisory oversight
- Overall responsibility
- Risk
- Opportunities
- Positive impact
- Negative impact
- Delegates

## Environment

We focus our efforts on two main topics, which are climate (in line with the publication of our Climate Strategy in 2022), and biodiversity. Environmental topics are highly interconnected.

Climate change, for instance, contributes to biodiversity loss by disrupting ecosystems. At the same time, biodiversity helps mitigate climate change, as healthy ecosystems naturally absorb and store carbon.

### Climate change

#### Climate-related policies

Climate risk is integrated into ABN AMRO’s ESG Risk Policy, which establishes requirements for managing ESG risks, including environmental risks, across the bank’s enterprise risk management cycle. Our climate strategy supplements this policy by defining targets and initiatives aimed at aligning our portfolio and operations with a net-zero trajectory and reducing GHG emissions. For further details, see the section on the ESG risk management framework and ESG Risk Policy.

#### Climate strategy

Our climate strategy outlines our commitment to aligning our portfolios with a 1.5°C scenario 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 guidance of the Net-Zero Banking Knowledge Hub (previously NZBA), we have prioritised sector-specific targets for high-emitting industries. In November 2025, we announced our intention to update our climate strategy (for more details, see the Key enablers of our strategy section of the Annual Report 2025).

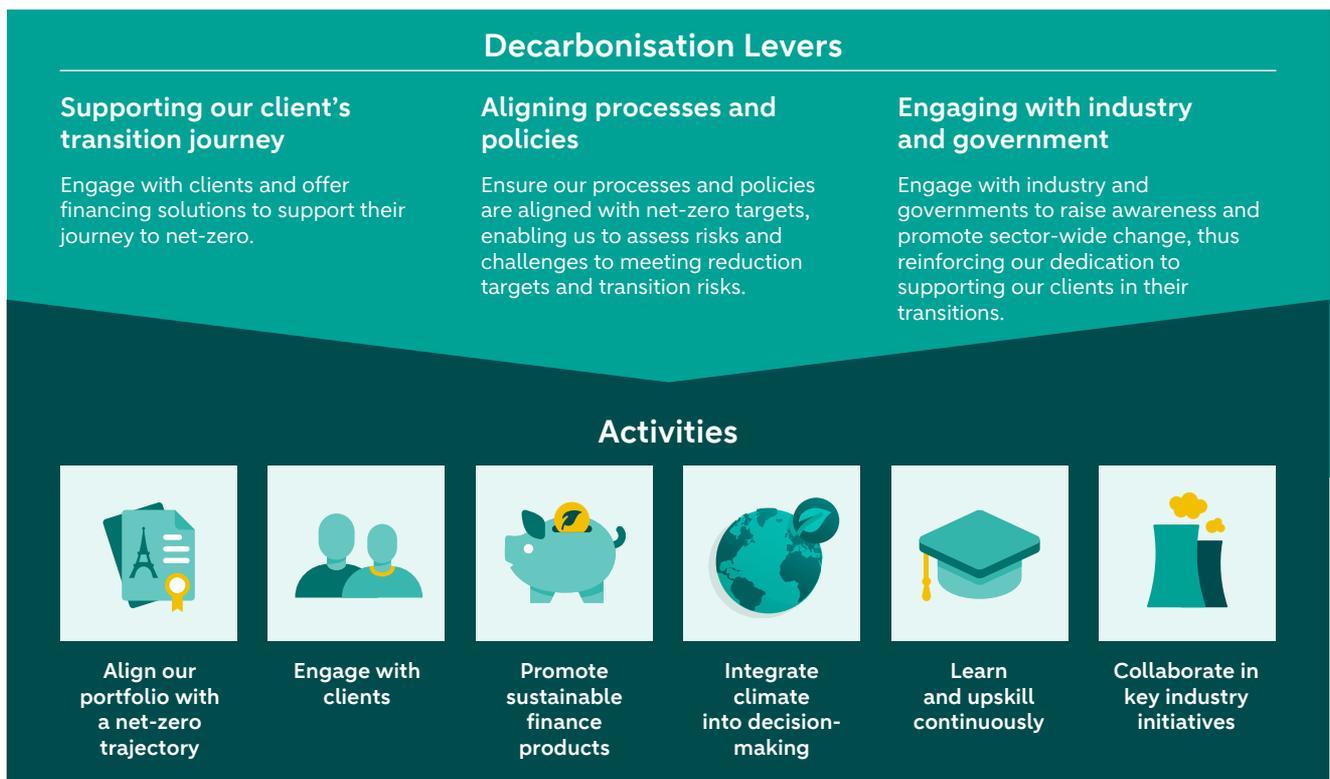
Following recent geopolitical developments and a positive vote by its members to move away from a membership-led alliance to a framework, NZBA ceased operations effective 3 October 2025. Since launching our climate strategy in 2022, NZBA has been a facilitator for its execution, providing guidance on science-based target setting, transition planning, best practices and joint policy advocacy. Over the coming period, the NZBA Steering Board and secretariat will define the details of this new framework. In the meantime, the guidance will remain available to use under the Net-Zero Banking Knowledge Hub. We will continue to reference the Guidance for Climate Target Setting for Banks and supporting implementation resources as a reference for the execution of our climate strategy.

## Decarbonisation levers

Based on the priorities from our climate strategy, we have identified three decarbonisation levers, which ABN AMRO uses to implement specific actions aimed at achieving climate targets for each sector. Our activities are linked to these decarbonisation levers and can be found below in the infographic.

The ESRS are sector-agnostic, which means they do not account for the specific characteristics of the banking industry. Moreover, the indirect influence of ABN AMRO's decarbonisation levers makes it difficult to directly measure their impact on GHG emission reductions. An important lever for supporting decarbonisation efforts is engaging with clients.

Finally, ABN AMRO's climate strategy and actions taken served as the foundation for identifying decarbonisation levers. Climate scenarios were not considered in this process.<sup>1</sup>



## Our approach

### How the targets were set

We have established emission reduction targets across our lending portfolios and client assets, focusing on responsible carbon intensity reduction.

To achieve our targets, we rely on assumptions embedded in the underlying sector-specific benchmarks, including the development of emerging technologies and shifts in consumer demand.

Regarding our 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 commercial real estate, we have chosen science-based benchmarks that are aligned with the latest 1.5°C scenario reference pathways. 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 Global Warming Potential (GWP) values and considers the implemented and proposed policies of the

<sup>1</sup> As the ESRS are sector-agnostic, they do not account for the specific characteristics of the banking industry. Additionally, the impact of our decarbonisation levers cannot be directly quantified in terms of GHG emission reductions due to the indirect nature of their influence within ABN AMRO's portfolio. Finally, ABN AMRO's climate strategy and actions taken served as the foundation for identifying decarbonisation levers, and climate scenarios were not considered in this process.

Dutch Coalition Agreement and its ability to fulfil the EU FIT for 55 goals. See the explanation on commercial real estate below. For client assets in 2025, we have aligned our reduction pathway with the 1.5°C scenario outlined in the Intergovernmental Panel on Climate Change (IPCC) Special Report, following current guidance and science-based net-zero investment frameworks.

### Overview of sectors and targets

For an overview of sectors and targets within the scope of our climate strategy, refer to the Annual Report 2025.

### Climate risk

Climate risks are deemed material in relation to our clients (downstream: physical and transition risks) and own operations (physical risk) as per the 2025 DMA (see the section on Determining financial materiality of risks). Climate risks are managed as explained under the Risk management of ESG matters section of the Sustainability Statements of the Annual Report 2025.

### Effect of climate risk on traditional risk types

The financial impact of climate risks was assessed as material for credit risk, business risk and non-financial risk, and as not material for market risk trading book, market risk banking book and liquidity risk.

ESG risks are integrated into the regular risk management processes of relevant traditional risk types. Accordingly, related to each traditional risk type there is responsibility for identifying, assessing, monitoring and reporting on material ESG risks related to their risk type, in accordance with the ESG risk management framework and as per the risk policies in place to manage ABN AMRO's ESG matters.

### Credit risk

In relation to our corporate lending activities, climate transition risks are assessed as material in the long term. The governmental carbon reduction policies are expected to lead to higher costs for our corporate clients operating in vulnerable sectors (downstream), negatively impacting their financial position and creditworthiness.

Such risks are assessed, monitored and to the extent possible mitigated, throughout the credit risk management process, via ESG risk assessment during new client take-on and credit approvals, client engagement, monitoring of climate risk KRIs (see the Risk management of ESG matters section in the Sustainability Statements chapter of the Annual Report 2025) provisioning and capitalisation. Effects of climate physical risk on the residential and commercial real estate portfolios are also closely monitored in accordance with the regulatory requirements. See the Strategy and business model section of the Sustainability Statements chapter in the Annual Report 2025 for more information on provisioning and capitalisation.

### Business risk

Climate transition risk is assessed as material in the long term. Climate policies, technology, innovation and changes in client behaviour can impact our products and services (own operations), as well as our earnings from the sectors vulnerable to the climate transition (downstream). For more details on these risk drivers, see the Business risk section of the Annual Report 2025. We assess the resilience of our business model to these risks, and use our climate strategy and portfolio steering to mitigate them. Resilience of our business model and strategy is disclosed in further detail in the section on Current and anticipated effects of material matters - Effect on strategy and business model in the Annual Report 2025.

### Non-financial risk

We consider climate physical risk and climate transition risk to be material at all time horizons. In our own operations, data centre failure and greenwashing are considered material risk events. Greenwashing refers to the risk that our sustainability-related statements or actions do not clearly and fairly reflect the underlying sustainability profile of ABN AMRO, its products and its services, and may therefore be misleading to our clients or other stakeholders. Our committees review our public disclosures for greenwashing risks. Periodic reviews of our product disclosures, policies and standards and staff training events also consider this risk and how to mitigate it. In our downstream value chain, the duty of care relating to our residential mortgages' portfolio is assessed as material. This refers to climate risks such as the foundation risk assessed under our climate scenario analyses for our mortgage portfolios. We mitigate the duty of care risk by monitoring litigations and by investing in client awareness and data quality. The identified risk drivers

(transmission channels) for these risks are legal costs, cost of compliance, operational losses and expenses. Material climate risks in our business operations were considered in the economic capital calculation and the ICAAP stress test. The Non-financial risk section of the Risk, funding & capital chapter in the Annual Report 2025 provides further information on management of non-financial risk types.

### Climate risk-mitigating processes

Climate risk management takes place at all stages of our ESG risk management framework. In this section, we highlight quantitative insights from our climate risk management processes.

Our environmental and social heatmaps relating to climate risks enable us to identify corporate clients (downstream) or suppliers (upstream) operating in sectors vulnerable to climate risks. Through climate scenario analyses, we assess the risks under our client portfolios, particularly in residential and commercial real estate sectors (downstream). Breaking down our portfolios by energy label and GHG emissions enables us to measure our progress. For information about the climate physical risk, refer to EU-ESG5.

### Climate risk heatmap

The climate risk heatmap 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 Global Impact Database sources), alongside various regulatory, technological and market parameters. The regulatory parameters function at two levels:

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

The results of the heatmap show that the highest sensitivities (Moderately high and High) are in the agricultural (NACE A), mining (NACE B), manufacturing (NACE C), power generation (NACE D), transport sectors (NACE H) and food and beverage service activities (NACE I). Compared to last year, there are no significant changes in subsector with moderately high or high sensitivity.

### Climate scenario analysis, scenario choice and data

We consider climate scenario analyses in medium- and high-risk sectors as per our environmental and social risk heatmaps to further investigate portfolio-specific risks. In 2025, we performed climate scenario analyses of our residential real estate, commercial real estate and road transportation portfolios.

The analyses of our residential and commercial real estate portfolios were performed against several long-term (to 2050) climate change scenarios. They 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 reflected a high-emission scenario, where no additional efforts are made to constrain greenhouse gas emissions.

For the physical risk assessment, vulnerability was defined, among others, as clients with high loan-to-value and loan-to-income ratios, and collateral with an energy label of D or lower. The impact of climate risk events on clients' creditworthiness was assessed and calculated in terms of RWA and provision requirements. The outcomes of the assessment served as an input for the financial materiality assessment.

For more information, see the section Determining financial materiality in the Strategy and Business Model section of the Sustainability Statements chapter of the Annual Report 2025.

Foundation problems are an important driver of physical climate risk in the Dutch real estate sector. Property-specific data on foundation risks was obtained from the Kennis Centrum Aanpak Funderingsproblematiek (KCAF). Granular data on the other physical climate risk drivers (flooding, wildfires and heat stress) was obtained from Climate Adaptation Services (CAS). The CAS data is partly based on scenarios provided by the Royal Netherlands Meteorological Institute (KNMI), which closely align with the Network for Greening the Financial System (NGFS) current policies scenario.

The climate scenario analysis results as published in our Annual Report 2025 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 during 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.

## Biodiversity

Through our DMA, we have defined Biodiversity as a material matter from an impact materiality perspective. This is based on its relevance to the sectors we finance, such as dairy farming and deep-sea shipping, in our downstream value chain. We are currently investigating and further specifying the impacts for these sectors.

By providing financial products to our clients, we support their value creation processes, which directly impact biodiversity. Negative impact occurs via multiple drivers of biodiversity loss, affecting sectors in differing ways. Our approach to biodiversity therefore focuses on mitigating the impact of our clients' activities.

ABN AMRO makes use of the transitional provisions for E4-Biodiversity that were introduced through the targeted 'quick fix' amendments to the first set of ESRS.

## Social

Through our DMA of the Social standards, we have identified Own workforce and Consumers and end-users as material topics. In comparison with 2024, Workers in the value chain is no longer a material topic; however, relevant information is provided in the ESG Annex of the Sustainability Statements chapter in the Annual Report 2025.

### Own workforce

Based on the Double Materiality Assessment, we have identified the impact of Diversity, Equity and Inclusion (DE&I) 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 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 is accountable for managing the HR and behavioural risks across ABN AMRO, with day-to-day management responsibilities delegated to the Group Risk Committee (GRC).

### HR Risk Policy

ABN AMRO defines the HR risk as part of its risk taxonomy, which integrates into ABN AMRO's Enterprise Risk Management (ERM) framework. The 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 complying with 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 internal employees, and where relevant to external employees and non-employees working for 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 refers to DE&I best practices in line with the Dutch Corporate Governance Code. To guide employees in ethical behaviour, both within and outside the organisation, ABN AMRO emphasises its Code of Conduct alongside HR risk management policies.

### Diversity, Equity & Inclusion policy

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

Our DE&I policy encourages equal treatment and equal opportunity across all areas of the organisation through initiatives such as the Diversity Circle and Diversity Table within the Netherlands, 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 laws.

ABN AMRO has integrated its DE&I policy into various processes to promote inclusivity across the organisation. For example, 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. Procedures aiming to prevent, mitigate and remediate discrimination are included in the policy, for example disciplinary actions to be taken if discrimination is detected.

### Behavioural Risk Policy

The Behavioural Risk Policy is designed to safeguard an enabling and supportive working environment, empowering internal and external employees to act in line with ABN AMRO's core values: care, courage and collaboration, and our Code of Conduct. This policy also anchors the importance of 'speak-up channels' for employees to share concerns and feedback in a safe and constructive manner. To monitor the behavioural risk, ABN AMRO conducts employee surveys to gain insights into their views of the work environment. These insights help the organisation take targeted action where needed.

The policy contributes to strengthening ABN AMRO's culture and promoting desirable behaviour across all levels of the organisation. By addressing the behavioural risk proactively, the policy helps protect our clients, employees, society and ABN AMRO from potential negative outcomes, with the aim of upholding trust and integrity.

### 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 interaction with trade unions. Specific topics, such as development, performance and personal circumstances, are often addressed through direct dialogue between the employee and their line manager.

The DE&I policy, which is accessible to our workforce, outlines the organisation's involvement in driving inclusive policies, interventions and activities. Engagement with employees on DE&I topics occurs through initiatives such as 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 is accountable for managing the DE&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 Dutch trade union federation FNV and the UNI Global Union. This agreement formalises ABN AMRO'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 ABN AMRO's adherence to the IFA and offers unions an opportunity to share workforce-related insights.

Regular employee surveys are used to determine areas of success and identify opportunities for improvement within ABN AMRO. These surveys include questions about the DE&I policy and employees' perspectives on its effectiveness. Our own workforce is encouraged to provide additional feedback or ideas related to DE&I through our Employee Resource Groups, enabling ABN AMRO to assess the effectiveness of its engagement and inclusivity efforts.

For non-employees working for ABN AMRO through third-party suppliers, the bank opens a Supplier Conduct Feedback Channel, allowing them a channel to express their perspectives as well.

## Employment conditions supporting environmental and social awareness

Sustainability is part of ABN AMRO's performance management processes. It is directly included in the KPI frameworks of Identified Staff, including the Executive Board. For CLA employees, sustainability is included in the calculation of the pool for discretionary variable remuneration. See our Remuneration report in the Annual Report 2025 for more information on employment conditions contributing to social sustainability.

## Our targets related to own workforce

### ABN AMRO NL D&I targets for 2026:

#### Gender representation

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

#### Cultural diversity

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

#### Inclusion of vulnerable and underrepresented groups

- Support the participation of at least 225 people with an occupational disability
- Continue the annual hiring of 20 people with a refugee background

The hiring freeze implemented in April 2025 has impacted ABN AMRO's workforce composition and, consequently, our diversity figures. For example, the pause of the B-Able programme between April and November resulted in 147 colleagues with occupational disabilities, compared with the long term target of 225. In addition, we did not meet our annual target of hiring 20 people with a refugee background; the total remains 127, unchanged from 2024. In line with our dedication to social responsibility, exceptions were made during the hiring freeze to allow B-Able and Reboot employees to continue entering the organisation, ensuring ongoing support for this important group.

Gender diversity targets continue to be an area of focus. Women currently represent 34% of the Extended Leadership Team against a 48% ambition, with senior and middle management representation also below the 35% target. Cultural diversity targets were met at the middle-management level, while senior management offers opportunities for further improvement (For more details, see the Diversity targets table in the Sustainability section of the Performance on our strategy chapter in the Annual Report 2025).

We will continue to build momentum and work steadily towards our long term ambitions.

## Workers in the value chain

Based on the 2025 materiality assessment, Workers in the value chain was no longer deemed a material topic. We approach this topic from the perspective of our human rights related commitments.

## Human rights related disclosures

'Workers in the value chain' was not deemed material in the DMA conducted in 2025 and is therefore not included in the Sustainability Statements. Our human rights approach is based on the human rights due diligence requirements as outlined in the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises (OECD) (due diligence steps 1-6). This section contains the disclosure requirements in line with the UNGPs, OECD Guidelines and Norwegian Transparency Act and describes (among other information) the outcome of the updates to the Human Rights Saliency Assessment. Although there are similarities, the methodology of the saliency assessment may deviate from the DMA methodology and therefore yield different outcomes.

### **Our commitments to human rights**

In addition to the policy framework described in the section the section Risk management of ESG matters in the Sustainability Statements chapter of the Annual Report 2025, our dedication to respecting human rights is embedded in our Human Rights Statement, our Modern Slavery Statement and our Supplier Code of Conduct.

The Human Rights Statement articulates our dedication to respecting human rights and is aligned with international frameworks such as the UNGPs and the OECD Guidelines. It sets expectations for ABN AMRO and our clients, investments and suppliers. It also highlights the importance of identifying and addressing salient human rights issues and outlines our governance of human-rights-related issues.

Through our Modern Slavery Statement, we disclose how we identify and address modern slavery risks, including forced labour, human trafficking and exploitation. In 2025, we strengthened our frameworks for client and supplier engagement and expanded our monitoring mechanisms. These enhancements reflect our dedication to combating modern slavery and fostering transparency across our operations.

### **Our human rights due diligence in action**

In 2025, we updated our Human Rights Saliency Assessment for the role of Procurer. This assessment identifies the most salient human rights issues across our business activities, focusing on areas where ABN AMRO's operations have the greatest potential impact on people. Through stakeholder consultation, we identified the most severe and likely human rights impacts. Following desk research, a data analysis was carried out that focused on refining the initial results. These findings were then validated.

Addressing modern slavery and forced labour remains an important focus of our work. In 2024, we began closely monitoring press coverage of modern slavery, even when this was not related to specific ABN AMRO clients. This external intelligence analysis revealed a rise in reports of labour exploitation in the Netherlands and a global increase in human trafficking. Therefore, in early 2025 we performed an investigation to deepen our understanding of modern slavery practices, evaluate the bank's exposure to related risks and refine our approach to combatting this pervasive issue. It also enhanced our intelligence position, enabling us to identify connections to financial economic crime-related risks and initiate targeted actions to address them. This effort reflects our dedication in 2025 to proactively combating modern slavery and informed the preparation of our annual Modern Slavery Statement.

Additionally, in 2025 we enhanced our engagement with clients on human rights, equipping coverage bankers with guidance on key topics such as grievance mechanisms, stakeholder engagement, child labour and forced labour, human rights due diligence and free prior and informed consent.

We continued integrating sustainability and human rights considerations into our procurement practices, ensuring alignment with international frameworks. One of the key milestones in 2025 was the introduction of the Sustainability Risk Procedure for suppliers, that outlines our sustainability due diligence requirements for the supply chain. This procedure is designed to proactively assess and manage environmental, social and governance risks associated with our suppliers, addressing critical human rights topics and fostering responsible business conduct throughout our supply chain.

### **Our collaborative approach on human rights topics**

We understand that addressing human rights challenges requires collective action. In 2025, ABN AMRO continued its co-leadership in the UNEP-FI Working Group on Decent Work, a partnership with other banks and the International Labour Organization to promote ethical labour practices globally. Together, we developed a UNEP-FI guidance framework for setting targets, taking action and monitoring progress on decent work standards.

In relation to access to remedy, we hosted a conference in May titled 'How to Facilitate and Enable Access to Remedy in Business-Related Human Rights Abuses'. This event brought together NGOs, human rights experts, companies and peers to explore the role of financial institutions in addressing business-related human rights abuses. Finally, 2025 marked the first year of our Human Rights Remedy Mechanism (HRRM) pilot. While three cases were reviewed during this phase, none met the eligibility criteria. For more information, please visit the dedicated website.

## Consumers and end-users

Through our DMA, we have identified Privacy of client data and Suitability of products and services as material matters from an impact materiality perspective. ABN AMRO makes use of the transitional provisions for S4-Consumers and end-users that were introduced through the targeted 'quick fix' amendments to the first set of ESRS.

### Privacy

#### Policies related 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). 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.

The Personal Data Policy applies to all personal data originating within the European Economic Area (EEA). Staff outside the EEA who have access to this data must also adhere to its principles. Additionally, this policy generally extends to personal data originating outside the EEA.

Oversight, execution and monitoring responsibilities are designated to the Executive Board and Senior Management, ensuring that the governance of personal data handling is embedded at the highest levels of the organisation.

The Third Party & Outsourcing Risk Policy sets the minimum requirements for managing the third party and outsourcing risk. The Third Party & Outsourcing Risk Policy is supported by the ABN AMRO Procurement Standard and consequently the Supplier Code of Conduct. Through that Code, ABN AMRO aims to ensure that our suppliers meet our requirements and principles as stipulated in the Personal Data Policy and BCRs with respect to data security and privacy.

We expect our suppliers to safeguard personal data and confidential information from unauthorised use, disclosure, access, loss, alteration, damage and destruction. The Supplier Code of Conduct also aims to ensure that suppliers handle information in compliance with national and other laws, regulations and guidelines and have a documented Data Privacy & Protection Policy. Furthermore, the Supply Chain Security Standard reinforces security measures, such as cyber threat monitoring, to ensure robust protection of client data throughout the supply chain.

#### Dialogue & engagement relating to privacy

ABN AMRO safeguards client privacy through a structured framework of proactive and reactive measures, including lawful data processing, respect for data subject rights, robust data security, controlled data retention, responsible data sharing and transfer, oversight of automated decision-making and profiling, and effective handling of privacy complaints.

Comprehensive details on GDPR compliance and client privacy rights are outlined in the ABN AMRO Privacy Statement, which is accessible via ABN AMRO's website, mobile apps and client documentation. Clients are kept informed through those channels about data use and their privacy rights.

ABN AMRO uses reactive engagement channels to address data breaches, privacy complaints and data subject rights requests. In the event of a data breach, ABN AMRO follows a strict protocol to adhere to the regulatory notification requirements in the proper time. Affected clients are informed of relevant breaches unless there are compelling reasons not to do so. Privacy complaints are addressed through a structured grievance mechanism designed to resolve issues promptly.

Under the GDPR, ABN AMRO ensures that data subject rights, including access, rectification, erasure, restriction of processing, data portability and objection to processing, are managed by specialised staff. Consumer engagement occurs mainly during data breaches, complaints and data subject rights requests.

Privacy risk accountability lies with the Executive Board members and is integrated into the bank's broader risk management framework. This framework focuses on identifying, mitigating and monitoring privacy-related risks.

Together, these responsibilities ensure continuous improvement in privacy practices through feedback, audits and reviews.

All privacy efforts align with ABN AMRO's Duty of Care & Client Centricity principles, emphasising consumer interests in our decision-making, as reinforced by the Privacy Statement.

### **Grievance mechanisms and remediation channels**

ABN AMRO ensures effective feedback channels for consumers and end-users to report privacy concerns. Complaints are handled promptly across multiple platforms, tracked until resolution, and followed by satisfaction surveys to evaluate effectiveness and client satisfaction.

ABN AMRO addresses material privacy-related negative impacts through its complaints and operational management processes, ensuring concerns raised through official channels are addressed. Privacy negative impact management is aligned with the general ESG risk management approach, which is explained in the Risk management of ESG matters section of the Sustainability Statements chapter in the Annual Report 2025. Escalation and crisis management procedures ensure effective handling of significant privacy issues. ABN AMRO uses the Privacy Dashboard to identify recurring issues and drive process improvements, and monitor the effectiveness of its privacy measures, integrating data into risk reports and evaluations. The Complaints Management Dashboard identifies trends in recurring privacy-related issues and supports identification of mitigating actions to prevent future recurrence.

### **Our approach to action for privacy**

ABN AMRO is dedicated to safeguarding the data, privacy and assets of its clients and employees by fostering a robust privacy foundation. The bank has implemented procedures under its Personal Data Policy to mitigate negative impacts across its entire value chain.

ABN AMRO expects its direct suppliers to adhere to the Supplier Code of Conduct and comply with applicable privacy and data protection standards, as part of its dedication to responsible business practices throughout its supply chain. To support this objective, appropriate monitoring activities are carried out. Furthermore, direct suppliers are required to submit comprehensive information regarding their data and IT security measures, including relevant security certifications, Information Security Policies and incident management processes.

ABN AMRO has also initiated a bank-wide privacy programme to strengthen its privacy risk management framework. Current efforts focus on translating Personal Data Policy requirements into actionable standards, procedures and guidelines. We are in the process of establishing renewed controls to monitor and evaluate privacy-related negative impacts.

### **Targets related to privacy**

In 2025, no privacy-specific targets were tracked. Reporting is conducted as outlined in the Risk Appetite Statement, which monitors the percentage of data breaches reported beyond the required timeframe and the volume of client complaints related to data protection.

## **Suitability of products and services**

### **Policies related to suitability of products and services**

#### **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 our clients and are offered to a defined target market, while considering relevant negative impacts for clients, ABN AMRO and external stakeholders.

The PAR Policy outlines minimum standards for approving, reviewing and modifying new and existing products and services and related processes and systems. It requires that products must be adapted to reflect macroeconomic, social and sustainability changes and that they must comply with all relevant regulations. Additionally, the policy aligns with ABN AMRO's Client Centricity Principles and is an integral part of the bank's risk governance.

The Executive Board holds accountability for managing product approvals and maintaining an effective PAR process, and the GRC has responsibility for oversight.

### **Duty of Care and Client Centricity Policy**

The Duty of Care and Client Centricity (DoC & CC) Policy establishes our approach to managing Duty of Care (DoC) Risk. This policy builds on the bank's Client Centricity Principles. The bank-wide Client Centricity Principles guide how we handle our clients' interests, covering aspects from understanding clients' needs and behaviours to ensuring that products and services are suitable, useful and easily understood. By upholding these principles in our daily work, we are dedicated to enabling our clients to make responsible and informed decisions.

The DoC & CC policy serves as an umbrella policy, providing structure and direction for DoC & CC-related 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 Enterprise Risk Management (ERM) cycle

Oversight on policy adherence is assigned to Compliance.

### **Client Categorisation, Suitability and Appropriateness Policy**

The Client Categorisation, Suitability and Appropriateness Policy sets the minimum requirements applicable when providing investment services and activities and ancillary services. Specifically, this policy describes how clients who make use of such services are classified and when/how suitability assessments and appropriateness assessments must be conducted. Compliance has responsibility, as the policy owner, for regularly reviewing this policy and ensuring it is up-to-date, for example in line with regulatory requirements.

### **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 ABN AMRO's Complaints Management Policy. In 2025, the Chief Operating Office maintained overall ownership of the complaints handling process within ABN AMRO.

### **Dialogue & engagement relating to suitability of products and 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, in 2025 we conducted a series of research with small groups of clients on the accessibility of both our banking app and our online environment. 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. For instance, the Customer Digital Engagement department has worked both directly and through 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 such as 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.

### **Grievance mechanisms and remediation channels for suitability of products & services**

Under ABN AMRO's official complaints procedure, clients can submit complaints via the website, using our online chat facility, by phone or through the app. This procedure is available for any concerns clients may wish to raise, including in relation to accessibility, suitability, discrimination and the use of our products and services. We provide an initial response, at a minimum confirmation of receipt of the complaint, within 5 business days. If a client does not receive a timely response they can escalate the complaint to the Kifid (the Dutch Institute for Financial Disputes). If an initial

response is provided in a timely fashion, the client can lodge an appeal if they are not satisfied with this response. After receiving the final response, the client can escalate the complaint to the Kifid.

In addition, clients are always free to initiate proceedings with other dispute resolution bodies, such as the courts, anti-discrimination agencies or other relevant institutions.

To assess the effectiveness of our complaints channels, we invite clients to provide feedback through a survey. The insights gathered from this feedback help us enhance the complaints handling process and improve outcomes for our clients. This feedback mechanism is an integral part of our closed feedback loop, driving continuous reviews of our products and processes. Relevant stakeholders, including product- and client-focused teams, have access to the complaints dashboard, enabling them to derive lessons from complaints and take actionable steps for improvement. The Complaints Management team within Legal also provides quarterly reports to the Executive Board and other stakeholders. Those reports analyse complaint trends, helping us identify critical issues and explore potential solutions to address them.

If a complaint raises concerns about specific aspects of one of our products, it may initiate the Product Approval and Review (PAR) process to assess the product's suitability and accessibility. Based on the findings from this evaluation, necessary adjustments to products and services can be made to better meet client needs.

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.

### **Our approach to action for suitability of products & services**

Product suitability is a topic that is highly regulated in the European market for almost every financial product or service that banks offer to consumers. Products includes payment cards and accounts, (consumer) credit and mortgage credit, investment services and insurance. This involves providing clear and comprehensible information. We continuously evaluate the effectiveness of our efforts through mechanisms such as client feedback, complaints and regular monitoring.

### **Targets related to suitability of products & services**

At this time we have not established any additional outcome-oriented or time-bound targets to measure progress. ABN AMRO is dedicated to adhering to our duty of care and preventing the negative impact which non-adherence could have on our clients. The effectiveness of our policies and actions related to product suitability is therefore tracked via several adherence indicators to ensure compliance.

## **Business conduct (Governance)**

Based on the DMA, Client Integrity (CI) was identified as the sole material topic in relation to Business Conduct from a financial materiality perspective. ABN AMRO is subject to strict national and international regulatory requirements. In this chapter, we describe the policies and mechanisms ABN AMRO has in place to monitor compliance and operational effectiveness, enhancing risk awareness, effective risk management, and a culture of integrity.

### **Client integrity**

The CI risk at ABN AMRO encompasses six key risk types: Money Laundering, Financing of Terrorism, Bribery & Corruption, Tax Evasion, Fraud and Sanction Circumvention. These forms of financial crime have a profound negative economic and societal effect. Our key stakeholders in this area include clients, regulators, employees, shareholders and society at large.

ABN AMRO attaches great importance to conducting business with integrity and takes its legal obligation to combat financial crime seriously. For this purpose, a set of CI policies have been implemented. These policies adopt industry best practices and foster a positive culture to mitigate and manage financial crime risks, while also ensuring compliance with applicable legislation (e.g. the Dutch Financial Supervision Act, the Dutch Anti Money Laundering and Anti-Terrorist Financing Act and the Dutch Sanctions Act 1977).

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 the financing of terrorism (ML/FT). It establishes the measures and requirements by which we seek to prevent and detect ML/FT, as well as the principles and rules by which we mitigate and manage these risks.

The Anti-Bribery and Corruption (ABC) Policy aims to protect ABN AMRO from any direct or indirect involvement in bribery or corruption and sets the framework for managing bank-wide bribery and corruption risks. Regarding CI, the policy describes several bribery and corruption risk indicators (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 specifies when Group Tax involvement is required. Additionally, it describes the bank's tax risk appetite and provides guidance for tax risk management, including the tax control framework.

The Fraud Risk Policy establishes the standards and requirements to safeguard the bank's risk profile in relation to fraud risks, including first party fraud (i.e. fraud by clients causing financial losses and/or reputational damage). The policy enhances ABN AMRO's fraud risk management by ensuring a proactive approach to managing fraud risk through prevention, detection and response. The policy is implemented within a comprehensive framework designed to adapt to the rapidly evolving fraud landscape.

The Sanctions Policy aims to protect ABN AMRO's products and services from being used for prohibited transactions, as well as in relation to sanctions evasion and circumvention. The policy sets the framework for managing bank-wide sanctions risks, defines the rules and requirements for compliance with applicable laws and regulations, lays out the consequences for non-compliance and describes the processes for escalation and reporting.

All policies apply globally to all ABN AMRO entities. Where national laws and regulations are more stringent, they take precedence. All policies are available on the bank's intranet and are shared with relevant internal stakeholders. An AML/CTF & Sanctions Statement, as well as the ABC Policy, are available on our website.

ABN AMRO's risk governance follows the three lines of defence principle, which assigns clear responsibilities for owning, managing, challenging, monitoring and reporting risks. The Executive Board and Supervisory Board oversee and advise on policies. Within the Executive Board, the Chief Executive Officer (CEO) is accountable for the CAAML and Sanctions Policy, the Chief Risk Officer (CRO) for the ABC and Fraud Risk Policies and the Chief Financial Officer (CFO) for the Tax Policy. The Risk & Capital Committee (R&CC) maintains a focus on compliance-related matters and oversees the integration of ESG risks (e.g. CI) into the bank's risk control framework. The R&CC receives quarterly updates on the activities of Detecting Financial Crime (DFC).

Our CI activities aim to prevent financial crime. To this end, in 2019 ABN AMRO established DFC. This department ensures the effective implementation of CI policies into systems and processes, such as the client lifecycle (CLC), designed to detect financial crime.

The CLC process consists of client onboarding, ongoing due diligence (ODD) and client exit. During client onboarding we assess what risk level a client poses. An ODD framework is in place to continuously monitor our clients. We periodically review our clients (every 1 to 5 years, depending on the client's risk score) and perform transaction monitoring, client monitoring, transaction filtering, client filtering and manual triggers. If risks are flagged and enhanced due diligence is warranted, an event-driven review (EDR) is initiated. Unacceptable CI risks (e.g. fraud, money laundering) may lead ABN AMRO to exit the client relationship. This is done only after thorough investigation and in accordance with legal requirements. The CLC process is supported by a yearly Systematic Integrity Risk Analysis (SIRA) and by our policies.

ABN AMRO requires all employees to have sufficient knowledge and understanding of CI risks. Employees need to be able to act appropriately if they encounter client behaviour that deviates from our policies. Awareness training on CI matters is mandatory for all staff, as presented in the table below. An additional curriculum of CI training on specific topics is available which is mandatory for specific ABN AMRO employees.

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

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

The bank's exposure to sectors contributing to Climate Change transition risk went up to EUR 46.6 billion as at 31 December 2025 from EUR 46.0 billion on 30 June 2025. The increase came mainly from the real estate activities sector (EUR 1.5 billion) and other sectors with lower contributions to climate change (EUR 0.6 billion), and was counterbalanced by reductions in the manufacturing (EUR 0.8 billion) and the wholesale and retail trade (EUR 0.4 billion) sectors. The decrease in manufacturing explained a large part of the drop of the GHG financed emissions for corporate loans to approximately 16.9 mtCO<sub>2</sub>e as at 31 December 2025 (30 June 2025: 19.2 mtCO<sub>2</sub>e).

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

| Sector/subsector <sup>1,2</sup>   | A                                   | B  | C | D  | E                           | 31 December 2025   |                             |                                    |
|---|-------------------------------------|--|---|--|-----------------------------|--|-----------------------------|------------------------------------|
|   | Gross carrying amount (in millions) | Of which: exposures towards companies excluded from EU Paris-aligned Benchmarks <sup>2</sup> |   | Of which: environmentally sustainable (CCM) <sup>4</sup> | Of which: stage 2 exposures | Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (in millions) |                             | Of which: non-performing exposures |
|   |                                     |  |   |  |                             | Of which: non-performing exposures   | Of which: Stage 2 exposures | Of which: non-performing exposures |
| <b>1 Exposures towards sectors that highly contribute to climate change</b>   | <b>46,572</b>                       | <b>1,497</b>   |   | <b>4,406</b>   | <b>1,680</b>                | <b>-579</b>  | <b>-66</b>                  | <b>-447</b>                        |
| 2 A - Agriculture, forestry and fishing   | 4,975                               |  |   | 592  | 141                         | -43  | -8                          | -25                                |
| 3 B - Mining and quarrying  | 1,501                               | 1,264  |   | 147  | 15                          | -2   | -1                          |                                    |
| 4 B.05 - Mining of coal and lignite   |                                     |  |   |  |                             |  |                             |                                    |
| 5 B.06 - Extraction of crude petroleum and natural gas  | 211                                 | 211  |   |  |                             |  |                             |                                    |
| 6 B.07 - Mining of metal ores   |                                     |  |   |  |                             |  |                             |                                    |
| 7 B.08 - Other mining and quarrying   | 166                                 |  |   | 106  |                             | -1   |                             |                                    |
| 8 B.09 - Mining support service activities  | 1,123                               | 1,053  |   | 40   | 15                          | -1   |                             |                                    |
| 9 C - Manufacturing   | 5,744                               | 130  |   | 1,126  | 425                         | -125   | -19                         | -99                                |
| 10 C.10 - Manufacture of food products  | 1,397                               |  |   | 113  | 55                          | -11  | -2                          | -7                                 |
| 11 C.11 - Manufacture of beverages  | 90                                  |  |   | 2  |                             | -2   | -1                          |                                    |
| 12 C.12 - Manufacture of tobacco products   |                                     |  |   |  |                             |  |                             |                                    |
| 13 C.13 - Manufacture of textiles   | 141                                 |  |   | 17   | 4                           | -2   |                             | -2                                 |
| 14 C.14 - Manufacture of wearing apparel  | 7                                   |  |   | 2  | 1                           |  |                             |                                    |
| 15 C.15 - Manufacture of leather and related products   | 15                                  |  |   |  |                             |  |                             |                                    |
| 16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials | 200                                 |  |   | 99   | 29                          | -9   | -1                          | -8                                 |
| 17 C.17 - Manufacture of pulp, paper and paperboard   | 89                                  |  |   | 4  | 26                          | -12  |                             | -12                                |
| 18 C.18 - Printing and service activities related to printing   | 49                                  |  |   | 16   | 2                           | -1   |                             |                                    |
| 19 C.19 - Manufacture of coke oven products   | 130                                 | 130  |   |  | 5                           |  |                             |                                    |
| 20 C.20 - Production of chemicals   | 720                                 |  |   | 224  | 43                          | -13  | -1                          | -11                                |

|  | A                                   | B  | C  | D                           | E  | F    | G                           | H                                  |
|--|-------------------------------------|--|--|-----------------------------|--|------|-----------------------------|------------------------------------|
|  | 31 December 2025                    |  |  |                             |  |      |                             |                                    |
|  | Gross carrying amount (in millions) |  |  |                             | Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (in millions) |      |                             |                                    |
|  |                                     | Of which: exposures towards companies excluded from EU Paris-aligned Benchmarks <sup>2</sup> | Of which: environmentally sustainable (CCM) <sup>4</sup> | 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                               | 74                                  |  |  | 4                           | 1  | -1   |                             | -1                                 |
| 22 C.22 - Manufacture of rubber products   | 303                                 |  |  | 51                          | 38   | -3   | -1                          | -1                                 |
| 23 C.23 - Manufacture of other non-metallic mineral products                       | 149                                 |  |  | 58                          | 7  | -2   | -1                          |                                    |
| 24 C.24 - Manufacture of basic metals  | 295                                 |  |  | 29                          | 100  | -17  |                             | -17                                |
| 25 C.25 - Manufacture of fabricated metal products, except machinery and equipment | 741                                 |  |  | 328                         | 22   | -12  | -7                          | -5                                 |
| 26 C.26 - Manufacture of computer, electronic and optical products                 | 142                                 |  |  | 58                          |  | -2   | -1                          |                                    |
| 27 C.27 - Manufacture of electrical equipment                                      | 120                                 |  |  | 7                           | 2  | -1   |                             | -1                                 |
| 28 C.28 - Manufacture of machinery and equipment n.e.c.                            | 528                                 |  |  | 50                          | 26   | -7   | -1                          | -5                                 |
| 29 C.29 - Manufacture of motor vehicles, trailers and semi-trailers                | 201                                 |  |  | 34                          | 5  | -2   |                             | -2                                 |
| 30 C.30 - Manufacture of other transport equipment                                 | 72                                  |  |  | 13                          | 15   | -7   |                             | -7                                 |
| 31 C.31 - Manufacture of furniture   | 56                                  |  |  | 2                           | 1  | -1   |                             |                                    |
| 32 C.32 - Other manufacturing  | 62                                  |  |  | 1                           | 22   | -8   |                             | -7                                 |
| 33 C.33 - Repair and installation of machinery and equipment                       | 161                                 |  |  | 15                          | 23   | -13  |                             | -13                                |
| 34 D - Electricity, gas, steam and air conditioning supply                         | 2,642                               | 103  |  | 172                         | 112  | -62  | -1                          | -59                                |
| 35 D35.1 - Electric power generation, transmission and distribution                | 2,540                               | 98   |  | 172                         | 112  | -62  | -1                          | -59                                |
| 36 D35.11 - Production of electricity  | 1,849                               | 98   |  | 172                         | 112  | -61  | -1                          | -59                                |
| 37 D35.2 - Manufacture of gas; distribution of gaseous fuels through mains         | 5                                   | 5  |  |                             |  |      |                             |                                    |
| 38 D35.3 - Steam and air conditioning supply                                       | 96                                  |  |  |                             |  |      |                             |                                    |
| 39 E - Water supply; sewerage, waste management and remediation activities         | 611                                 |  |  | 64                          | 21   | -8   | -1                          | -6                                 |
| 40 F - Construction  | 2,916                               |  |  | 212                         | 110  | -45  | -6                          | -34                                |
| 41 F.41 - Construction of buildings  | 1,990                               |  |  | 145                         | 40   | -15  | -4                          | -8                                 |
| 42 F.42 - Civil engineering  | 294                                 |  |  | 52                          | 14   | -15  | -1                          | -13                                |
| 43 F.43 - Specialised construction activities                                      | 632                                 |  |  | 15                          | 56   | -16  | -1                          | -13                                |
| 44 G - Wholesale and retail trade; repair of motor vehicles and motorcycles        | 7,894                               |  |  | 1,084                       | 502  | -222 | -18                         | -188                               |
| 45 H - Transportation and storage  | 7,958                               |  |  | 256                         | 154  | -29  | -3                          | -19                                |
| 46 H.49 - Land transport and transport via pipelines                               | 1,210                               |  |  | 113                         | 118  | -17  | -1                          | -14                                |
| 47 H.50 - Water transport  | 5,563                               |  |  | 60                          | 1  | -5   |                             |                                    |
| 48 H.51 - Air transport  | 8                                   |  |  |                             | 5  | -1   |                             | -1                                 |
| 49 H.52 - Warehousing and support activities for transportation                    | 1,090                               |  |  | 83                          | 28   | -6   | -1                          | -3                                 |
| 50 H.53 - Postal and courier activities  | 87                                  |  |  |                             | 1  | -1   |                             | -1                                 |

|  | A                                   | B  | C  | D                           | E  | F           | G                           | H                                  |
|--|-------------------------------------|--|--|-----------------------------|--|-------------|-----------------------------|------------------------------------|
|  | 31 December 2025                    |  |  |                             |  |             |                             |                                    |
|  | Gross carrying amount (in millions) |  |  |                             | Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions (in millions) |             |                             |                                    |
|  |                                     | Of which: exposures towards companies excluded from EU Paris-aligned Benchmarks <sup>2</sup> | Of which: environmentally sustainable (CCM) <sup>4</sup> | 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 <sup>3</sup>                          | 1,828                               |  |  | 224                         | 141  | -17         | -5                          | -7                                 |
| 52 L - Real estate activities  | 12,332                              |  |  | 754                         | 200  | -44         | -10                         | -17                                |
| 53 Exposures towards sectors other than those that highly contribute to climate change | 20,620                              |  |  | 1,784                       | 1,481  | -408        | -24                         | -351                               |
| 54 K - Financial and insurance activities  | 3,926                               |  |  | 323                         | 94   | -44         | -3                          | -36                                |
| 55 Exposures to other sectors (NACE codes J, M - U)                                    | 14,865                              |  |  | 1,237                       | 1,246  | -347        | -17                         | -308                               |
| <b>56 TOTAL</b>  | <b>67,192</b>                       | <b>1,497</b>   |  | <b>6,190</b>                | <b>3,161</b>   | <b>-987</b> | <b>-90</b>                  | <b>-797</b>                        |

- 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.
- In accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation.
- 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.
- In alignment with the EBA no-action letter issued as at 6 August 2025 and the transitional provisions outlined in the Consultation Paper on Pillar 3 ESG ITS amendments, we have decided not to disclose information pertaining to ESG Template 1 column C in our Pillar 3 report as at 31 December 2025.

|   | I   | J                                    | K   | L             | M                   | N                    | O            | P                         |
|---|---|--------------------------------------|---|---------------|---------------------|----------------------|--------------|---------------------------|
|   | 31 December 2025  |                                      |   |               |                     |                      |              |                           |
|   | GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO <sub>2</sub> equivalent) |                                      | GHG emissions: gross carrying amount percentage of the portfolio derived from company-specific reporting <sup>4</sup> | ≤ 5 years     | > 5 year ≤ 10 years | > 10 year ≤ 20 years | > 20 years   | Average weighted maturity |
|   |   | Of which: Scope 3 financed emissions |   |               |                     |                      |              |                           |
| <b>Sector/subsector<sup>1,2</sup></b>   |   |                                      |   |               |                     |                      |              |                           |
| <b>1 Exposures towards sectors that highly contribute to climate change</b>   | <b>16,869,464</b>   | <b>9,977,360</b>                     | <b>25%</b>  | <b>37,149</b> | <b>5,134</b>        | <b>2,662</b>         | <b>1,628</b> | <b>4</b>                  |
| 2 A - Agriculture, forestry and fishing   | 4,660,706   | 2,484,902                            | 10%   | 4,139         | 782                 | 42                   | 12           | 3                         |
| 3 B - Mining and quarrying  | 1,322,589   | 809,951                              | 4%  | 659           | 496                 | 346                  |              | 6                         |
| 4 B.05 - Mining of coal and lignite   |   |                                      | 0%  |               |                     |                      |              |                           |
| 5 B.06 - Extraction of crude petroleum and natural gas  | 108,189   | 75,444                               | 0%  | 57            | 154                 |                      |              | 4                         |
| 6 B.07 - Mining of metal ores   |   |                                      | 0%  |               |                     |                      |              |                           |
| 7 B.08 - Other mining and quarrying   | 280,665   | 239,514                              | 38%   | 166           | 1                   |                      |              | 1                         |
| 8 B.09 - Mining support service activities  | 933,735   | 494,994                              | 0%  | 436           | 341                 | 346                  |              | 7                         |
| 9 C - Manufacturing   | 3,421,342   | 2,974,614                            | 3%  | 4,929         | 424                 | 278                  | 113          | 3                         |
| 10 C.10 - Manufacture of food products  | 1,346,222   | 1,264,062                            | 3%  | 1,309         | 83                  | 1                    | 3            | 2                         |
| 11 C.11 - Manufacture of beverages  | 84,575  | 81,863                               | 1%  | 90            |                     |                      |              | 4                         |
| 12 C.12 - Manufacture of tobacco products   | 1   | 1                                    | 0%  |               |                     |                      |              |                           |
| 13 C.13 - Manufacture of textiles   | 26,346  | 23,800                               | 0%  | 137           | 4                   |                      | 1            | 1                         |
| 14 C.14 - Manufacture of wearing apparel  | 1,415   | 1,235                                | 1%  | 5             | 1                   |                      | 1            | 6                         |
| 15 C.15 - Manufacture of leather and related products   | 2,677   | 2,469                                | 7%  | 1             | 13                  | 1                    |              | 5                         |
| 16 C.16 - Manufacture of wood and of products of wood and cork, except furniture; manufacture of articles of straw and plaiting materials | 102,051   | 97,297                               | 8%  | 195           | 5                   |                      |              | 2                         |
| 17 C.17 - Manufacture of pulp, paper and paperboard   | 35,932  | 30,590                               | 0%  | 79            | 10                  |                      |              | 2                         |

|    | I   | J   | K         | L                   | M                    | N          | O                         | P   |
|----|---|---|-----------|---------------------|----------------------|------------|---------------------------|-----|
|    | 31 December 2025  |   |           |                     |                      |            |                           |     |
|    | GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO <sub>2</sub> equivalent) | GHG emissions: gross carrying amount percentage of the portfolio derived from company-specific reporting <sup>4</sup> |           |                     |                      |            |                           |     |
|    | Of which: Scope 3 financed emissions  |   | ≤ 5 years | > 5 year ≤ 10 years | > 10 year ≤ 20 years | > 20 years | Average weighted maturity |     |
| 18 | C.18 - Printing and service activities related to printing  | 25,517  | 24,207    | 2%                  | 45                   | 3          | 1                         | 3   |
| 19 | C.19 - Manufacture of coke oven products  | 44,233  | 26,299    | 0%                  | 127                  | 3          |                           |     |
| 20 | C.20 - Production of chemicals  | 465,532   | 296,412   | 7%                  | 521                  | 15         | 172                       | 5   |
| 21 | C.21 - Manufacture of pharmaceutical preparations   | 27,881  | 17,387    | 0%                  | 39                   | 1          | 34                        | 11  |
| 22 | C.22 - Manufacture of rubber products   | 124,418   | 105,543   | 0%                  | 261                  | 40         | 2                         | 2   |
| 23 | C.23 - Manufacture of other non-metallic mineral products   | 56,342  | 40,211    | 0%                  | 134                  | 15         |                           | 2   |
| 24 | C.24 - Manufacture of basic metals  | 227,725   | 165,320   | 11%                 | 188                  | 19         | 89                        | 4   |
| 25 | C.25 - Manufacture of fabricated metal products, except machinery and equipment   | 512,244   | 476,870   | 4%                  | 680                  | 51         | 3                         | 2   |
| 26 | C.26 - Manufacture of computer, electronic and optical products   | 31,260  | 29,408    | 6%                  | 134                  | 7          |                           | 1   |
| 27 | C.27 - Manufacture of electrical equipment  | 23,085  | 21,785    | 0%                  | 61                   | 51         |                           | 6   |
| 28 | C.28 - Manufacture of machinery and equipment n.e.c.  | 131,707   | 127,671   | 0%                  | 452                  | 28         | 8                         | 40  |
| 29 | C.29 - Manufacture of motor vehicles, trailers and semi-trailers  | 58,613  | 54,815    | 1%                  | 196                  | 3          |                           | 2   |
| 30 | C.30 - Manufacture of other transport equipment   | 16,768  | 15,871    | 1%                  | 64                   | 8          |                           | 3   |
| 31 | C.31 - Manufacture of furniture   | 13,432  | 12,563    | 0%                  | 40                   | 11         |                           | 4   |
| 32 | C.32 - Other manufacturing  | 16,725  | 15,047    | 4%                  | 52                   | 8          | 1                         | 1   |
| 33 | C.33 - Repair and installation of machinery and equipment   | 46,643  | 43,888    | 5%                  | 117                  | 43         | 2                         | 3   |
| 34 | D - Electricity, gas, steam and air conditioning supply   | 1,076,562   | 509,879   | 7%                  | 1,484                | 294        | 771                       | 93  |
| 35 | D35.1 - Electric power generation, transmission and distribution  | 978,711   | 486,490   | 8%                  | 1,383                | 293        | 771                       | 93  |
| 36 | D35.11 - Production of electricity  | 414,566   | 342,865   | 10%                 | 790                  | 253        | 713                       | 93  |
| 37 | D35.2 - Manufacture of gas; distribution of gaseous fuels through mains   | 4,922   | 1,131     | 0%                  | 5                    |            |                           |     |
| 38 | D35.3 - Steam and air conditioning supply   | 92,929  | 22,257    | 0%                  | 95                   | 1          |                           | 3   |
| 39 | E - Water supply; sewerage, waste management and remediation activities   | 107,502   | 58,370    | 0%                  | 409                  | 100        | 100                       | 1   |
| 40 | F - Construction  | 526,569   | 471,178   | 33%                 | 2,439                | 305        | 81                        | 92  |
| 41 | F.41 - Construction of buildings  | 274,905   | 237,981   | 47%                 | 1,681                | 176        | 46                        | 86  |
| 42 | F.42 - Civil engineering  | 80,689  | 74,385    | 1%                  | 248                  | 46         |                           | 3   |
| 43 | F.43 - Specialised construction activities  | 170,974   | 158,811   | 3%                  | 509                  | 83         | 34                        | 5   |
| 44 | G - Wholesale and retail trade; repair of motor vehicles and motorcycles  | 1,475,792   | 1,372,207 | 3%                  | 7,217                | 545        | 20                        | 111 |
| 45 | H - Transportation and storage  | 4,047,849   | 1,226,721 | 45%                 | 5,951                | 1,198      | 790                       | 20  |
| 46 | H.49 - Land transport and transport via pipelines   | 522,843   | 272,539   | 1%                  | 1,037                | 154        | 15                        | 4   |
| 47 | H.50 - Water transport  | 2,919,705   | 765,755   | 62%                 | 3,853                | 920        | 775                       | 15  |
| 48 | H.51 - Air transport  | 7,430   | 1,924     | 0%                  | 8                    |            |                           | 1   |
| 49 | H.52 - Warehousing and support activities for transportation  | 594,988   | 184,040   | 11%                 | 966                  | 124        |                           | 2   |
| 50 | H.53 - Postal and courier activities  | 2,882   | 2,463     | 0%                  | 86                   | 1          |                           | 4   |

|   | I   | J                                    | K   | L             | M                   | N                    | O            | P                         |
|---|---|--------------------------------------|---|---------------|---------------------|----------------------|--------------|---------------------------|
|   | 31 December 2025  |                                      |   |               |                     |                      |              |                           |
|   | GHG financed emissions (scope 1, scope 2 and scope 3 emissions of the counterparty) (in tons of CO <sub>2</sub> equivalent) |                                      | GHG emissions: gross carrying amount percentage of the portfolio derived from company-specific reporting <sup>4</sup> | ≤ 5 years     | > 5 year ≤ 10 years | > 10 year ≤ 20 years | > 20 years   | Average weighted maturity |
|   |   | Of which: Scope 3 financed emissions |   |               |                     |                      |              |                           |
| 51 I - Accommodation and food service activities <sup>3</sup>                                 | 396,462   | 318,147                              | 4%  | 1,646         | 144                 | 11                   | 27           | 3                         |
| 52 L - Real estate activities   | 230,555   | 69,538                               | 48%   | 9,922         | 990                 | 233                  | 1,187        | 5                         |
| 53 <b>Exposures towards sectors other than those that highly contribute to climate change</b> |   |                                      |   | <b>16,743</b> | <b>2,191</b>        | <b>247</b>           | <b>1,440</b> | <b>4</b>                  |
| 54 K - Financial and insurance activities   |   |                                      |   | 2,969         | 288                 | 57                   | 613          | 6                         |
| 55 Exposures to other sectors (NACE codes J, M - U)   |   |                                      |   | 12,127        | 1,759               | 179                  | 800          | 4                         |
| <b>56 TOTAL</b>   | <b>16,869,464</b>   | <b>9,977,360</b>                     | <b>25%</b>  | <b>53,891</b> | <b>7,325</b>        | <b>2,908</b>         | <b>3,067</b> | <b>4</b>                  |

- 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.
- In accordance with points (d) to (g) of Article 12.1 and in accordance with Article 12.2 of Climate Benchmark Standards Regulation.
- 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.
- The figure of "GHG emissions: gross carrying amount percentage of the portfolio derived from company-specific reporting" in column K row 56 is adjusted to be equal to column K row 1 according to EBA Regulation (EU) 2022/2453 - ITS on ESG disclosures, in reference to EBA Q&A #2025\_7426.

### 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 based on 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 a 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 second edition of 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, CO <sub>2</sub> emissiefactoren.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 the 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 given that 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 that information was not available, the CBS and the PCAF databases were used.

### GHG emissions for agriculture

For dairy farming, a combination of the research paper by 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 was used as our main source to collect GHG emissions at the vessel level for the sea and coastal freight water transport portfolio. The Kennisinstituut voor Mobiliteitsbeleid (KiM) and emissiefactoren.nl database were used as a source to collect GHG emissions for inland shipping cargo vessels. For all vessels not covered by these 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 CO<sub>2</sub>e emissions for each barrel of oil produced, distributed or transported by each client we finance. ABN AMRO links client data (company-specific disclosures) to carbon intensity and production data from Rystad to calculate the carbon intensity baseline and target. IPCC was used for emissions factors related to combustion of fossil fuels. Appropriate proxies were used in instances where carbon intensity and production data were not available.

### GHG emissions for power generation

For power generation, a combination of company disclosures, BP Energy Statistics 2022 and an internal database were 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 have been 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 CO<sub>2</sub> associated with each transported tonne of freight per kilometre and our financed emissions for vans in grams of CO<sub>2</sub> per vehicle kilometre, capturing the scope 1 GHG emissions. The scope 2 emissions for trucks and vans were 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 relied on external emission factors, as well as average distances travelled, to calculate the financed scope 1 emissions associated with our portfolio, and we relied 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 label and asset type. CBS data for energy consumption was used to calculate CO<sub>2</sub> emissions. To convert the energy data into carbon emission data, the emission factors provided by CBS were used. An attribution factor at loan level was applied; this is the ratio of the gross carrying amount and the property value at origination.

For the commercial real estate financing portfolio, the GHG emissions calculations (scope 1 and 2) were based on energy label and asset type and the corresponding emission factors provided by the PCAF emission factor database.

### **Scope 3 emissions**

Starting 31 December 2023, we report estimates of our clients' scope 3 emissions. For part of the portfolio, we used client data as reported by the client. Scope 3 emission estimates 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 define 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 a stated maturity and for which the counterparty can determine the repayment date were reported in the 20 years bucket. The average weighted maturity was estimated based on the average of each maturity bucket.

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

For loans collateralised by residential immovable property in the mortgage portfolio, the amounts attributed to EPC labels in this report consist of EPC labels under the old regulation (NEN7120, prior to 1 January 2021) and new regulation (NTA8800) as provided by the Netherlands Enterprise Agency (Rijksdienst voor Ondernemend Nederland - RVO). Only the new regulation (NTA 8800) score is considered 'official' in columns B-G and is provided with an accompanying EP score. This is not the case for the old regulation EPC label, where the EP score is classified as estimated in columns B-G.

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

For all loans collateralised by immovable property, in accordance with the instruction, the columns that show the EP score include official as well as estimated labels, while the columns that show the EPC labels only include official energy labels. All the exposures without an official EPC label (NTA8800 and NEN 7120) are reported in the column 'Without EPC label of collateral'. This includes estimated energy labels for:

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

As part of its climate strategy, ABN AMRO has set targets to reduce its carbon footprint. In line with this strategy, the distribution and migration of official energy labels as at 31 December 2025 showed a slight improvement compared with 30 June 2025 (57% vs 55%, respectively). Roughly half of the final labels were higher-than-A labels and label A and 78% of the portfolio had an energy label of C or higher (30 June 2025: 77%). This corresponds to EUR 5.3 billion inflow in labels A – C, and EUR 0.2 billion outflow in labels D – G.

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 higher-than-A labels and 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, based on the Dutch Building Decree (Besluit Bouwwerken Leefomgeving) new-build houses have an A+++ label as a minimum.

|  | A   | B             | C             | D             | E            | F          | G            |
|--|---|---------------|---------------|---------------|--------------|------------|--------------|
|  | 31 December 2025  |               |               |               |              |            |              |
|  | Total gross carrying amount   |               |               |               |              |            |              |
|  | Level of energy efficiency (EP score in kWh/m <sup>2</sup> of collateral) |               |               |               |              |            |              |
| (in millions)  | 0; ≤ 100  | > 100; ≤ 200  | > 200; ≤ 300  | > 300; ≤ 400  | > 400; ≤ 500 | > 500      |              |
| <b>Counterparty sector</b>   |   |               |               |               |              |            |              |
| 1 <b>Total EU area</b>   | <b>193,278</b>  | <b>66,995</b> | <b>91,231</b> | <b>12,892</b> | <b>1,040</b> | <b>754</b> | <b>7,745</b> |
| 2 - of which Loans collateralised by commercial immovable property                                     | 26,710  | 4,989         | 2,575         | 1,739         | 962          | 709        | 7,478        |
| 3 - of which Loans collateralised by residential immovable property                                    | 166,568   | 62,006        | 88,656        | 11,153        | 78           | 45         | 267          |
| 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 <sup>2</sup> of collateral) estimated       | 125,723   | 40,281        | 71,271        | 10,916        | 505          | 382        | 2,368        |
| 6 <b>Total non-EU area</b>   | <b>1,032</b>  |               |               |               |              |            |              |
| 7 - of which Loans collateralised by commercial immovable property                                     | 364   |               |               |               |              |            |              |
| 8 - of which Loans collateralised by residential immovable property                                    | 668   |               |               |               |              |            |              |
| 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 <sup>2</sup> of collateral) estimated      |   |               |               |               |              |            |              |

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 2025                                     |               |               |              |              |              |              |                                 |   |
|  | Total gross carrying amount                          |               |               |              |              |              |              |                                 |   |
|  | Level of energy efficiency (EPC label of collateral) |               |               |              |              |              |              | Without EPC label of collateral |   |
| (in millions)  | A <sup>1</sup>                                       | B             | C             | D            | E            | F            | G            |                                 | Of which: level of energy efficiency estimated <sup>2</sup> |
| <b>Counterparty sector</b>   |  |               |               |              |              |              |              |                                 |   |
| 1 <b>Total EU area</b>   | <b>51,916</b>  | <b>13,971</b> | <b>19,593</b> | <b>9,015</b> | <b>5,840</b> | <b>4,368</b> | <b>4,482</b> | <b>84,094</b>                   | <b>85%</b>  |
| 2 - of which Loans collateralised by commercial immovable property                                     | 7,039  | 910           | 1,463         | 571          | 398          | 267          | 460          | 15,601                          | 47%   |
| 3 - of which Loans collateralised by residential immovable property                                    | 44,877   | 13,060        | 18,130        | 8,443        | 5,442        | 4,100        | 4,023        | 68,493                          | 94%   |
| 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 <sup>2</sup> of collateral) estimated       |  |               |               |              |              |              |              | 71,471                          | 100%  |
| 6 <b>Total non-EU area</b>   |  |               |               |              |              |              |              | <b>1,032</b>                    | <b>0%</b>   |
| 7 - of which Loans collateralised by commercial immovable property                                     |  |               |               |              |              |              |              | 364                             | 0%  |
| 8 - of which Loans collateralised by residential immovable property                                    |  |               |               |              |              |              |              | 668                             | 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 <sup>2</sup> of collateral) estimated      |  |               |               |              |              |              |              |                                 | 100%  |

1. Label A includes the category higher than A.  
2. EP score in kWh/m<sup>2</sup> 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 selected of sectors. The products and sectors disclosed in Template 3 are aligned with those currently covered by ABN AMRO's climate strategy, which are disclosed in our Annual Report (AR). The AR serves as our primary disclosure, where we provide comprehensive updates on our progress.

ABNAMRO takes a sector-based approach to target-setting, as we believe this is the most effective way to achieve decarbonisation of our portfolio, given that each sector of the economy faces specific challenges in transitioning to net zero. In doing so, we prioritise high-emitting sectors.<sup>1</sup> 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.<sup>2</sup>

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 include other types of counterparties as well. This explains the discrepancies in the reported gross carrying amounts between the two disclosures (Annual Report and Pillar 3 Report) for the various sectors. The most significant difference observed pertains to the agriculture and commercial real estate disclosures, as substantial portions of these portfolios are classified as households and so fall outside the scope of this template. Consequently, the emissions intensity disclosed for these sectors in Template 3 is lower than the figures reported in our 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 included in 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 Net Zero Emissions scenario 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 timing differences in reporting, we report our intensity figures with a one-year delay to ensure that all data used for calculations is sourced from the same year. The latest data available is from 2024, which results in an emissions intensity for this portfolio of 0 kgCO<sub>2</sub>/MWh. The distance to the IEA NZE 2050 scenario is therefore 0%.

### Fossil fuel combustion

#### Oil and gas upstream

Fossil fuel combustion includes our oil and gas upstream portfolio. In 2025, our commitments to these sectors decreased to EUR 566 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

The operational emissions intensity figures are reported with a one-year delay. The latest data available is from 2024, resulting in an emissions intensity for this portfolio of 13.1 kgCO<sub>2</sub>/boe, with a distance to the NZE 2050 scenario of 45%.

<sup>1</sup> The high-emitting sectors have been identified using the Guidance for Climate Target Setting for Banks (NZBA, Version 3, April 2025).

<sup>2</sup> If additional sectors come into scope for ABN AMRO's climate strategy, they will be included in this template accordingly.

## Automotive

### Trucks and vans

Our targets for trucks and vans for road transport are based on our asset-based financing lease portfolio. The reported financed emissions intensity for trucks is 77.2 gCO<sub>2</sub>/tkm and there is a distance to the NZE 2050 scenario of 26%. The reported financed emissions intensity for vans is 197.2 gCO<sub>2</sub>/vkm and there is a distance to the NZE 2050 scenario of 40%.

### Passenger cars

In 2025, the emissions intensity of this portfolio was 84.7 gCO<sub>2</sub>/vkm, with a distance to the NZE 2050 scenario of 34%. Due to the planned sale of ALFAM in 2026, the passenger cars in their portfolio are not included in the 2025 performance figures. These assets are recorded as being held for sale and therefore fall outside the scope of the climate strategy.

## Maritime transport

### Deep sea shipping

For deep sea shipping, ABN AMRO uses the verified data submitted through the Poseidon Principles framework and verified by DNV, and figures are reported with a one-year delay. The latest data available is from 2024, which results in a climate strategy alignment delta for shipping of -2.1%. The bank's target is to be fully aligned with the DNV 1.5°C trajectory (Scenario 10).

### Inland freight water transport

For inland freight water transport (inland shipping) the intensity metric for 2025 is 25.9 gCO<sub>2</sub>/tkm, which results in a decrease from Q2 2025 of 27.7 gCO<sub>2</sub>e/tkm. The distance to the IEA NZE 2050 scenario is 42%.

## Agriculture

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

## Commercial real estate

In 2025 our portfolio emission intensity for commercial real estate was 56.6 kgCO<sub>2</sub>/m<sup>2</sup>, which is a slight decrease from the Q2 2025 intensity of 57.9 kgCO<sub>2</sub>/m<sup>2</sup>. This resulted in a distance to the IEA NZE 2050 scenario of 58%. Underlying this performance is an increase in the percentage of collateral with energy labels A or higher, and a decrease in the percentage of collateral with energy labels D-G. In early-2025 it was decided that ABN AMRO would use the PCAF approach for calculating portfolio emissions intensity for all new and reassessed targets unless applying PCAF approach is not feasible. As a result, we aligned our commercial real estate target with the PCAF approach.

|   | A  | B                               | C  | D                 | E  | F  |
|---|--|---------------------------------|--|-------------------|--|--|
|   | 31 December 2025   |                                 |  |                   |  |  |
| (in millions)                             | NACE Sectors <sup>2</sup>                                | Portfolio gross carrying amount | Alignment metric                         | Year of reference | Distance to IEA NZE2050 in % <sup>3</sup>                          | Target (year of reference +3 years) <sup>4</sup> |
| <b>Sector<sup>1</sup></b>                 |  |                                 |  |                   |  |  |
| 1 Power                                   | 3511   | 1,697                           | 0 kgCO <sub>2</sub> /MWh                 | 2024              | 0%   | 294,2 kgCO <sub>2</sub> /MWh                     |
| 2 Fossil fuel combustion                  |  |                                 |  |                   |  |  |
| Oil and gas - upstream                    | 0610, 0620   | 211                             | EUR 566 million <sup>5</sup>             | 2025              | 0%   | EUR 1.049 million                                |
| Oil and gas - upstream and midstream      | 06.10, 06.20, 09.10, 35.12, 35.21, 49.50, 52.10.1, 52.21 | 1,659                           | 13.1 kgCO <sub>2</sub> /boe              | 2024              | 45%  | 10,2 kgCO <sub>2</sub> /boe                      |
| 3 Automotive                              |  | 350                             |  |                   |  |  |
| -of which Road transport trucks           |  | 249                             | 77.2 gCO <sub>2</sub> /tkm               | 2025              | 26%  | 66,9 gCO <sub>2</sub> /tkm                       |
| -of which Road transport vans             |  | 67                              | 197.2 gCO <sub>2</sub> /vkm              | 2025              | 40%  | 165,4 gCO <sub>2</sub> /vkm                      |
| -of which Road transport passenger cars   |  | 73                              | 84.7 gCO <sub>2</sub> /vkm               | 2025              | 34%  | 72,9 gCO <sub>2</sub> /vkm                       |
| 4 Maritime transport                      |  | 3,540                           |  |                   |  |  |
| -of which Sea and coastal water transport | 5020   | 3,238                           | -2.1% weighted climate alignment         | 2024              | Target is to be fully aligned with DNV 1.5 trajectory, scenario 10 | 0% weighted climate alignment                    |
| -of which Inland freight water transport  | 5040   | 301                             | 25.9 gCO <sub>2</sub> /tkm               | 2025              | 42%  | 20,5 gCO <sub>2</sub> /tkm                       |
| 5 Agriculture                             | 0113, 0125, 0128, 0130, 0141, 0142, 0146                 | 2,718                           | 1.1 mtCO <sub>2</sub> e/mln EUR financed | 2025              | 0% <sup>6</sup>  | 1,6 mtCO <sub>2</sub> e/mln EUR financed         |
| 6 Commercial Real Estate                  |  | 8,183                           | 56.6 kgCO <sub>2</sub> /m <sup>2</sup>   | 2025              | 58% <sup>7</sup>   | 40,1 kgCO <sub>2</sub> /m <sup>2</sup>           |

- Please refer to the Definitions section in our Annual Report 2025 for the definitions of the sectors that are included.
- 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.
- 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 Annual Report.
- ABN AMRO has only set a 2030 target, therefore the figures reported in this column are based on linear targets.
- This amount includes both the outstanding and undrawn loan amounts.
- Our Agriculture target is based on the Dutch Coalition Agreement.
- For CRE, we utilise the Carbon Risk Real Estate Monitor (CRREM 1.5 NL V1) methodology. Although it is not the latest CRREM version, it is aligned with a 1.5°C maximum global warming scenario.
- Our target slightly deviates from the IEA's NZE2050 to also include Scope 2 emissions.

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

This template has been reported using the list available in the Carbon Majors Database from CDP. Our exposures to top 20 carbon-intensive firms is less than EUR 0.5 million (and in the table below is therefore rounded down to 0). This is a reputable source that provides a clear methodological explanation and also includes Scope 3 GHG emissions data. For each counterparty included in the CDP list, the full group related to this counterparty has been assessed.

|               | A                                 | B   | C  | D                         | E   |
|---------------|-----------------------------------|---|--|---------------------------|---|
|               | 31 December 2025                  |   |  |                           |   |
| (in millions) | Gross carrying amount (aggregate) | Gross carrying amount towards the counterparties compared to total gross carrying amount (aggregate) <sup>1</sup> | Of which: environmentally sustainable (CCM) <sup>2</sup> | Weighted average maturity | Number of top 20 polluting firms included |
| 1 CDP         |                                   | 0%  |  | 1                         | 2   |

- For counterparties among the top 20 carbon emitting companies in the world
- In alignment with the EBA no-action letter issued as at 6 August 2025 and the transitional provisions outlined in the Consultation Paper on Pillar 3 ESG ITS amendments, we have decided not to disclose information pertaining to ESG Template 4 column C in our Pillar 3 report as at 31 December 2025.

## ESG5 - Banking book - Climate change physical risk: Exposures subject to physical risk

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

Compared with 30 June 2025 our exposure sensitive to impact from climate change events increased slightly due to the accompanying increase in total exposure. The majority of our portfolio is located in the Netherlands, which has varying degrees of sensitivity to the impact of flooding, sea level rise and water stress. Most of the Dutch collateral and counterparties in our portfolio are located in the western part of the country, some of which are sensitive to flood risk depending on their proximity to rivers. The majority of our exposures in that region are in urban areas around Amsterdam and Rotterdam, which have lower sensitivity to physical risk mainly because of the highly developed flood protection systems in these cities. The agricultural sector has a large exposure in the north and east relative to other sectors in our portfolio, resulting in higher sensitivity to chronic risk.

The sections that follow 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 2025  |                     |                      |            |        |                           |  |
|   | Gross carrying amount   |                     |                      |            |        |                           |  |
|   | Of which: exposures sensitive to impact from climate change physical events |                     |                      |            |        |                           |  |
|   | Breakdown by maturity bucket <sup>1</sup>                                   |                     |                      |            |        | Average weighted maturity | Of which: exposures sensitive to impact from chronic climate change events |
| (in millions)   | ≤ 5 years   | > 5 year ≤ 10 years | > 10 year ≤ 20 years | > 20 years |        |                           |  |
| <b>Geographical area subject to climate change physical risk - acute and chronic events</b> |   |                     |                      |            |        |                           |  |
| 1 A - Agriculture, forestry and fishing   | 4,975   | 2,543               | 523                  | 21         | 3      | 3                         | 2,486  |
| 2 B - Mining and quarrying  | 1,501   | 203                 |                      | 31         |        | 5                         |  |
| 3 C - Manufacturing   | 5,744   | 1,641               | 117                  | 11         |        | 2                         | 896  |
| 4 D - Electricity, gas, steam and air conditioning supply                                   | 2,642   | 622                 | 231                  | 516        |        | 8                         | 339  |
| 5 E - Water supply; sewerage, waste management and remediation activities                   | 611   | 188                 | 40                   | 1          |        | 3                         | 211  |
| 6 F - Construction  | 2,916   | 426                 | 45                   | 6          | 1      | 3                         | 180  |
| 7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles                  | 7,894   | 2,442               | 280                  | 8          | 1      | 2                         | 1,011  |
| 8 H - Transportation and storage  | 7,958   | 1,692               | 260                  | 20         |        | 3                         | 572  |
| 9 L - Real estate activities  | 12,332  | 2,610               | 258                  | 26         | 44     | 3                         | 975  |
| 10 Loans collateralised by residential immovable property                                   | 167,250   | 1,196               | 1,299                | 2,911      | 12,020 | 21                        | 12,960   |
| 11 Loans collateralised by commercial immovable property                                    | 27,502  | 9,235               | 1,656                | 138        | 16     | 3                         | 5,676  |
| 12 Repossessed collaterals  | 3   | 3                   |                      |            |        |                           |  |
| 13 Other relevant sectors (breakdown below where relevant)                                  | 20,620  | 3,987               | 624                  | 65         | 20     | 3                         | 1,244  |

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 2025  |   |                             |                                    |  |                                    |     |
|   | Gross carrying amount   |   |                             |                                    |  |                                    |     |
|   | Of which: exposures sensitive to impact from climate change physical events |   |                             |                                    |  |                                    |     |
|   | Of which: exposures sensitive to impact from acute climate change events    | Of which: exposures sensitive to impact both from chronic and acute climate change events | Of which: Stage 2 exposures | Of which: non-performing exposures | Accumulated impairment, accumulated negative changes in fair value due to credit risk and provisions |                                    |     |
| (in millions)   |   |   |                             |                                    | Of which: Stage 2 exposures  | Of which: non-performing exposures |     |
| <b>Geographical area subject to climate change physical risk - acute and chronic events</b> |   |   |                             |                                    |  |                                    |     |
| 1 A - Agriculture, forestry and fishing   | 288   | 316   | 410                         | 100                                | -25  | -6                                 | -13 |
| 2 B - Mining and quarrying  | 159   | 74  | 43                          |                                    | -1   |                                    |     |
| 3 C - Manufacturing   | 757   | 116   | 241                         | 108                                | -45  | -4                                 | -38 |
| 4 D - Electricity, gas, steam and air conditioning supply                                   | 419   | 613   | 113                         | 43                                 | -27  | -1                                 | -25 |
| 5 E - Water supply; sewerage, waste management and remediation activities                   | 5   | 13  | 33                          | 21                                 | -7   | -1                                 | -5  |
| 6 F - Construction  | 278   | 20  | 47                          | 42                                 | -21  | -1                                 | -19 |
| 7 G - Wholesale and retail trade; repair of motor vehicles and motorcycles                  | 1,414   | 306   | 488                         | 170                                | -64  | -8                                 | -50 |
| 8 H - Transportation and storage  | 855   | 545   | 94                          | 51                                 | -13  | -1                                 | -10 |
| 9 L - Real estate activities  | 1,787   | 175   | 177                         | 34                                 | -10  | -3                                 | -4  |
| 10 Loans collateralised by residential immovable property                                   | 4,202   | 265   | 1,232                       | 192                                | -24  | -4                                 | -16 |
| 11 Loans collateralised by commercial immovable property                                    | 4,542   | 826   | 1,250                       | 290                                | -67  | -16                                | -33 |
| 12 Repossessed collaterals  |   | 3   |                             |                                    |  |                                    |     |
| 13 Other relevant sectors (breakdown below where relevant)                                  | 2,908   | 543   | 691                         | 169                                | -46  | -8                                 | -31 |

### Methodology and data sources

Physical risk is categorised as ‘acute’ when it arises from extreme events, such as droughts, floods, and storms. It 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 are exposures to physical risk considers the location of counterparties, 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:

- locations in the Netherlands collateralised by residential real estate, containing information on flooding and wildfires from the Climate Impact Atlas (CIA) and information on foundation risks from the Kennis Centrum Aanpak Funderingsproblematiek;
- other locations in the Netherlands, containing flooding data from the CIA and information on wildfires, heat stress, water stress, hurricanes and typhoons and sea level rise from Moody's;
- locations outside the Netherlands, containing 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 to 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, collateralized by residential immovable property | Loans in the Netherlands, collateralized by commercial immovable property or not secured by immovable property | Loans outside the Netherlands |
| Flooding              | Climate Impact Atlas   | Climate Impact Atlas   | Moody's ESG Solutions         |
| Wild fire             | Climate Impact Atlas   | Moody's ESG Solutions  | Moody's ESG Solutions         |
| Heat stress           |  | Moody's ESG Solutions  | Moody's ESG Solutions         |
| Water stress          |  | Moody's ESG Solutions  | Moody's ESG Solutions         |
| Hurricanes & Typhoons |  | Moody's ESG Solutions  | Moody's ESG Solutions         |
| Sea level rise        |  | Moody's ESG Solutions  | Moody's ESG Solutions         |
| Foundation risks      | Kenniss Centrum Aanpak Funderingsproblematiek                              |  |                               |

The starting point of the physical risk assessment is the climate hazard exposure to a counterparty's geographical location or, when available, its collateral. The exposure is marked as sensitive to acute or chronic risk if the location is sensitive to one of the underlying hazards, as per Moody's ESG Solutions methodology. An alternative approach is used for Dutch flooding events: a Dutch exposure is classified as sensitive to acute risk if at least 10% of the buildings in the NUTS region are exposed to a flooding of more than 50 centimetres.

# Disclaimer & cautionary statements

ABN AMRO has included in this document, and from time to time may make in its public statements, certain statements that may constitute 'forward-looking statements'. This includes, without limitation, such statements that include the words 'expect', 'estimate', 'project', 'anticipate', 'should', 'intend', 'plan', 'probability', 'risk', 'value at risk ('VaR')', 'target', 'goal', 'objective', 'will', 'endeavour', 'outlook', 'optimistic', 'prospects' and similar expressions or variations of such expressions. In particular, the document may include forward-looking statements relating but not limited to ABN AMRO's potential exposures to various types of operational, credit and market risk. Such statements are subject to uncertainties. Forward-looking statements are not historical facts and represent only ABN AMRO's current views and assumptions regarding future events, many of which are by nature inherently uncertain and beyond our control. Factors that could cause actual results to deviate materially from those anticipated by forward-looking statements include, but are not limited to, macroeconomic, demographic and political conditions and risks, actions taken and policies applied by governments and their agencies, financial regulators and private organisations (including credit rating agencies), market conditions and turbulence in financial and other markets, and the success of ABN AMRO in managing the risks involved in the foregoing. Any forward-looking statements made by ABN AMRO are current views as at the date they are made. Subject to statutory obligations, ABN AMRO does not intend to publicly update or revise forward-looking statements to reflect events or circumstances after the date the statements were made, and ABN AMRO assumes no obligation to do so.

[abnamro.com](https://abnamro.com)